Memorandum

DATE: June 26, 2018

REPLY TO
ATTN OF: Erica Burrin, Acting Program Manager
Weatherization and Intergovernmental Program Office

SUBJECT: Update to Field Guide Expiration Reminder for WAP Grantees – NEW VARIANCE REQUEST SAMPLES

TO: Weatherization Assistance Program Grantees

INTENDED AUDIENCE: Grantee Technical Managers, Weatherization Training Centers

The Department of Energy (DOE) outlined requirements to support and verify quality work in the Weatherization Assistance Program (WAP) beginning in Program Year (PY) 2014. Weatherization Program Notice (WPN) 14-4, which was superseded by WPN 15-4, defined what constitutes a quality installation of weatherization measures, outlined how those measures are inspected and validated, and defined acceptable training and credentialing of workers.

Specifically, the Quality Work Plan addresses aligning the work done throughout WAP with the Standard Work Specifications (SWS). Section 1 of WPN 15-4 describes the requirement for aligning the Field Guides with the SWS, and Section 2 with making those guides available to the network covering a Grantee’s service territory. Later sections describe requirements for inspecting and monitoring to ensure work meets the SWS requirements.

DOE issued WAP Memorandum 032: Update to Field Guide Expiration Reminder for the WAP Grantees – New Variance Request Form on March 5, 2018, to remind WAP Grantees of upcoming Field Guide expiration dates and provide a link to the electronic form for Grantees to use when submitting variance requests.

This Memorandum updates the list of suggested variances and provides additional resources for submitting variance requests.

Please follow the web link below to access the variance request form. If you are able, use the digital form linked in the text on the page. If security settings in your office won’t allow access, use the spreadsheet linked at the bottom of the page.

https://energy.gov/eere/wipo/downloads/sws-variance-request-form

Grantees wishing to review the process to submit variance requests can access and view a short (12 minutes) webinar here.

As the SWS are updated on a 3-year cycle, field guides must be re-submitted and approved on a 3-year cycle. Many of the original field guides DOE approved are set to expire within 6 months; therefore, Grantees are reminded to review those original approval dates, revise the guides and resubmit, as applicable. The review, revision and approval process can be time-consuming – Grantees are encouraged to begin the process at least 6
months prior to expiration of your current approval.

DOE, in collaboration with the National Renewable Energy Laboratory (NREL), has continued to update the SWS for Home Energy Upgrades, which are the basis for field guides. The 2017 Master Key on the SWS Maintenance Page (https://sws.nrel.gov/maintenance) is a comprehensive list of all the SWS that have been updated. It is recommended to use this to crosscheck your field guides and make sure your guide remains in alignment with the current SWS.

Variance requests are on the same general review and approval schedule as the field guide(s). You are allowed to submit additional variance requests as you discover they are needed but should attempt to submit any obvious ones with the field guide so all can be reviewed together.

The recent SWS update removed many of the issues that led to common variance requests. However, since the SWS are intended for the broader home-performance industry and WAP network, there are still some instances where they may not make sense in WAP or the specific regions within the WAP. Specifically, consider reviewing the following SWS in relation to your work practices to see if a variance request is needed (this list has been updated since release of Memorandum 032):

- **2.0201.1** – Check the combustion safety action limits to see if your network requires a variance
- **2.0201.2d** – Check the gas oven clean & tune action limits to see if your network requires a variance
- **4.1103.1a** – Requires verification of dense-pack insulation density with chemical smoke.
- **4.1103.2e** – Requires interior holes drilled for the installation of dense-pack sidewall insulation to be patched to match interior original surface. Most WAP Subgrantees allow for leaving a "paint-ready" surface, or otherwise.
- **5.3001.1a** – Requires Manual J calculations for Heating, and Air Conditioning system replacements. If you use the National Energy Audit Tool (NEAT) or the Manufactured Housing Energy Audit (MHEA) (heating only), this is acceptable for WAP but it is not a Manual J calculation and would require the submittal of a variance request. If you use another audit tool to size replacement systems, then provide evidence that it provides equivalent calculations to Manual J when submitting your variance request.
- **5.3002.4b** and **5.3002.13b** – Multifamily (MF) – Requires testing and/or removing environmental hazards (e.g., mold, asbestos) when installing new HVAC equipment.
- **5.3003.3** – Requires comprehensive system airflow testing (e.g. measuring pressure drop across air conditioning and heating filters and air conditioning coils). Check the entire specification to see if your network is complying or have other standards that meet the objectives.
- **5.3003.14a** – Requires gas pressure testing on every gas fired furnace as part of combustion safety testing. Variance request should include how problems are identified through other combustion safety diagnostic testing, and reference a furnace inspection worksheet.
- **7.8103.1c** – Domestic Hot Water (DHW) tank wrap required to achieve R-24 unless the Savings to Investment Ratio (SIR) is less than 1.0.

A spreadsheet with samples of approved variance requests for the SWS listed above and a selection of others is included as an attachment with this Memorandum.

As a reminder: If you do not have a variance request on file, and you are doing a measure that is covered by the SWS, you are required to adhere to the full SWS that applies to that measure and as such will be monitored to that detail.

If you have questions regarding the information in this Memorandum, please contact your DOE Project Officer.