

Georgia WAP Health and Safety Plan 2019

Budgeting (Check one):

The grantee is encouraged to budget health and safety costs as a separate category and, thereby, excludes such costs from the average per-unit cost calculation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. The grantee is reminded that, if health and safety costs are budgeted and reported under the program operations category rather than the health and safety category, the related health and safety costs must be included in the calculation of the average cost per home and cost-justified through the audit.

Separate Health & Safety Budget

Contained in Program Operations

Incidental Repairs (List repairs, if any, that will be removed as health and safety measures and implemented as incidental repairs.):

If the grantee chooses to identify any health and safety measures as incidental repairs, they must be implemented as such under the grantee's weatherization program in all cases – meaning, they can never be applied to the health and safety budget category. To be considered incidental repairs, the measure must fit the following definition and be cost justified along with the associated efficiency measure. Incidental Repairs means those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include, but are not limited to, framing or repairing windows and doors which could not otherwise be caulked or weather-stripped and providing protective materials, such as paint, used to seal materials installed under this program.

Such repairs include, but are not limited to framing or repairing windows and doors which could not otherwise be caulked or weather-stripped; providing protective materials, such as paint, used to seal materials installed under this program; minor drainage work including extensions of downspouts or repairs to gutters/downspouts; sealing minor roof leaks to preserve new attic insulation; repairing water-damaged flooring as part of replacing a water heater; minor electrical repairs; etc.

While repair to a roof to protect the insulation to be installed is allowable, expanding this definition to include roof replacement or for other non-energy related repairs is not a permissible use of DOE funds. If the roof needs replacing the unit should either be referred to a rehabilitation program or the subgrantee must use other funds to cover the costs for this type of work. Roofing repairs are to be charged as incidental repairs and must be included and cost justified in the improvement package of the project.

Incidental repairs must not exceed 10% of the DOE allowable average cost per unit and must be cost justified in the improvement package of the project in accordance with WPN 12-9.

Health and Safety Expenditure Limits (Provide a per-unit average percentage and justification relative to the amount. Low percentages should include a statement of what other funding is used to support health and safety costs, while larger percentages will require greater justification and relevant historical support.):

The grantee must set health and safety expenditure limits for their subgrantees, providing justification by explaining the basis for setting these limits and providing related historical experience. It is possible that these limits may vary depending upon conditions found in different geographical areas. These limits must be expressed as a percentage of the average cost per dwelling unit. For example, if the average cost per dwelling is \$5000, then an expenditure of \$500 per dwelling would equal 10 percent expenditures for health and safety. Ten percent is not a limit on H&S expenditures but exceeding this amount will require ample justification. These funds are to be expended by subgrantees in direct weatherization activities. While required as a percentage of the average unit cost, if budgeted separately, the health and safety costs are not calculated into the per-house limitation.

Subgrantees may use funds to abate energy-related health and safety hazards only if elimination of such hazards are necessary before, or as a result of, installation of weatherization materials.

2019-2020 Program Year Limits: Related Health and Safety expenditures are limited to 15% of the state's total program operations budget. Subgrantees will be required to obtain prior written approval from GEFA for all health and safety repairs to individual units exceeding \$1,364.09.

Expenses charged as health and safety measures, do not require cost justification (meeting SIR \geq 1) and are not to be included as part of the overall job average.

Deferral and Referral Policy (Provide a detailed narrative of the grantees overall deferral policy):

Deferral may be necessary if health and safety issues cannot be adequately addressed according to WPN 17-7 guidance. The decision to defer work in a dwelling is difficult but necessary in some cases. This does not mean that assistance will never be available, but that work must be postponed until the problems can be resolved and/or alternative sources of help are found. In the judgment of the auditor, any conditions that exist, which may endanger the health and/or safety of the workers or occupants, should be deferred until the conditions are corrected. Deferral may also be necessary where occupants are uncooperative, abusive, or threatening. The grantee should be specific in their approach and provide the process for clients to be notified in writing of the deferral and what corrective actions are necessary for weatherization to continue. The grantee should also provide a process for the client to appeal to a higher level in the organization.

Deferral conditions may include:

- If Health and Safety costs exceed the health and safety limit for that program year, and no approval to exceed the limit is given by the state.
- The client has known health conditions that prohibit the installation of insulation and other weatherization materials. When a person's health may be at risk and/or the work activities could constitute a health or safety hazard, the occupant at risk will be required to take appropriate action based on severity of risk. Failure or the inability to take appropriate actions must result in deferral.
- The building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent and the conditions cannot be resolved cost-effectively.
- The unit has code issues that would require extra work to be done beyond the scope of weatherization.
- A client refuses mechanical ventilation.
- The house has sewage or other sanitary problems that would further endanger the client and weatherization installers if weatherization work were performed. Deferral may be necessary in cases where a known agent (odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.) is present in the home that may create a serious risk to occupants or weatherization workers.
- The property has been condemned or electrical, heating, plumbing, or other equipment has been "red tagged" by local or state building officials or utilities and the improvement is beyond the scope of weatherization..
- Moisture problems, mold, and/or mildew are so severe they cannot be resolved under existing health and safety measures and with minor repairs.
- The home has drainage related conditions (gutters, downspouts, extensions, flashing, sump pumps, landscape, etc.) that may create a serious health concern and require more than incidental repair.
- Dangerous conditions exist due to high carbon monoxide levels in combustion appliances, and cannot be resolved under existing health and safety measures.
- Dangerous conditions exist due major gas leak(s), and cannot be resolved under existing health and safety measures
- If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client. Pollutants include Formaldehyde, Volatile Organic Compounds (VOCs), and other Air Pollutants.
- When the extent and condition of lead-based paint in the house would potentially create further health and safety hazards.
- Infestation of pests, including rodents, vermin, fleas, roaches, may be cause for deferral where it cannot be reasonably removed or poses health and safety concern for workers.
- If there is a dangerous dog or other animal which poses a threat to weatherization workers
- Improperly stored chemicals, combustible materials, or other fire hazards that present a danger to the occupants or workers.
- The home cluttered to the extent that mobility and ability to perform weatherization work is hindered and obstacles create a safety hazard.
- If the home is being remodeled or rehabilitated and the weatherization work is not coordinated with that effort.
- The client is uncooperative, abusive, violent, or threatening to the crew, sub-contractors, auditors, inspectors, or others who must work on or visit the house.
- The client refuses to allow measures which are required as part of the weatherization work scope.
- The presence of live knob-and-tube wiring in areas where weatherization work must be performed.
- The illegal presence or use of any controlled substance in the home during the weatherization process.
- If the client has tested for radon with levels of four (4.0 pCi/L) or higher, requiring radon mitigation.
- If a client living in a manufactured home refuses to allow unvented secondary heating systems (except one may be left for emergency purpose) to be rendered inoperable or removed so that weatherization work may proceed.

Procedure: If a subgrantee decides to defer weatherization of a dwelling unit it must notify the client and owner/authorized agent in writing and include the following items:

- The nature and extent of the problem(s) and how the problem(s) relate to the determination to not weatherize the unit;
- Any and all test results that led to deferral;
- Any corrective action required before weatherization services can be initiated;
- A time limit for correcting problems so that weatherization services may be rescheduled;
- The right of appeal; and
- All correspondence justifying the decision to "defer" must be kept in the client file.

Withholding of Weatherization Services: A subgrantee may withhold weatherization services under the following conditions:

- A dwelling unit is vacant.
- A dwelling unit is for sale.
- A dwelling unit is scheduled for demolition.
- A dwelling unit is found to have serious structural, mechanical, electrical or plumbing problems that would make weatherization impossible or impractical.
- A dwelling unit is deemed by the auditor to have irreparable conditions that pose a threat to the health or safety of the crew or subcontractor.
- A mobile home is improperly installed (for example, inadequate supports).
- A dwelling unit is uninhabitable (for example, such as a burned out apartment).
- A dwelling unit has been condemned or electrical, heating, plumbing, or other equipment has been "red tagged" by local or state building official or utilities for reasons deemed irreparable by the auditor.
- When there are minor children in the dwelling but no adult client or adult agent of the client at the time of the estimate or at any other time subgrantee personnel must enter the dwelling.
- The client is uncooperative with the weatherization subgrantee, either in demanding that certain work be done and refusing higher priority work, which is needed, or by being abusive to the work crew or subcontractor, or by being unreasonable in allowing access to the unit. Every attempt should be made to explain the program and the benefits of the work. If this fails, work should be suspended and the State Weatherization Office consulted.
- Obvious discrepancies are found between the information supplied by the client on the application and observed conditions at the time of weatherization. The subgrantee must resolve these discrepancies before weatherization work can continue.
- If, at any time prior to the beginning of work (materials installed in a unit), the subgrantee determines that the client is no longer eligible or subgrantee personnel believe that circumstances may have changed, the unit shall not be weatherized until updated information can be obtained from the client.
- Insect or animal infestation: this includes rodents, reptiles, or other vermin that are inappropriate or not properly contained on the premises.
- There are health or safety hazards that must be corrected before weatherization services may begin including, but not limited to:
 - The presence of animal feces and/or other excrement,
 - Disconnected waste water pipes,
 - Hazardous electrical wiring, or
 - Unvented combustion appliances.
- There are illegal activities occurring on the premises.
- The client or owner is physically or verbally abusive to subgrantee personnel.
- The eligible household moves from the dwelling unit where weatherization activities and services are in progress. In such a case, the subgrantee must determine whether to complete the work and the circumstances must be documented in the client file.
- For lead-based paint, refer to the deferral policy related to Lead-Based Paint section.
- Mold and/or moisture problems are so severe that the home is deemed irreparable.

