



QP 2
ANNUAL INTERNAL AUDIT REPORT / CHECKLIST

Company Name: _____
Street Address: _____
City: _____ **State:** _____ **Zip:** _____
Phone: _____ **Fax:** _____
E-mail: _____ **Web:** http:// _____

Performed By: _____
Corporate QA/QC Mgr. (print) Signature/Date

Office Audit: _____
Date

Job Audit: _____
Date Name of Site

*Approved By: _____
S & H Officer (print) Signature/Date

* Required if Health & Safety portion of audit is performed by someone other than the QA/QC Manager.

Approved By: _____
President, CEO, COO (print) Signature/Date

NOTE: This internal audit report / checklist must be approved by the CEO, Chief Operations Officer, or President in order to be accepted by SSPC.

ANNUAL QP 2 INTERNAL AUDIT REPORT

The following questions must be answered by the contractor's representative performing the Annual QP 2 Internal Audit.

1. Have you replaced key management personnel in the past year?

Yes No (If Yes, list names and titles below)

NAME

TITLE

_____	_____
_____	_____
_____	_____

2. Has your company undergone (within the past 12-18 months) or planning to undergo any major organizational changes (e.g., name change; change in ownership; Chapter 7, 11, 13; purchase or takeover of another contracting firm, etc.)

Yes No (If Yes, please explain - attach sheet to application.)

3. Have you completed and signed the Annual Internal Audit Report? (The certification cannot be continued without performing an annual internal audit and reporting the results to SSPC.)

Yes No

4. a. Is your company now or has it in the past been associated in any way with a contracting firm operating under another name, which has been disciplined by SSPC under the DAC?

Yes No (If Yes, please explain - attach sheet to application.)

b. Are any of your company's officers, directors, owners, managing agents, managers now exercising (or have previously exercised) directly or indirectly control, management or ownership of another contracting firm, which has been disciplined by SSPC under the DAC?

Yes No (If Yes, please explain - attach sheet to application.)

If no such association with a firm previously disciplined under the DAC exists, you must state so below.

No, there has not been an association.

Yes, there has been an association (attach explanation).

5. Has your company been disqualified or disbarred from any bidder's list in the past 24 months?

Yes No (If Yes, please provide the reason for the disqualification or disbarment and the name of the facility owner.)

6. a. Have the previous SSPC QP 2 external audit results been reviewed prior to completing this Internal Audit?

Yes No

b. Have previous deficiencies cited at both your last external audit and the most recent internal audit been reviewed and the corrective actions verified?

Yes No

AUTHORITY AND RESPONSIBILITY OF COMPETENT PERSONS

	Required Information MANAGEMENT	Evaluation Items/ (Minimally Acceptable Responses)	Rating	Auditor Notes
1a	<p>Does the company have an adequate Competent Person (CP) capability? Does the competent person (CP); (1) Report directly to and have the complete support of upper management? (2) Has written authority to ensure hazardous paint abatement is carried out according to compliance plans and governmental regulations? (3) Has the authority to stop nonconforming paint removal operations?</p>	<p>The Competent Person(s) The designated competent person(s) is an employee of the contractor and clearly has the written authority from higher management to ensure that paint removal is carried out in accordance with safety, health and environmental compliance plans and applicable regulations. This written authority includes stop work authority. There is also a back-up competent person plan implemented in case the assigned competent person is absent from the job site.</p>	1 2 3	<p>Payroll records checked. Competent person is employee <input type="checkbox"/></p> <p>CP has written authority statement from CEO <input type="checkbox"/></p> <p>CP Backup plan in-place <input type="checkbox"/></p>
1b	<p>Authority & Responsibility of Competent Persons QP2, 4.2.2</p> <p>Is the competent person a routine member of the crew that performs hazardous paint removal operations that the CP is required to oversee?</p>	<p>The competent person is not routinely required to act as a member of the crew that performs paint removal work.</p> <p>The contractor clearly demonstrates that the competent person is not routinely a member of the crew that performs paint removal work. The contractor must also show that the competent person is budgeted for separately on hazardous paint removal projects.</p> <p>There is evidence corroborated by payroll records or invoices and daily CP documentation that the CP is on site during exposure producing operations.</p>	1 2 3	<p>CP Not a crew member <input type="checkbox"/></p> <p>Budgeted separately <input type="checkbox"/></p>
1c	<p>Is the competent person (CP) responsible for the following? Monitoring effectiveness of the environmental controls? Supervision of both airborne and biological exposure monitoring & employee notification?</p>	<p>There is evidence that the CP is responsible for:</p> <ol style="list-style-type: none"> Monitoring effectiveness and ensuring the continued integrity of environmental controls (i.e., integrity of containment and ventilation systems) according to contract specifications. Supervising worker airborne and biological exposure monitoring and employee notification. 	<p>1 2 3</p> <p>1 2 3</p>	<p>Daily forms filled out <input type="checkbox"/></p> <p>Personal Air Monitoring & BLL's/ZPP's available on original Lab reports. <input type="checkbox"/></p> <p>What about exposure to Cadmium, Arsenic, and other heavy metals? <input type="checkbox"/></p>

