

ACCREDITATION REQUIREMENTS MANAGEMENT OF HAZARDOUS COATINGS – INDUSTRIAL SITUATIONS

Editorial Note: This version of the document includes a new logo.

1. SCOPE

- a) This document details the requirements for contractors requiring accreditation in the area of removal of hazardous paints. It reflects the new definition of Class 5 as heavy metal-containing coatings (not just lead) and adds Class 6 for respirable dusts.
- b) This document contains information and material needed to apply for PCCP accreditation to classes 5 and 6.

2. INTRODUCTION

2.1 General

- a) For details on the PCCP scheme, its history, management and operation, refer to PCCP Documents PP-D001 to PP-D004.
- b) For details on the various protective coatings accreditation classes refer to PCCP Document PP-D007.
- c) Protective Coatings Category A, Class 5 'Removal of Hazardous Paints – Industrial Situation' was developed by PCCP to assess the capabilities of contractors to protect the public and worker health and safety as well as the environment from the hazards of lead based paint removal. This category was granted to those contractors that demonstrated compliance with the requirements of AS4361.1 and relevant sections of NOHSC:1012 and NOHSC:2015

2.2 Heavy metal-based coatings

The increasing interest in the hazards associated with paints containing chromium VI and other heavy metals has necessitated a revision and broadening of the Class 5 definition to include heavy metals other than lead.

Chromium is most often found in metal primers although some green topcoats may also contain pigments based on chromium. Other heavy metals (such as those listed in the Uniform Paint Standard) are also sometimes encountered though less frequently.

2.3 Coatings with respirable dusts

Simultaneously, the identification of potential hazards associated with the removal of coatings without heavy metals but containing e.g. asbestos or anti-fouling active ingredients has necessitated the introduction of a separate PCCP Class for respirable dusts.

Although these coatings may be intrinsically safe in their dry, stable form, attempts to remove or recoat them may require disturbing the coating e.g. by abrading the surface, resulting in air-borne dust which may pose a health risk if inhaled.

3. AUTHORITY & RESPONSIBILITIES

- a) The Executive Officer, PCCP (EO) has the authority to implement the requirements of this procedure.

4. REFERENCED DOCUMENTS

This procedure makes reference to the following documents;

1. PCCP Document D001 How PCCP Operates.
2. PCCP Document D013 Accreditation Requirements for Classes 1 – 4 Shop & Site Application
3. PCCP Document D007 Categories and Classes.

PCCP Documents and Forms may be downloaded from the PCCP web site at

[Documents – Painting Contractor Certification Program \(csiro.au\)](http://www.pccp.org.au/Documents/Painting_Contractor_Certification_Program_(csiro.au))

4. AS 4361 Guide to lead paint management
Part 1 – Industrial applications
Part 2 – Residential & commercial buildings
Australian Standards may be purchased on-line from SAI-Global at

<https://infostore.saiglobal.com/>

5. NOHSC:1012 (National Standard for the control of inorganic lead at work)
- 6.
7. NOHSC:2015 (National Code of Practice for the control and safe use of inorganic lead at work) available from Safe Work Australia on-line at;

<https://www.safeworkaustralia.gov.au/doc/national-code-practice-control-and-safe-use-inorganic-lead-work-nohsc-2015-1994>

8. The Poisons Standard (the SUSMP), PART 2 CONTROL ON MEDICINES AND POISONS, SECTION SEVEN/Appendix I PAINT OR TINTERS
This document is available from the Australian Government - Department of Health - Therapeutic Goods Administration & via the Department's website at

<https://www.legislation.gov.au/Details/F2017L00605>

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5. DEFINITIONS

Accreditation

A formal recognition of the competence of contractors in the preparation of surfaces and the application of protective coatings

Compliance program

A document prepared by the contractor performing the hazardous coating removal giving detailed description of engineering controls, work practices, environmental and safety precautions that will be adopted for the execution of the work.

Hazardous Coating

An existing coating on a structure that has been identified as containing heavy metal/s as defined in the Uniform Paint Standard. Typically, these will be lead-based coatings but the requirements apply equally to coatings containing chromium VI, arsenic or tin.

Hazardous Waste

Waste from coatings that are classed as hazardous by the Environmental Protection Authority (EPA) or relevant statutory authority.

Respirable Dust

Fine or micro-fine air-borne particulate matter possibly containing ingredients that may pose a health risk to persons inadvertently inhaling the dust.

Responsible Person

A person who, by virtue of their experience and level of training, is capable of identifying hazards and who has authorisation to take prompt corrective measures to eliminate them.

