Weatherization Grantee Health and Safety (H&S) Plan- Optional Template

Grantee Name

1.0 — GENERAL INFORMATION Additional information that does not fit neatly in one of the other sections of this document. Enter Additional H&S Information Here

2.0 - BUDGETING

Grantees are encouraged to budget H&S costs as a separate category and, thereby, exclude such costs from the Average Cost Per Unit (ACPU) cost limitation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. H&S costs that are budgeted and reported under the Program Operations category rather than the H&S category, the related H&S costs must be included in the calculation of the ACPU and cost-justified through the Grantee's Department of Energy (DOE)-approved energy audit tool.

Select which option used below.

Separate H&S Budget ☑ Contained in Program Operations □

3.0 – H&S EXPENDITURE LIMITS

Pursuant to 10 CFR 440.16(h), Grantees must establish H&S expenditure limits for their Program and provide justification for those limits by explaining the basis and related historical H&S expenditures. DOE acknowledges that it may be necessary for Grantees to deviate from historical expenditures when certain circumstances arise (e.g., funding source changes).

 $\underline{10 \ CFR \ 440.16(h)(2)}$ dictates that these limits must be expressed as a percentage of the ACPU. To calculate this percentage, use the following formula:

 $Total\ Average\ H\&S\ Cost\ per\ Unit = \frac{H\&S\ budget\ amount}{Program\ Operations\ budget\ amount}$

For example, if the ACPU is \$5,000 and a Grantee's Program expends an average of \$750 per dwelling on energy-related H&S measures, the Total Average H&S Cost per Unit would equal 15 percent. DOE acknowledges that this percentage may vary significantly between Grantees due to different geographical areas and depending upon the availability of other funding sources, resource availability, etc. Low percentages should include a statement of what other funding supports H&S costs, while larger percentages will require greater justification and relevant historical support.

15 percent is not a maximum limit on H&S expenditures. DOE will conduct a secondary level of review on H&S Plans with a Grantee request of more than 15 percent of Program Operations used for H&S purposes. DOE strongly encourages using the table below in developing justification for the requested H&S budget amount. In accordance with 10 CFR 440.18(d)(15), these funds are to be expended by the Program in direct weatherization activities, "of which is necessary before, or because of, installation of weatherization materials." This same section of the regulation excludes the H&S costs from the ACPU limitation if H&S costs are budgeted separately.

DOE recommends reviewing recent budget requests and compare those to actual H&S expenditures to see if previous budget estimates have been accurate. The resulting Total Average H&S Cost per Unit multiplied by the Grantee's production estimate in the Annual File should correlate to the H&S budget amount listed in the Grantee's annual plan.

H&S expenditure limits and justification explaining the basis for setting the limits.

Describe H&S Expenditure Limits and Justification Here

Utilizing the spreadsheet embedded below, provide a full list of H&S measures using historical data from your program, including average cost, and frequency rate. If installing more than a single instance of one measure in a unit (e.g. multiple CO alarms), Grantees may aggregate costs so that frequency does not exceed 100%, or enter a justification into the measure column, which explains why that measure has a frequency rate of over 100%. The spreadsheet will auto calculate your expected Total Average H&S Cost per Unit.

Instructions: Double-click icon directly below to open, view and edit Measure Matrix Spreadsheet. Complete the spreadsheet by entering the required information. To save, close the spreadsheet and it will save to this document. Alternatively, the measure matrix is also available as a standalone spreadsheet located at the following link: Weatherization Program Notice 22-7:

Weatherization Health and Safety | Department of Energy



Measure Matrix Final.xlsx

4.0 - INCIDENTAL REPAIR MEASURES

Any measures that could potentially be identified as H&S, but the Grantee chooses to instead identify and treat those measures as incidental repair measures (IRMs), must be implemented consistently throughout the Grantee's weatherization program. The measure must fit the regulatory definition of an IRM and be cost justified along with the associated energy conservation measure and/or package of measures. 10 CFR 440.3 defines Incidental Repairs as, "those repairs necessary for the effective performance or preservation of weatherization materials."

H&S measures identified and treated as IRMs within your Program.

List any H&S measures from the Table of Issues which are instead addressed as IRM with DOE WAP Funds

5.0 – OCCUPANT PRE-EXISTING OR POTENTIAL HEALTH CONDITIONS AND HAZARD IDENTIFICATION AND NOTIFICATION FORM(S)

Grantees must develop a written policy that includes, at a minimum, the following documentation relating to H&S Plan implementation and maintain signed copies in each client file. <u>Each notification must include</u> the occupant(s) (and landlord if applicable) name and address, be signed and dated by the occupant (and landlord if applicable) indicating that they understand and have been informed of their rights and options and signed by the Subgrantee personnel collecting the information.

Required topics are:

- Occupant Pre-existing or Potential Health Condition Screening
 - Provides documentation that allows occupant(s) to self-report known or suspected health concerns as part of initial application for weatherization, during the energy audit, or other part of the weatherization process as specified. Must minimally contain the following:
 - Any known risks associated with the measures and materials being installed

- Subgrantee point of contact information for occupant(s)
- Date of screening

Hazard Identification Notification

- Provides documentation that the occupant and landlord (if applicable), have been informed of any potential hazards
 identified during the energy audit or intake process. Must minimally contain the following:
 - Date(s) of the energy audit/assessment and when the occupant(s) (and landlord, if applicable) was informed of a potential H&S issue
 - A clear description of the problem, including any testing results
 - A statement indicating if, or when weatherization could continue

Radon Informed Consent Form

- Provides documentation that the occupant(s) (and landlord if applicable) have been informed of any potential hazards associated with radon in weatherized dwellings. The form must minimally contain the following:
 - An explanation on the potential small risk of increasing radon levels when building tightness is improved. This
 is based on the results of the <u>Buildings Assessment of Radon Reduction Interventions with Energy retrofits</u>
 <u>Expansion Study (The BEX Study)</u>
 - A list of precautionary measures WAP will install based on <u>EPA Healthy Indoor Environment Protocols.</u>
 - Some of the benefits of Weatherization including energy savings, energy cost savings, improved home comfort, and increased safety.

Procedure for soliciting occupants' health and safety concerns related to components of their homes

Maine WAP staff and contractors will be required to take all reasonable precautions against performing work on homes that will subject workers or clients to health and safety risks.