- There are unusual situations, which in the judgment of the subgrantee staff, must be corrected before proceeding with weatherization:
 - No utility hookups (It is apparent that utilities have been shut off).
 - Lack of cooperation from client.
 - Dwelling units undergoing remodeling, or which have untreated areas that directly affect the weatherization process, shall not be weatherized.
- If for any reason, a worst-case draft test cannot be done in a dwelling requiring a worst-case draft.

Standards for referrals:

Agencies should always seek to be aware of additional funds or services and should provide information on options to the client for the following:

- Repair and/or replacement of appliances,
- Asbestos and hazardous materials removal,
- Building rehabilitation and roofing,
- Remediation of biological concerns and unsanitary conditions to local health departments or publically funded rehabilitation services,
- Utility services for leaks, code compliance or combustion safety gas issues that cannot be resolved within this plan.
- Mold and moisture, the "Guide to Mold, Moisture and Your Home" should be given to occupants and owners if mold is discovered
- Fire hazards and electrical issues,
- Services for dealing with lead based paint,
- Occupant preexisting or potential health conditions that may be exacerbated by WAP,
- Services for replacement, repair, and/or installation of windows and doors,
- Levels of radon and dangers associated with radon,
- Pest control.

Procedure for Identifying Occupant Health Concerns:

Procedures must be developed and explained on how information is solicited from clients to reveal known or suspected occupant health concerns as part of the initial application for weatherization, additional screening of occupants again during the audit, and what steps will be taken to ensure that weatherization work will not worsen the health concern.

GEFA has updated the client application form to comply with WPN 17-7 to solicit occupant health conditions that may be exacerbated by weatherization. GEFA has moved from a priority list and is now using NEAT/MHEA audits, which also allows the auditor to identify and document potential health concerns. GEFA has provided guidance and a standard form for subgrantees to notify a client with a potential respiratory illness about the hazards of airborne insulation and two-part foam. GEFA encourages agencies to choose alternative insulation materials in client's homes with respiratory or breathing illness.

The health and safety of the building occupants and the weatherization staff must not be compromised by any weatherization technique or practice. Workers must take all reasonable precautions against performing work on homes that will subject workers or occupants to health and safety risks. The subgrantee is advised to proceed cautiously when preparing to weatherize a dwelling unit where lead, mold, asbestos or other toxic conditions may be present. Subgrantees are advised to provide information and education to clients regarding the presence of toxic or potentially toxic materials and or conditions, and to modify weatherization work scopes to ensure that weatherization will not exacerbate existing conditions resulting in harm to building occupants. Consult the Deferral Policy when weatherization may place a person's health at risk.

As part of the initial application for weatherization, occupants shall be required to reveal any known or suspected health concerns. Occupants shall be screened again during the audit. During the audit process subgrantees should take all reasonable precautions by visually documenting (taking pictures of) the presence of mold, lead, asbestos or any toxic or potentially toxic conditions. Workers shall provide client information regarding any known risks. The client should be informed throughout this entire process of any issues or concerns discovered during the initial audit along with an explanation that weatherization would be inappropriate, or that the weatherization work scope must be modified or changed. The subgrantee must document its concerns in writing along with pictures and other relevant information and secure them in the client file. Traditional weatherization approaches may need to be modified, delayed or eliminated to ensure that unintended consequences are prevented. Workers shall provide client with worker contact information so client can inform other workers of any issues.

Audit Procedures:

- Identify and document existing and potential Health and Safety hazards that could be affected by weatherization activities.
- For each identified existing and potential hazard, determine whether it is an allowed WAP activity and within the resource limitations of the program.
- Identify whether the hazard should be mitigated before, during or after weatherization activities.
- Identify who is responsible for addressing each Health and Safety hazard (i.e., Subgrantee, the dwelling owner or client).
- Determine whether to go forward with weatherization, defer weatherization until the hazard is mitigated, or to walk away entirely.
- Provide written notification of the Health and Safety hazards to the owner/landlord in rental dwellings and to the client in both rental and owner-occupied dwellings. Include all information relevant to the hazard.
- Document the results of all hazard mitigation activities in the WAP software.

Documentation Form(s) have been developed (Check Yes or No):

Documentation forms must be developed, include the client's name and address, dates of the audit/assessment and when the client was informed of a potential health and safety issue, a clear description of the problem, a statement indicating if, or when weatherization could continue, and the client(s) signature(s) indicating that they understand and have been informed of their rights and options

Yes

No

Double Click To Open For Editing			
Cells this shade auto calculate			
Enter Measure ↓	Enter Cost ↓	Enter Frequency % ↓	Auto Calculates
CO monitor (2)	\$250.00	34.0%	\$85.00
smoke alarms (4)	\$150.00	76.0%	\$114.00
CO monitor and smoke combo	\$200.00	72.0%	\$144.00
bath exhaust fans (ASHRAE) (2)	\$590.00	30.0%	\$177.00
Venting for existing exhaust fans	\$150.00	24.0%	\$36.00
Kitchen exhaust fan	\$400.00	29.0%	\$116.00
Venting for existing kitchen exhaust	\$200.00	9.0%	\$18.00
ERV	\$750.00	5.0%	\$37.50
Whole house ventilation	\$300.00	10.0%	\$30.00
Smart switch	\$75.00	10.0%	\$7.50
Dryer vent	\$80.00	30.0%	\$24.00
CO ventilation	\$225.00	5.0%	\$11.25
Hi-Low venting	\$175.00	5.0%	\$8.75
Temp & Pressure release valve piping	\$72.00	12.0%	\$8.64
Removal and Disposal	\$200.00	5.0%	\$10.00
HVAC Clean and Tune	\$275.00	15.0%	\$41.25
HVAC Repair	\$600.00	10.0%	\$60.00
Filters	\$70.00	54.0%	\$37.80
HVAC Replacement	\$3,500.00	4.0%	\$140.00
Vapor Barrier	\$700.00	36.0%	\$252.00
Lead based paint testing	\$30.00	18.0%	\$5.40
Total Average H&S Cost Per Unit			\$1,364.09
Enter Estimated Production (Annual File: IV.2 WAP Production Schedule) →			305
Enter Estimated Program Operations Budget →			2773974
H&S Budget (Total Average H&S Cost Per Unit * Estimated Production)			\$416,047.45
Requested H&S Percentage Per Unit (H&S Budget/Program Operations)			15.0%

Air Conditioning and Heating Systems/Units	
<p>Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. Note: Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.</p>	
<p>Concur with WPN 17-7 <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/></p>	<p>Primary "red tagged", inoperable, or nonexistent heating system replacement, repair, or installation is allowed where climate conditions warrant, unless prevented by other guidance herein.</p> <p>Primary cooling system replacement, repair, or installation is allowed only in homes of at-risk occupants where climate conditions warrant.</p> <p>Primary systems are most relied upon to provide heating/cooling throughout the home. Secondary systems are employed only in extreme conditions.</p> <p>An attempt to cost-justify the measure must be made via the DOE approved audit tool prior to replacing/repairing with health and safety funds.</p>

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funding may be used to repair or replace primary air conditioning and heating systems per the Installation criteria listed below. Unsafe units must be repaired, removed, or rendered inoperable, or deferral is required. Replacement or installation of secondary units is not allowed.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

Air Conditioning and Heating Systems may only be replaced if determined to be a Health & Safety measure requiring action or as an Energy Conservation Measure (ECM) shown to have an SIR ≥ 1 as confirmed by a NEAT/MHEA audit. Otherwise, DOE WAP funds may not be used and agencies should work with the occupant where possible to direct them to alternative sources of funding or assistance.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

