



Painting Contractor Certification Program (PCCP)

**QP-9 Audit Evaluation Checklist
Standard Procedure for Evaluating the Qualifications of
Commercial Painting and Coating Contractors**

Revised 7/14

Contractor: _____

Jobsite Location: _____

Date: _____

Audit Performed by: _____

Date Completed: _____

Name/Title _____

Email Address _____

Phone Numbers: _____

Recent Changes in Personnel: _____

QCS: _____

Safety Manager: _____

Production Manager: _____

Executive Management: _____

Superintendents: _____

Project Managers: _____

Other: _____

Changes in Ownership: _____

	QP-9 Reference	Audit Criteria	Rating 1 2 3	Comments
1	Mission Statement	<ul style="list-style-type: none"> • Must address the Company's commitment to: Quality Work, Compliance with applicable Environmental and Worker Health/Safety regulations during coating and related operations • Posted at office and job sites where workers can view. • On company letterhead (signed and dated within the previous 12 months by current member of executive management). 		
2	Procedures for Disseminating Company Policies within the Organization	<ul style="list-style-type: none"> • Procedures have been implemented to disseminate policies to all workers under its direction through an employee manual or handbook, new employee orientation materials, work force meetings or other methods). • Companies with informal policies must record employee orientation attendees, dates, topics covered and documents issued. 		
3	Organizational Chart	<ul style="list-style-type: none"> • Lines of responsibility of key personnel responsible for coating and related operations are shown by name and title and reflect actual company practice (key personnel must include owner managers or responsible executive, if not owner managed, production management, QCS, and Safety Manager). • Key personnel must be full time employees of the organization (e.g. contractor, shipyard). • Must be signed, and dated by member of current executive management or posted on active company web site. • Organization chart should clearly show separation between Commercial and Industrial areas of a contractor's operations. 		

4	Job Descriptions of Key Personnel	<ul style="list-style-type: none"> Responsibilities and duties are clearly stated and current. Persons involved in purchasing and handling of paints are identified. Required experience, licenses, certifications, training and refresher training for Project and Production Managers, QCS, Safety Manager are stated and current. 		
5	Financial Record Keeping	<ul style="list-style-type: none"> A formal accounting system is in place using accepted accounting practices. Current letter from CPA firm or accounting professional is on file confirming that the contractor's operating accounting system and procedures follow established accounting principles and procedures. 		
6	Legal Viability Documentation	<p>Federal Tax returns are filed in the name of the company on the certification application in a timely manner.</p> <ul style="list-style-type: none"> Federal Tax ID/EIN Number statement issued by the IRS under the applicant's name is on file for review during the audit. Company holds current and valid worker's compensation, general liability, and other insurance coverage required to conduct operations. There is evidence that production workers are employed or properly leased by the company. Firm holds current licenses for locales where it operates. Appropriate ownership/incorporation papers under applicant's name are on file with proper authorities and available for review during the audit. 		<p>Auditor Note: All items are subject to verification for new applicants and those having undergone major organization or ownership changes after initial certification.</p>
7	Procedures for Reviewing Specifications and Other	<ul style="list-style-type: none"> There is evidence (documentation) that one or more members of management 		

	Bidding Documentation	<p>prior to production review project contract documents and specifications in effect at contract award.</p> <ul style="list-style-type: none"> • There is evidence that specifications are reviewed by one or more key personnel prior to start of production and subsequently distributed to all affected personnel within the organization. 		
8	<p>Procedures for Complying with Regulations</p> <p><u>CRITICAL ITEM</u></p>	<ul style="list-style-type: none"> • A key person is designated by management (in writing) to keep abreast of and inform key personnel of EPA, OSHA, DOL, Coast Guard, RR, Army Corps and other regulations affecting the Contractor's operations. • There is a history of a key person(s) performing these duties at least 6 months prior to the first audit and routinely thereafter. • Versions of regulations applicable to specific projects and general business operations are available at the main office and any division offices. • The contractor has copies of or immediate access to project-applicable EH&S regulations at the job site. 		<p>Auditor Note: Access to project-applicable regulations at the job site</p>
9	Selection of Subcontractors	<p>Documentation that approved subcontractors are selected on the basis of their ability to assist the painting contractor in meeting project requirements and any specific inspection requirements per requirements of QP 9 Appendix B of the Standard.</p>		
10	<p>Regulatory Citations and Disposition</p> <p><u>CRITICAL ITEM</u></p>	<ul style="list-style-type: none"> • Records and fine amounts are kept of all federal, state and local regulatory citations, notices of non-compliance and violations issued to the contractor for coating and related operations, and their 		

		<p>resolution. (note by auditor: Affirmed violations/final orders/settlement agreements are documented by the auditor for referral to the SSPC Corporate Certification Specialist for potential disciplinary action review under the DAC.)</p> <ul style="list-style-type: none"> • There is evidence that management reviews all significant (e.g. "serious, willful or repeat") regulatory citations, etc., and documents root cause analysis (RCA) for each and takes corrective action to avoid repeat violations . 		
11	<p>Craft Worker Assessments</p> <p><u>CRITICAL ITEM</u></p>	<p>The contractor has developed and implemented a written Craft Worker Assessment Program in accordance with the requirements outlined in the Standard at the end of this checklist.</p> <p>At a minimum,</p> <ul style="list-style-type: none"> • Procedures exist and have been implemented for conducting training (as needed) and qualifying newly hired and/or experienced craft workers. • Procedures exist and have been implemented for conducting training (as needed to meet job or contract requirements) and qualifying trainees. • Procedures exist and have been implemented for training and qualifying workers on the use of materials and equipment not previously used by or unfamiliar to craft personnel. • A worker proficiency evaluation system is in place and performed annually by supervisory personnel. 		
12	<p>Industry Group Affiliations</p>	<p>Review of current membership certificates and correspondence confirms that contractor maintains affiliation(s) with industry group(s) such as PDCA or MPI that provide technical and regulatory compliance information re: architectural painting of commercial buildings and interiors.</p>		