Before work begins on the residence, the agency/contractor must take into consideration the health concerns of each occupant, the condition of the dwelling, and the possible effect of work to be performed on any particular health or medical condition of the occupants.

Agencies will provide an "Occupant Pre-Existing or Potential Health Conditions" form to the client which explains that some weatherization measures create dust, smells, or other conditions that may aggravate certain health conditions in some individuals. The client will then have the opportunity to self-identify any pre-existing or potential health concerns that may be aggravated by weatherization services.

Agencies, and contractors, are to take into account the client's concerns to the extent feasible to minimize health risks, such as scheduling weatherization work when the at-risk occupants aren't present. It is the responsibility of the occupants to take the appropriate safety precautions to protect themselves and notify weatherization workers in advance of any health risks they may have. Clients will be provided a point of contact, in writing, so that the client can inform the agency of any new or developing health conditions. Failure or the inability to take appropriate actions must result in deferral.

Procedure for determining whether occupants suffer from health conditions which may be negatively impacted by the act of weatherizing their dwelling

weatherizing their dwelling			
See above			
Procedure for addressing potential health concerns including pre-existing health conditions when they are identified			
See above			
Location where forms have been uploaded/submitted			
Separate attachment to SF424 ■ Separate attachment to H&S Plan □			

6.0 — HEALTH AND SAFETY CATEGORIES

For each of the following H&S categories identified by DOE in the following tables, follow the directions below.

- Any section that is "Required" below must be explicitly detailed in the H&S Plan regardless of funding source used. If the Grantee checks the box for "Concurrence with DOE Guidance" the contents of the box may be left as it exists or reference the section/location within Grantee Policy and Procedure manual that contains language or insert Grantee specific language. If the "Alternative Guidance" box is checked, the Grantee must provide that alternative guidance in the box.
 - If a Grantee is proposing an alternative action/allowability for a "Required" item, the alternative requires comprehensive explanation of how it meets the intent of the DOE program notice.
 - If a "Required" item/category will not be addressed with any funding source and will always result in deferral, the H&S Plan must state that.
- Any section that is "Allowable" below must be detailed only if DOE WAP funds are used to implement the measures. If the Grantee uses DOE funds for any "Allowable" activities from the Table of Issues then they must be described here in detail, including defining "minor", "major", "limited", "case-by-case", and "at-risk" if the term is applied. If you only check the box "Allowed with Alternative Funds" then no additional information is required.
- Any section that is "Prohibited" below may not be addressed with DOE WAP H&S funds and does not need to be specifically addressed in the H&S Plan. The Grantee simply needs to check the "Concur with DOE guidance" box and indicate if the condition will result in deferral/referral.
- The Grantee H&S Plan may address additional H&S hazards specific to their program that are not included in the Table of Issues. If a Grantee chooses to include additional measures as DOE WAP funded H&S costs, the H&S Plan must include details pertaining to the measures allowed, testing required, and client education for these specific hazards.
- All required "Testing/Inspection" related items must be documented in the client file to verify completion and results.

6.1 – Air-Conditioning, Heating Systems, and Combustion Appliances			
Required Actions			
Concur with DOE Guidance ☑ Alternative Guidance □ Results in Deferral/Referral □			
DOE WAP H&S Funds ☑ Alternative Funds ☑		Alternative Funds ☑	

- Replace, repair, or install primary heating systems when existing primary heating systems are unsafe, inoperable, or nonexistent. No home may be left without a safe primary heating system after weatherization where climate conditions require heating (i.e., all climate zones except zone 1 as defined by ASHRAE). If unable to meet this requirement, deferral is required.
- No DOE-funded weatherization work is permitted if the completed dwelling unit will be heated with an unvented combustion space heater as the primary heat source. The primary heat source must be replaced with a vented unit prior to or by weatherization. The replacement unit must be sized to heat the entire dwelling unit.
- Unsafe secondary units, including space heaters, must be repaired, or removed and disposed of, or deferral is required. Secondary unvented space heaters are considered unsafe if they:
 - o are not listed and labeled as meeting ANSI Z21.11.2;
 - o have an input rating of more than 40,000 BTU/hour;
 - o are in a bedroom and have an input rating of more than 10,000 BTU/hour;
 - o are in a bathroom and have an input rating of more than 6,000 BTU/hour;
 - o are operating in an unsafe manner (e.g., high carbon monoxide (CO) readings, too close to combustible materials, lack sufficient combustion air volume);
 - o or are not permitted by the Authority Having Jurisdiction (AHJ).
- DOE WAP Grantees must comply with the Manufactured Home Construction and Safety Standards which mandates that:
 - All fuel-burning appliances in manufactured homes except: ranges, ovens, illuminating appliances, clothes
 dryers, solid fuel-burning fireplaces and solid fuel-burning 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), and be vented to outside the dwelling.
 - All appliances installed by weatherization in manufactured homes must meet these standards, including secondary heating sources. No unvented fuel-burning space heating appliances may remain in a MH after weatherization under any circumstances. If an occupant will not allow the removal of an unsafe combustion appliance from the home, deferral is required.
 - Repair or replace combustion gas venting to ensure proper combustion gas venting to outside the dwelling for all combustion appliances, including but not limited to gas dryers and refrigerators, furnaces, vented space heaters, and water heaters.
- If weatherization installs an appliance that is vented into a masonry chimney, the chimney must be lined in compliance with the International Fuel Gas Code (IFGC) or local AHJ if more stringent.
- Install adequate combustion air for all combustion appliances left after weatherization.
- If permits are required for heating/cooling system work, they must be secured and are a program operation cost if the installation is an ECM or may be included in the H&S cost if installed as a H&S measure.
- If unsafe conditions relating to existing combustion appliances require remediation to safely perform weatherization and cannot be remedied by repair or tuning, replacement is an allowable H&S measure unless prevented by other guidance herein.
- Documentation justifying the replacement with a cost comparison between replacement and repair must be maintained in the client file.
- When combustion safety tests fail, weatherization tasks are deferred until corrective action is taken. Clients are informed of issues and deferral in writing. A state licensed technician evaluates the system. If repair or replacement is recommended, DOE or leveraged funds are pursued first and used whenever allowable or available. If DOE is used for replacement or repair and results in SIR>1, it must be assigned as an ECM. If SIR is < 1, it must be assigned as H&S. If deemed outside the scope of weatherization, deferral is necessary.
- A CO alarm is the first measure installed in the home if there is none present.

