QP2 Audit Evaluation Checklist

Contractor: _____

Location: _____

Date: _____

Type of Audit: _____

Auditor: _____

AUTHORITY AND RESPONSIBILITY OF COMPETENT PERSONS

Audit Item Number	QP Number	Required Information	Rating 1 2 3	Auditor Notes
1.a.	4.2.2.1	**Does the company have adequate Competent Person (CP) capabilities?** Does the competent person (CP); • Report directly to upper management? • Have written authority to ensure hazardous coatings abatement is carried out according to compliance plans and governmental regulations? • Have the authority to stop nonconforming coatings removal operations. (The competent person is an employee or independent contractor and has written authority from executive management to ensure that hazardous coatings removal is carried out IAW safety, health and environmental compliance plans and regulations.)	○ ○ ○	CP has written authority from upper management
1.b.	4.2.2.1	**Authority & Responsibility of Competent Persons** The CP must be put in a position by management to carry out duties and responsibilities. • **Is there a designated "backup" Competent Person in the event the Competent Person is absent from the job?** • Is the competent person a routine member of the crew that performs hazardous paint removal operations that the CP is required to oversee? The CP cannot be a regular member of the crew.	○ ○ ○	Budgeted separately
1.c.	4.2.2.2	**Is the competent person (CP) responsible for the following?** • Monitoring effectiveness **and ensuring the continued integrity of containment and ventilation systems?** • Supervision of both airborne and biological exposure monitoring? • **Ensure Hazard communication training and implementation and other required training has been performed for personnel on site?**	○ ○ ○	-Daily documentation of engineering and management control of hazardous coatings disturbance. -Personal Air Monitoring and BLL/ZPP are available on original or copies of lab reports. Is there risk of exposure to Cadmium, Arsenic, and Hexavalent Chrome?

1.c. (Continued)	4.2.2.2 (Continued)	• Ensuring employees entering contaminated zones are properly protected and trained in use and maintenance of personal protective equipment (PPE), types of exposure control methods, and decontamination practices?
		• Ensuring the minimization of fugitive emissions to air, water, or soil and handling of all waste streams is in compliance with specification?
		• Is access to the site and designated contamination work zones controlled?
		• Maintaining project documentation to include:
		  • Initial and periodic biological monitoring
		  • daily ventilation performance checks,
		  • respirator fit tests,
		  • Results of worker exposure monitoring
		  • weekly site safety inspections
		  • medical surveillance results (blood Pb), etc., IAW the company and contract EHS compliance plan.
			○ ○ ○
			○ ○ ○
				Do they match payroll or independent contractor training records?
				
				Are correct respirators in use and is the Respiratory Protection Program on-site?
				
				Hazardous communication training records are available for crew currently working or scheduled to be working on site?
				
				Is listing of hazard protection equipment on-site and performance of equipment monitored and documented on daily checklists?
				
				If applicable, are chain-of-custody forms used and available?
				
				Are job-site access restrictions in-place?
				
				NOTE TO THE AUDITOR: In some instances, the CP may not personally carry out the above duties but is always directly responsible for ensuring these items are accomplished. For office audits look at historical records from previous projects.

2	4.3.1	**"Qualification Category"** **The contractor shall meet either Category A or Category B requirements for containment.**		
	4.3.2	**For initial audits the contractor shall provide objective evidence that it has fulfilled project specification for hazardous coating removal projects at least *six production months prior to the initial qualification audit.* The documentation shall demonstrate how the contractor:** • Does the contractor have six months of production performing hazardous coating removal prior to initial certification audit?	○ ○ ○	For initial audits only.
2.a	4.3.3, 4.3.4, 4.3.4.1, 4.3.6.2.a, 4.3.6.2.f	***Category A:*** The company demonstrates competence in coating removal using containment and ventilation meeting requirements of Classes 1A, 2A, 1P, or 1W of SSPC Guide 6 during the active job site walk through. • Has the contractor accomplished installation of Class 1A, 2A, 1P or 1W containment with ventilation IAW containment and ventilation drawings? • Are the containment and ventilation drawings, if required by specification, available at the job site? • 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. • Is cleanliness maintained in the contractor required hazard restriction zone and the area within the containment area (no cigarette butts, water bottles, etc)? • Is containment ventilation air flow and negative pressure maintained and documented IAW specification during abrasive blasting evolutions? • Emission inspections are accomplished and properly documented? • Containment integrity is maintained throughout hazardous coating removal process?	○ ○ ○ ○ ○ ○	Document what category of containment being used to qualify. Document type of platform, staging being used. I.D. SSPC Class of Containment Observed and Emissions (take photo if allowable). Compare with contract requirements.
2.b		***Category 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?	○ ○ ○	