<p>13</p>	<p>Technical Standards Library</p> <p><u>CRITICAL ITEM</u></p>	<ul style="list-style-type: none"> • Key personnel have access to technical standards applicable to the company's operations. • Versions of specified and applicable technical standards and documents (e.g. PDCA, MPI), PDSs and SDSs applicable to each project are available to affected personnel on site. 		
<p>14</p>	<p>Document Control Procedures</p> <p><u>CRITICAL ITEM</u></p>	<ul style="list-style-type: none"> • Contractor records receipt and distribution of specifications and other contract documents and all changes and revisions (record is kept of who gets copies with signatures of recipients and dates of receipt). • Superseded or obsolete documents are removed from the workplace are removed as active documents from the workplace so those performing the work, QC, and other key functions are working with the most current requirements. 		
<p>15</p>	<p>Procedures for Clarifying Ambiguous Specifications</p> <p><u>CRITICAL ITEM</u></p>	<ul style="list-style-type: none"> • There is evidence of correspondence or other communication noting exceptions to specifications or other clarifications such as omissions, errors, and conflicting requirements. • Verify that acknowledgement of correspondence is on file showing that the clarification request was received and answered. 		<p>Note: In isolated cases contractors will submit a request for clarification and receive a “verbal” response from the owner or its representative. Clarifications received through a “verbal” process should be documented by the contractor (name & title of person responding and date / method of response). This approach still presents risks for the contractor</p>

		<ul style="list-style-type: none"> • Requests for deviations from contract requirements are documented and processed through proper channels. Contractor maintains copies of notices or correspondence showing that any deviation from specification (DFS) has been accepted by the architect or other owner-authorized representative. 		
16	<p>Communicating Contract & Technical Requirements</p> <p><u>CRITICAL ITEM</u></p>	<ul style="list-style-type: none"> • Pre-job and other contract/specification altering meeting notes are formally documented and available at the job site as part of the contract information package • There is a procedure to show that current contract and technical requirements, including changes and clarifications, are formally delivered to key jobsite personnel in the field responsible for ensuring conformance with contract requirements. • Contract document package includes all contract submittals (e.g. color schedule; approved drawn downs; wall cover samples; quantities of materials; room by room summaries; purchase orders; punch lists) 		
17	<p>Company's Work Experience</p>	<p>The documentation shall include:</p> <ul style="list-style-type: none"> • Building owner name, address, including zip code, telephone and fax number; owner's and GC's representative overseeing your field operations. • Duration of project (start-finish date). • Description of work performed. • Architectural paints applied/thinners used and approximate quantities. • Equipment used for surface preparation and coating application. 		

		<ul style="list-style-type: none"> • Numbers of personnel and type used to do the work; names of project manager and field supervisors. • Special safety (e.g., protection from lead; working at heights; ventilation) practices. • Review documentation (e.g. letters of reference from customers and suppliers; approved punch lists) supporting successful completion of projects. 		
18	Maintenance and Repair of Equipment	<ul style="list-style-type: none"> • Office Audit - Contractor has a written preventive maintenance plan or copies of manufacturer's maintenance manual for all major equipment, leased or owned. • Office Audit - There are maintenance records that document routine PM (Preventative Maintenance) and other required service and repair of major equipment used by the contractor or its subcontractors. • Field Audits – Equipment on site is in good operating condition & appears to be well- maintained Document with photos where permitted. 		
19	Storage Facilities <u>CRITICAL ITEM</u>	<ul style="list-style-type: none"> • Contractor maintains proper storage of coatings materials per manufacturer's and/or specification requirements and regulations and building codes: • Material is properly handled and stored per federal, state, and local regulations and codes (confirmed by Fire Marshall, Insurance Company, OSHA, Safety consultant audits). • Flammable materials are in approved containers. • Storage temperatures are maintained. • Paints and solvents are properly covered and out of direct sunlight. 		

		<ul style="list-style-type: none"> • Storage areas have approved and functioning fire extinguishers & explosion proof lighting, if applicable. • Hazard and warning signs where applicable are visible and posted. • Material with expired shelf life is segregated from current material and labeled expired. • Storage area is free of debris, empty paint cans and combustibles. 		
20	<p>Process Control Procedures</p> <p><u>CRITICAL ITEM</u></p>	<p>Contractor has written process control procedures for applicable work processes (surface preparation; application, repairs, etc.) that its production crews follow to ensure conforming work.</p> <p>Examples include:</p> <ul style="list-style-type: none"> (1) Surface Preparation of Drywall, Concrete, Wood, Metal, Steel (2) Brush, Spray and Roll (3) Repair Procedures 		<p>Note: some companies may use PDCA or equivalent procedures/standards as their PCPs</p>
21	<p>Personnel Qualifications/ Q.C. Supervisor</p> <p><u>CRITICAL ITEM</u></p>	<ul style="list-style-type: none"> • A full-time employee (verified by payroll records) is designated in writing (e.g. letter, org. chart, job description) by executive management as the company Quality Control Supervisor (QCS). • Designated person must be listed on organization chart. • Designated person meets the requirements of contractor's job description. • Designated person shall have a minimum of 2 years experience in quality control for architectural coating applications or related functions. • Designated person has documented proof of successful completion of SSPC 		

		<p>QCS Course or equivalent training in quality systems management.</p> <ul style="list-style-type: none"> • There is evidence that designated person performs duties of Quality Control Supervisor. 		
22	<p>Paint Inspectors</p> <p><u>CRITICAL ITEM</u></p>	<ul style="list-style-type: none"> • Contractor employs the services of a Paint Inspector(s): • Contactor has evidence that a qualified Paint Inspector performs all inspections and results are reported, as required, per contract documents. • Paint Inspectors shall have a minimum of 1-year experience in architectural painting and coating inspection. • Paint Inspectors have documented proof of successful completion of architectural paint and coating inspection training. 		<ul style="list-style-type: none"> • Note (1): A training program (in- house, supplier, consultant) equivalent to the Masters Painters Institute Essentials of Paint and Painting Technology or CSI is acceptable. • Note (2): Unless 3rd party inspection is required, the inspector is provided by the contractor • Note (3): the QCS can also be the inspector for a specific project
23	Safety Managers	<p>Safety Manager: Executive Management has designated a qualified employee as its Safety Manager, qualified by training and experience to manage the company’s environmental, health and safety programs. The Safety Manager shall have successfully completed training from one of the following:</p> <ul style="list-style-type: none"> • OSHA-500 training <p>OR</p> <ul style="list-style-type: none"> • A minimum of 40 contact hours of equivalent training acceptable to the Qualifying Agency covering the body of knowledge in the OSHA- 5003 course. <p>OR</p> <ul style="list-style-type: none"> • A B.S. degree in Industrial Safety or equivalent training acceptable to the Qualifying Agency with a minimum of three years of experience in construction safety practices. <p>There is evidence that the EH & S Officer carries out duties per the company job description.</p>		
24	<p>Authority of QC Personnel</p> <p><u>CRITICAL ITEM</u></p>	<ul style="list-style-type: none"> • There is written authority for the Q.C. Supervisor and Paint Inspectors to report directly to management, and to stop nonconforming work and inform the production supervisor of required 		<p>Note: Contractor may choose to delegate this authority to someone other than the inspector if he so chooses, provided that person has the authority to direct production crews to take corrective actions to meet specification requirements</p>