	 After the weatherization measures are complete combustion appliances are operating safely. 	d, the home must be checked again to ascertain that all	
	Allowab	le Actions	
	Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds □	
	Repair and/or replacement of primary	heating systems is allowed using H&S funding.	
		ed Actions	
		OE Guidance 🗹	
		stallation of secondary heat sources is prohibited.	
	•	ting/Inspection	
	Concur with DOE Guidance ☑	Alternative Guidance ✓	
•	Verify that primary heating systems are present, operabl		
•	Conduct a visual inspection of all combustion appliances		
•	Conduct combustion appliance testing of all gas and liqui	• • • • • • • • • • • • • • • • • • • •	
•		ion of all combustion appliances and their related venting.	
•		ategory 1 appliances pre- and post-weatherization and before	
	leaving the home on any day when work has been done that could affect draft (e.g., air or duct sealing, adding exhaust ventilation).		
•	CO testing is required for all gas and liquid-fueled combu	stion appliances, regardless of venting type.	
•	Verify proper clearances for all combustion venting types	S	
•	fireplaces) including the venting system to ensure it adhe	installations (e.g., wood stoves, coal stoves, pellet stoves, eres to the applicable code or local authority having jurisdiction. ion. Appliances must be inspected pre- and post-weatherization ent H&S notification form.	
•	Since there is no consensus method for verifying safe operatesting policies and limits. If the Grantee does not propose vent must meet national or local codes, or the home can		
•	adequate floor protection, and code-compliant clearance		

Due to some limitations on testing imposed by the Maine Fuel Board (see links in Testing Protocols below) it is
 MaineHousing policy that oil-fired combustion heating appliances in homes to be weatherized must have been
 professionally serviced within the previous 12 months; and gas-fired combustion heating appliances must have been
 serviced within the previous 24 months, of the audit date. Documentation of the service date must be provided. Any
 combustion heating appliances that do not meet this requirement must receive a Clean Tune and Evaluate (CTE) by a
 licensed heating technician.

Grantee Combustion Testing Action Levels			
Guidance will be followed as outlined in BPI-1200 regarding testing and action levels			
Grantee Woodstove & Fireplace inspection/testing policy including actions/limits			
Concur with DOE Guidance 🗹 Alternative Guidance 🗹			
Fireplace or woodstove venting that is left operational after weatherization must meet current local or national standards or the			
home must be deferred.			
Required Occupant Education			
Concur with DOE Guidance ☑ Alternative Guidance □			

- Appropriate use and maintenance of units.
- Provide all paperwork and manuals for any equipment installed by weatherization.
- Discuss and provide information on proper disposal of bulk fuel tanks when not removed as part of the weatherization work.
- Where combustion equipment is present, provide combustion safety and hazards information including how to recognize depressurization, dangers of CO poisoning, and fire risks associated with combustion appliance use.

6.2 – Asbestos (Confirmed and/or Presumed Asbestos Containing Material)			
Required Actions			
Concur with DOE Guidance 🗹	Alternative	Guidance 🗆	Results in Deferral/Referral □
DOE WAP H&S Funds 🖸	1		Alternative Funds ☑
			uding vermiculite, assume they contain audit and work unless testing determines
asbestos contamination in the	ected ACM that provi	des for reasonable ar	nd necessary precautions to prevent as defined by EPA), including vermiculite.
 Decisions on approaches to potential weatherization work where asbestos is present shall be based on the judgment of the most qualified individual at the agency or a MaineHousing representative. When major energy-saving measures might be sacrificed as a result of suspected asbestos-containing materials, the agency or contractor may have the suspected material tested for asbestos content. 			
	Grantee A	CM policy	
Assess potential asbestos hazard; if unsure assess the material and to sample and test		ntains asbestos, cont	act a qualified asbestos professional to
Grantee Blo	ower Door Testing Po	licy When Suspected	ACM Exists
Blower door testing shall not b	e conducted when th	ere is the presence o	f suspected or confirmed ACM.
	Allowabl	e Actions	
Allowed with DOE WAP H&S F	unds 🗹	Allov	wed with Alternative Funds ☑
H&S fu	nding can be used for	testing of suspect m	aterials.
	Prohibite	d Actions	
	Concur with DO	DE Guidance 🛚	
Using DOE WAP H&S funds for general abatement/removal/or replacement of asbestos siding, thermal system insulation (TSI) or Transite, or vermiculite is prohibited.			
Required Testing/Inspection			
Concur with DOE Guidance 🗹		Guidance □	Results in Deferral/Referral
DOE WAP H&S Funds	1		Alternative Funds
Visually inspect all surfaces (i.e., wa	lls, floors, ceilings, roo	ofs) for suspected AC	M prior to drilling or cutting.
 Assume asbestos is present in suspentine. 			
	Allowable Test	ting/Inspection	
Allowed with DOE WAP H&S Fu	unds 🗹	Allov	wed with Alternative Funds ☑
H&S fu	nding can be used for	testing of suspect m	aterials.
Required Occupant Education			
Concur with DOE Guidance	· 🗹		Alternative Guidance

- Formally notify the occupant, and landlord if applicable, in writing:
 - of suspected ACMs that are present and what precautions will be taken to ensure the occupants' and workers' safety during weatherization;
 - o of results if testing was performed;
 - not to disturb suspected ACM;
 - When deferral is necessary due to asbestos, occupant, or landlord if applicable, must provide documentation that a certified professional performed the remediation before work continues.