	Required Information MANAGEMENT (cont'd)	Evaluation Items/ (Minimally Acceptable Responses)	Rating	Auditor Notes
1c	<p>Hazard communication training and implementation?</p> <p>Ensuring employees entering contaminated zones are properly protected and trained in use and maintenance of personal protective equipment, types of exposure control methods, and decontamination practices?</p> <p>Verification of the proper functioning of engineering controls?</p> <p>Ensuring the minimization of emissions to air, water, or soil?</p> <p>Controlling access to the site and designated contamination work zones?</p>	<p>There is evidence that the CP is responsible for:</p> <p>3. Ensuring that hazard communication (“Right-to-Know”) information and training has been conducted for the contractor’s personnel on site.</p> <p>4. Ensuring that employees working in the exposure area are wearing required personal protective equipment (PPE) and are trained in the use and maintenance of PPE.</p> <p>4a. Ensuring that employees are trained in required exposure control methods (i.e., use of personal hygiene facilities; respiratory protection; decontamination sequence and practices)</p> <p>5. Ensuring that any required containment and engineering controls in use are in good operating condition and functioning in accordance with contract specifications.</p> <p>6. Ensuring that the emissions to air, water or soil are minimized and that all waste streams are handled in compliance with federal, state and local regulations <u>and</u> the contract specifications.</p> <p>7. Ensuring that work site access is controlled and contamination control boundaries are clearly marked off.</p>	<p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p>	<p>Training sign-offs available? <input type="checkbox"/></p> <p>Matches payroll records?</p> <p>Correct respirators in use and Respiratory Program (copy) is on site <input type="checkbox"/></p> <p>Training records are available – sign offs match crew members currently and previously on site <input type="checkbox"/></p> <p>Form completed, listing equipment on site and condition and daily checks <input type="checkbox"/></p> <p>Completed chain-of-custody forms available <input type="checkbox"/></p> <p>Access restrictions at job site in-place <input type="checkbox"/></p>

<p>1d</p> <p>2.</p>	<p>Project documentation?</p> <p>Is there a history of compliance with above (1a, 1b, 1c)?</p>	<p>There is evidence that the CP is responsible for: Maintaining project documentation such as exposure assessment results; daily ventilation performance checks; respirator fit tests; personal monitoring results; results of weekly site safety inspections; medical surveillance results; etc., in accordance with the company's compliance programs.</p> <p>The contractor clearly documents and demonstrates: a) management's backing of the competent person's (CP) authority on hazardous paint removal projects completed and in progress within the past 6-24 production months;</p>	<p>1 2 3</p> <p>1 2 3</p>	<p>Check CP log for:</p> <ul style="list-style-type: none"> • ventilation checks • respirator fit tests • personal air monitoring lab reports • BLL's/ZPP lab reports • Daily safety inspections, including moving containment safety • Required Corrective actions documented and implemented <p>Check historical records (may need to obtain from office if not at job site) <input type="checkbox"/></p>
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NOTE TO THE AUDITOR: In some instances, the competent person may not personally carry out the above duties but in all instances is directly responsible for ensuring the correct implementation on schedule.