		<p>corrective rework.</p> <ul style="list-style-type: none"> This authority may be written in a site-specific plan or job description or authorized letter or company plan. 		
25	<p>Corrective Action Program: Identifying Non-conforming Work - performing rework and verifying that rework is conforming</p> <p><u>CRITICAL ITEM</u></p>	<p>There are procedures for checking for non-conforming work and stopping work, if necessary, and correcting the work. There is evidence that these procedures re used by on-site QC personnel when necessary as follows:</p> <ul style="list-style-type: none"> Nonconforming work is documented. Root cause of problem is noted and documented. Inspectors notify production supervisors of non-conforming work and identify re-work requirements, if applicable. Paint inspectors routinely record non-conformities and required corrective actions. There is evidence that re-work inspections are performed and rework is accepted by QC. Written inspection results of tests are maintained for each project. Inspection results are recorded on a daily basis during painting operations. 		
26	<p>Documentation of Paint Inspection</p> <p><u>CRITICAL ITEM</u></p>	<p>Maintaining and filing in-process and final inspection reports. Reports shall contain the following (as applicable):</p> <ul style="list-style-type: none"> Detergent/Cleaning agents used Repair materials used Surface temperature Ambient conditions (air temperature and RH @ start & in-process) Type and amount of paint used Thinner used and amount Type of mixing done Tinting or custom colors Type of Application (Spray-pressure and tip size) (Brush size & type) (Roller-size and type) WFT measurements 		<p>Note (1): Jobs will have varied requirements. Contractor must document objective evidence of compliance with job specifications and Product Data Sheets.</p> <p>Note (2): Additional inspection criteria (e.g. DFT) may be required for specialty applications such as coating of steel, non-ferrous metals, applying intumescent paint.</p> <p>Note (3): daily foreman logs, etc., may serve to record visual and instrument inspections</p>

		<ul style="list-style-type: none"> • Mixing (box, stir, mechanical) • Moisture transmission levels • Damages and source 		
27	<p>Calibration Standards-- Checking Accuracy of Inspection Instruments</p> <p><u>CRITICAL ITEM</u></p>	<p>Verify that QC personnel on-site know how to operate, calibrate and verify accuracy of inspection equipment used.</p>		<p>NOTE: Inspection of applied architectural coatings is limited to specialty applications. Visual inspection may be adequate in many cases.</p>
28	<p>3.3.3 Preventive Action Program (PA)</p>	<p>There is a Quality System manual.</p> <ul style="list-style-type: none"> • Corrective (CA)(see item #20 above) and Preventive Action (PA) Programs are implemented, correct, and supported by Executive Management. • (PA) Management review of the effectiveness of all company processes and procedures occurs at least annually and is documented. • Processes and procedures in the Quality System Manual are adjusted, as necessary, based on annual Management review. 		

<p>29</p>	<p>Safety Program and Documentation of Safety Education, Meetings, and other Safety-Related Activity</p> <p><u>CRITICAL ITEM</u></p>	<ul style="list-style-type: none"> • Contractor has a written Health and Safety Program based on current OSHA or equivalent standards applicable to its operations. • At a minimum, the program must address all <u>applicable</u> sections of the following topics <p>Hazardous materials</p> <ul style="list-style-type: none"> • Personal protective equipment (PPE) • General health and safety • Occupational health and environmental controls • Fire protection and prevention • Signs signals, and barricades • Materials handling, storage, use, and disposal • Hand and power tools • Electrical (e.g., lighting, wiring, heating and cooling equipment, GFCIs) • Working near power lines, third rails, other live power sources, etc. • Scaffolds • Fall protection • Cranes, derricks, hoists, elevators, and conveyors • Ladders • Toxic and hazardous substances • Airless spray injection • Safe operating procedures for major equipment • Other project-specific conditions not addressed in the corporate safety program <p style="text-align: center;">Communication to Workers</p> <ul style="list-style-type: none"> • There is evidence that workers receive annual general health and safety refresher training (or as required by applicable regulations). • There is evidence that EHS violations are filed (office and at applicable job sites). 		
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		<ul style="list-style-type: none"> • There is evidence that workers are made aware of the contents of the corporate safety and health program • There is evidence that workers receive project- specific training (e.g., weekly tool box talks; job specific hazard training) • The Corporate Health and Safety Plan must be reviewed and approved in writing by the Owner Manager or Responsible Company Executive and Safety Manager at least annually. <p style="text-align: center;">Safety Assessments</p> <ul style="list-style-type: none"> • Pre-job safety assessments identifying specific job site hazards are conducted and documented • Job site safety assessments are routinely conducted (at least weekly) by the Safety Manager or his/her delegate and immediate corrective actions are taken when potential hazards or safety violations are identified. 		
30	Accident Reporting & First Aid Training	<ul style="list-style-type: none"> • Contractor has a written accident reporting procedure. • Accident reports address (what happened, to who, where, how it happened, root cause, and follow-up action to prevent recurrence) • There is evidence that supervisors assigned follow up actions complete necessary corrective action at the job site within a week after the accident, if feasible, to ensure hazard is removed or properly controlled. • Accidents are documented in accordance with federal/state/local regulations and contract requirements 		