All combustion appliances must have combustion safety testing to confirm proper operation and carbon monoxide levels. If any combustion appliance is determined to not operate or operate properly or experience higher than acceptable CO levels, appropriate action must be taken to resolve the issue (specified below under Installation). A Carbon Monoxide detector must be installed per ASHRAE 62.2 2016 or most current standard. Determine and document presence of "at-risk" occupants when installing as a health and safety measure. Check DOE approved audit to determine if the system can be installed as an ECM prior to replacement as a health and safety measure. On combustion equipment, inspect chimney and flue and test for Combustion Appliance Zone (CAZ) depressurization. For solid fuel, appliances look for visual evidence of soot on the walls, mantel or ceiling or creosote staining near the flue pipe.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training will be provided using T&TA monies. Various trainings are offered covering different concepts related to Air Conditioning and Heating Systems including: BPI Building Analyst Professional, BPI Envelope Professional, BPI Heating Professional, BPI Manufactured Housing Professional, HVAC Clean and Tune, Combustion Safety Training (required), Understanding Manual J training, Home Energy Professional Trainings and CAZ depressurization test and inspection training.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

Occupant will be provided with documentation describing the specific Health & Safety risks associated with Carbon Monoxide, especially if an unvented space heater is left in the home as a secondary heat source or if a combustion appliance is installed inside the living space. Occupant will be provided with documentation regarding the proper use and ongoing maintenance of Air Conditioning and Heating units (annual inspection/cleaning, regular replacement of filters, proper use of programmable thermostats [if installed]). All documentation shall be signed by the client and maintained in the client file.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

All Air Conditioning and Heating systems which are replaced must be removed from the client's property and either recycled when possible or disposed of per local code requirements. Prior to weatherization, client shall sign a release for old equipment to be removed.

Air Conditioning Installation (as specific to installation as a health and safety measure): Provide a narrative on implementation protocols of air conditioning repair, replacement, and installation including justification for allowability that includes climate justification with degree days and how to define at-risk occupants

- Georgia consists of three distinct climate regions with different associated Cooling Degree Days as follows:
 - North – 1545 CDD, Central – 2334 CDD, South – 2519 CDD
- An at-risk occupant is defined as a person/household meeting one or more of the following conditions: an elderly person (65 years or older); a person with health condition(s) that would be exacerbated by exposure to high/low temperature conditions; a person who is pregnant; a household containing an infant(s) (2 years or less).
- Air conditioning systems should be inspected to verify proper functionality. If found to be either non-operable or not operating properly, *a clean-and-tune by a licensed HVAC professional should only be performed using DOE Health & Safety funds on dwellings with an at-risk occupant as defined above.* This should include inspection and cleaning of evaporator coil, inspection and correction of refrigerant charge if necessary, inspection and cleaning of blower fan, if necessary, and inspection and replacement of filter, if necessary.
- If Air conditioning system cannot be properly repaired or is non-operable, system should be replaced if the home qualifies as having an at-risk occupant as defined above. Air conditioning systems being replaced should meet the following applicable efficiency levels:
 - AC \geq 14.5 SEER / 12 EER
 - Heat Pump \geq 14.5 SEER / 12 EER air-source heat pump
- If funds do not allow this, documentation must be provided showing why this is not feasible.
- An air conditioning system may be replaced as an ECM if SIR \geq 1 and is confirmed by a NEAT/MHEA audit.
- Replacement system must be properly sized to the improved condition of the home in accordance with NEAT, ACCA Manual J, or other approved method.

Heating System Installation (as specific to installation as a health and safety measure): Provide a narrative on implementation protocols of Heating System repair, replacement, and installation including justification for allowability that includes climate justification with degree days

- Georgia consists of three distinct climate regions with different associated Heating Degree Days as follows:
 - North – 3500 HDD, Central – 2700 HDD, South – 1800 HDD
- An at-risk occupant is defined as a person/household meeting one or more of the following conditions: an elderly person (65 years or older); a person with health condition(s) that would be exacerbated by exposure to low temperature conditions; a person who is pregnant; a household containing an infant(s) (2 years or less).
- If any heating systems are found to be drafting improperly, appropriate action must be taken to alleviate the issue. Potential solutions include but are not limited to: eliminating pressure imbalances causing the excessive depressurization of the CAZ, isolating the appliance from the living space, repairing or replacing the flue/chimney, replacing the system.
- Heating systems experiencing CO levels higher than acceptable limits require a Clean-and-Tune by licensed HVAC professional, followed by additional CAZ testing to verify CO has been brought within acceptable limits. If appliance cannot be repaired to alleviate the CO problem, it should be replaced under Health & Safety.
- If a heating system cannot be properly repaired or is non-operable, system should be replaced if the home qualifies as having an at-risk occupant as defined above.
- Heating systems requiring replacement should be replaced with sealed/high efficiency (Furnace \geq 90+ AFUE / Heat Pump \geq 8.5 HSPF) units. If funds do not allow this, documentation must be provided showing why this is not feasible and should be replaced with \geq 80 AFUE or \geq 8.2 HSPF systems.
- A heating system may be replaced as an ECM if SIR \geq 1 and is confirmed by a NEAT/MHEA audit.
- Replacement system must be properly sized to the improved condition of the home in accordance with NEAT, ACCA Manual J, or other approved method.

Asbestos - in siding, walls, ceilings, etc.

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7

Alternative Guidance

Removal of siding is allowed to perform energy conservation measures. All precautions must be taken not to damage siding or asbestos-containing surfaces. Asbestos siding or asbestos-containing surfaces should never be cut or drilled. Where possible, insulate through home interior.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE funds may be used to remove siding in order to perform allowable weatherization measures. DOE funds may not be used to perform asbestos remediation.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

Asbestos remediation is beyond the scope of DOE WAP.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

Inspect exterior and interior surfaces and sub-surfaces for asbestos prior to drilling or cutting. If surfaces are found to contain asbestos, DOE funds may not be used to remedy and alternative strategies may be used to complete allowable weatherization measures. If after inspection, friable asbestos containing materials are found or suspected present, no blower door testing should be performed. If a home contains asbestos containing materials but does not contain friable asbestos or vermiculite, then the recommended best practice is to use the blower door to pressurize instead of depressurize the home.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training will be provided using T&TA monies covering safe practices for siding removal and replacement, and on how to identify asbestos containing materials.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

If asbestos siding or surfaces are present documentation will be provided to the client regarding potential health and safety concerns, location of those surfaces where asbestos has been identified, and how precautions will be taken. All documentation shall be signed by the client and maintained in the client file.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

Use of DOE WAP funds for disposal of surfaces containing asbestos is not allowed and should not be performed as a weatherization measure.

Asbestos - in vermiculite

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7



Alternative Guidance



When vermiculite is present, unless testing determines otherwise, take precautionary measures as if it contains asbestos, such as not using blower door tests and utilizing personal air monitoring while in attics. Where blower door tests are performed, it is a best practice to perform pressurization instead of depressurization. Encapsulation by an appropriately trained asbestos control professional is allowed. Removal is not allowed.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funds may be used for encapsulation of asbestos-containing vermiculite insulation by an appropriately trained asbestos control professional. DOE WAP funds may not be used for removal.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

Removal of asbestos-containing vermiculite insulation is beyond the scope of DOE WAP.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

Assess whether vermiculite is present. Asbestos Hazard Emergency Response Act of 1986 (AHERA) certified prescriptive sampling is allowed by a certified tester. If found, asbestos may be encapsulated by AHERA or other appropriately trained or certified asbestos control professional.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training will be provided using T&TA monies to teach auditors and crew members how to recognize asbestos in vermiculite.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

Clients will be instructed not to disturb suspected asbestos containing material. Client will be provided with asbestos safety information. Client will be formally notified if test results are positive for asbestos and agency will obtain signed acknowledgment by the client and maintain the documentation in the client file.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

Use of DOE WAP funds for disposal of asbestos in vermiculite is not allowed and should not be performed as a weatherization measure.