	Required Information TECHNICAL CAPABILITIES	Evaluation Items/ (Minimally Acceptable Responses)	Rating	Auditor Notes
3a.	“Qualification Category” Can the contractor demonstrate competence in protecting, storing and labeling of hazardous material and waste?	The company has a written environmental protection plan for the referenced project(s), reported in the work history portion of its QP-2 application submittal, which meets the requirements of item #3b below, and can document and demonstrate competence in protecting, storing and labeling hazardous materials according to its plan. For past projects, such documentation can include: photographs of the site equipment and waste storage area (must identify contractor by name and date); sample chain-of-custody forms signed by the contractor’s competent person; TCLP sample results corresponding to the chain-of-custody form; and completed waste disposal records (Uniform Hazardous Waste Disposal Manifests if a hazardous waste). This same level of competence is demonstrated at the active job site(s) being observed during the audit.	1 2 3	Written Environmental Protection Plan available – corporate or site-specific <input type="checkbox"/>
3b.	Is there evidence that the contractor demonstrates competence in the safe operation and maintenance of applicable removal equipment?	The contractor documents and demonstrates competence in the safe operation and maintenance of paint removal equipment (e.g., blast cleaning equipment; hand and power tools; water jetting equipment; chemical stripping apparatus). There are written safe operating procedures (SOPs), initial worker training records, periodic safety meetings, weekly maintenance inspections, and disciplinary records for noncompliance. SOP’s for equipment used are at the job site being observed and workers appear to be following them.	1 2 3	SOP’s on site-records of worker and supvr Training on SOP’s are available <input type="checkbox"/>
3c.	Is there evidence that the contractor has competence in the safe operation and maintenance of recovery equipment?	The contractor documents and demonstrates competence in the safe operation and maintenance of abrasive or water recovery equipment. That is, provides evidence of written safe operating procedures; initial worker training records; periodic safety meetings; weekly maintenance inspections;	1 2 3	

		disciplinary records for noncompliance. Workers at the active job site being observed appear to follow safe operating procedures.		
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	Required Information TECHNICAL CAPABILITIES	Evaluation Items/ (Minimally Acceptable Responses)	Rating	Auditor Notes
3d.	<p>CAT "A" Is there evidence that the contractor has competence in coating removal using containment and ventilation meeting requirements of Classes 1A, 2A, 1P or 1W of SSPC Guide 6 (CON)?</p> <p>CAT "B" Is there evidence the contractor has competence in coating removal using containment meeting requirements of Classes 3A, 4A, 2W, 3W, 1C, 2C, 3C, 2P, or 3P of SSPC Guide 6 (CON)?</p>	<p>The company demonstrates competence in coating removal using containment and ventilation meeting requirements of Classes 1A, 2A, 1P, or 1W of SSPC Guide 6 (CON) during the active job site walk through. The contractor also documents successful completion of a project where the job specification required Class 1A, 2A, 1P or 1W containment with ventilation. Copies of the job specification requiring Class 1A, 2A, 1P, or 1W containment or equivalent, and the drawings, calculations, and photographs of the containment successfully used in response to the job specification must be provided. For jobs completed in the past, photographs must show the site, containment and ventilation equipment and identify the contractor by name and date. Evidence of payment for substantial completion of work or owner verification is available.</p> <p>To achieve initial Category "A" QP 2 certification, contractors are required to demonstrate the ability to erect and operate within the containment on the structure where cleaning and coating are taking place.</p> <p>To maintain QP 2 Category "A" certification after initially earning it, a contractor must demonstrate Category "A" capability at an active job site where an SSPC auditor can witness the containment in operation at least once in the 48 calendar months following each on-site verification. It is the responsibility of</p>	<p>1 2 3</p>	<p>I.D. SSPC Class of Containment Observed and Emissions (take photo if allowable). Compare with contract requirements.</p> <hr/>

