



New Information and Timely Reminders

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OSHA Fines to Jump This Year

As a result of the Bipartisan Budget Act of 2015, signed into law by President Obama on Nov. 2, 2015, OSHA has been authorized to raise the price of its penalties for the first time since 1990. The increases tied to the Consumer Price Index between 1990 and 2015 will lead to an 80 percent jump in fine amounts, which will keep pace with the inflation rate moving forward. It is expected that the current maximum \$70,000 fine for the most severe violations would grow to about \$125,000, and the \$7,000 maximum fine for other serious violations would increase to around \$12,500. The rule is scheduled to take effect by August 1, at the latest.

OSHA 300A Injury/Illness Summaries Must Remain Posted Through April

Covered employers are required to post OSHA's Form 300A, which summarizes the total number of job-related injuries and illnesses logged during 2015, through April 30. This information should be displayed in a common area where notices to employees are usually posted.

Employers with 10 or fewer employees and employers in specific low-hazard industries are normally exempt from federal OSHA injury and illness recordkeeping and posting requirements. However, due to changes in OSHA's recordkeeping requirements that went into effect on Jan. 1, 2015, certain previously exempt industries are now covered. Further information can be found here:

<https://www.osha.gov/recordkeeping/>

Updated SSPC C3/C5 Courses Released



SSPC C3 Supervisor/Competent Person Training For Deleading/Hazardous Coatings Removal of Industrial Structures has been extensively updated. In addition to lead paint, it now covers other hazardous materials that may be found on the job site and all of the updates to OSHA and EPA standards that have occurred in the past five years. The unit order has been arranged to discuss hazardous materials and health effects first before moving into worker protection, waste management, legal issues, work site preparation, and Competent Person

duties and responsibilities. Units include brand new review questions and extensive appendices of support materials. Workshops run the gamut of use of Safety Data Sheets to review of containment drawings to calibration of worker monitoring equipment.

SSPC C5 Supervisor/Competent Person Training Refresher For Deleading/Hazardous Coatings Removal of Industrial Structures

has also received a complementary revision to match those updates to standards and regulations found in the new C3. It begins with a pre-test that is used to launch a discussion about job issues you may have encountered over the past year. The coursework is now divided into two volumes, including an extensive appendix of updated regulatory information. Most of the photos found in each unit have also been changed and a new unit has been added about regulatory changes that will be updated each year.



QP Program Now ISO 17020 Certified

SSPC's QP program Quality Management System (QMS) recently achieved ISO 17020 certification. This accreditation signifies that SSPC's QP QMS meets the requirements for the competence of bodies performing inspection and for the impartiality and consistency of their inspection activities. This standard is used by inspection bodies and their accrediting organizations to ensure integrity.

TruQC Software In Place for QP Audits

The QP program is now using TruQC software for auditing. This change makes it possible for all contractors to receive their audit information at the conclusion of the audit instead of having to wait for it to be sent from Pittsburgh. All contractors are also required to submit complete corrective actions within 45 days from the conclusion of the audit. If you have any questions about this, or about how to submit an acceptable corrective action plan (CAP), please contact Joe Berish, Corporate Certification Program Manager (berish@sspc.org); tel: 1-877/281-7772, Ext. 2235. SSPC continues to encourage all contractors to provide us with constructive feedback using the auditor evaluation forms provided at the end of the audit. This information is vital to our continuous improvement program.

Discounted PCI Training Available for QP Contractors!

All QP-certified contractors and QP 5 firms are eligible for a discount on SSPC Protective Coating Inspector (PCI) training to be held at SSPC headquarters in Pittsburgh beginning August 8, November 7, and December 5. This program is open

to everyone but only current QP-certified contractors are eligible for the discounted registration rates of \$845 for PCI Level 1 and \$1095 for combined Levels 1 and 2.

To be eligible for the discount, registrants must be certified current contractor organizational members. Contractors who enroll will have any QC training audit deficiencies held until the class has been completed.

To sign up, contact Nicole Lourette (lourette@sspc.org); tel: 1-877/281-7772, Ext. 2204.

OSHA Rules on Silica and Beryllium Expected Soon

OSHA has announced that it expects to issue final rules on silica and beryllium during 2016. The proposed rulemaking on silica includes two separate standards—one for general industry and maritime employment, and one for construction—that would have widespread impact on the industrial and commercial coating and abrasive-blasting industries. The rule would limit worker exposure to a Permissible Exposure Limit (PEL) of 50 micrograms of respirable crystalline silica per cubic meter of air, averaged over an eight-hour day—a sharp reduction from the current limits. The agency has also proposed an action level of 25 $\mu\text{g}/\text{m}^3$, which would trigger the proposed rule's exposure monitoring provisions. Other provisions include:

- Requirements for regulated areas or written access control plans
- Prohibitions on work practices on construction sites such as compressed air, dry sweeping, and dry brushing
- Medical surveillance
- Respiratory protection
- Training and hazard communication
- Recordkeeping



The rulemaking on beryllium exposure could affect workers involved in abrasive blast cleaning with coal and copper slag abrasives. Under consideration are four options for minimizing exposure to the beryllium found in abrasive blast cleaning dust, frequently at levels that exceed the current PEL of 2 micrograms. Three of the four options call for the current PEL to be lowered to .2 micrograms, while the fourth option does not change the PEL. Option Three also calls for including the construction industry in the scope for the full implementation of a rule as it would apply to general industry. This option would change the current PEL and introduce both action- and short-term exposure limits. The proposed changes would also require exposure monitoring, regulated areas, medical surveillance, and methods of compliance.

Other issues under discussion at OSHA for 2016 include action to clarify the language on the employer's continuing obligation to make and maintain accurate records of each recordable injury and illness; amending the respiratory protection standard to include three new quantitative fit test protocols; updating the fall protection requirements for shipyards; and updating or issuing new PELs for 350 chemicals.

SSPC Releases Wet Abrasive Blast Cleaning Standards

SSPC's new wet abrasive blast cleaning standards combine elements of the existing standards for dry abrasive blast cleaning with elements of the 2012 SSPC/NACE waterjet cleaning standards. The definitions of cleanliness for the steel surface immediately following wet abrasive blast cleaning are identical to the definitions in the five dry abrasive blast cleaning standards. However, because water is used to convey the abrasive onto the surface, a layer of flash rust will form on the cleaned steel as the water evaporates. Due to the varied tolerance of coatings for the presence of flash rust on the surface, it is important that the contractor know the maximum permissible level of flash rust that may be present on the steel immediately prior to the application of the protective coating, and how to assess how much flash rust has developed. The wet abrasive blast cleaning standards define four levels of flash rust: no flash rust, light flash rust; medium flash rust; and heavy flash rust. These definitions are based on the extent to which the flash rust obscures the underlying steel substrate, the ease with which it can be removed by wiping with a cloth, and the amount of material that appears on the cloth after the surface is wiped.

As with the waterjetting standards and the dry abrasive blast cleaning standards, the wet abrasive blast cleaning standards also include information on materials and methods used to perform the cleaning process. For example, the water used must be free of contaminants that would affect the cleanliness of the prepared surface, as well as the functioning of the pumps or other equipment. If the project specification includes specific requirements for non-visible contaminants, the water used for waterjetting must be free of impurities that could prevent the surface from meeting those requirements.