Asbestos - on pipes, furnaces, other small covered surfaces

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7

Alternative Guidance

Assume asbestos is present in covering materials. Encapsulation is allowed by an AHERA asbestos control professional and should be conducted prior to blower door testing. Removal may be allowed by an AHERA asbestos control professional based on the situation as determined by the inspector or subgrantee representative.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funds may be used for encapsulation and removal on a case-by-case basis. If it exceeds the incidental repair limit, then the home should be deferred.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

If encapsulation or removal is beyond the scope of the WAP, the home should be deferred.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

Assume asbestos is present in covering materials. If suspected, testing should be performed by an AHERA certified tester prior to any blower door testing or weatherization work on the suspected area(s). If necessary, removal and abatement may be performed by an AHERA asbestos control professional on a case-by-case basis.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training will be provided using T&TA monies to teach auditors and crew members how to recognize asbestos on pipes, furnaces, and other small surfaces.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

Clients should be instructed not to disturb suspected asbestos containing material. If asbestos on pipes, furnaces, or other surfaces is located, client will be provided with asbestos safety information and documentation describing where the asbestos was found. All documentation shall be signed by the client and maintained in the client file.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

Disposal of asbestos must be performed by a certified AHERA asbestos control professional and disposed of according to EPA guidance found here: <http://www.epa.gov/region4/air/asbestos/asbmatl.htm>

Fuel Leaks

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7



Alternative Guidance



When a minor gas leak is found on the utility side of service, the utility service must be contracted before work may proceed. Notify the utility and halt work if a leak is discovered during weatherization. Fuel leaks that are major (exceeding the health and safety limit) are the responsibility of the client (vs. the utility) and must be repaired before weatherizing a unit.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE funding may be used for the minor repair of fuel leaks. DOE funding may be not used for the environmental remediation of fuel leaks.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

Notify the utility or the client of the fuel leak before beginning work, or halt work that may be in progress until the leak is properly repaired.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

Test exposed gas lines for fuel leaks from utility coupling into and throughout, the home. Conduct sensory inspection on bulk fuels to determine if leak exists.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training will be provided to weatherization workers on fuel leak testing.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

Client will be informed in writing if fuel leaks are detected, documentation shall be signed by the client and maintained in the client file.

Building Structure and Roofing

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7



Alternative Guidance



Building rehabilitation is beyond the scope of the Weatherization Assistance Program. Homes with conditions that require more than incidental repair should be deferred. See Mold and Moisture, Code Compliance and Pests guidance below.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE funding may not be used for repair to building structure and roofing other than those allowable under Incidental Repairs as described above.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

Building rehabilitation is beyond the scope of DOE WAP and is cause for deferral.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

Testing is performed by visual inspection. Ensure that access to the portions of the home where weatherization will occur are safe for entry and performance of assessments, work and inspections. Building rehabilitation is beyond the scope of DOE WAP and is cause for deferral. Agencies should always seek to be aware of additional funds or services for building rehabilitation and provide information on all applicable options to the client.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Auditors and crews receive training using T&TA monies on how to identify structural and roofing issues, and how to ensure that access to areas necessary for weatherization is safe for entry and performance of assessment, work, and inspection.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

If structural or roofing issues are found that prevent weatherization work from proceeding, client will be provided with documentation of the issues and provided with guidance and available references on how to remedy the issues such that weatherization work can continue. All documentation shall be signed by the client and maintained in the client file.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

Building rehabilitation is beyond the scope of the Weatherization Assistance Program so disposal procedures are not applicable.

Code Compliance

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7



Alternative Guidance



Correction of preexisting code compliance issues is not an allowable cost other than where weatherization measures are being conducted. State and local (or jurisdiction having authority) codes must be followed while installing weatherization measures. Condemned properties and properties where "red tagged" health and safety conditions exist that cannot be corrected under this guidance should be deferred.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funds may not be used for correction of preexisting code compliance issues except in the case where weatherization measures are being conducted.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

Correction of preexisting code compliance issues is beyond the scope of DOE WAP.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

Testing is done by visual inspection. Correction of preexisting code compliance issues is not an allowable cost other than where weatherization measures are being conducted.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training will be provided using T&TA monies on local and state code requirements as they relate to weatherization work and how to identify any preexisting code compliance issues. Various trainings are offered covering different concepts related to code compliance including: BPI Building Analyst Professional, BPI Envelope Professional, BPI Heating Professional, BPI Manufactured Housing, BPI Whole House Air Leakage Control Installer, Circuit Rider Training, Codes Training, DET (Duct and Envelope Tightness) Verifier training and Home Energy Performance Trainings. Workers are directed to contact their local code official offices for questions regarding code compliance.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

Client will be provided information on any code compliance issues present in the home and how to address them. All documentation shall be signed by the client and maintained in the client file.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

When performing weatherization work where state and local (or jurisdiction having authority) codes must be followed, materials should be removed from client's home and either recycled when possible or disposed of properly.

Combustion Gases

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7



Alternative Guidance



Proper venting to the outside for combustion appliances, including gas dryers, refrigerators, furnaces, vented space heaters and water heaters is required. Correction of venting is allowed when testing indicates a problem. If unsafe conditions whose remediation is necessary to perform weatherization cannot be remedied by repair or tuning, replacement is an allowable health and safety measure.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funds may be used for repair or installation of proper venting of combustion appliances to the outside.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

Where conditions exist that cannot be corrected without endangering the crew, contractor or client, work must be deferred.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

- Combustion safety testing is required on all combustion appliances located in or adjacent to the living space – this includes heating systems, water heaters, dryers, ovens, cooktops. Venting of combustion appliances will be inspected to confirm proper functionality, code compliance, and confirm adequate clearances. All naturally drafting appliances will be tested for spillage under worst case conditions before and after air tightening and at the end of every day while weatherization work is underway. Cooking burners will be tested for operability and flame quality. Ovens will be tested to confirm CO levels are within acceptable limits.
- If combustion appliances are found to be failing spillage, appropriate action must be taken to alleviate the issue. Potential solutions include but are not limited to: eliminating pressure imbalances causing the excessive depressurization of the CAZ, isolating the appliance from the living space, repairing or replacing the flue/chimney, replacing the system (with the exceptions of ovens and ranges which may not be replaced with DOE funds).
- Combustion appliances experiencing CO levels higher than acceptable limits require a Clean-and-Tune by licensed HVAC professional, followed by additional CAZ testing to verify CO has been brought within acceptable limits.
- Kitchen vent hoods should be installed in homes where a gas cooktop exists and no exhaust ventilation is present.
- A Carbon Monoxide detector must be installed per ASHRAE 62.2 2016.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training is provided by Grantee technical staff or through a state approved Weatherization Training Center on how to perform appropriate testing, how to determine when a building is excessively depressurized, and the difference between air free and as measured. Various trainings are offered covering different concepts related to combustion gases including: Combustion Safety Training, BPI Building Analyst Professional, BPI Envelope Professional, BPI Heating Professional, BPI Manufactured Housing Professional, New Crew Basics, Assessment, Crew Leader, Circuit Rider Training, ASHRAE 62.2 2016, Ventilation Training and Home Energy Professional Training.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

Client will be provided with information on combustion safety and hazards, including the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO. All documentation shall be signed by the client and maintained in the client file.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

All combustion appliances or venting systems which are replaced must be removed from the client's property and either recycled when possible or disposed of per local code requirements.

Combustion Gas Problem Discovery: Provide a narrative describing the process to be followed when combustion gas testing reveals health and safety concerns.

- If combustion appliances are found to be failing spillage, appropriate action must be taken to alleviate the issue. Potential solutions include but are not limited to: eliminating pressure imbalances causing the excessive depressurization of the CAZ, isolating the appliance from the living space, repairing or replacing the flue/chimney, replacing the system (with the exception of ovens and ranges which may not be replaced with DOE funds).
- Combustion appliances experiencing CO levels higher than acceptable limits require a Clean-and-Tune by licensed HVAC professional, followed by additional CAZ testing to verify CO has been brought within acceptable limits. If appliance cannot be repaired to alleviate the CO problem, it should be replaced under Health & Safety (with the exception of ovens and ranges which may not be replaced with DOE funds).
- Kitchen vent hoods exhausting to the outside should be installed in homes where a gas oven or cooktop exists and no exhaust ventilation is present.

Electrical

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7



Alternative Guidance



Minor electrical repairs are allowed where health or safety of the occupant is at risk. Upgrades and repairs are allowed when necessary to perform specific weatherization measures. Evaluate and if necessary provide sufficient over-current protection and damming (if required) prior to insulating building components containing knob and tube wiring, as required by AHJ.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

When necessary to effectively weatherize a home and provided the cost does not exceed \$1,000 dollars, DOE WAP funds may be used for minor electrical repairs or upgrades of energy related health and safety. When necessary for the installation of an ECM(s) DOE funds may also be used to cover the cost of electrical inspections by a licensed electrician in order to verify proper electrical wiring and electrical wiring loads.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

Major electrical repairs or upgrades in excess of \$1,000 dollars are beyond the scope of DOE WAP and may be cause for deferral. Agencies should always seek to be aware of additional funds or services for electrical upgrades and/or repairs providing information on all such options to the client.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

Testing by visual inspection for presence and condition of knob and tube wiring. Voltage drop and voltage detection testing are allowed. Check for alterations that may cause an electrical hazard. Electrical hazards causing injury and fire can result from uncovered wiring, unsafe service boxes, knob-and-tube circuits spliced into improperly, and other electrical code violations. When concerns arise at the time of audit, electrical inspections and repairs by a licensed electrician are required before weatherization is done. Repairs or upgrades, if necessary, are to be made before air sealing and insulation work can proceed.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training will be provided using T&TA monies. Training will be provided on how to perform visual inspection of electrical systems to determine if electrical problems may exist and how to proceed if such problems are encountered and local or AHJ code compliance.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

If electrical problems are encountered, clients will be provided with information on electrical/safety risks and overloading circuits. All documentation shall be signed by the client and maintained in the client file.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

If minor electrical repairs or upgrades are performed which create materials requiring disposal, materials should be removed from client's home and either recycled when possible or disposed of properly.