31	Monitoring Safety and Loss Control	<ul style="list-style-type: none"> • Contractor can provide written evidence (i.e. documentation of management review) that executive management & key personnel perform a comprehensive annual review of accidents, near misses, and safety procedures, etc., in an effort to improve safety performance or maintain good safety performance. • The required annual review of safety performance includes review of OSHA logs, Workers Compensation incident rates as well as actual losses. 		
32	SOPs for Major Equipment <u>CRITICAL ITEM</u>	<ul style="list-style-type: none"> • Copies of equipment manufacturer's standard operating and safety procedures, written so they are understood by the workers on the job site, are on the job site, on or in close proximity to the piece of operating equipment and available for reference by personnel operating the equipment and their field supervisors. 		
33	Personal Protective Equipment and Respiratory Protection <u>CRITICAL ITEM</u>	<ul style="list-style-type: none"> • Contractor has an OSHA 1910.134 compliant (or equivalent regulatory compliant) respiratory protection program (documented annual fit testing and training). • Contractor also has written procedures for issuing and using other PPE such as (protective clothing for skin protection, eye protection, hearing protection, foot protection, head protection, and all other life saving equipment (e.g., skiffs, life jackets, fall protection, confined space rescue equipment, etc.). • Required respirators and protective equipment are available and there is evidence that workers use respirators and PPE at each job site per company 		

		<p>safety plan or project-specific plan or PPE Assessment, and applicable SDSs.</p> <ul style="list-style-type: none"> • The Contractor has a process to ensure that any PPE used is in the appropriate condition for effective usage as defined by the PPE manufacturer and the contractor's safety program. • An approved, functional, first aid kit is available on the jobsite and is accessible in case of an emergency. • At least one person is available on each job site that has had current first aid and CPR training certificates issued by the Red Cross or an equivalent organization. This is applicable to all projects that last 2 or more days. A crew of 6 or more will require a back up first aid and CPR trained person. • Check credentials on site. • Emergency telephone numbers (e.g. police, fire, ambulance, nearest hospital or clinic) are posted at each jobsite • There is tangible and documented evidence that contractor management and supervision enforces all safety rules, per its own compliance programs whether general or project-specific, and per customer requirements (e.g., plant, shipyard, military or governmental installation safety rules). • Contractor has corporate procedures to provide job site access to relevant EH&S information (OSHA, EPA, etc.) and equipment. 		
34	<p>Environmental Compliance</p> <p><u>CRITICAL ITEM</u></p>	<ul style="list-style-type: none"> • The contractor has a current, written environmental compliance program that addresses how the company handles and disposes and records chain-of-custody of hazardous and non-hazardous materials (e.g. solvent, paint cans) discarded. • There's documented evidence that the program is enforced. • The contractor has knowledge of USGBC (LEED) standards and complies where 		

		required. <ul style="list-style-type: none">• Note: some contractors may have LEED certified persons on staff.		
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SSPC: The Society for Protective Coatings Qualification Procedure No. 9

Standard Procedure for Evaluating the Qualifications of Commercial Painting and Coating Contractors

1. Scope

1.1 This standard procedure contains requirements for evaluating the qualifications of painting contractors who apply architectural paints and coatings on commercial or institutional structures, and defines a minimum standard for qualification. This procedure encompasses surface preparation and architectural coating application of the required quality under the conditions and restrictions specified by the owner.

1.2 The purpose of this procedure is to determine whether a commercial painting and coating contractor:

- a. Has a corporate organization that clearly defines the authority and responsibilities of positions typically required for operation of a commercial coating contracting firm;
- b. Employs qualified management and utilizes qualified craft personnel and other workers;
- c. Has established and implemented a quality management system meeting requirements of Sections 3.3.2 and 3.3.3;
- d. Has established and implemented a written worker safety and health program meeting requirements of Section 3.4.1 and 3.4.2 and any project-specific requirements;
- e. Has established and implemented environmental protection procedures meeting requirements of Section 3.4.3 and any project-specific requirements;
- f. Demonstrates knowledge of industry technical standards and good painting practice.

1.3 In addition to the evaluation criteria outlined in this procedure, the owner is advised to review items not covered by this procedure. Examples include, but are not limited to, the applicant's financial stability; performance history; bonding capacity; and ability to successfully complete a specific project in the time frame required.

1.4 This standard procedure is limited to evaluation of the qualifications of painting contractors applying architectural paints and coatings in the commercial and institutional sectors.

2. Description

2.1 DEFINITIONS

Architectural paints and coatings: Paints and coatings applied on-site to new and existing commercial, institutional and buildings.

Auditor: 1) The person or persons performing audits on behalf of the Qualifying Agency. 2) The person(s) possessing the necessary technical and quality system auditing skills to review painting contractor submittals, conduct on-site audits of applicants, and report findings to the Qualifying Agency's program administrator in compliance with the requirements of this procedure and the written requirements of the formal audit program.

Commercial Painting and Coating Contractor (hereafter "painting contractor"): A firm whose primary business is provision of surface preparation and architectural paint application to commercial structures as defined in Section 2.2 of this standard.

Customer: Entity (e.g., the building owner, developer, property manager or leasing agent, general contractor, or architect/designer) having the agreement with the painting contractor for architectural paint and coating application.

Loss Control: Multidisciplinary approach in which human, engineering, and risk management practices are employed to reduce the frequency or severity of losses

Owner: The owner (or owner's legal representative) of the building/structure/facility to be painted.

Procedure: The sequence of steps taken to carry out a particular course of action.

Qualification: The objective evidence by which written assurance is given that an applicant conforms to the prescribed set of conditions or requirements of this standard.

Qualifying Agency: The organization responsible for development, maintenance, sponsorship, and operation of a program to ensure uniform compliance with the provisions of this standard.

Quality Control Inspectors: Persons designated to perform quality control inspections in accordance with any contract requirements and the painting contractor's quality program (see Section 3.3.1 b).

Quality Control Supervisor: A qualified employee designated by executive management who is responsible for implementation and maintenance of the firm's quality management system for painting operations (see Section 3.3.1 a).

Safety Manager: A qualified employee designated by executive management who is responsible for management, maintenance, and enforcement of the contracting company's plans for compliance with applicable safety, health and environmental regulations.

2.2 TYPES OF STRUCTURES: Commercial and institutional structures encompass a wide range of building types and interior and exterior configurations. Architectural paints

are normally applied for aesthetic purposes, protection, or signage. Examples include but are not limited to: retail stores, shopping centers; office buildings; schools, colleges and universities; libraries, institutional buildings, public and military housing; apartment buildings; warehouses and product storage and distribution centers, medical and dental facilities; sports and recreational facilities; airports, rail and bus stations.

2.3 FUNCTIONS TO BE EVALUATED: There are four qualification categories to be evaluated: Management Procedures, Technical Capabilities, Job Quality Procedures, and Safety, Health and Environmental Compliance. General requirements for each of these categories are presented in Section 3.