6.3 – Biologicals and Unsanitary Conditions				
Required Actions				
Concur with DOE Guidance □ Alternative Guidance ☑ Results in Deferral/Referral □				
DOE WAP H&S Funds ☑ Alternative Funds ☑				
Maine Weatherization Standards, Section 4.9				
Allowed Actions				
Allowed with DOE WAP H&S Fur	Allowed with DOE WAP H&S Funds ☑ Allowed with Alternative Funds ☑			
 Remediation of a condition that may 	y lead to or promote	biological concern	s or unsanitary conditions is allowed,	
however, addressing bacteria and vi	ruses is not an allow	able cost.		
 Remediation of viruses is not an allo 	wable cost. Howeve	r, in the unprecede	ented environment of COVID 19, PPE,	
cleaning and disinfecting materials a	and supplies, and rea	sonable allowance	for extra time needed to meet safe work	
practice protocols specific to COVID	19 will be allowable	H&S costs.		
	See 6.	24, COVID 19		
	Required Testi	ng/Inspection		
Concur with DOE Guidance ✓				
DOE WAP H&S Funds ☑ Alternative Funds ☑				
Sensory inspection of interior, exterior, attics, and subspaces of the dwelling.				
Prohibited Testing/Inspection				
Concur with DOE Guidance 🗹				
DOE WAP H&S funds may not be used for testing of materials for biological contaminants.				
Required Occupant Education				
Concur with DOE Guidance ☑ Alternative Guidance □				
Inform occupant in writing of observed biological and unsanitary conditions.				

6.4 – Building Structure and Roofing (e.g., roofing, wall, foundation)		
Allowable A	Actions	
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds \square	
 Use testing equipment such as IR camera and moisture meter as well as visual inspection to determine the extent of issues. Structural issues that may pose any risk to clients or weatherization workers must be addressed prior to weatherization and in some cases, deferral is necessary. 		
• • • • • • • • • • • • • • • • • • • •	nerization workers must be addressed prior to weatherization	
• • • • • • • • • • • • • • • • • • • •	·	
and in some cases, deferral is necessary.	Actions	
and in some cases, deferral is necessary. Prohibited A Concur with DOE	Actions	
Prohibited A Concur with DOE Using DOE WAP H&S funds for major	Actions Guidance ☑	

Major unallowable structural or roofing repairs are those which include more than 15% of the total roof or structural area. In addition, major unallowable roof/structural repairs are those that result in exceeding the per contract H&S per unit average of \$1,200.00 Repairs exceeding the definition are unallowable major repairs. Required Testing/Inspection Alternative Guidance Concur with DOE Guidance

✓ Results in Deferral/Referral □ DOE WAP H&S Funds ☑ Alternative Funds □ Visual inspection of building structure and roofing for damages that compromise building durability and to verify that portions of the home where weatherization will occur are safe for entry and performance of assessments, work, and inspections. Allowable Testing/Inspection Allowed with DOE WAP H&S Funds □ Allowed with Alternative Funds □ If DOE WAP H&S Funds are used for any "allowable" testing, detail them here. **Prohibited Testing/Inspection** Concur with DOE Guidance ☑ Using DOE WAP H&S funds for any testing/evaluation of structural materials by a third-party is prohibited. **Required Occupant Education** Concur with DOE Guidance ☑ Alternative Guidance Notify occupant in writing of structurally compromised areas. **6.5 – Code Compliance Allowable Actions** Allowed with DOE WAP H&S Funds ☑ Allowed with Alternative Funds

✓ All repair and installation work on the weatherization work order shall conform to the local building codes when applicable, including, but not limited to, 2015IRC, the Maine Plumbing Code; the NFPA 70 National Electric Code; NFPA 101 Life Safety Code; NFPA 31 Standard for the Installation of Oil- Burning Equipment; NFPA 54 National Fuel Gas Code; NFPA 211 Standard for Chimneys, Fireplaces, Vents, and Solid Fuel-Burning Appliances; and ASHRAE 62.2-2016 Ventilation and Indoor Air Quality in Low-Rise Residential Buildings. **Prohibited Actions** Concur with DOE Guidance

✓ Using DOE WAP H&S funds for correction of preexisting code compliance issues not directly related to the installation of specific weatherization measures in the home is prohibited. Using DOE WAP funds for work on condemned properties and properties where H&S conditions exist that cannot be corrected under this guidance is prohibited **Required Testing/Inspection** Alternative Guidance \Box Concur with DOE Guidance ☑ Results in Deferral/Referral □ Alternative Funds □ DOE WAP H&S Funds Visual inspection. Allowable Testing/Inspection Allowed with DOE WAP H&S Funds ☑ Allowed with Alternative Funds □ Ventilation and Indoor Air Quality Combustion appliance operation and venting Electrical work related to installing building ventilation Electrical work related to health and safety items affecting worker safety found in the home. **Required Occupant Education**

Inform occupant in writing of observed code compliance issues when it results in a deferral.

Concur with DOE Guidance ☑

Alternative Guidance

6.6 – Electrical				
Required Actions				
Concur with DOE Guidance ☑	Alternative (Guidance □	Results in Deferral/Referral □	
DOE WAP H&S Funds ☑ Alternative Funds ☑				
Electrical Labor and Materials used to addre	ess K&T shall be cate	gorized as Incidental R	epair. Other electrical	
labor or materials use	ed to address worker	/client safety shall be	categorized as H&S.	
	Allowable	e Actions		
Allowed with DOE WAP H&S Fu			ed with Alternative Funds 🛘	
Minor allowable electrical repairs are those		exceeding the per cont e of \$1,200.00.	ract H&S per unit	
	Prohibite	d Actions		
	Concur with DC	E Guidance 🛚		
Using DOE WAP H&S funds f	for <i>major</i> electrical re	epairs as defined by th	e Grantee's H&S plan is prohibited	
	Define "ma	jor" repairs		
Repairs exceed	ing the definition of r	minor repairs are unall	owable major repairs.	
	Required Testi	ing/Inspection		
Concur with DOE Guidance ☑	Alternative (Guidance 🗆	Results in Deferral/Referral	
DOE WAP H&S Funds ☑			Alternative Funds ☑	
 Visual inspection for presence and co 	ondition of knob-and-	-tube wiring.		
 Evaluate knob-and-tube wiring for safety prior to work. 				
 Check for alterations that may create 	e an electrical hazard			
	Allowable Test	ing/Inspection		
Allowed with DOE WAP H&S Fu			ed with Alternative Funds ☑	
Knob and tube testi	ng by a licensed elect	rician is allowable to o	determine if it is energized.	
Required Occupant Education				
Concur with DOE Guidance		Δ	Alternative Guidance 🛚	
 Clients are notified in writing if there are electrical concerns or issues that require a deferral of services. 				
 If deferral is necessary, the client will be informed in writing of the nature and extent of the problem, how the problem results in deferral and corrective action needed for weatherization to proceed. 				