Fire Hazards

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7 <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/>	Correction of fire hazards is allowed when necessary to safely perform weatherization.
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Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.
 DOE WAP funds may be used to correct fire hazards when necessary to safely perform weatherization.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.
 If fire hazards (such as improperly stored chemicals, combustible materials, etc.) exist which present a danger to the occupants or workers the home should be deferred. Agencies should always seek to be aware of additional funds or services correction of fire hazards and provide information on all applicable options to the client.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.
 If fire hazards are identified in a home, those hazards may be corrected if by doing so no danger is presented to the occupants or workers and if doing so is necessary to allow weatherization work to proceed safely.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.
 Training using T&TA monies will be provided on how to check for and recognize fire hazards in the home. Various trainings are offered covering different concepts related to fire hazards including: BPI Building Analyst Professional, BPI Envelope Professional, and Home Energy Professional Training.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.
 Client will be informed of any fire hazards observed in the home. All documentation shall be signed by the client and maintained in the client file.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.
 If correction of fire hazards is performed which creates materials requiring disposal, materials should be removed from client's home and either recycled when possible or disposed of properly.

**Formaldehyde, Volatile Organic Compounds (VOCs),
and other Air Pollutants**

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7 <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/>	Removal of pollutants is allowed and is required if they pose a risk to workers. If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client, the unit must be deferred. Refer to <i>Hazardous Materials Disposal</i> section for more information.
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Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.
 DOE funds may be used to remove pollutants if they pose a risk to workers.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.
 If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client, the unit must be deferred. Agencies should provide information to client on safety and proper disposal of household pollutants. Agencies should always seek to be aware of additional funds or services for removal of pollutants and provide information on all applicable options to the client.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.
 Sensory inspection will be performed to identify presence of pollutants in the home. If identified, pollutants should be removed from the home prior to beginning weatherization work, so long as by doing so no risk is presented to workers or occupants.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.
 Training will be provided on how to recognize potential hazards and when removal is necessary. Various trainings are offered covering different concepts related to pollutants: BPI Building Analyst Professional, BPI Envelope Professional, and Home Energy Professional Trainings.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.
 If pollutants are identified in the home, client will be informed of observed condition and associated risks. Client will be provided with written materials on safety and proper disposal of household pollutants. All documentation shall be signed by the client and maintained in the client file.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.
 Pollutants must be removed from clients' homes and must be disposed of properly at local household hazardous waste disposal facilities and/or in accordance with state and local regulations. Search here for local hazardous waste disposal facilities - <http://search.earth911.com/?what=HHW>. Such pollutants may never be disposed of in the regular household garbage, down the sewer, or on the ground.

**Injury Prevention of Occupants and Weatherization
Workers – Measures such as repairing stairs and replacing handrails.**

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is “required” or “not allowed” through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7

Alternative Guidance

Workers must take all reasonable precautions against performing work on homes that will subject workers or occupants to health and safety risks. When necessary to effectively weatherize a home, workers may make minor repairs and installations. Please refer to *Incidental Repair Measures* section for more details.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funding may be used as stipulated above.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

If the issue is determined to be beyond the scope of DOE WAP, crews/contractors shall follow all Georgia referral and deferral policies and protocols. Subgrantees should always seek to be aware of additional funds or services for injury prevention repairs and provide information on all applicable options to the client.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

Inspection will be performed to identify whether dangers are present in the home that would prevent weatherization work to proceed or would subject workers or occupants to health and safety risks. If these dangers are minor (see health and safety limits above) they may be corrected, as long as correction is necessary to allow weatherization work to proceed. If these dangers are major or if it is not necessary to repair the dangerous condition to allow weatherization work to proceed, the home should be deferred. The client should be given information on the dangers observed and provided with recommendations and referral information if available.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training will be provided on how to recognize and be aware of existing and/or potential dangers in a home that would prevent weatherization.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

Client will be provided with information on the observed hazards and associated risks. All documentation shall be signed by the client and maintained in the client file.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

If correction hazards is performed which creates materials requiring disposal, materials should be removed from client's home and either recycled when possible or disposed of properly.

Lead Based Paint

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7 <input checked="" type="checkbox"/>	Follow EPA's Lead; Renovation, Repair and Painting Program (RRP) when weatherization crews are working in pre-1978 housing. Deferral is required when the extent and condition of lead-based paint in the house would potentially create further health and safety hazards. Only those costs directly associated with the testing and lead safe practices for surfaces directly disturbed during weatherization activities are allowable. Documentation in the client file must include Certified Renovator certifications and a description of specific actions taken, testing, photos and site containment set up.
Alternative Guidance <input type="checkbox"/>	

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funding may be used to follow RRP when weatherizing homes containing Lead Based Paint.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

Deferral is required when the extent and condition of lead-based paint in the house would potentially create further health and safety hazards. Agencies should always seek to be aware of additional funds or services for dealing with Lead Based Paint and should provide information on all applicable options to the client.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

For all homes built prior to 1978, proper testing for Lead Based Paint must be performed and results must be documented. If tests are positive for Lead Based Paint and weatherization activities will disturb identified areas, EPA's Lead RRP practices and requirements will be followed. All weatherization crews working on pre-1978 homes must be accompanied by an EPA Certified Renovator. Job site testing setup and cleaning verification is required by a Certified Renovator. A copy of the Certified Renovator's report will be in the client file.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

EPA's Lead; Renovation, Repair and Painting Program Training must be provided using T&TA monies to all weatherization workers.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

All necessary documentation per RRP requirements will be provided to the client living in a pre-1978 home. All documentation shall be signed by the client and maintained in the client file.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

All materials containing or contaminated with Lead Based Paint must be disposed of properly according the RRP and LSW requirements.

Lead Based Paint Compliance: Provide a narrative describing how RRP will be conducted and how the grantee will verify compliance.

All weatherization workers must take the RRP course, which consists of 8 modules of classroom training, hands-on skills assessment, and a 25 question test. The Agenda for RRP is as follows:

- Why should I be concerned about Lead Based Paint?
- Regulations
- Before Beginning Work
- Contain Dust During Work
- During the Work
- Cleaning Activities / Check the Work
- Training Non-Certified Renovation Workers
- Recordkeeping
- Hands-on Skills Assessment
- Test

Each agency must have at least one Certified Renovator with current certification. Adherence to RRP requirements will be verified through monitoring of field activity and client file and record keeping documentation.

Mold and Moisture

(Including but not limited to: drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, leaking roofs, vapor retarders moisture barriers, etc.)

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7



Alternative Guidance



Limited water damage repairs that can be addressed by weatherization workers and correction of moisture and mold creating conditions are allowed when necessary in order to weatherize the home and to ensure the long term stability and durability of the measures. Source control is allowed when necessary to weatherize the home and to ensure the long-term stability and durability of the measures. Where severe mold and moisture issues cannot be addressed, deferral is required.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funding may be used to perform water damage repairs and correction of moisture and mold creating conditions when necessary in order to weatherize the home and to ensure the long term stability and durability of

the measures. DOE WAP funds may not be used for mold testing. Where severe mold and moisture issues cannot be addressed, deferral is required.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

Where mold and moisture issues cannot be addressed by weatherization workers as described below, deferral is required.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

See Mold Protocols below

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training (equivalent to the National Curriculum on Mold and Moisture) will be provided using T&TA monies and will cover the following: understanding sources of moisture, identifying the presence of mold through visual assessment, likely causes of mold outbreaks, use of diagnostic testing equipment, possible solutions. Various additional trainings are offered covering different concepts related to mold and moisture including: BPI Building Analyst Professional, BPI Envelope Professional, BPI Heating Professional, BPI Manufactured Housing Professional, BPI Whole House Air Leakage Control Installer, OSHA 10, OSHA 30, Infrared for Weatherization Training and Home Energy Professionals Trainings.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

Clients will be notified of the discovery of mold, the potential conditions causing the mold, and possible remedies. This documentation shall be signed by the client and maintained in the client file. The EPA pamphlet, "A Brief Guide to Mold, Moisture and Your Home", should be given to occupants and owners if mold is discovered. The pamphlet may be obtained online at: <http://www.epa.gov/mold/pdfs/moldguide.pdf>

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

Any materials containing or contaminated with mold as a result weatherization work of must be removed from the client's home and disposed of properly

Mold Protocols: Provide a narrative describing protocols for addressing mold found in the client's homes. The protocol should include a method of identifying the presence of mold during the initial audit or assessment, notification to the client, and crew training on how to alleviate mold and moisture conditions in homes.

