5610401 COATING EXISTING STRUCTURAL STEEL COMMENTS FROM INTERNAL/INDUSTRY REVIEW

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Comments: (5-28-19, Internal)

We need to change this specification to allow for minor rehab projects not requires QP1 and SSPC designation. When you are just installing a couple of braces or misc metals, you should be able to do this work with your own forces.

Response: SSPC QP1 and NIICAP AS1F requirements are appropriate for coating all structural steel. The Department would be willing to work with industry to determine scalable requirements based on risk and complexity of the work.

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Comments: (5-30-19)

Seems we have overlapping and inconsistent language between the proposed language and Section 110-6.2.2, as it pertains to the removal of hazardous coating

110-6.2.2 Removal of Steel Members with Hazardous Coatings: Submit to the Engineer for approval the "Contractor's Lead in Construction Compliance Program", QP2 certification from the Society for Protective Coatings (SSPC) from the firm actually removing and disposing of these steel members before any members are disturbed.

Vacuum power tool clean any coated steel member to bare metal as defined by SSPC-SP11 a minimum of 4 inches either side of any area to be heated (e.g. torch cutting, sawing, grinding, etc.) in accordance with 29 CFR 1926.354. Abrasive blasting is prohibited.

application of coatings, sSubmit a current Corporate QC Plan approved by Society for Protective Coatings (SSPC) under the SSPC QP1 or the National Association of Corrosion Engineers (NACE) International Institute Contractor Accreditation Program (NIICAP) AS-1F certification programs and SSPC QP2 certifications as appropriate and a site specific Coating Pplan to the Engineer at least 14 calendar days prior to beginning coatings work. For the removal of hazardous coatings, submit a current Corporate QC Plan approved by SSPC under SSPC QP2 and a site specific Coating Pplan to the Engineer at least 14 calendar days prior to beginning coatings work. Do not begin coatings work until the site specific Coating Pplan has been approved by the Engineer.

Response: While these articles contain similar requirements, they are intended for different applications. 561-4 is written in reference to Quality Control requirements for re-coating existing structural steel. 110-6.2.2 is written in reference to procedures involved with the removal of steel members when they contain hazardous coatings.

Anonymous

Comments: (6-14-19)

It should be noted that SSPC does not and will not review or approve QC plans.

Response: The language has been revised accordingly. The Department verified with SSPC that while QC Plans are reviewed as part of the QP program, the QC Plan itself is not directly approved.