6.7 – Fuel Leaks				
Required Actions				
Concur with DOE Guidance ☑	Alternative Guidance 🗹 Results in Deferral/Referral 🗹		Results in Deferral/Referral ✓	
DOE WAP H&S Funds 🖸	DOE WAP H&S Funds ☑ Alternative Funds ☑			
 When a gas leak is found on the utility side of service, the utility service must be contacted, work must be temporarily halted, and the leak must be repaired before work may proceed. Fuel leaks that are the responsibility of the occupant (vs. the utility) must be repaired before installing weatherization measures in the home. 				
	Allowabl	e Actions		
Allowed with DOE WAP H&S Funds ☑ Allowed with Alternative Funds ☑				
Fuel and gas leaks on the client side of the utility can be repaired so that weatherization work can proceed.				
Prohibited Actions				

Concur with DOE Guidance				
 Using DOE WAP H&S funds to repair leaks that are the responsibility of the utility to correct is prohibited. 				
 Using DOE WAP H&S funds for environmental cleanup resulting from bulk fuel leaks is prohibited 				
Required Testing/Inspection				
Concur with DOE Guidance ☑ Alter	native Guidance 🛚	Results in Deferral/Referral		
DOE WAP H&S Funds ☐ Alternative Funds ☐				
Test all exposed gas lines, fittings, valves, and con-	nections for fuel leaks from	utility connection to the appliance		
throughout the home.				
 Test all gas appliances for fuel leaks at all connections, valves, fittings, and burners. 				
 Conduct sensory inspection of all bulk fuels lines a 				
, ,	ole Testing/Inspection			
Allowed with DOE WAP H&S Funds □		owed with Alternative Funds		
If DOE WAP H&S Funds are				
	ted Testing/Inspection			
	with DOE Guidance 🗹			
Using DOE WAP H&S funds for en		or water is prohibited		
	d Occupant Education	or water is prombited.		
Concur with DOE Guidance ☑	d Occupant Education	Alternative Guidance		
Inform occupants in writing of fuel leak te	sting results, including sne			
morni occupants in writing of facilical te	string results, including spec	the location in fact leaks are detected.		
6.8 – Gas Ov	vens/Stovetops/Rang	ges		
	lowable Actions			
Allowed with DOE WAP H&S Funds ☑	Allo	owed with Alternative Funds ☑		
Repair and/or replacement or gas ovens/stoveto	ps/ranges is allowed.			
 Unsafe gas cooking appliances must be repaired 	-	may be used for renair only not		
replacement.	ii cost cirective. Doe ranas	may be used for repair only, not		
 Unsafe gas cooking appliances may be replaced un 	ısing HFAP Weatherization	funds when that funding is available		
onsure gas cooking appliances may be replaced to	John S 1127 II Weather 12ation	Tarias Wiler triacrariang is available.		
Follow BPI safety	protocols for any actionabl	e levels of CO.		
	ed Testing/Inspection			
	native Guidance	Results in Deferral/Referral		
DOE WAP H&S Funds		Alternative Funds □		
Use a gas leak detector to test for leakage on fue	ol supply lines. Verify leaks			
 Visually inspect oven for carbon build-up and flat 		with bubble solution.		
 Visually inspect over 101 carbon build-up and half Visually inspect burner flames for size and color of 	, -	ssively high and orange it may be set up for		
the wrong fuel. Discontinue testing and inform of				
Monitor ambient CO when testing oven and flam		•		
_		Follow protocol for actionable levels of CO		
 Measure CO in the appliance vent and compare to and other issues. See section 6.8 Combustion Gase 		. Follow protocor for actionable levels of CO		
	oven CO testing and resul	ting actions		
		•		
Action levels can be found in BPI-1200 and Maine WAP Guidance				
Allowable Testing/Inspection				
Allowed with DOE WAP H&S Funds □		owed with Alternative Funds		
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.				
Required Occupant Education				

Concur with DOE Guidance ☑	Alternative Guidance □		
Inform occupants of the importance of using exhaust ventilation when cooking and the importance of keeping burners and			
broilers clean to limit the production of CO.			
• Inform clients of signs of potential problems such as flame impingement and CO emissions and stress the importance of maintenance.			
 Stress the importance of using exhaust ventila 	tion when operating the stove.		
 Ensure client understands CO alarm operation 	and signals.		
6.9 –	Hazardous Materials		
Required Actions			
Concur with DOE Guidance ☑ Al	ternative Guidance ☐ Results in Deferral/Referral ☑		
DOE WAP H&S Funds ☑ Alternative Funds ☑			
Hazardous Waste Materials generated by weatherization work (e.g., refrigerant, asbestos, lead, mercury, CFL lighting			
bulb/ballasts, etc.) must be disposed of according to all local and federal laws, regulations, and guidelines, as applicable.			
Costs specifically related to disposal may be charged as a H&S expense.			
Subgrantees must document disposal requirements in contract language with the responsible party.			
• Limited removal of pollutants that pose a risk to workers is required (e.g., flammable liquids, hazardous chemicals, and			

 Subgrantees must document disposal requirements in contract language with the responsible party. 			
• Limited removal of pollutants that pose a risk to workers is required (e.g., flammable liquids, hazardous chemicals, and			
other air pollutants) as defined the Grantee's H&S Plan.			
If removal cannot be performed or is not allowed by the occupant, the unit must be deferred.			
Define "limited" removal of pollutants			
Removal of pollutants is required if they pose a risk to weatherization workers. DOE H&S funds may be used. If removal cannot			
be performed or is not allowed by the client, deferral is	necessary and the deferr	al policy will be followed.	
A	llowable Actions		
Allowed with DOE WAP H&S Funds ☑ Allowed with Alternative Funds □			
Limited ren	noval is allowed as descr	ibed above	
P	rohibited Actions		
Concur	with DOE Guidance ☑		
Using DOE WAP H&S funds for Lea	ad, Asbestos, and Radon	abatement is prohibited.	
Requir	ed Testing/Inspection		
Concur with DOE Guidance ☑ Alte	rnative Guidance 🏻	Results in Deferral/Referral ✓	
DOE WAP H&S Funds □		Alternative Funds □	
Se	Sensory inspection.		
Allowable Testing/Inspection			
Allowed with DOE WAP H&S Funds □	Allowed with DOE WAP H&S Funds ☐ Allowed with Alternative Funds ☐		
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.			
Prohibi	Prohibited Testing/Inspection		
Concur	with DOE Guidance 🗹		
Using DOE WAP H&S funds for any testing for hazardous materials other than that specifically permitted in the asbestos, lead, and			
radon sections of this document is prohibited.			
Required Occupant Education			

Alternative Guidance

Concur with DOE Guidance

- Inform occupant in writing of hazards associated with hazardous waste materials being generated/handled in the home.
- Inform occupant in writing of observed hazardous condition and associated risks.
- Provide occupant written materials on safety issues and proper disposal of household pollutants.