3	4.3.3.a 4.3.5 4.3.61b 4.3.7	***Hazardous Waste Identification, Storage, Management, and Disposal:*** Can the contractor demonstrate competence in the identification, storage, management, and disposal of hazardous waste? The contractor's hazardous waste materials management disposal plans address the following: 1. Methods of testing debris (Toxicity Characteristic Leaching Procedure (TCLP), EP Toxicity Test Procedure where allowed or per specification). 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.		Take photos of haz waste storage area, drums, labels, and other forms of haz waste stored on site.
		• Does the hazardous waste management plan include elements 1-4 above?	○ ○ ○	
		• Is the waste management plan on site and approved by owner if required?	○ ○ ○	
		• Is there a current hazardous waste profile on file for the site waste?	○ ○ ○	
		• Has a TCLP of the waste been taken if required by contract?		
		• Has the proper type of and number of lab samples required by samples required by specification and federal, state, and local regulations for proper disposal been accomplished?		
		• Is the waste stream (hazardous or non-hazardous) debris stored in containers approved by specification and federal, state, and local regulations?	○ ○ ○	
		• Is the hazardous waste labeled properly? Is the waste stream generated from project activities and stored at the project site labeled correctly (to include type of waste and code, waste storage start time andgenerator EPA ID number)?		
		• Is storage area cleanliness maintained and records of dated storage inspections by the CP?		
		• Correct hazardous waste signage; is the hazardous waste placed in a restricted access area if required by specification?		
		• Are other possible forms of waste, washing machines, blast cleaning waste water, discarded clothing, respirators properly managed and stored?	○ ○ ○	

4.a. 4.a. (Continued)	4.3.5, 4.3.5.2 4.3.5 , 4.5.3.2	***Technical Documentation and reference material Required at Contractor's Corporate Office:*** The ***Corporate Compliance Plan*** is required to be available at the Corporate Office and must include: • A Worker Protection Plan meeting the minimum requirements of OSHA standards for hazardous coatings removal. • An Environmental Compliance Program and must reference the monitoring methods described in SSPC-TU 7. • A Waste Management Program referencing and utilizing appropriate sections of SSPC-Guide 7. • Reference Materials that are relevant must be available at the Corporate Office to include: a. Relevant federal, state, provincial, and local occupational safety and health standards, regulations, compliance directives, and guidelines. b. Ventilation standards and procedures, if applicable. c. Relevant federal, state, provincial, and local environmental regulations on solid and hazardous waste and on air, water, and soil quality. d. Equipment operating manuals and dust collector fan curves. e. Blast cleaning and other coating removal methods (e.g., water jetting, vacuum shrouded power tool or chemical stripping). f. Waste collection, handling, and disposal guidelines. g. Industrial hygiene and safety practices. h. SSPC-Guide 6, SSPC-Guide 7, SSPC-Guide 16, SSPC-Guide 18, SSPC-QP 1, SSPC-TU 7	○ ○ ○	Office Audits only
4.b.	4.3.6	***Technical Documentation Required at Jobsite:*** Unless otherwise specified, the contractor shall have available at the jobsite during hazardous coating removal activities: • Documentation that substantiates the type and content of hazardous coatings involved with the work. • All inspection reports, testing requirements listed in this standard and owner specification, specific company and site specific procedures. **Documentation of Enforcement of Compliance Plans**: The contractor shall document that procedures and policies are in effect to ensure that the contractor's project-specific worker safety and health plans are enforced. Documentation shall include: • respirator fit tests (if QP-2 audit only, see item 35 of QP-1 checklist)	○ ○ ○	See other paragraphs on this checklist for other documentation required at the job site.

4.b. (Continued)	4.3.6.2 4.3.6 (Continued)	• worker exposure initial and periodic monitoring results (including field and laboratory documentation) • Air and soil monititoring results • blood lead level/zinc protoporphyrin (ZPP) test results • daily safety inspections of job site • corrective actions implemented and documented • are all test results and inspections listed above available for review at the job site? **Applicable Technical Standads** required by the project being audited. (e.g., SSPC-Guide 6, SSPC-Guide 7, SSPC-Guide 16, SSPC-TU 7). • Are the applicable Technical Standards available for review at the job site? [1]***For work in Marine and General Industries the equivalent standards governing coating removal under 29 CFR 1915 and 29 CFR 1910 apply (i.e. 1910.1025, Lead would be equivalent with 1926.62)*** **Other Documentation Required at Jobsite:** • Project specification, change orders, and other documentation as listed in QPI Section 3.1.3 and 3.2.3. • Company mission statement (if QP-2 audit only) • Records of project safety meetings (topic and attendees) • Evidence of job-specific worker safety training • Safe operating procedures for hazardous coating removal equipment. • Is all “other” documentation listed above available for review at the job site?	○ ○ ○ ○ ○ ○ ○ ○ ○	

