

# Memorandum

DATE: March 5, 2018

WAP Memorandum 032

REPLY TO

ATTN OF: James Carlisle, Operations Supervisor *JCC*  
Weatherization and Intergovernmental Program Office

SUBJECT: Update to Field Guide Expiration Reminder for WAP Grantees – New Variance Request Form

TO: Weatherization Assistance Program Grantees

The Department of Energy (DOE) outlined requirements to support and verify quality work in the Weatherization Assistance Program (WAP) beginning in 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 Weatherization Program Notice (WPN) 14-4, which was superseded by WPN 15-4, defined what constitutes a quality installation of weatherization measures, outlined how those measures are inspected and validated, and defined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 Weatherization Memorandum 029 on December 5, 2017, to remind WAP Grantees of upcoming Field Guide expiration dates. Since issuing the reminder, DOE created an electronic form for Grantees to use when submitting variance requests. Please follow the web link below to access the form.**

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

Additionally, Grantees wishing to review the process to submit variance requests can now access a short webinar on the WAP Technical and Management Resources Training Resources page on the EERE website through this link, as well as, access the form link: <https://www.energy.gov/eere/wipo/downloads/training-resources>

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>) lists all of the SWS that have been updated. 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, there are still some instances where they may not make sense in WAP. Specifically, consider reviewing the following SWS in relation to your work practices to see if a variance request is needed:

- 2.0201.1 – Check the combustion safety action limits to see if variances are required
- 2.0201.2d – Gas oven clean & tune required at CO limits of 225 ppm as measured
- 4.1103.1a and 4.1103.2a – Requires verification of dense-pack insulation density with chemical smoke.
- 4.1103.2e – Requires interior holes drilled for dense-pack sidewall insulation to be patched to match interior original surface. Most WAP agencies allow for leaving a "paint-ready" surface, or otherwise.
- 5.3001.1a – Manual J calculations for HVAC system replacements. If you use NEAT or MHEA (heating only) or other approved audit to size systems, that is acceptable for WAP but it is not a Manual J calculation so please submit a variance request. This was fixed in most of the other HVAC equipment SWS, but this one was missed.
- 5.3002.4b and 5.3002.13b - MF – testing and/or removing environmental hazards (e.g., mold, asbestos) when installing new HVAC.
- 5.3003.3 – System airflow testing. Check the whole thing to see if you are complying or have other standards that meet the objectives. Are you measuring pressure drop across coils and filters? If you aren't, you need a variance.
- 5.3003.14a – Requires gas pressure testing on every furnace as part of combustion testing. Variance request should include how problems are identified through other diagnostic testing, and reference a furnace inspection worksheet.
- 7.8102.2e – If your local jurisdiction does not require expansion tanks when replacing water heaters, consider a variance request.
- 7.8103.1c – DHW tank wrap required to achieve R-24 unless the SIR is less than 1.

As a reminder: If you do not have a variance request on file, if you are doing a measure that is covered by the SWS, you will be expected to adhere to the full SWS that applies to that measure.

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