2.4 EVALUATION PLANNING: The Qualifying Agency must develop criteria and rating plans to evaluate each painting contractor against this standard. The Qualifying Agency shall also determine which of the specific items deemed critical within the four functional areas are to be evaluated for subsequent follow-up evaluations, ensuring the items evaluated are the same for all painting contractors. The sequence of steps for conducting an evaluation within a certification program is outlined in Section 4. The initial evaluation, in each instance, will be performed by the auditor and must include observation of the painting contractor's operational capability on one or more active commercial painting projects under contract.

3. General Qualification Requirements

3.1 MANAGEMENT PROCEDURES: Procedures shall exist for disseminating company policy and for personnel, administrative and financial management as follows:

3.1.1 Company Policy:

- a. Written policies stating its commitment to quality work, worker safety and health and environmental compliance.
- b. Written procedures for disseminating company policies to employees and those personnel working under its direction, including subcontractors. The painting contractor shall show that procedures are followed.

3.1.2 Organization and Personnel: The painting contractor shall have:

- a. A company-approved organization chart (updated as changes occur, signed, and dated by the responsible company executive (RE) showing division of responsibility within the contracting firm by name of person and title. Documentation and observation must show that responsibilities are carried out in accordance with the organization chart. Key management personnel (e.g., production manager, quality control supervisor, and safety manager) shall be full-time employees of the contracting firm and report to the RE.
- b. The painting contractor maintains a list of names, titles, duties, and job descriptions for key personnel

(management, technical, quality management, safety and environmental compliance) involved in purchasing and handling of paints, as well as personnel directly involved in surface preparation and painting operations.

- c. There is a list of in-house or external training courses and written career advancement programs available to and attended by key personnel.

3.1.3 Administrative and Management Procedures:

The painting contractor shall provide:

- a. A brief written description of the painting contractor's method of financial record keeping.
- b. Written confirmation by a CPA firm or equivalent accounting professional that the painting contractor's operating accounting systems and procedures follow established and accepted accounting practices and principles.
- c. Documentation of review of contract specifications.
- d. Procedures implemented by management to review and distribute specifications to all employees who manage and effect projects.
- e. Written procedures that have been established and implemented for learning about and complying with federal, state and local administrative, environmental protection, worker health and safety regulations applicable to projects performed by the painting contractor. A person in the organization shall be assigned the task of keeping track of new, revised and withdrawn regulations and informing the CEO and/or other management personnel of the impact of regulatory changes on the company's operations.
- f. Information that it is a legally viable entity in the locations in which it operates. Examples include: filing of appropriate company ownership/incorporation papers; filing of federal tax returns in a timely manner; Federal Tax ID/EIN statement; holding current state and/or local business licenses and maintaining valid insurance coverage; and other evidence as required.
- g. Documentation that approved subcontractors are selected on the basis of their ability to assist the painting contractor in meeting project requirements and any specific inspection requirements. A painting contractor certified to SSPC-QP 9 has overall and ultimate responsibility to maintain all QP 9 requirements when delivered directly by subcontractors (see Mandatory Appendix B).
- h. Keep records of citations or fines concerning any and all federal, state, and local worker safety and health, wage and hour, tax, and other applicable code or governing regulations, and document that actions are taken to avoid repeat violations.

3.2 TECHNICAL CAPABILITIES: The applicant shall provide documented history of successfully performing application of architectural paints and shall provide evidence that it utilizes qualified personnel and appropriate technical

resources, equipment, and facilities. Evidence, at a minimum, shall include the following:

3.2.1 Craft Worker Qualifications: The painting contractor shall have a written craft worker assessment and proficiency monitoring program that defines procedures the company uses to initially qualify, train and at least annually evaluate and document the proficiency of all craft workers (i.e., persons performing surface preparation and application) under its supervision. The worker assessment program must meet the performance requirements of Mandatory Appendix C and evidence of its implementation must be documented.

3.2.2 Technical Resources:

- a. The painting contractor shall provide a list of technical societies, trade associations, or other industry groups (universities, major manufacturers, consultants) with which it is associated. Current membership certificates or correspondence shall be available at the home office location(s) to verify these associations.
- b. The painting contractor shall maintain a library of current versions of technical standards and references (e.g., manufacturer's product data sheets and manufacturer's safety data sheets (SDS; PDCA standards; MPI Standards) applicable to the work it performs. Project-specific references and standards shall be available to production personnel at the job site.

3.2.3 Procedures: The painting contractor shall have written procedures that it uses to convert job specifications into field work orders, job plans, instructions to craft workers, etc. These include procedures for:

- a. Logging receipt of specifications and revisions and recording recipients, as well as removing obsolete or superseded documents from the workplace.
- b. Procedures for formally clarifying ambiguous, erroneous, omitted, or conflicting specification and contract requirements.
- c. Communicating specifications and work procedures, revisions and change orders to quality control personnel and production supervisors.
- d. Procedures for requesting and obtaining approval from the owner for deviations from contract requirements, including technical or logistical justification for the request to deviate.
- e. Quality control programs. Work procedures shall specifically define quality control methods and criteria.

3.2.4 Experience, Equipment, and Facilities

3.2.4.1 Experience:

- a. The painting contractor shall provide a list of examples of current and completed projects, performed under the applicant's name, demonstrating a minimum of 18 months experience¹ that supports the painting

contractor's suitability for certification. The list shall include the following:

- Name, address, and principal contact(s) of facility owners, general contractors, or other clients, including specific contact information (e.g., cell phone, landline phone, email address, mailing address).
 - Description of work performed, including: generic types of architectural paints/thinners applied with name and address of manufacturers; equipment used; project and shift supervisor's name(s) and number of painters required per shift; special safety or environmental requirements or provisions; approximate volume of paint applied.
- b. The painting contractor shall provide evidence of successful completion of the company's three most recent commercial painting projects. Examples of evidence include: copies of current facility owner evaluations; letters of commendation; statements confirming final payment and acceptance of work or equivalent documentation.
 - c. The painting contractor shall notify the Qualifying Agency of any contracts that it failed to complete due to default, or cause, and explain the cause.
 - d. The painting contractor shall notify the Qualifying Agency of any project that has entered litigation or arbitration and explain the cause.
 - e. The painting contractor shall notify the Qualifying Agency of any disbarments, disqualifications due to defective work, termination for cause, unsatisfactory performance, regulatory non-compliance, fraud, illegal activities, or any legal actions concerning alleged business operation violations.