5.a.	4.4.6	***Environmental, Health, and Safety Manager (see note 7 at bottom of page 6 of QP-2 Standard):*** Has the Contractor 's EH&S Manager successfully taken a minimum 30 hours OSHA-approved Construction Safety Training (See QP-1 item 30) ***plus*** SSPC C-3, an additional 16 hours of formal training in the body of knowledge (BOK) of this standard, and hazardous waste management per 40 CFR 262 (or other training that has been approved by at least one of the states maintaining a training program accreditation system applicable to the industrial/marine coatings industry)? • This person may be on the Contractor's staff, or the contractor may utilize the services of an industrial hygiene or safety professional with knowledge of hazardous coating removal operations. • It is not necessary, as it is with the Competent Person, for the safety coordinator to be on site at all times. However, the safety coordinator shall be available for consultation as needed during exposure producing operations. • Must have three years experience in environmental monitoring, haz waste sampling or monitoring, and worker monitoring in the hazardous coating removal industry.	○ ○ ○	**This is a change to the previous title of "safety coordinator" for this item.**
5.b.	4.4.1, 4.4.2, and 4.4.3	***Training and experience of CP:*** CP training curriculum requirements shall consist of at least 32 hours and the training program must be SSPC C-3 or other training that has been approved by one of the states maintaining a training program accreditation system applicable to the industrial/marine coatings industry. • Does the CP have a current SSPC C-3 or equivalent, accepted by the SSPC PCCP PM, certificate on file? • C-5 Annual refresher training or SSPC-accepted equivalent, accepted by the SSPC PCCP PM been accomplished?	○ ○ ○	Only accept SSPC C-3 /C-5 or alternative accepted in advance by SSPC PCCP PM

		• Does the CP have a minimum of 2 years field experience in industrial/marine coatings?		
6.	4.4.4	***Training of Production and Job-site Located Support Personnel:*** 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: a. Contents of 29 CFR 1926.21, 1926.59, 1926.62 and any EPA regulations in effect to comply with Title X. 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. c. Proper operation of environmental control systems (e.g., dust collectors, recycling units, containment structures) for workers involved in equipment operation. d. Contents of the contractor's general and site specific written compliance plans; including Hazardous Waste Compliance Plan, Environmental Compliance Plan, Worker Protection Plan, • Have all site personnel been trained to site specific compliance plans prior to the start of production work? • Have site personnel been given annual training on all company general compliance plans, including mandatory	○ ○ ○	Are all exposed workers on the payroll trained? Look for training rosters on site with signatures and dates.

		OSHA hazard communication? "Note" 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 syllabus 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 5b above. Each employee has participated in the training program at least annually. A sign-off sheet must document initial and annual training.	○ ○ ○	For annual training on company plans conduct this during office audit or if no site specific plans required access to this training should be available on site. See Item 30 and 31 of QP-1 checklist
7.	4.3.6.1 4.4.5 4.3.1 (Continued) QP1 Section 3.4 4.3.7.2 4.2.2.2	***Worker Safety and Health Program and Site Compliance:*** The contractor has a written worker safety and health protection plan at the job site, which includes, at a minimum, the following: 1. Defined responsibilities for a Environmental, Health, and Safety Manager who meets the certification requirements of item 5.a of this checklist. 2. Evidence that the program addresses all applicable requirements of 29 CFR 1926.62 and any other hazards identified on the job site and has been reviewed and formally approved by the above referenced industrial hygiene and Safety Professional. Documented approval 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). 3. Provisions for both air and biological (i.e. blood lead analysis and ZPP testing) exposure monitoring. 4. Details of a hazardous materials compliance plan including provisions for protective clothing, housekeeping, hygiene, medical surveillance, training, and record- keeping. 5. Includes details of the company's respiratory protection program. 6. The contractor's written worker protection plan includes the applicable requirements 29 CFR 1926.92 (Lead Exposure in Construction; Interim Final Rule) • Does the Worker Safety and Health Plan include the elements listed in 1-6 above? • Is the OSHA recordkeeping requirement (30 yrs) observed by the contractor?	○ ○ ○ ○ ○ ○	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 significantly affects the contr's hazardous paint removal operations. See item 35 of QP-1 Checklist for the Respiratory Protection Program Does company documentation and observed field practice match the contr's safety and health program requirements? Take photos of the job site to properly document compliance.

