

Memorandum

DATE: **July 18, 2014**

WAP Memorandum 003

REPLY TO

ATTN OF: **Robert C. Adams, Supervisor**
Weatherization and Intergovernmental Program Office

SUBJECT: **Rescission of OSHA-10 and OSHA-30 Requirement in WAP**

TO: **Weatherization Assistance Program Grantees**

Recent inquiries regarding the possibility of Grantees requesting a waiver for the OSHA-10 and OSHA-30 training requirement within the Weatherization Assistance Program (WAP) initiated a conversation with the Occupational Safety and Health Administration (OSHA) seeking confirmation of waiver authority.

As a result of those discussions with OSHA, the DOE decision to mandate completion of the OSHA-10 and OSHA-30 courses for all weatherization workers is hereby rescinded without the need for Grantees to request a waiver. DOE reminds Grantees that this rescission in no way exempts them and/or their subgrantees from their obligation to comply with all applicable Federal rules and regulations, including those of OSHA. Rather, it eliminates the DOE imposed requirement to complete these two courses as a requirement to work in the program. If Grantees choose to exercise this option to remove this training requirement, they should revise their Health and Safety plan and notify their DOE Project Officer of the change. A formal grant modification is not necessary. If Grantees choose not to eliminate the OSHA training requirements, no plan changes or notification to the DOE Project Officer is needed. DOE will update the next version of our Health and Safety Weatherization Program Notice to reflect this adjustment.

OSHA still requires that all workers receive training to address specific hazards that the worker can reasonably expect to encounter on a particular job site. For example, if a worker is expected to perform work on a roof, then that worker must be trained in ladder safety (or whatever method of getting onto the roof that may be used), fall protection, personal protective equipment, electrocution (if power lines are nearby and/or if power tools are being used), the safe operation on whatever tools that worker may be using (hand and power), etc.

The 10-Hour and 30-Hour Construction Industry courses cover all of these types of topics and more. DOE continues to strongly recommend this training for all workers as a best practice even though it is not required.