6.10 - Injury Prevention of Occupants				
	Allowable	e Actions		
Allowed with DOE WAP H&S Funds ☐ Allowed with Alternative Funds ☐				
DOE H&S funds are strictly for safet	DOE H&S funds are strictly for safety issues related to weatherization activities. Issues of accessibility or home repair must			
be referred to other programs.				
	Prohibite	d Actions		
	Concur with DC	DE Guidance 🗹		
Using DOE WAP H&S funds	for <i>major</i> repairs, as	defined by the Gran	tee's H&S Plan is prohibited	
	Define "ma	jor" repairs		
Minor allowable injury prevention measures are those that don't result in exceeding the per contract H&S per unit average of \$1,200.00. Repairs exceeding the definition are unallowable major repairs.				
	Required Testi			
Concur with DOE Guidance 🗹	Alternative (Guidance □	Results in Deferral/Referral	
DOE WAP H&S Funds			Alternative Funds □	
Visually in	spect for dangers that	would prevent wea	therization.	
	Allowable Test	ing/Inspection		
Allowed with DOE WAP H&S Fu	ınds 🗆	Allo	wed with Alternative Funds	
If DOE WAP H	&S Funds are used fo	r any "allowable" te	sting, detail them here.	
	Required Occup	pant Education		
Concur with DOE Guidance	Concur with DOE Guidance ☑ Alternative Guidance □			
If identified hazardous conditions will not be	e corrected during we	atherization, inform	occupant in writing of observed hazards and	
associated risks utilizing the "Hazard Identification Notification Form" required by WPN 22-7.				
6.11 – Lead-Based Surface Coverings (Paint, Varnishes, Roofing, etc.)				
	Required			
Concur with DOE Guidance 🗹	Alternative (Guidance 🛚	Results in Deferral/Referral ☑	
DOE WAP H&S Funds ☑			Alternative Funds ☑	
• Subgrantees must comply with EPA's Lead; Renovation, Repair and Painting Program (RRP) rules when working in pre-				
1978 housing unless testing confirms the work area to be lead free. This includes, but is not limited to:				
 Client file documentation including the Certified Renovator's certification; any training provided on-site; description of 				
•	_	•	hotos of site and containment set up.	
Include the location of photos referenced if not in file.				
 Job site set up and cleaning verification by a Certified Renovator. 				
 Only those costs directly associated with lead safe work practices for surfaces directly disturbed during weatherization 				
activities are allowable WAP H&S ex	<u> </u>			
	Allowable			
Allowed with DOE WAP H&S Fu			wed with Alternative Funds	
Costs directly associated with lead	•	·	isturbed during weatherization activities are	
allowable H&S expenses.				
	Prohibite	d Actions		

Concur with DOE Guidance ☑				
 Using DOE WAP H&S funds for lead abatement is prohibit 	Using DOE WAP H&S funds for lead abatement is prohibited.			
	naintenance of X-ray Fluorescence (XRF) devices is prohibited.			
	ing/Inspection			
Allowed with DOE WAP H&S Funds □	Allowed with Alternative Funds □			
	r any "allowable" testing, detail them here.			
	pant Education			
Concur with DOE Guidance 🗹	Alternative Guidance			
Follow pre-renovation education	requirements per EPA RRP rules.			
6.12 – Mold a	and Moisture			
Allowabl	e Actions			
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds □			
 Limited water damage repairs are allowed, using DOE full 	inds, when necessary in order to weatherize the home and to			
ensure the long-term stability and durability of the meas	sures.			
 Source control is allowed when necessary in order to we 	eatherize the home and to ensure the long- term stability and			
durability of the measures. Source control is independen	nt of latent damage and related repairs. Extensive issues with			
grade and water table that require excavation may be d	eemed outside the scope of weatherization. See definition of			
"Minor" below.				
 Where severe Mold and Moisture issues cannot be addr 	essed, deferral is required.			
 Mold cleanup is not an allowable H&S cost. 				
 Surface preparation where weatherization measures are 				
order to apply caulk) must be charged as part of the ECN	Λ, not to the H&S budget			
category.				
	-			
Prohibite	d Actions			
Prohibite Concur with DO	d Actions DE Guidance ☑			
Prohibite Concur with DO Using DOE WAP H&S funds for mold cleanup is prohibited.	d Actions DE Guidance ☑ d.			
 Prohibite Concur with DO Using DOE WAP H&S funds for mold cleanup is prohibited Using DOE WAP H&S funds for window and door replacer 	d Actions DE Guidance ☑ d. ments is prohibited			
Prohibite Concur with DO Using DOE WAP H&S funds for mold cleanup is prohibited Using DOE WAP H&S funds for window and door replacer Required Test	d Actions DE Guidance ☑ d. ments is prohibited ing/Inspection			
Prohibite Concur with DO Using DOE WAP H&S funds for mold cleanup is prohibited Using DOE WAP H&S funds for window and door replacer Required Test Concur with DOE Guidance ☑ Alternative O	d Actions DE Guidance ☑ d. ments is prohibited ing/Inspection Guidance □ Results in Deferral/Referral □			
Prohibite Concur with DO Using DOE WAP H&S funds for mold cleanup is prohibited Using DOE WAP H&S funds for window and door replacer Required Test Concur with DOE Guidance ☑ Alternative O DOE WAP H&S Funds □	d Actions DE Guidance ☑ d. ments is prohibited ing/Inspection Guidance □ Results in Deferral/Referral □ Alternative Funds □			
Prohibite Concur with DO Using DOE WAP H&S funds for mold cleanup is prohibited Using DOE WAP H&S funds for window and door replacer Required Test Concur with DOE Guidance ☑ Alternative of DOE WAP H&S Funds □ Visual assessment for moisture or mole	d Actions DE Guidance d. In ments is prohibited ing/Inspection Guidance Results in Deferral/Referral Alternative Funds Id damage including exterior drainage.			
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Prohibite Concur with DO Using DOE WAP H&S funds for mold cleanup is prohibited Using DOE WAP H&S funds for window and door replacer Required Test Concur with DOE Guidance ☑ Alternative of DOE WAP H&S Funds □ Visual assessment for moisture or mole Allowable Test Allowed with DOE WAP H&S Funds □ If DOE WAP H&S Funds are used for Prohibited Test Concur with DOE	Actions DE Guidance Id. Inents is prohibited Ing/Inspection Guidance Alternative Funds Id damage including exterior drainage. Iting/Inspection Allowed with Alternative Funds r any "allowable" testing, detail them here. Iting/Inspection DE Guidance Identify Inspection Allowed with Alternative Funds Identify Inspection Control of the control o			
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Required Actions