3.2.4.2 Equipment: The painting contractor shall provide written description of preventive maintenance (PM) and repair procedures for equipment used (e.g., compressors, paint pumps; pressure washing units; spray equipment; ventilation equipment) and evidence of use of such plans, including PM and repair logs.

3.2.4.3 Facilities: The painting contractor shall maintain proper storage of paints and thinners in accordance with manufacturer's requirements, governing safety regulations and contract specifications. At a minimum, flammable materials shall be stored in approved containers; storage area temperature shall be maintained in accordance with manufacturer's recommendations or overriding safety regulations; smoking shall be prohibited; mixing of paints shall be prohibited in the storage area; paint with expired shelf life shall be stored separately; storage area is to be kept neat and orderly, free of accumulation of empty paint cans, combustibles, and other debris.

3.3 JOB QUALITY MONITORING: The painting contractor shall demonstrate the existence of inspection equipment and qualified personnel within the organization who are responsible

¹ Contractors having less than 18 months experience have the option to apply for SSPC-QP 7 qualification.

for job quality monitoring procedures. Quality monitoring personnel shall demonstrate knowledge of proper maintenance and use of inspection equipment. Quality monitoring personnel are responsible for inspecting work performed, documenting inspections, and maintaining document control procedures to ensure conformance with contract requirements. The Qualifying Agency shall establish the criteria for monitoring and has the option, at its own discretion, to recognize third party certification as a means of qualifying monitoring personnel.

3.3.1 Personnel Qualifications:

- a. Quality Control Supervisor: The painting contractor shall employ a Quality Control Supervisor who has documented proof of successful completion of SSPC Quality Control Supervisor (QCS) training or equivalent training acceptable to the Qualifying Agency. In addition, the Quality Control Supervisor shall have a minimum of two years of experience in quality control for architectural paint and coating application or related functions.
- b. Paint Inspector: Unless third-party inspection is required for a specific project, the architectural paint inspector is typically provided by the painting contractor. The painting contractor shall employ the services of a Paint Inspector(s) who has (have) satisfactorily completed formal architectural painting and inspection training.² In addition, inspectors shall have a minimum of one year of architectural painting experience. The painting contractor shall ensure that a qualified inspector performs all inspections and results are reported as required by contract documents. It is possible for an appropriately qualified employee to perform the duties of both the Quality Control Supervisor and the Paint Inspector.
- c. **Safety Manager:** The painting contractor must designate a qualified employee as its Safety Manager, qualified by training and experience to manage the company's environmental, health and safety programs. The Safety Manager shall have successfully completed training from one of the following:
 - OSHA-500 training
OR
 - A minimum of 40 contact hours of equivalent training acceptable to the Qualifying Agency covering the body of knowledge in the OSHA-500³ course
OR
 - A B.S. degree in Industrial Safety or equivalent training acceptable to the Qualifying Agency with a minimum of three years of experience in construction safety practices.

² A training program equivalent to the program offered by The Master Painters Institute (604) 298-7578; <<http://www.paintinfo.com>> will satisfy this requirement.

³ U.S. Department of Labor Occupational Safety and Health Administration (OSHA) Information on OSHA 500 (Construction Industry Train-the-Trainer) training to meet requirements of 29 CFR 1926.63 is available at <<https://www.osha.gov>>

3.3.2 Inspection Procedures and Recording Systems:

The painting contractor shall have a Quality Procedures Manual, which contains implemented procedures on:

- a. How to operate, calibrate and check accuracy (per manufacturer's instructions) of inspection and test equipment required to perform job quality control.
- b. Maintaining and filing in-process and final inspection reports to record such key information as: ambient conditions at the start of the job and during painting; thinners used and amount; mixing; tinting done; detergent washers or other cleaning agents used during surface preparation; repair materials used; moisture on the surface or transmitting to and from the surface; wet film thickness of paint applied; equipment used (e.g. roller size and type; brush size and type; spray pressure and tip size). In all instances, the painting contractor shall document objective evidence of compliance with contract requirements, including referenced technical documents.
- c. Documenting that quality control personnel report results directly to the designated level of authority in a timely manner.
- d. Ensuring painting contractor has formal process control procedures (PCPs) in place to ensure that repairs, surface preparation, painting and related work is done in accordance with customer and supplier requirements.
- e. Stopping work not conforming to specification and manufacturer's requirements and identifying, isolating, and documenting non-conforming product.
- f. Documenting successful completion of corrective rework.
- g. Documenting receipt and resolution of customer complaints.

3.3.3 Corrective and Preventive Action: Painting contractor management shall have in place a program to document and track non-conformities and corrective rework. This program shall examine recurring non-conformities in order to determine the root causes, and shall revise the Quality System manual to avoid recurrences. Management reviews shall occur at least annually and shall be documented.

3.4 SAFETY, HEALTH AND ENVIRONMENTAL COMPLIANCE

The submitted application shall document proper safety and environmental compliance procedures and recordkeeping systems and access to resource material as follows:

3.4.1 Safety Procedures

- a. The painting contractor shall demonstrate that it documents safety education, safety meetings, regular job site safety inspections, and other relevant activities. The painting contractor shall implement a written compliant safety and health program as required by governmental occupational safety, health, and environmental regulations and by client requirements

applicable to the work it performs. There shall be evidence that the program has been implemented at all work sites and that it is reviewed annually by executive management and the company safety manager for effectiveness and accuracy.

- b. Pre-job safety hazard analysis and planning to eliminate or control hazards shall be performed and documented for every project.
- c. Accidents shall be documented in accident reports, including the investigation to determine cause as well as actions taken to prevent recurrence.
- d. The painting contractor has procedures for determining effectiveness of safety and loss control measures at least annually or after any incidents or near misses.
- e. The painting contractor has trained applicable personnel on Safe Operating Procedures (SOPs) for equipment.

3.4.2 Environmental Compliance

- a. The painting contractor shall have an adequate, current, written environmental compliance program to handle processing and proper disposal of hazardous waste and other waste such as paint cans, used solvent. The program shall be consistently monitored and enforced.
- b. The painting contractor shall have knowledge of Leadership in Energy and Environmental Design (LEED)⁴ certification and credentials and apply them as appropriate.

3.4.3 Safety Resource Materials

- a. Sources of information on safety requirements.
- b. Procedures used for acquiring safety information and materials.
- c. Availability of safety information referenced in submittals.