		<p>the contractor to notify SSPC when and where it is performing QP 2 Category "A" type work.</p> <p>Removing components from a structure and cleaning and coating them in a yard under a temporary or permanent containment structure, or similar operations, is considered "shop" painting and does not meet QP 2 Category "A" requirements.</p> <p>Also for the purposes of QP 2 Category "A" qualification, the structure being cleaned and painted (e.g., an interior section of a building or the interior of a tank or other vessel); or the cleaning equipment itself (e.g. vacuum-shrouded power tools; or vacuum shrouded blast cleaning equipment) is not considered a "containment structure."</p> <p>Contractors performing industrial deleading or other types of hazardous paint removal operations using such cleaning methods as hand and power tool cleaning; wet abrasive blast cleaning or water jetting, in accordance with applicable regulations and contract requirements, WITHOUT THE USE OF A CONTAINMENT STRUCTURE, may be eligible for Category "B," QP 2 certification. (Refer to SSPC-QP 2, March 1, 2000 or latest revision).</p> <p>A QP 2 Category A job has a functioning mobile dust collector connected to the containment enclosure with ductwork that provides adequate air flow from the containment enclosure. The dust collector found on an industrial painting project will typically be a mobile unit with appropriate duct work and have an exhaust capacity of 10,000 cfm or greater. Dust collectors with higher exhaust capacity are</p>		
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		<p>normally seen on industrial hazardous paint removal projects on storage tanks, bridges, ships and other industrial structures.</p> <p>When evaluating a QP 2 Category A job, the SSPC auditor must be able to observe coating removal using containment and ventilation that meets the requirements of SSPC Guide 6 Classes 1A or 2A or 1W or 1P. The majority of projects meeting Category A guidelines fall into Class 1A or 2A (Dry Abrasive Blast Cleaning Operations). A Category "A" containment structure shall be mechanically ventilated (i.e. have an operating dust collector attached to it). Air movement through the containment enclosure shall be measured by the contractor to ensure adequate air flow, and those measurements must be documented by contractor personnel.</p> <p>Air flow in enclosures and ductwork can be measured using such instruments as vane anemometers or other tools that measure velocity of air. In addition to measurement of air flow, the contractor must demonstrate that the dust collector is "pulling" negative air through the enclosure. Negative pressure is created when the air pressure inside containment is less than the air pressure outside of the containment. The contractor must verify the existence of negative pressure by instrument measurements or by visual assessment.</p> <p>And finally, in order to be considered a Category A project, the contractor must be performing the actual work as a Category A project. That is, the use of a Category A type containment must be required by specification or approved in writing by the authorized facility owner representative.</p>		
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		<p>If only a portion of the surface preparation is being done as Category A work, the contained work area to be cleaned and painted shall be a minimum of 1,000 sq. ft.</p> <p>IMPORTANT NOTE: Demonstrations set up on a project just for the time the SSPC auditor is present at the job site for a QP 2 audit will not be considered for Category A under any circumstances.</p> <p>Any contractor who has a question whether a project they're doing is a Category A project, can contact SSPC for a preliminary determination. Note, however, that regardless of any preliminary determination, what the auditor actually sees at the job site and reports to SSPC will determine whether the project meets Category A requirements.</p> <p>For the purposes of QP 2 job site auditing, a valid hazardous paint removal job is defined as a project in which the contractor is removing a coating and air monitoring by a qualified independent laboratory shows that airborne exposure exceeds prescribed limits, that is, the Permissible Exposure Limit (PEL). For example, 50 micrograms per cubic meter of air, as a Time Weighted Average (TWA) over an eight hour period is the current OSHA PEL for lead. The PEL (micrograms per cubic meter of air) for other metals that might be found in paints being removed include: Arsenic = 10; Cadmium = 5; Chromium = 500.</p> <p>Note: If the contractor chooses to do its own exposure monitoring, it must provide independent confirmation in writing from a qualified CIH or CSP familiar and experienced</p>		
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		<p>with industrial painting operations, that the monitoring protocol being used by the contractor on the job is being done in accordance with regulations and accepted practice with properly functioning and calibrated equipment. If project airborne exposures do not exceed the PEL, the contractor may still be eligible for QP 2 certification provided the contractor can:</p> <ol style="list-style-type: none">1. Demonstrate (i.e. provide documentation by independent, accredited/approved laboratories) during the QP 2 audit that it has historically implemented its OSHA & Environmental compliance programs to the extent required by regulations but that none of its hazardous paint removal projects has required full implementation of its compliance plans; and2. Demonstrate during the QP 2 audit that it has the capability to fully implement its compliance programs at a moment's notice, if project and work process conditions dictate; and3. Agree in writing to notify SSPC as soon as it takes on a project where it must fully implement its compliance programs (i.e. on projects where the contractor cannot reduce the exposure below the OSHA PEL and/or where waste generated at the job site is tested and deemed hazardous). <p>The SSPC Certification Manager reserves the right to <u>not</u> accept a project for a corrective action verification or a post-DAC audit where project airborne exposures do not exceed the PEL or TLV where there is no OSHA PEL.</p>		
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		<p>Regardless of which scenario the contractor can present, the SSPC auditor must observe the contractor removing hazardous paint (based on independent laboratory tests of paint/materials being removed) at an active job site during the initial QP 2 audit.</p> <p>The contractor demonstrates competence in coating removal using containment meeting requirements of Classes 3A, 4A, 2W, 3W, 4W, 1C, 2C, 3C, 2P or 3P of SSPC Guide 6 (CON) during the active job site walk through. For jobs completed in the past, the contractor also documents successful completion of a project where the job specification required Class 3A, 4A, 2W, 3W, 1C, 2C, 3C, 2P or 3P containment. Copies of the job specification requiring Class 3A, 4A, 2W, 3W, 4W, 1C, 2C, 3C, 2P or 3P containment or equivalent, and the drawings, calculations, and photographs of the containment successfully used in response to the job specification must be provided. Photographs must show the site, containment identify the contractor by name and date. Evidence of payment for substantial completion of work or owner verification is available.</p> <p>To achieve initial Category "A" QP 2 certification or renew Category "A" certification, contractors are required to demonstrate the ability to erect and operate within the containment on the structure where cleaning and coating are taking place. Removing components from a structure and cleaning and coating them in a yard under a temporary or permanent containment structure, or similar operations, is considered shop painting and meets QP 3 (Shop Painting), not QP 2 requirements.</p>	<p>1 2 3</p>	<p>Note to auditor-read carefully what SSPC will accept as a Class A containment</p>
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		<p>For the purposes of QP 2 qualification, the structure being cleaned and painted (e.g., an interior section of a building or the interior of a tank); or the cleaning equipment itself (e.g. vacuum-shrouded power tools; or vacuum-shrouded blast cleaning equipment) are not considered a "containment structure."</p> <p>Contractors performing industrial deleading or other types of hazardous paint removal operations using such cleaning methods as hand and power tool cleaning; wet abrasive blast cleaning or water jetting, in accordance with applicable regulations and contract requirements, WITHOUT THE USE OF A CONTAINMENT STRUCTURE, may be eligible for Category "B," QP 2 certification. (Refer to SSPC-QP 2, March 1, 2000 or latest revision).</p>		
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	Required Information TECHNICAL CAPABILITIES	Evaluation Items/ (Minimally Acceptable Responses)	Rating	Auditor Notes
3e.	Is there evidence that the contractor has competence in assessing quantities of emissions?	The contractor demonstrates and documents competence in assessing and/or complying with the quantity of emissions provisions on the active job site being observed. The contractor also documents competence in assessing quantity of emissions on previous hazardous paint removal jobs using TSP-Lead monitoring data, and/or documented visual assessment of emissions by a qualified person.	1 2 3	Method 22 forms completed; signed by CP <input type="checkbox"/>
3f.	Is there evidence the contractor has competence in maintaining employee exposures below the appropriate OSHA permissible exposure limit (PEL), first through use of engineering and work practice controls to the extent feasible and secondarily through use of required respiratory protection?	<p>The contractor documents and demonstrates competent knowledge of how to maintain employee exposures below the appropriate OSHA Permissible Exposure Limit (PEL) by means of employee exposure air monitoring and biological monitoring from the job being observed and from previous hazardous paint removal jobs. Air sample results for hazards, in combination with the Protection Factor of the respirator worn, must have maintained worker exposures below the PEL. A random review of medical and exposure monitoring results of representative project crew members confirm compliance.</p> <p>Important Note: The SSPC Auditor has the right to request payroll records for workers working during exposure producing operations.</p>	1 2 3	<p>Sample BLL/ZPP lab reports (do not accept cover letters written by consultants showing results) <input type="checkbox"/></p> <p>Check against payroll records <input type="checkbox"/></p> <p>Testing is done as required by 1926.62 or other governing regulation and contract Documents <input type="checkbox"/></p>