6. ACCREDITATION REQUIREMENTS Class 5 – Heavy metals

6.1 Pre-requisites

- a) Applicants shall already hold, or already be well on the way to receiving, PCCP accreditation for Protective coatings Class 3 and 4 Site Operations – refer PCCP Documents PP-F002 and PP-D013.

6.2 Management requirements

- a) The successful management of the removal of hazardous coatings requires informed, empowered and knowledgeable management on site at all times.
- b) Applicants for Class 5 Hazardous Coatings accreditation are required to;
- i) Have in place a documented policy detailing the company's approach to OH&S and environmental issues related to hazardous coating removal activity.
 - ii) Assign a suitably skilled, experienced and trained person as the Responsible Person (RP) for each hazardous coating removal job.

- iii) The role/s, responsibilities and authority of the RP shall be documented and shall include the power to shut down non-complying work with the full support of senior management.
- iv) RP training (initial and on-going) shall be conducted by an approved training authority. Records of the training shall be kept.

6.3 Site control requirements

- a) The safe and effective removal of hazardous coatings requires a high level of constant job control on the job site. Thus, the Applicant needs to ensure that;
- i) There is on-site at all times access to documentation, standards, legislation, regulations, codes of practice, exposure limits, hazardous waste management requirements etc governing removal activities, control monitoring
 - ii) All operators, employees, sub-contractors, visitors receive appropriate induction training as to safe working practices. The training needs to be on-going and records need to be kept.

6.4 Compliance Plans requirements

- a) The Applicant needs to have comprehensive, documented Compliance Plans in place for;
- i) Protection of workers, sub-contractors, the general public and visitors. This shall include provision for PPE, medical surveillance, laundry and staff personal hygiene facilities.
 - ii) Protection of the environment (soil, air and water) in the immediate vicinity. This shall include the provision of sampling and testing services including visual monitoring of containment failures.
 - iii) The proper collection, testing and disposal of contaminated wastes.

6.5 Competence requirements

- a) The Applicant needs to be able to demonstrate that it is technically competent to carry out removal activities by;
- i) Designing and constructing containment structures that are robust enough to withstand local climatic conditions without any break-outs, and
 - ii) Thorough record keeping including chain of custody forms and photographic records

6.6 Specialised equipment requirements

- a) In order to complete a hazardous coating removal and/or repaint job to the satisfaction of the client and so that all legislative, regulatory, codes and PCCP requirements are complied with, the Applicant needs a range of specialised equipment. The Applicant needs to be able to demonstrate familiarity with;
- i) the set-up, use and de-commissioning of the equipment, and

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- ii) the daily maintenance requirements to ensure smooth operations
- b) A guide to the range of typical equipment is given in Appendix A below. Applicants are expected to either own the majority of this equipment or have ready access through borrowing or leasing arrangements.

7. ACCREDITATION REQUIREMENTS Class 6 – Respirable dusts

7.1 Pre-requisites

- a) Applicants shall already hold, or already be well on the way to receiving, PCCP accreditation for Protective coatings Class 3 and 4 Site Operations – refer F002 and D013.
- b) Applicants shall be able to ascertain the chemical nature of any previous coating/s on jobs undertaken in order to formulate appropriate compliance plans. The use of an external properly accredited analytical laboratory is acceptable.

7.2 Requirements

- a) Clauses 6.2 to 6.6 above shall also apply to Class 6 with the following exceptions;
 - i) The extent and type of medical monitoring shall be determined with the assistance of a practising industrial hygienist and shall be based on the results of 7.1b) above.

8. GRADES OF ACCREDITATION

8.1 General

- a) Applications for Class 5 or 6 accreditation will be granted one of two grades;

8.2 Provisional status

- a) This status will be granted where the Applicant contractor cannot as yet demonstrate to a PCCP auditor, the implementation of these requirements in practice or on a current project. The Applicant needs to be able to demonstrate to a PCCP auditor that they have adequate written compliance and training programs as well as qualified personnel to conduct and manage hazardous paint removal work. The Applicant may have demonstrated the technical capability to successfully perform hazardous paint removal work based on previous projects within the last eighteen months. However, the PCCP EO/Assessor has not observed actual practices on an active project.
- b) Structures may require complete removal of existing coatings, which may or may not have hazardous materials associated with the existing coating.
- c) The organisation shall have experience in the various aspects of painting, and shall have the equipment to enclose the structure and contain and

dispose of abrasive dust and contaminants etc. to comply with all current legislation.