4. Evaluation Sequence

4.1 SUBMITTAL OF WRITTEN APPLICATION

PACKAGE: The initial step is to request an application form and instructions. The request, along with an application fee and required submittals, shall be submitted to the Qualifying Agency.

4.2 REVIEW OF APPLICATION PACKAGE:

The Qualifying Agency's certification manager reviews the painting contractor's application package, using guidelines for evaluation established by the Qualifying Agency. The evaluation items are based on Section 3 above.

4.3 AUDITING REQUIREMENTS:

Subject to satisfactory evaluation and acceptance of the application package referred to above and on dates mutually agreed upon by the painting contractor and the Qualifying Agency, the Qualifying

Agency will visit the painting contractor's business office(s) and jobsite(s) where surface preparation and application of architectural paints and coatings on commercial or institutional structures is in progress. An audit of the painting contractor's Quality Programs will be performed to verify (through sampling) conformity with the requirements of this standard procedure.

4.4 EXIT INTERVIEW: Following the audit, and before the auditor leaves the site, an exit or closing interview will be held with an officer of the company or an employee designated by company executive management. At the exit interview, the auditor will review findings with the painting contractor, including discussions of concerns, corrective actions or deficiencies and omissions, if any. A written list of deficiencies and omissions will be provided to a supervisor and/or officer of the company, who will be asked to confirm receipt of the list. Every attempt will be made by the auditor during the exit interview to fully explain audit findings. Failure of the supervisor and/or officer of the company to acknowledge in writing receipt of the audit finding report will render the audit incomplete, and shall result in suspension, revocation or denial of certification.

4.5 EVALUATION OF APPLICATION AND DETERMINATION OF STATUS:

At the conclusion of the evaluation process, the auditor will report the findings to the Qualifying Agency's audit manager and program administrator, who will make the final decision regarding the painting contractor's status based on the following options:

4.5.1 Qualify: The Qualifying Agency has determined that the painting contractor has met or exceeded the requirements of the audit program. The Qualifying Agency will make final determination of the painting contractor's qualification status based on the audit findings and any disciplinary or other evaluation criteria defined in the program rules. Upon review of all information, the Qualifying Agency will issue a certificate identifying the painting contractor by name and by location of the painting contractor's home office acknowledging compliance with this procedure and other administrative requirements. Once certified to this standard, the painting contractor shall reapply for renewal of qualification annually and undergo any submittal reviews or audits required by the Qualifying Agency to maintain certification to this standard.

4.5.2 Withhold Qualification: Based on audit findings and other factors, the Qualifying Agency has determined that the painting contractor has not met the requirements of this standard procedure. If qualification is withheld, the Qualifying Agency shall formally notify the painting contractor of the reasons for withholding qualification. The painting contractor will be allowed up to 45 days after written notification to submit a corrective action plan acceptable to the Qualifying Agency, and request an audit to verify that nonconformities in the quality system have been identified, root causes have been analyzed and a formal corrective action plan has been implemented to update the quality plan to avoid repeating the system nonconformities that led to denial of qualification.

⁴ For information on LEED certification and credentials, contact the U.S. Green Building Council, 2101 L Street, NW, Suite 500, Washington, DC, 20037 <<http://www.usgbc.org>>.

4.6 METHOD OF APPEAL: If a painting contractor disputes the audit findings, the painting contractor has the right to appeal, using the following steps of recourse:

- The painting contractor shall appeal to the Qualifying Agency in writing within 10 working days after the exit interview, identifying the specific reasons for contesting the findings.
- The Qualifying Agency will evaluate the written appeal and notify the painting contractor of the evaluation results in writing within 30 calendar days of receipt of the appeal submission. Appeal evaluations will result in either acceptance or denial of the appeal.
- If the painting contractor disputes denial of the appeal, the painting contractor has the option to continue the appeal process by requesting an informal conference in writing within 10 business days of an appeal denial. The time and location of the informal conference shall be determined by the Qualifying Agency.
- In the event the foregoing steps fail to resolve the dispute, a mutually agreed-upon arbitration panel consisting of three persons (one person chosen by the painting contractor, one by the Qualifying Agency, and one agreed upon by both parties) with knowledge of architectural painting operations will convene to hear evidence and make a final, binding decision. If the arbitration panel finds for the painting contractor, the cost of all fees and expenses of the arbitration panel members will be shared by the painting contractor and the Qualifying Agency. If the arbitration panel does not find for the painting contractor, the painting contractor will be responsible for payment of all fees and expenses. Any other costs incurred by any party to the dispute will be borne by that party.

4.7 RECONFIRMATION OF QUALIFICATION

4.7.1 Internal Audit: The painting contractor shall at its own expense perform at least one annual internal audit of its QP 9 Quality System, based on the requirements of this standard procedure, following initial qualification. The results of this internal audit shall be retained on file by the painting contractor, and made available to the auditor upon request during any announced or unannounced external Qualifying Agency audits.

4.7.2 Reconfirmation of Qualification – Owner Comments: Owners for whom the painting contractor performs work will be given an opportunity to comment on the qualified painting contractor's performance by completing an owner comment form provided by the Qualifying Agency. Comments will be in the form of replies to specific questions asked of owners regarding performance on specific jobs. All owner replies will be treated as confidential.

4.8 REVOCATION: Failure to satisfactorily complete the annual internal audit, pass announced or unannounced external audit(s), cooperate with the auditor or Qualifying Agency or adhere to disciplinary or administrative criteria

established by the Qualifying Agency will be cause for suspension, revocation or denial of certification.

4.9 QUALIFICATION PERIOD: The Qualifying Agency shall require that the painting contractor's qualification be reaffirmed annually subject to successful completion of internal or Qualifying Agency audits (or both) as well as compliance with administrative and disciplinary requirements. Announced or unannounced audits by the Qualifying Agency shall be conducted at the painting contractor's office and/or active job site at the Qualifying Agency's discretion.

4.10 QUALIFYING AGENCY FILES: The Qualifying Agency will maintain a list of certified painting contractors. Information submitted by owners and users who have used the painting contractor's services will also be maintained. This information will assist in the validation process during the certification term.

All information gathered will be used only for purposes intended. Information determined to be proprietary, such as audit findings and other non-public information, will be treated as confidential.

5. Disclaimer

5.1 This consensus standard was developed by SSPC: The Society for Protective Coatings. While every precaution is taken to ensure that all information furnished in SSPC standards is as accurate, complete, and useful as possible, SSPC cannot assume any responsibility, nor incur any obligation, resulting from the use of any materials or methods specified therein, or of the procedure itself.