	Required Information PERSONNEL TRAINING	Evaluation Items/ (Minimally Acceptable Responses)	Rating	Auditor Notes
5a	<p>“Competent Person” Is there evidence that the competent person(s) has the required training?</p>	<p>Training and experience of CP CP training curriculum requirements:</p> <ol style="list-style-type: none"> 1. Relevant hazardous and solid waste handling procedures. 2. Relevant portions of the following regulations and standards. <ul style="list-style-type: none"> • National Ambient Air Quality Standards. • OSHA construction industry standards on lead. • EPA solid and hazardous waste regulations. • EPA site cleanup and spill response regulations. • Relevant State and local environmental regulations. 3. Different removal methods, classes of containment, and environmental controls consistent with one of the qualification categories specified in QP-2 Section 4.3. 4. All aspects of training specified in QP-2 Sections 4.2.2. 5. Relevant safety practices found in QP-2 Section 4.5. 6. C-5 Annual refresher training or SSPC-accepted alternative, accepted in advance of audit by Certification Manager. <p>The competent person has furnished evidence such as training certificates (32 hours minimum) and training manual that covers the curriculum described above. Professional safety, health and environmental personnel conducted the training. Resumes, or equivalent documentation, must verify that course instructors were either Certified</p>	<p>1 2 3 1 2 3 1 2 3 1 2 3 1 2 3 1 2 3</p>	<p>Only accept SSPC C-3 or alternative accepted by SSPC Cert Mgr <input type="checkbox"/></p> <p>Only accept SSPC C-5 or alternative accepted in advance by Cert Mgr <input type="checkbox"/></p>