All homes should be checked for mold during the initial inspection. If a mold condition is discovered during the initial inspection of the home that cannot be adequately addressed by the weatherization crew, then the dwelling unit should be referred to the appropriate public or non-profit agency for remedial action. As well, clients must be notified and informed of the presence of mold in their homes, and are to be given a copy of the pamphlet *A Brief Guide to Mold, Moisture, and your Home*.

- If the moldy area is less than 10 square feet (about 3 ft. by 3 ft.), then the job can potentially be handled by the weatherization crew.

- Professionals should be contacted when:
 - The mold covers more than 10 square feet;
 - There is evidence of extensive water damage;
 - It is suspected that the heating/ventilation/air conditioning (HVAC) system may be contaminated, i.e. there is mold near the intake of the system. The HVAC is not to be run, as it could spread mold throughout the house;
 - The water and/or mold damage was caused by sewage or other contaminated water;
 - There is a health concern.
- For instances when the moldy area is less than 10 square feet, the following steps may be taken:
 - Eliminate or repair all moisture problems using the aforementioned moisture protocols;
 - Scrub mold off hard surfaces with detergent and water, and dry completely;
 - Absorbent materials, such as ceiling tiles and carpet, may have to be thrown away when they become moldy. Mold can grow on or fill in the empty spaces and crevices of porous materials, so the mold may be difficult or impossible to remove completely;
 - Avoid exposing yourself or others to mold;
 - Do not paint or caulk moldy surfaces. Clean up the mold and dry the surfaces before painting. Paint applied to the moldy surfaces is likely to peel;
 - When unsure about how to clean an item, or if the item is expensive or of sentimental value, a specialist should be consulted;
 - Avoid breathing in mold or mold spores. In order to limit your exposure to airborne mold, N-100 respirators are recommended when working in moldy areas;
 - Wear gloves. Long gloves that extend to the middle of the forearm are recommended;
 - Wear goggles. Goggles that do not have ventilation holes are recommended;
 - Revisit the site(s) shortly after clean up to make sure that it shows no signs of water damage or mold growth.

Occupant Preexisting or Potential Health Conditions

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is “required” or “not allowed” through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7 <input checked="" type="checkbox"/>	When a person’s health may be at risk and/or the work activities could constitute a health or safety hazard, the occupant at risk will be required to take appropriate action based on severity of risk. Failure or the inability to take appropriate actions must result in deferral. See below under standards for remedy for additional details on how to proceed.
Alternative Guidance <input type="checkbox"/>	

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funds may be used to as stipulated above.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

Where client fails or is unable to take appropriate actions to avoid exacerbation of preexisting or potential health conditions the home must be deferred. Agencies should always seek to be aware of additional funds or services for addressing occupant preexisting or potential health conditions and should provide information on all applicable options to the client.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

GEFA has updated the client application form to include a section to solicit the occupants' health conditions, which may be exacerbated by weatherization work.

Workers must take all reasonable precautions against performing work on homes that will subject workers or occupants to health and safety risks. The subgrantee is advised to proceed cautiously when preparing to weatherize a dwelling unit where lead, mold, asbestos or other toxic conditions may be present. Subgrantees are advised to provide information and education to clients regarding the presence of toxic or potentially toxic materials and or conditions, and to modify weatherization work scopes to ensure that weatherization will not exacerbate existing conditions resulting in harm to building occupants. When a person's health may be at risk and/or the work activities could constitute a health or safety hazard, the occupant at risk will be required to take appropriate action based on severity of risk. Failure or the inability to take appropriate actions must result in deferral.

As part of the initial application for weatherization, occupants shall be required to reveal any known or suspected health concerns. Occupants shall be screened again during the audit. During the audit process subgrantees should take all reasonable precautions by visually documenting (taking pictures of) the presence of mold, lead, asbestos or any toxic or potentially toxic conditions. Workers shall provide client information regarding any known risks. The client should be informed throughout this entire process of any issues or concerns discovered during the initial audit along with an explanation that weatherization would be inappropriate, or that the weatherization work scope must be modified or changed. The subgrantee must document its concerns in writing along with pictures and other relevant information and secure them in the client file. Traditional weatherization approaches may need to be modified, delayed or eliminated to ensure that unintended consequences are prevented. Workers shall provide client with worker contact information so client can inform the workers of any issues.

Audit Procedures:

- Identify and document existing and potential Health and Safety hazards that could be affected by weatherization activities.
- For each identified existing and potential hazard, determine whether it is an allowed WAP activity and within the resource limitations of the program.
- Identify whether the hazard should be mitigated before, during or after weatherization activities.
- Identify who is responsible for addressing each Health and Safety hazard (i.e., Subgrantee, the dwelling owner or client).
- Determine whether to go forward with weatherization, defer weatherization until the hazard is mitigated, or to walk away entirely.
- Provide written notification of the Health and Safety hazards to the owner/landlord in rental dwellings and to the client in both rental and owner-occupied dwellings. Include all information relevant to the hazard.
- Document the results of all hazard mitigation activities.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training will be provided using T&TA monies on how to assess occupant preexisting conditions and what actions to take if the home is not deferred. Workers will also be trained on how to recognize potential hazards in a home that may cause exacerbation of preexisting or potential health conditions.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

Client will be provided information and written/visual documentation on any known risks discovered in the home, along with an explanation that weatherization would be inappropriate, or that the weatherization work scope must be modified or changed. If the intended weatherization work activities could constitute a health or safety hazard, the occupant at risk will be required to take appropriate action based on severity of risk in order for weatherization work to proceed. Documentation shall be signed by the client and maintained in the client file.

Worker Safety

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7 <input checked="" type="checkbox"/>	Workers must follow OSHA standards and Safety Data Sheets (SDS) and take precautions to ensure the health and safety of themselves and other workers. SDS must be posted wherever workers may be exposed to hazardous materials.
Alternative Guidance <input type="checkbox"/>	

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funds may be used to follow OSHA standards and instructions to ensure the health and safety of themselves and other workers.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

N/A

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

Subgrantees will be assessed and monitored to determine whether crews are utilizing safe work practices and following all OSHA standards. Any deficiencies found shall be documented and reported to the grantee, and appropriate action will be taken to address the issue including additional training, notification of "at-risk" status, or issuance of "stop work" order, until such time as it is determined that subgrantee understands all OSHA requirements and will adhere to them.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training will be provided using T&TA monies covering the use and importance of personal protection equipment. As part of all trainings provided to weatherization workers, sections focused on worker safety and PPE are always included. In addition to these training which include a focus on worker safety and PPE, OSHA 10 hour training will be provided to and required for all workers and monitors/auditors.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

N/A

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

All hazardous materials removed or created while performing weatherization work should be removed from the client's home and properly disposed of according to local and state requirement. These disposal costs are allowed as a health and safety cost.

OSHA and SDS Compliance: Provide a narrative describing procedures for implementation of OSHA and SDS requirements related to crew and worker safety, and what the process is for determining if crews are utilizing good safe work practices according to all requirements (EPA, OSHA, etc.).

OSHA 10 and 30 trainings may be provided to all workers and monitors/auditors. At all times, workers must follow OSHA standards and take precautions to ensure the health and safety of themselves and other workers. Safety Data Sheets (SDS) must be posted wherever workers may be exposed to hazardous materials.

During field visits of in-progress units, field monitors inspect to confirm adherence to OSHA safe work practice requirements and necessary posting and adherence to SDS. Monitors also perform file review for evidence of safe work practices. All findings are documented. Any non-compliance or deficiencies are addressed (with additional training provided when necessary) and the crews are re-monitored at a later date to verify compliance.