Alternative Guidance □

Results in Deferral/Referral

✓

Concur with DOE Guidance ☑

DOE WAP H&S Funds]		Alternative Funds □		
When a person's health may be at risk and/or WAP work activities could constitute an H&S hazard, the occupant is					
required to take appropriate action	based on severity of r	isk.			
	Allowable	Actions			
Allowed with DOE WAP H&S Fo	unds 🗆	Allow	ed with Alternative Funds 🛘		
If DOE WAP H	&S Funds are used fo	r any "allowable" actio	ons, detail them here.		
	Required Testi	ng/Inspection			
Concur with DOE Guidance 🗹	Alternative (Guidance 🗆	Results in Deferral/Referral		
DOE WAP H&S Funds]		Alternative Funds □		
 Screen occupants for known or susp 	ected health concerns	s either as part of initi	al application for weatherization, during		
the audit, or both.					
 This is done utilizing the "Occupant 	Pre-existing or Potent	ial Health Condition S	creening Form" required by WPN 22-7.		
	Allowable Test	ing/Inspection			
Allowed with DOE WAP H&S Fu	unds 🗆	Allow	ed with Alternative Funds 🛘		
If DOE WAP H	H&S Funds are used fo	r any "allowable" testi	ng, detail them here.		
	Required Occup	oant Education			
Concur with DOE Guidance ☑ Alternative Guidance □			Alternative Guidance 🛚		
Inform occupant in writing of any known risks and provide pre-weatherization screening form.					
Provide occupant with Subgrantee point of contact information in writing.					
	6.14 –				
	Required				
Concur with DOE Guidance 🗹	Alternative (Suidance L	Results in Deferral/Referral 🗹		
DOE WAP H&S Funds ☑			Alternative Funds ☑		
Deferral of homes where infestation of pests cannot be reasonably removed or poses H&S concern for workers.			or poses H&S concern for workers.		
Allowable Actions					
Allowed with DOE WAP H&S Funds Allowed with Alternative Funds Allowed with Alternative Funds					
If DOE WAP H&S Funds are used for any "allowable" actions, detail them here.					
	Allowable Test	•			
Allowed with DOE WAP H&S Funds Allowed with Alternative					
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.					
Required Occupant Education					
Concur with DOE Guidance Alternative Guidance					
Inform occupa	ant in writing of obser	ved conditions and ass	sociated risks.		
	6.15 –	Radon			
Required Actions					
Concur with DOE Guidance ☑	Alternative (Results in Deferral/Referral		
Concur with DOE Guidance E	Aiternative	Juluanice 🗀	vesairs in perelial/verellar 🗖		

Cover exposed dirt floors within the pressure/thermal boundary with a sealed soil gas retarder

Allowable Actions

DOE WAP H&S Funds ☑

Allowed with DOE WAP H&S Funds ☑

Implement ventilation as required by ASHRAE 62.2-2016

Cover sump well/pits with airtight covers

Alternative Funds

✓

Allowed with Alternative Funds

✓

- Radon mitigation is not an allowable H&S cost.
- Clients must sign an informed consent form prior to receiving weatherization services. This form must be kept in the client file.
- In homes where radon may be present, work scope should include precautionary measures based on EPA Healthy Indoor Environment Protocols for Home Energy Upgrades, to reduce the possibility of making radon issues worse. Whenever site conditions permit:
- Cover exposed dirt floors within the pressure/thermal boundary with 6 mil (or greater) polyethylene sheeting, lapped at least 12" and sealed with appropriate sealant at all seams, walls and penetrations.
- Other precautions may include, but are not limited to, sealing any observed floor and/or foundation penetrations, including open sump pits, isolating the basement from the conditioned space.

Maine climate rules out passive ventilation of basements. When CAZ issues are not a concern, mechanical exhaust may be

installed in the basement as a H&S measure.			
Prohibited Actions			
Concur with DOE Guidance ☑			
Using DOE WAP H&S funds for radon mitigation is prohibited.			
Allowable Testing/Inspection			
Allowed with DOE WAP H&S Funds □ Allowed with Alternative Funds □			
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.			
Required Occupant Education			
Concur with DOE Guidance ☑ Alternative Guidance □			
Provide all occupants EPA's A Citizen's Guide to Radon and inform them of radon related risks.			
 Occupants must sign an informed consent form prior to receiving weatherization services. 			