		Industrial Hygienists, or Certified Safety Professionals, or had a undergraduate degree (minimum Bachelors degree) in safety, industrial hygiene, environmental science or related field and 3 years related experience; or 5 years of substantial safety, industrial hygiene and/or environmental practice in the coating industry.		
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NOTE TO AUDITOR: QP-2 application item #4 has been skipped. Item #4 refers to the “Work History” part of the application submittal and is not rated by the auditor, although it must be used as a reference during the audit.

	Required Information PERSONNEL TRAINING (cont'd)	Evaluation Items/ (Minimally Acceptable Responses)	Rating	Auditor Notes
5b.	Is there evidence that the CP has the required experience?	<p>The experience of the competent person(s) include:</p> <ol style="list-style-type: none"> 1. Minimum of two years of industrial painting field experience 2. Experience in relevant safety procedures 3. Experience in relevant waste-handling procedures relative to projects described in the work history submitted. 4. Experience in relevant environmental monitoring relative to projects described in the work history. <p>For experience to qualify as “relevant” the competent person must (now and previously) have been capable of identifying existing and potential lead hazards on the job site and the proper methods to control them. Minimum relevant experience must include job site inspection reports completed and signed by the competent person (addressing worker safety and health, environmental controls, and waste handling); and job site safety talks given by the competent person.</p>	<p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p>	<p>Check Employee Records <input type="checkbox"/></p>

	Required Information PERSONNEL TRAINING (cont'd)	Evaluation Items/ (Minimally Acceptable Responses)	Rating	Auditor Notes
6.	<p>“Production Workers” Is there documentation that production & support personnel (e.g., those involved in hazardous paint removal operations or related work) have been trained? If so, has each employee participated in the training program at least annually?</p>	<p>There is evidence or documentation that production and support personnel (e.g., those involved in hazardous paint removal operations or related work) have been given annual training on the following topics:</p> <p>a. Contents of 29 CFR 1926.21, 1926.59, 1926.62 and any EPA regulations in effect to comply with Title X.</p> <p>b. Awareness of the types of operations with lead or other hazardous materials that could result in exposure that exceeds the action levels. If no action level exists, use half of the Permissible Exposure Limit (PEL) or Threshold Limit Value (TLV) as the threshold.</p> <p>c. Procedures for handling hazardous materials and waste.</p> <p>d. Proper operation and maintenance of environmental control systems (e.g., dust collectors, recycling units, containment structures) as well as coating removal tools and equipment.</p> <p>e. Contents of the contractor’s general and site specific written compliance plans.</p>	<p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p>	<p>Review training documentation and sign off sheets <input type="checkbox"/></p> <p>Are all exposed workers on the payroll trained <input type="checkbox"/></p>