Pests

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7



Alternative Guidance



Pest removal is allowed only where infestation would prevent weatherization. Infestation of pests may be cause for deferral where it cannot be reasonably removed or poses health and safety concern for workers. Screening of windows and points of access is allowed to prevent intrusion.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funding may be used for pest removal only where infestation would prevent weatherization and for screening of windows and points of access to prevent intrusion.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

If infestation of pests poses a health and safety concern for workers or pests cannot be reasonably removed, the issue is beyond the scope of DOE WAP and the home should be deferred. Agencies should always seek to be aware of additional funds or services for pests and should provide information on all applicable options to the client.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training using T&TA monies will be provided on how to assess the presence and degree of infestation, associated risks, and need for deferral.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

If infestation of pests is present which presents a health and safety concern for workers and/or pests cannot be easily removed, thereby preventing weatherization work from being completed, client will be provided with information regarding observed conditions and associated risks. Where possible, client should be directed to other sources of funding or available services to remedy the problem. Agencies should always seek to be aware of additional funds or services for addressing pest infestation and should provide information on all applicable options to the client.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

If pest removal work is performed which creates materials requiring disposal, materials should be removed from client's home and either recycled when possible or disposed of properly.

Radon

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7



Alternative Guidance



Whenever site conditions permit, exposed dirt should be covered with a 6 mil or greater polyethylene sheeting, lapped at least 12 inches and sealed with appropriate sealant at all seams, walls and penetrations, except for mobile homes. Other precautions may include sealing any observed floor or foundations penetrations, including open sump pits, isolating the basement from the conditioned space and ensuring crawl space venting is installed.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funding may be used for installation of vapor barriers, and/or taking action to reduce the likeliness of making radon issues worse.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

Agencies should always seek to be aware of additional funds or services for radon mitigation and should provide information on all applicable options to the client.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

Whenever site conditions permit, except for mobile homes, a vapor barrier should be installed to cover exposed dirt. In homes where client's performed radon testing with levels above (4.0 pCi/L) precautions should be taken to reduce the likeliness of making radon issues worse. Please see deferral section.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training will be provided using T&TA monies covering what radon is, how and where it occurs, what factors may increase indoor radon levels, weatherization measures that may be helpful, and techniques and importance of vapor barrier installation. Various trainings are offered covering different concepts related to radon including: BPI Building Analyst Professional, BPI Envelope Professional, and Home Energy Professionals Trainings. Workers will be trained in proper vapor retarder installation. A zonal map for high radon potential can be located at <https://www.epa.gov/radon/epa-map-radon-zones>.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

All clients must sign the radon consent form. If client testing reveals high levels (4.0 pc/ml or higher) in a home, subgrantees should provide documentation and information to client regarding the dangers associated with radon and any available references or funding sources to address the issue. If home is suspected or tested to confirm higher than acceptable radon levels, client should be provided with *EPA Consumer's Guide to Radon Reduction* found here: <http://www.epa.gov/radon/pdfs/consguid.pdf>. All documentation shall be signed by the client and maintained in the client file.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

If work is performed which creates materials requiring disposal, materials should be removed from client's home and either recycled when possible or disposed of properly.

Hazardous Materials Disposal

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7 <input checked="" type="checkbox"/>	Hazardous Waste Materials generated in the course of weatherization work shall be disposed of according to all local laws, regulations and/or Federal guidelines, as applicable. Document proper disposal requirements in the contract or work order language with responsible party. Reclaim refrigerant per Clean Air Act 1990, section 608, as amended by 40 CFR82, 5/14/93. Refer to <i>Lead</i> and <i>Asbestos</i> sections for more information on these topics.
Alternative Guidance <input type="checkbox"/>	

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funding may be used for hazardous materials disposal and the reclaiming of refrigerant if repair or replacement of HVAC systems, or Refrigerators is performed for health and safety reasons or as an ECM and proven by NEAT/MHEA audit to have an SIR ≥ 1 .

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

Only Hazardous Waste Materials that are generated in the course of weatherization work shall be eligible under health and safety. These include but are not limited to mercury thermostats, CFLs and fluorescent lighting disposal.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

In order to perform testing, recharge, and/or reclaim refrigerant, workers must hold EPA-approved section 608 type I or universal certification. Normally, this will not be performed by weatherization workers. Refer to *Lead* and *Asbestos* sections for more information on this topic.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training may be provided using T&TA monies covering the concept of the refrigerant cycle and the importance and energy efficiency benefits of maintaining proper refrigerant charge in heat pump and A/C systems. Training of appropriate personal protective equipment (PPE) and disposal requirements for working with hazardous materials.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

Clients should not disturb refrigerant and should be informed in writing of hazards associated with hazardous waste materials being generated or handled in the home.

Safety Devices: Smoke, Carbon Monoxide Detectors, and Fire Extinguishers

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7



Alternative Guidance



Installation of smoke alarms is allowed where detectors are not present or are inoperable. CO alarms are required to comply with ASHRAE 62.2.2016.

Replacement of operable smoke/CO alarms is not an allowable cost. Providing fire extinguishers is allowed only when solid fuel (such as wood) is present.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funding may be used for installation of smoke alarms where detectors are not present or are inoperable. DOE WAP funding shall be used for installation of CO alarms where detectors are not present or are inoperable. DOE WAP funding may be used for providing fire extinguishers only when solid fuel is present.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

Replacement of operable smoke/CO alarms is not an allowable cost. Providing fire extinguishers is allowed only when solid fuel is present.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

Homes should be inspected to determine if smoke/CO alarms are present and/or operable. If not operable or present, smoke alarms may be installed per local and state codes. If not operable or present, CO alarms must be installed per local and state codes. A fire extinguisher may be provided in homes where primary heat source is wood. The fire extinguisher must be installed according to manufacturer standards and local code in vicinity of the primary heating source.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training will be provided using T&TA monies covering benefits of installing smoke/CO alarms, difference between CO alarms and CO detectors where to install alarms, and legal code compliance. Various trainings are offered covering different concepts related to smoke/CO alarms including: BPI Building Analyst Professional, BPI Envelope Professional, BPI Heating Professional, BPI Manufactured Housing, Circuit Rider Training and Home Energy Professional Trainings.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

Client will be provided with verbal and written information on use of smoke and CO alarms and fire extinguishers where allowed.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

Any smoke and CO alarms which are replaced should be removed from client's home and either recycled when possible or disposed of properly.

Space Heaters, Stand Alone Electric

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7



Alternative Guidance



Repair, replacement, or installation in not allowed. Removal is recommended.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funds may not be used with regards to stand-alone electric space heaters.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

N/A

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

Circuitry should be inspected to ensure adequate power supply for existing space heaters. Removal should be recommended.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training will be provided using T&TA monies to ensure workers understand guidance related to stand-alone electric space heaters.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

Client will be informed of hazards associated with electric space heaters. If client will not allow removal of electric space heater, client must sign a waiver and this documentation should be kept in the client's file.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

If electric space heaters are removed from the home, they should either be recycled when possible or disposed of properly.

Space Heaters, Unvented Combustion

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7



Alternative Guidance



Removal is required, except as secondary heat where the unit conforms to ANSI Z21.11.2. Units that do not meet ANSI Z21.11.2 must be removed prior to weatherization but may remain until a replacement heating system is in place.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funding may be used for the removal of unvented combustion space heaters. DOE WAP funds may not be used to repair or replace unvented combustion space heaters in mobile homes.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

N/A

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

If unvented combustion space heaters are present in a home, they must be removed, except as secondary heat where the unit conforms to ANSI Z21.11.2. Testing for air-free CO levels should be performed and documented. Units left in home should be checked for labels which ensure conformity to ANSI Z21.11.2. In mobile homes, unvented combustion space heaters must be removed before weatherization work may proceed.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training will be provided using T&TA monies covering how to perform air-free CO testing and understanding the dangers and health risks associated with unvented combustion space heaters. Training will also be provided on understanding the ANSI Z21.11.2 standard an installation of units which conform to that standard.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

Client will be informed of hazards and health risks associated with unvented combustion space heaters. If client will not allow removal of unvented combustion space heater, client must sign a waiver and this documentation should be kept in the client's file.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

If unvented combustion space heaters are removed from the home, they should either be recycled when possible or disposed of properly.

Space Heaters, Vented Combustion

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7

Alternative Guidance

Testing and Health and Safety replacement requirements for vented space heaters will be the same as those for furnaces.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funds may be used to replace vented space heaters when they pose a health and safety concern as identified through testing and visual inspections described above in "Air Conditioning and Heating Systems" section. Replacement of vented space heaters as an ECM with DOE WAP funds may only occur if $SIR \geq 1$, as demonstrated through a NEAT/MHEA audit. In Mobile Homes, DOE WAP funding may not be used to repair or replace vented combustion space heaters unless they meet the guidance set forth in WAP Program Notice 08-4 as follows: The Manufactured Home Construction and Safety Standards require all fuel-burning, heat-producing appliances in mobile homes, except ranges and ovens, to be vented to outside. Further, all fuel-burning appliances in mobile homes, except ranges, ovens, illuminating appliances, clothes dryers, solid fuel-burning fireplaces and solid fuel-burning fireplace stoves, must be installed to provide for the complete separation of the combustion system from the interior atmosphere of the manufactured home (i.e., to draw their combustion air from outside).