6.16 – Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers				
Required Actions				
Concur with DOE Guidance ☑	Alternative (Guidance □	Results in Deferral/Referral □	
DOE WAP H&S Funds ☑			Alternative Funds ☑	
Install CO alarms in every home where alar	ms are not present or a	are inoperable in com	pliance with ASHRAE 62.2-2016 which	
references NFPA 720 (note: NFPA 720 has b	een incorporated into	NFPA 72).		
	Allowable	e Actions		
Allowed with DOE WAP H&S F	unds 🗹	Allow	ed with Alternative Funds ☑	
 When a dwelling has any combust 	ion appliances and no	operable CO alarms a	re present, at least one carbon monoxide	
(CO) alarm must be installed in the dwelling prior to weatherization measures being installed.				
 CO alarms must be installed in all 	homes where none cu	rrently exist or existing	g alarms do not function, whether	
there are combustion appliances in the home or not.				
All CO alarms installed shall be the equivalent to the latest Underwriters Laboratory standard, ANSI/UL 2034, and comply				
with NFPA 720. Installed CO alarms may be used that sound alarm at a lower concentration of CO than 9ppm.				
Prohibited Actions				
Concur with DOE Guidance ☑				
Using DOE WAP H&S funds for replacement of functional smoke or CO alarms that are not beyond the manufacturer's stated				
lifetime is prohibited.				
Required Testing/Inspection				
Concur with DOE Guidance ✓	Alternative Guidance ☐ Results in Deferral/Referral ☐		Results in Deferral/Referral □	
DOE WAP H&S Funds □ Alternative Funds □				

Verify operation and age of installed alarms.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds □	Allowed with Alternative Funds □		
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.			
Required Occupant Education			
Concur with DOE Guidance ☑ Alternative Guidance □			
Provide occupant with verbal and written information on use of newly installed devices and the potential risks of not properly			
maintaining these devices.			

6.17 – Ventilation and Indoor Air Quality				
	Required	Actions		
Concur with DOE Guidance 🗹	Alternative Guidance ☐ Results in Deferral/Referral ☑		Results in Deferral/Referral ✓	
DOE WAP H&S Funds 🖸	1		Alternative Funds ☑	
Install ventilation as required by ASHRAE 6	2.2 - 2016. If occupant	refuses ventilation as	required by ASHRAE 62.2, the home must	
	be def	erred.		
	Allowable	e Actions		
Allowed with DOE WAP H&S Funds ☐ Allowed with Alternative Funds ☐			ed with Alternative Funds 🛘	
If DOE WAP H	&S Funds are used fo	r any "allowable" actio	ons, detail them here.	
	Required Testi	ng/Inspection		
Concur with DOE Guidance 🗹	Alternative Guidance Results in Deferral/Referral		Results in Deferral/Referral ✓	
DOE WAP H&S Funds			Alternative Funds ☑	
ASHRAE 62.2 evaluation to determine required post-weatherization ventilation.				
Measure fan flow of existing fans and of installed equipment to verify performance.				
Allowable Testing/Inspection				
Allowed with DOE WAP H&S Funds □ Allowed with Alternative Funds □		ed with Alternative Funds 🛘		
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.				
Required Occupant Education				
Concur with DOE Guidance		Alternative Guidance		
Provide occupant with information on function, use, and maintenance (including location of service switch and cleaning)				
instructions) of ventilation system and components.				
Provide occupant with equipment manuals for installed equipment.				
 Include disclaimer that ASHRAF 62.2 does not account for high polluting sources or guarantee indoor air quality. 				

6.18 – Water Heaters				
(see Combustion Appliances for combustion related requirements)				
	Allowable	e Actions		
Allowed with DOE WAP H&S Fo	Allowed with DOE WAP H&S Funds □ Allowed with Alternative Funds □			
If DOE WAP H&S Funds are used for any "allowable" actions, detail them here.				
Required Testing/Inspection				
Concur with DOE Guidance 🗹	Alternative Guidance Results in Deferral/Referral		Results in Deferral/Referral ✓	
DOE WAP H&S Funds ☑ Alternative Funds □		Alternative Funds □		
 Visual inspection of all water heaters and related piping for safety and leaks 				
 See Combustion Appliances section for related combustion safety testing requirements. 				
Allowable Testing/Inspection				
Allowed with DOE WAP H&S Funds ☑ Allowed with Alternative Funds ☑			ed with Alternative Funds ☑	
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.				
Required Occupant Education				

Concur with DOE Guidance ✓	Alternative Guidance	
Annronriate use and maintenance of units		

- Provide all paperwork and manuals for any installed equipment.
- Where combustion equipment is present, provide combustion safety and hazards information including how to recognize depressurization, dangers of CO poisoning, and fire risks associated with combustion appliance use.

6.19 – Worker Safety				
Required Actions				
Concur with DOE Guidance	Alternative Guidance		Results in Deferral/Referral □	
DOE WAP H&S Funds	1		Alternative Funds □	
Adherence to all fede	eral, state, and local w	orker safety regulation	ns (e.g., OSHA, EPA).	
	Allowabl	e Actions		
Allowed with DOE WAP H&S Funds □ Allowed with Alternative Funds □		ed with Alternative Funds 🛘		
If DOE WAP H&S Funds are used for any "allowable" actions, detail them here.				
Prohibited Actions				
Concur with DOE Guidance				
Using DOE WAP H&S funds for <i>major</i> repairs as defined by the Grantee's H&S Plan is prohibited.				
Define "major" repairs				
Define the term "major" repairs using a quantifiable methodology.				
Allowable Testing				
Allowed with DOE WAP H&S Fu	Allowed with DOE WAP H&S Funds □ Allowed with Alternative Funds □		ed with Alternative Funds	
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.				

6.X – (Insert Additional H&S Items for Use of DOE WAP H&S funds)				
Required Actions				
Concur with DOE Guidance	Alternative Guidance □		Results in Deferral/Referral	
DOE WAP H&S Funds 🛚			Alternative Funds □	
	Insert re	quired item text		
	Allowabl	e Actions		
Allowed with DOE WAP H&S Fund	ds 🗆	Allow	ved with Alternative Funds □	
If DOE WAP H&S	Funds are used fo	r any "allowable" acti	ons, detail them here.	
	Prohibite	d Actions		
	Concur with DC	DE Guidance 🛚		
What is prohibited				
Required Testing/Inspection				
Concur with DOE Guidance	Alternative (Guidance 🗆	Results in Deferral/Referral	
DOE WAP H&S Funds □			Alternative Funds □	
Insert required item text				
Allowable Testing/Inspection				
Allowed with DOE WAP H&S Funds ☐ Allowed with Alternative Funds ☐		ved with Alternative Funds □		
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.				
Prohibited Testing/Inspection				
Concur with DOE Guidance				
What is prohibited				
Required Occupant Education				
Concur with DOE Guidance	Concur with DOE Guidance Alternative Guidance		Alternative Guidance	
Insert required item text				