	Required Information PERSONNEL TRAINING (cont'd)	Evaluation Items/ (Minimally Acceptable Responses)	Rating	Auditor Notes
6.		<p>(Continued from previous page):</p> <p>There is evidence or documentation that production and support personnel (e.g., those involved in hazardous paint removal operations or related work) have been trained, including the following:</p> <p>The contractor has provided evidence including training certificates and training manuals demonstrating that production and support personnel (e.g., those involved in hazardous paint removal operations or related work) have been trained in hazards of their specific jobs for the specific project. The training manual for the course(s) must address all items described above and training conducted by the contractor's competent person or a qualified safety and health professional as described in item 5a above. Each employee has participated in the training program at least annually. A written sign-off sheet or equivalent must document initial and annual training.</p>	1 2 3	

	Required Information COMPLIANCE PROGRAMS	Evaluation Items/ (Minimally Acceptable Responses)	Rating	Auditor Notes
7.	<p>“Safety & Health Program” Does the contracting firm have a written worker safety and health protection plan based on the applicable requirements of 29 CFR 1926.62 (construction industry), and OSHA and NIOSH lead in construction guidelines and compliance directives?</p>	<p>The contractor has a written worker safety and health protection plan <u>at the job site</u>, which includes, at a minimum, the following:</p> <p>A. Defined responsibilities for a safety coordinator who shall have a minimum of 40 hrs. documented training in industrial hygiene and safety or a degree in either of these aspects. This person may be on the contractor’s staff or the contractor may utilize the services of an industrial hygiene and safety professional with training requirements equivalent to item 5a above and knowledge of hazardous paint removal operations. The safety coordinator is available for consultation as needed, during hazardous paint removal operations.</p> <p>B. Evidence that the program addressing all applicable requirements of 29 CFR 1926.62 has been reviewed and formally approved by the above referenced industrial hygiene and safety Professional. Official approval must be documented by a signed letter or other document specifically attesting that the program has been formally reviewed and approved for industrial painting operations. Management review and approval is also documented (i.e., signed by upper level company management).</p> <p>C. Provisions for both air and biological (i.e. blood lead analysis and ZPP testing) exposure monitoring.</p> <p>D. Details of a hazardous materials compliance plan including provisions for protective clothing, housekeeping, hygiene, medical surveillance, training, and record- keeping.</p>	<p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p>	<p>Safety Coordinator Qualified? <input type="checkbox"/></p> <p>Safety Program reviewed and approved annually by exec mgmt and every 3 years by a safety or IH professional or when a new process is used or a new regulation is issued that affects contr’s operations. <input type="checkbox"/></p> <p>Does company documentation and observed field practice match the contr’s safety and health program requirements? <input type="checkbox"/></p>

	Required Information COMPLIANCE PROGRAMS	Evaluation Items/ (Minimally Acceptable Responses)	Rating	Auditor Notes
8.	<p>“Environmental Compliance” Does the contractor have a written environmental protection plan for hazardous materials, which includes a protection plan for air, soils and water at or around the job site, and a hazardous waste materials management and disposal plan?</p>	<p>8a. The contractor has a written environmental protection plan <u>at the job site</u> which may include the following depending upon contract specification requirements:</p> <ol style="list-style-type: none"> 1. A daily criterion for air monitoring using TSP-Lead or approved equivalent. Procedures for instrument monitoring of particulate matter and lead and/or for visual assessment of emissions by a qualified person. Quality assurance criteria for ambient air monitoring. 2. Lead analysis of soils including cleanup criteria, soil analysis and soil sampling. 3. Information on water quality regulations and guidance on compliance with provisions from the National Pollutant Discharge Elimination System, and sampling of water/sediments. 4. Discharges as a result of site clearance, (e.g. containment material and equipment decontamination operations). <p>*NOTE: Some contractors prepare and use site-specific environmental protection plans rather than invoke a general plan. Either is acceptable as long as regulatory and contract requirements are addressed for each hazardous paint removal project undertaken.</p>	<p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p>	<p>EC plan at job site – site specific? <input type="checkbox"/></p>