8.3 Full status

- a) This status will only be granted where an Applicant Class 5 or 6 contractor has implemented, practiced and can demonstrate all of the PCCP requirements on recent hazardous paint removal project(s) consistent with the category being applied for and where the PCCP Executive Officer (EO) or Assessor has observed actual practices on an active project during an audit.
- b) Applicants do not need to go through a Provisional status before achieving Full status.

9 ACCREDITATION PROCESS

9.1 General

The process of accreditation is detailed in PCCP Document D001 How PCCP Operates.

9.2 Gaining Provisional status

- a) The Applicant organisation shall already be accredited to Class 3.
- b) The Applicant organisation, including key personnel involved in the preparation of surfaces and application of coatings, shall have extensive experience in these activities. See also Note 1 below.
- c) The Applicant organisation shall own or have ready access to the necessary equipment as detailed in Appendix A below.
- d) The Applicant organisation shall have a prepared documented Hazardous Coating Compliance Plan that complies with all requirements of AS 4361 Parts 1 &/or 2. In order to demonstrate compliance with this, an independent assessment of the Plan by an authority acceptable to PCCP (see PCCP Document D012) shall be provided as part of the application pack.
- e) The Applicant organisation shall provide to PCCP evidence of the successful training of key personnel involved daily in the removal of hazardous coatings (lead workers and Responsible Persons) by an authority approved by PCCP for such training (see PCCP Document D012).
- f) The Applicant organisation shall provide to PCCP evidence of a Responsible Person Position Description that authorises that person to stop all work deemed non-compliant under the Standard (AS4361.1) with the full support of senior management.
- g) The Applicant organisation shall provide to PCCP evidence of the successful training of operational personnel involved daily in the removal of hazardous coatings by an authority approved by PCCP for such training (see PCCP Document D012 Lead Worker).

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- h) The Applicant organisation shall provide to PCCP evidence of all necessary changes made to QA, WHS&E policies, procedures and practices to prepare for Class 5/6 activities. PCCP will pay particular attention to personal sanitation practices and controls.
- i) The Applicant organisation shall provide to PCCP evidence of hazardous waste management practices including name and accreditations for any waste removal authority to be engaged.
- j) Provisional status does not necessarily require submitting to a PCCP desktop or site audit. Evidence may be submitted to PCCP together with the application form either hardcopy or electronically.
- k) Once the PCCP officer is satisfied with the evidence submitted and the application fee has been paid, Provisional accreditation shall be issued.

Note 1: "Extensive" experience will generally be taken to mean at least 10 years' experience in similar fields of surface preparation and application of coatings.

9.3 Gaining Full accreditation status

- a) Full accreditation is typically achieved as a 2-stage process, Provisional then Full.
- b) There shall be no minimum or maximum time between Provisional and Full applications.
- c) Where an Applicant has won a lead removal project and wants to go direct to Full accreditation via a site audit, the documentation required by clause 9.2 above shall be submitted at least 2 weeks prior to the site audit date to allow PCCP to assess the documentation. Where PCCP is satisfied with the document submission, the site audit shall proceed. Where PCCP is not satisfied with the document submission, PCCP shall discuss the shortcomings with the Applicant and only if they can be rectified in time, will the site audit proceed.
- d) Full accreditation shall be granted once an actual site audit by a PCCP officer of a hazardous coating removal project has been completed and all non-conformances have been closed to the satisfaction of the PCCP auditor.

**10 APPENDIX A
A.1 Guide to equipment requirements**

In order to satisfactorily complete a job requiring the management of hazardous coatings such that all regulatory, legislative and code requirements are satisfied (environmental & OH&S), the Contractor is required to have access to certain specialist equipment. The absence of such equipment will either make the job too difficult (and hence expensive) or non-compliant (illegal) or both.

Access to such equipment can be via either direct ownership, lease/hire arrangements or borrowing.

Depending on the nature of the job, the following is a guide to equipment that may be required;

Surface preparation / Paint removal
Dry abrasive blast
Water jetting & abrasive injection
Water jetting
Spider jetting
Wet abrasive blast
Power tool with vacuum
Power tool
Chemical stripping
Dry sanding
Magnetic induction
Sponge blasting
Cryogenic blasting
Containment
Support structure
Containment material
Permeability
Joints
Air make up points
Site access control devices
Ventilation
Input airflow (forced or natural)
Exit airflow/dust collector
Air pressure (instrument or visual verification)
Air movement inside containment
Dust collector
Ventilation ducts
Equipment for ensuring worker safety
Decontamination unit
PPE
Laundry facilities
Access to qualified monitoring services
Environmental
Medical
Waste Collection
Containers for waste collection
Labelling for waste containers
Facilities for waste storage
Access to registered waste disposal agents