6. Note

SSPC has developed a set of painting contractor qualification procedures and supporting administrative certification programs that supplement this standard in order to confirm a painting contractor's ability to carry out specialty processes. These include but are not limited to, "Standard Procedure for Evaluating the Qualifications of Industrial/Marine Painting Contractors," (SSPC-QP 1); "Standard Procedure for Evaluating the Qualifications of Painting Contractors to Remove Hazardous Paint" (SSPC-QP 2); "Certification Standard for Shop Application of Complex Protective Coating Systems," (AISC 420-10/SSPC-QP 3); "Standard Procedure for Evaluating the Qualifications of Painting contractors who Apply Thermal Spray Metallizing for Corrosion Protection," SSPC-QP 6; "Standard Procedure for Evaluating the Qualifications of Painting Contractors who Install Polymer Coatings and Surfacing on Concrete," (SSPC-QP 8); and "Standard Procedure for Evaluating a Painting Contractor's Advanced Quality Management System," (SSPC-QS 1), Nuclear Coating Supplement (SSPC-QN 1).

More information on these and other SSPC qualification programs are available at <http://www.sspc.org> (click on "certification").

Mandatory Appendix A: Example of General Training and Qualification Requirements for Craft Workers⁵

A. GENERAL DESCRIPTION

In order to meet the requirements of Section 3.2.1.a, the painting contractor shall implement a written program to:

- a. Assess the skills and general training needs of newly hired technicians/craft workers⁶ and qualify them for their assigned tasks;
- b. Verify the qualifications of existing technicians/craft workers;
- c. Train inexperienced technicians/craft workers (trainees) as necessary;
- d. Evaluate the performance of technicians/craft workers at least once per calendar year and provide additional training as necessary; and
- e. Ensure compliance with contract specific worker training/qualification requirements.

B. CONTENTS OF THE PROGRAM - GENERAL TRAINING AND QUALIFICATION REQUIREMENTS

Newly Hired Experienced Technician/Craft Workers

The program shall contain provisions to administer written tests and/or a hands-on evaluation to assess the skills of new hires that claim to have previous experience, or verify previous qualifications through a formal training or qualification program.

When written tests are used, they shall include information that the painting contractor determines to be necessary to verify the general knowledge of the trade and the qualifications of the individual tested to perform work assigned. While it is left to the painting contractor to create or use the test that works best for its business, the painting contractor shall show that the questions and answers are based on training materials using means and methods established by the Qualifying Agency. A sample training curriculum is provided in Mandatory Appendix C.

Trainees

General training for trainees shall be based on programs approved by the Qualifying Agency.

C. QUALIFICATION TO APPLY SPECIFIC PAINT AND USE NEW EQUIPMENT

The program shall contain procedures to qualify technician/craft workers to apply paint or use equipment unfamiliar to the craft worker. The program shall also document that those workers have been qualified/trained.

⁵ This example provides requirements for obtaining qualification according to SSPC's administrative program for qualifying commercial painting contractors for application of architectural paints and coatings. Other qualifying agencies may develop their own requirements for craft workers.

⁶ A technician/craft worker is one who performs surface preparation and/or applies architectural paints and coatings.

D. QUALITY CONTROL OR TRAINING MANAGER

Each painting contractor shall designate a Quality Control or Training Manager to be responsible for implementation of the company's technician/craft worker training and qualification program and monitoring its effective use in the field.

The Quality Control or Training Manager shall have sufficient technical knowledge and documented training in the use of specific paints and equipment.

Annual Performance Evaluation

The painting contractor shall have implemented procedures and documentation to show that his/her production supervisor evaluates each technician/craft worker's performance at least annually.

Mandatory Appendix B: Proper use of Subcontractors on Projects Performed by Certified Contractors

OVERVIEW: Certified painting contractors are responsible for the actions of their subcontractors, to ensure they perform in accordance with certification requirements. They shall evaluate and select subcontractors based on their ability to provide products/services in accordance with the contract and certification quality management requirements. Certified subcontractors are always preferred.

SUBCONTRACTOR SELECTION: Painting contractors certified to SSPC-QP 9 are to follow a procedure for selecting subcontractors. This procedure shall include a review of the subcontractor's safety plan, EMR, craft worker training program, quality control inspectors qualifications, quality manual, insurance, licenses or any other items required by the contract documents or the procedure. Subcontractors are required to provide a trained workforce at a minimum. If the subcontractor is missing one or more of the documents listed above, the certified painting contractor's documentation is acceptable as long as it is permitted by contract. If a subcontractor does not have a trained quality control inspector, a qualified inspector provided by the certified painting contractor is acceptable.

CONTRACTS & INSURANCE: All subcontracted work on a qualified project shall have a fully executed contract agreement in place, clearly describing the scope of work to be performed. The scope of work shall be in accordance with the certified painting contractor's scope for the project. The subcontractor is required to supply proof of proper insurance to the certified painting contractor.

SUBCONTRACTOR SUPERVISION: A painting contractor certified to SSPC-QP 9 is required to regularly supervise the work of the subcontractor to ensure conformance to the subcontract agreement. If the subcontractor is performing the inspection duties, the painting contractor shall perform a regular review of the daily inspection reports. If the certified painting contractor is providing the quality inspector, the inspector shall report the inspection results to the certified painting contractor on a regular basis.

IMPROPER USE OF SUBCONTRACTORS: If a painting contractor certified to SSPC-QP 9 improperly uses a subcontractor on a QP 9 project, the certified painting contractor will be subject to a minor or major finding upon review during an audit. If the Qualifying Agency is notified of a substantiated report of the improper use of a subcontractor by a certified painting contractor it will be considered a critical fault of the DAC. Severity will be determined by the Qualifying Agency.

**Mandatory Appendix C:
Sample Outline of Craft Worker Training
Curriculum for Architectural Paints**

1. Overview
2. Review
 - a. Basic components of architectural paints
 - b. Surface properties of commonly encountered substrates for architectural paints
 - c. Review of precautions regarding adhesion of paints to commonly encountered substrates
3. Overview of architectural paint types
4. Overview of selection of architectural paints for specific uses
5. Overview of commonly used substrate repair techniques
6. Overview of surface preparation/inspection and testing
7. Overview of application/installation and inspection
8. Overview of required safety, health, and environmental compliance programs
9. Exam

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