	4.3.6.1a	• Are the respirators properly maintained and stored? • Are air suppled hoods receiving grade D air with the calibration of the air supply current and IAW manufacturer's requirements? • Is the decon station in proper working condition and have hot and cold water and personal hygiene items for the crew? • Is there a hand wash station available for use by the crew in the vicinity of the hazardous coating removal work? • Has personnel and air monitoring been accomplished if required by contract? Are results available for review at job site? Have employees been notified of results? • Are employee biological test (BLL/ZPP. Etc) results for the hazards present at the job site available for review on site? Are tested employees results below actionable levels? If not, has the contractor taken appropriate action to mitigate employee risks?	○ ○ ○ ○ ○ ○ ○ ○ ○ ○ ○ ○	
8.	4.3.6.1 (Continued) and 4.3.6.2	***Environmental Compliance Plan:*** 8a. **<u>The contractor has a written environmental protection plan at the job-site which may include the following depending upon contract specification requirements:</u>** 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).		Is EC plan job site–site specific? This is also documented in item 38 of the QP-1 checklist. If test results indicate that the coating being removed is non-hazardous use the QP-1 checklist to document compliance.

		• Does the site specific and/or company general Environmental Compliance Plan include the elements listed items 1-4 above? • Are TSP air samplers, if required by contract, functioning properly? • If water, air, and soil sampling is required by contract does the contractor have the results on site? Sampling methods used are listed in specification? • Is there any evidence of environmental contamination at the site during the audit? *NOTE: Some contractors prepare and use site-specific environmental compliance 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.	○ ○ ○ ○ ○ ○	
9.	4.3.6.2 (Continued)	***Enforcement of Compliance Programs:*** The contractor demonstrates and has documents that demonstrate that the contractor worker safety, health, and environmental plans are enforced. Documentation includes: • Internal disciplinary actions in the event of a noncompliance to company policies. • 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. • Does the contractor properly document and issue disciplinary action to employees for non-compliance to procedures and policies?	○ ○ ○	Toolbox meetings conducted? Topics relevant to work activities? Safety and Health violations written up? Employee counseled? Supervisor notified?

10.	4.5, 4.5.3, 4.5.5, 4.5.6	Subcontractor Control: the contractor shall only use QP-2 certified subcontractors to conduct hazardous coatings removal projects requiring QP-2 certification unless a waiver is issued in writing by the owner. • Has the contractor subcontracted out any portion of the hazardous coating removal? If so, is the subcontractor QP-2 certified? If not, has a proper waiver been issued by the owner? • Is the QP-2 certified contractor performing IAW with specification requirements? • Does the Purchase Order include all applicable contract requirements? For non-QP-2 required projects, the QP-2 certified company may elect to subcontract out work to a non-certified company. If this is the case the contractor shall notify SSPC. Subcontractors performing tasks that will likely not result in occupational and environmental exposures are exempt from 4.5.3 of this standard. • Has the QP-2 certified contractor subcontracted out any work to a non-certified QP-2 contractor? If so, is the QP-2 contractor performing reasonable oversight of the non-certified subcontractor? • Does the Purchase Order include all applicable contract requirements?	○ ○ ○ ○ ○ ○	The auditor may elect to audit the subcontractor as well as the contractor. If so, use this existing checklist

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.

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 ore 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.

Appendix A
Category A Containment Notes:

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.

To achieve initial Category "A" QP 2 certification, contractors are required to demonstrate the ability to operate within the containment on the structure where cleaning and coating are taking place. 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 the contractor to notify SSPC when and where it is performing QP 2 Category "A" type work.**

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. 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."

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, September 1, 2009 or latest revision).

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 normally seen on industrial hazardous paint removal projects on storage tanks, bridges, ships and other industrial structures.

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 the measurements must be documented by the Contractor.

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.

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. If only a portion of the surface preparation is Category A work, the contained work area to be cleaned and painted shall be a minimum of 1,000 sq. ft.

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.

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.

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.

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 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:

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; and

2. 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; and

3. 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).

The SSPC PCCP Program Manager reserves the right to not 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. 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.

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, and identify the contractor by name and date. Evidence of payment for substantial completion of work or owner verification is available.

To achieve initial Category "A" QP 2 certification or renew Category "A" certification, contractors are required to demonstrate the ability to operate within a containment on the structure where cleaning and coating is 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. 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."

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 waterjetting, 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, September 1, 2009 or latest revision.)