	Required Information COMPLIANCE PLANS (cont'd)	Evaluation Items/ (Minimally Acceptable Responses)	Rating	Auditor Notes
8.	“Environmental Compliance” (cont'd)	8b. The contractor’s hazardous waste materials management disposal plan addresses the following: 1. Methods of testing debris (Toxicity Characteristic Leaching Procedure (TCLP), EP Toxicity Test Procedure where allowed). 2. A sampling plan for collecting debris for testing. 3. Sample identification and chain of custody forms. 4. Site Storage and Handling Practices. Treatment and Disposal Practices as appropriate, including site clearance of contaminated equipment, containment, materials and proper disposal of filters, tarps, etc.	1 2 3 1 2 3 1 2 3 1 2 3	Waste tested for all RECRA 8 metals? <input type="checkbox"/>

	Required Information COMPLIANCE PLANS (cont'd)	Evaluation Items/ (Minimally Acceptable Responses)	Rating	Auditor Notes
9.	<p>“Enforcement” Is there documentation that the contractor has procedures and policies in effect that ensure enforcement of the worker safety and environmental plans?</p>	<p>The contractor demonstrates and has documentation, which demonstrates that the contractor worker safety and environmental plans are enforced. Documentation includes: records of site inspections with follow-up on deficiencies; safety meetings addressing known hazards; worker training documentation; and internal disciplinary actions in the event of a noncompliance. The contractor can document that procedures and policies in place to ensure worker protection and environmental compliance are enforced. Work site inspection reports, safety meeting records, and worker training documents are used to reinforce proper work practices. Written disciplinary procedures include a prescribed procedure of verbal warning, written warning, suspension, termination (or equivalent) for first, second, third and fourth offenses, respectively. Disciplinary actions are issued in the event of noncompliance. Records of enforcement of disciplinary procedures must be maintained in the project and/or personnel files. All enforcement criteria must address the requirements of the written worker protection plan and environmental protection plan required in Items 7 and 8 respectively. The role of the competent person must fulfill the authority and responsibility requirements of Evaluation Item 1.</p>	1 2 3	<p>Tool box meetings conducted? Topics relevant to work activities? <input type="checkbox"/></p> <p>Safety and Health violations written up? Employee counseled? Supvr notified? <input type="checkbox"/></p>

RATINGS DEFINITION OF SCORING TERMS

1. **Number 1 – MAJOR CAR** = Required training, written program, practice or procedure non-existent OR Required training or written program inadequate; required practice and procedure in place without a minimal history of conformance (i.e. six consecutive production months) or in place sporadically (e.g. less than 2/3 implemented).
2. **Number 2 – MINOR CAR** = training or written program adequate or requiring minor revisions; i.e. practice or procedure is in place with instance (nor more than 1/3 of the time) of nonconformance (e.g. lack of practice or documentation due to personnel turnover, nonperformance by field personnel, personal hardship, natural disaster, etc).
3. **Number 3 – No CAR required** = Company consistently adheres to specific training and written program requirement; required practice and procedure consistently meets the letter of the standard.

Pass Criteria for each item – minimal rating of 2 and redemption of MINOR CAR within 45 days of on-site audit.

SUBCONTRACTING WORK

SSPC certified contractors are responsible for the actions of subcontractors, to ensure they perform in accordance with PCCP requirements. Contracted tasks include (but are not to be limited to): environmental monitoring and testing; personal monitoring; medical surveillance; cleaning, surface preparation and painting; erecting and moving containment / scaffolding; and equipment maintenance.

The contractor will control its sub-contracting process to ensure that its sub-contractors conform to PCCP requirements. The contractor shall evaluate and select sub-contractors based on their ability to provide products or services in accordance with the contract and PCCP requirements.

Purchasing documents sent to the sub-contractor shall specify information describing the product or service being purchased. The contractor shall ensure that specified requirements are adequately defined in the purchasing documents prior to their release to subcontractors.