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

DOE WAP monies may only be used to replace vented space heaters if they pose as a health and safety concern or as an ECM if SIR \geq 1. Agencies should always seek to be aware of additional funds or services for replacement or repair of vented combustion space heaters and should provide information on all applicable options to the client.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

All combustion appliances must have combustion safety testing to confirm proper operation and carbon monoxide levels. If any combustion appliance fails combustion safety testing, appropriate action must be taken to resolve this issue(s) (specified below under Installation). A Carbon Monoxide detector must be installed per the Single Family Homes and Manufactured Housing Field Guides. In Manufactured Homes all fuel-burning, heat-producing appliances, except ranges and ovens, must be vented to the outside and must be installed to provide for the complete separation of the combustion system from the interior atmosphere of the manufactured home (i.e., to draw their combustion air from outside).

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training will be provided using T&TA monies. Various trainings are offered covering different concepts related to vented combustion space heaters including: BPI Building Analyst Professional, BPI Envelope Professional, BPI Heating Professional, BPI Manufactured Housing Professional, HVAC Clean and Tune, Combustion Safety Training (required), Circuit Rider Training, Understanding Manual J training and Home Energy Professional Trainings.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

Occupant will be provided with documentation describing the specific Health & Safety risks associated with Carbon Monoxide, especially if an unvented space heater is left in the home as a secondary heat source or if a combustion appliance is installed inside the living space. All documentation shall be signed by the client and maintained in the client file.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

All Vented Combustion Space Heaters which are replaced must be removed from the client's property and either recycled when possible or disposed of per local code requirements.

Gas Ovens/Stovetops/Ranges

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7



When testing indicates a problem, entities may perform standard maintenance on or repair gas cooktops and ovens. Replacement of ovens and ranges is not allowed.

Alternative Guidance <input type="checkbox"/>	
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Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.
DOE WAP funds may be used to repair gas ovens, stovetops and ranges.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.
DOE WAP funds may not be used to replace gas ovens, stovetops and ranges.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.
Test gas ovens for CO. Inspect cooking burners and ovens for operability and flame quality.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.
Training will be provided using T&TA monies to all weatherization professionals on proper testing techniques and CO action levels. Combustion safety training is mandatory.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.
Inform clients of the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO.

Ventilation and Indoor Air Quality

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7 <input checked="" type="checkbox"/>	ASHRAE 62.2 2016 is required to be met to the fullest extent possible when performing weatherization activities. Implementing ASHRAE 62.2 2016 is not required where acceptable indoor air quality already exists as defined by ASHRAE 62.2.2016 Existing fans and blower systems should be updated if not adequate according to ASHRAE 62.2.2016 requirements.
Alternative Guidance <input type="checkbox"/>	

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.
DOE WAP funds may be used to install or update ventilation in order to satisfy ASHRAE 62.2.2016 requirements.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

N/A

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

The following actions are required and must be performed in all homes in regards to ventilation: ASHRAE 62.2.2016 evaluation and calculations before and after weatherization work is performed (including Blower Door testing), pre-weatherization fan flow testing of existing systems, and post-installation fan flow testing of new installations in order to ensure compliance with ASHRAE 62.2.2016.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

ASHRAE 62.2 2016 training is required to ensure proper evaluation of ventilation needs and existing ventilation equipment, proper sizing of new systems, depressurization limits, and identification of critical air zones.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

Clients will be provided with information on purpose, function, use, and maintenance of ventilation systems and components. This information will include a disclaimer that ASHRAE 62.2 does not account for high pollution sources or guarantee indoor air quality. All documentation shall be signed by the client and maintained in the client file.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

If installation of equipment necessary to ensure adherence to ASHRAE 62.2.2016 is performed which creates old equipment or materials requiring disposal, materials should be removed from client's home and either recycled when possible or disposed of properly.

ASHRAE 62.2.2016 Compliance: Provide a narrative describing implementation of ASHRAE 62.2, which will be required during the 2012 program year. Grantees must provide justification if making changes to ASHRAE 62.2.2016 specific to their housing stock and local considerations.

In accordance with ASHRAE 62.2 2016, mechanical ventilation will only be installed in buildings requiring more than 15 CFM continuous ventilation.

Exceptions include:

- Install mechanical ventilation for spot moisture control in buildings requiring 1-15 CFM, where existing spot ventilation is not operated by the occupants for a reasonable amount of time per day.
- Install mechanical ventilation for spot moisture control in buildings requiring 1-15 CFM, where there is no pre-existing ventilation.
- Agencies may install mechanical ventilation in any buildings where there is documented evidence of moisture or indoor air quality problems. ASHRAE 62.2 2016 will be used to determine the needed ventilation.
- If the ASHRAE normative Appendix A is employed and an existing fan is being replaced or upgraded to meet mechanical ventilation requirements, take actions to prevent zonal pressure differences greater than three pascals across the closed door.

Window and Door Replacement, Window Guards

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is “required” or “not allowed” through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN 17-7



Alternative Guidance



Replacement, repair, and/or installation is not an allowable health & safety cost but may be allowed as an incidental repair or an ECM if SIR ≥ 1 .

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funds may not be used for replacement, repair, and/or installation of windows, doors, or window guards unless installed as an incidental repair or as an ECM with an SIR ≥ 1 .

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

If replacement, repair, and/or installation of windows, doors, or window guards is necessary, but falls outside the criteria for incidental repairs and/or does not have an SIR ≥ 1 , the home should be deferred. Agencies should always seek to be aware of additional funds or services for replacement, repair, and/or installation of windows, doors, or window guards and provide information on all applicable options to the client.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

If replacement, repair, and/or installation of windows, doors, or window guards is necessary, it must be determined whether it meets the criteria for incidental repairs. If so, it may be treated as such and addressed. If not, a NEAT or MHEA audit should be performed to determine whether the work meets an SIR ≥ 1 . If so, it may be addressed as an ECM. Otherwise, the home should be deferred.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training using T&TA monies will be provided on the awareness of the health and safety guidance as it relates to replacement, repair, and/or installation of windows, doors, or window guards and what qualifies as an incidental repair.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

If the home was constructed prior to 1978 and replacement, repair, and/or installation of windows, doors, or window guards is necessary and, information on lead risks, including the EPA Lead Safe Renovation, Repair, and Painting Rule “Renovate Right” pamphlet, will be provided to the client. All documentation shall be signed by the client and maintained in the client file.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

If replacement, repair, and/or installation of windows, doors, or window guards is performed which creates materials requiring disposal, materials should be removed from client's home and either recycled when possible or disposed of properly.

Biologicals and Unsanitary Conditions - odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.

Concurrence or Alteration: Check if you concur with existing guidance from WPN 17-7 or if you are using an alternative action/allowability. Include the guidance action/allowability from WPN 17-7 or alternative guidance in the space provided. Alternatives must be explained and comply with DOE guidance. **Note:** Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-7, the grantee must concur or choose to defer all units where the specific issue is encountered. Allowable items under WPN 17-7 leave room for determining if the issue or testing will be addressed and in what circumstances.

Concur with WPN17-7 <input checked="" type="checkbox"/>	Remediation of conditions that may lead to or promote biological concerns and unsanitary conditions is allowed. Addressing bacteria and viruses is not an allowable cost. Deferral may be necessary in cases where a known agent is present in the home that may create a serious risk to occupants or weatherization workers. Also see Mold and Moisture guidance below.
Alternative Guidance <input type="checkbox"/>	

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE funding may be used for remediation of conditions that may lead to or promote biological concerns and unsanitary conditions.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

Addressing bacteria and viruses is beyond the scope of DOE WAP. If outside funds or services for remediation of biologicals, unsanitary conditions, or addressing bacteria and viruses are available, these options should be presented to the client.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

Remediation is only allowed for conditions that may lead to or promote biological concerns and unsanitary conditions. Remediation of actual existing biological concerns and unsanitary conditions, including viruses and mold, is not allowed and is cause for deferral.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training will be provided using T&TA monies to teach auditors and workers how to recognize biological and unsanitary conditions and when to defer. Training will also focus on worker safety when coming in contact with these conditions.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan. **Note:** Some health and safety categories, like mold and moisture, require client education.

If biological or unsanitary conditions are found, client will be informed of observed conditions, their locations, and associated health risks. This documentation shall be signed by the client and maintained in the client file. Information will be provided on how to maintain a sanitary home and steps to correct deferral conditions.