Weatherization Grantee Health and Safety Plan

☑ POLICY SUBMITTED WITH PLAN

1.0 – GENERAL INFORMATION

Allowable energy related health and safety (H&S) actions are those actions necessary to maintain the physical well-being of both the occupants and/or weatherization workers where:

- Costs are reasonable as determined by The Department of Energy (DOE) in accordance with this approved Master Plan:
- The actions must be taken to effectively perform weatherization work; or
- The actions are necessary because of completed weatherization work.

If Deferral is necessary, it is required that the sub-grantee inform the client in writing, describing the condition(s) causing the deferral and what must be done prior to weatherization work. If the sub-grantee knows of another program that could help, they must provide that information to the client in the letter. A copy of this letter must be in the client file.

Prior to a measure being considered an allowable H&S measure, it must first be determined that it is not an energy conservation measure (ECM) or incidental repair to an ECM.

Weatherization Bootcamp is a requirement for most of the measures below. This course combines Energy 101, Pressure Diagnostic 101, General Thermal Performance, Residential Retrofit Application 101, and Combustion Safety course into a weeklong training course that will provide weatherization professionals with an introduction to energy principles, thermal performance, health and safety standards, lead safe weatherization (LSW), auditing, pressure diagnostics, and field repair. This course provides a combination of classroom and hands-on instructions that will prepare candidates to perform the tasks required of weatherization technicians within the current Weatherization Program Guidelines.

In Bootcamp attendees are expected to learn to:

- Recognize H&S issues including (but not limited to):
 - o Radon
 - o Lead
 - o Mold/Moisture
 - o Electrical
 - o Carbon Monoxide (CO)
- Understand causes and effect of the above H&S issues
- Properly identify through testing or sensory inspection
- Mitigate those issues if mitigation is allowed within H&S measures.

2.0 – BUDGETING H&S costs are a separate category and, thereby, exclude such costs from the average cost per unit cost (ACPU) limitation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. Select which option is used below. Separate Health and Safety Budget ☑ Contained in Program Operations □

3.0 – HEALTH AND SAFETY EXPENDITURE LIMITS

For DOE, each sub-grantee will have just under 15% of their program operations set aside for energy related H&S repairs. Each sub-grantee will be responsible for the management of their H&S budget and will be required to bill H&S repairs as a separate budget line item. Sub-grantees will also be required to obtain written approval from The Arizona Department of Housing (ADOH) for all H&S repairs exceeding \$2,000. Any H&S expenses exceeding the 15% cap of the sub-grantee program operations budget will not be reimbursed.

	H&S Measure Matrix - Op	otional				
	Double Click To Open For	Editing				
	Cells this shade auto calc	culate				
<u>Enter</u> Measure ↓	<u>Enter</u> Cost ↓	Enter Cost ↓ Enter Frequency % ↓ Auto Calculates				
ASHRAE Fan	\$750.00	100.0%	\$750.00			
Combination smoke/co detector	\$65.00	100.0%	\$65.00			
Kitchen exhaust fan/hood	\$150.00	15.0%	\$22.50			
Bathroom ventilation	\$150.00	25.0%	\$37.50			
T&P valve	\$75.00	15.0%	\$11.25			
Gas valve and flex line	\$150.00	15.0%	\$22.50			
Misc. electric	\$100.00	5.0%	\$5.00			
Misc. H&S repair	\$250.00	15.0%	\$37.50			
Evaporative Cooling	\$1,500.00	5.0%	\$75.00			
Total Average H&S Cost Per Unit			\$1,026.25			
Enter Estimated Production (Annual File:	IV.2 WAP Production Sch	edule) →	354			
Enter Estimated Program Operations Bud	lget →		\$2,477,073			
H&S Budget (Total Average H&S Cost Per	Unit * Estimated Product	ion)	\$363,292.50			
Requested H&S Percentage Per Unit (H&S			14.7%			

4.0 - INCIDENTAL REPAIR MEASURES

In order to be considered an incidental repair, 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
- Providing protective materials, such as paint, used to seal materials installed under this program.

Any repair that does not meet the above definition of incidental repair is considered an H&S measure. If a measure could be treated as an incidental repair to an Energy Conservation Measure (ECM), it is a requirement of ADOH that it is treated as such. ADOH chooses not to specifically identify any H&S measure listed in this plan as strictly an incidental repair.

5.0 - DEFERRAL/REFERRAL POLICY

Deferral of services may be necessary if H&S issues cannot be adequately addressed according to WPN 17-07 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. If, in the judgment of the auditor, any conditions exist which may endanger the health and/or safety of the workers or occupants, the unit should be deferred until the conditions are corrected. Deferral may also be necessary where occupants are uncooperative, abusive, or threatening. Grantees must be specific in their approach and provide the process for clients to be

notified in writing of the deferral and what conditions must be met for weatherization to continue. Grantees must also provide
a process for the client to appeal the deferral decision to a higher level in the organization.
Grantee has developed a comprehensive written deferral/referral policy that covers both H&S, and other deferral reasons?
Yes ☑ No □
Where can the deferral/referral policy be accessed?
The deferral policy can be found in the Master File of the State Plan under section V1.2 -Approach to determine building
eligibility.

6.0-HAZARD IDENTIFICATION AND NOTIFICATION FORm(S)

Forms have been developed that include but is not limited to: the client's name and address, dates of the audit/assessment and when the client was informed of a potential H&S 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. The forms can be found on the ADOH website and are titled:

- Health & Safety Evaluation Form
- Hazard Disclosure Form
- Residential Diagnostic Evaluation Form

Documentation been developed and comply with guidance?

Yes ☑ No □

7.0 – HEALTH AND SAFETY CATEGORIES

	7.1	- Air Conditioning	and Heati	ng Syste	ems	
		Concurrence, Alter		Deferral		
Concurrence with Gui		Alternative Gui			Results in Deferral	
	Air Conditioning U	Inallowable Measure		g Unallo	owable Measure	
	_	Fund				
DOE 🗹	LIHEAP	State	Utili	ty 🗆	Other \square	
					nting/cooling systems?	11 .:
					ystem replacement, repair,	
					ant, unless prevented by st ge of 4 and under and adul	
					y sensitive to the effects of	
					that of all people who die	
					nd hypertension increase n	
percent during heat wa					na nypertension merease n	nore man 50
_	waiver is required					
	tachment A knowle					
			t require a w	aiver ur	nless exceeding the \$2000	threshold.
	nust be decided usin		1		8 ,	
		•	epaired, repl	aced, rei	ndered inoperable or deferi	al is required.
					ges and ovens must be ven	
		on air from outside.	1		6	
			ry heating s	ystems,	Including unvented seco	ndary space
·		heat				· -
 Secondary ur 	evented units that co	onform to the safety	standards o	f ANSI	Z21.11.2 may remain as ba	ack-up heat
sources.						
					oved and properly disposed	d of prior to
weatherization	n but may remain ι	until a replacement h	neating syste	m is in p	place.	
 Repair or rep 	lacement of second	lary unvented units i	s not allowe	ed.		
 Secondary ur 	vented units that m	neet the ANSI Z21.1	1.2, but are	not oper	rating safely, must be remo	oved and
properly disp						
• WPN 17-7 at	tachment A knowle					
		Documentation Req				
					documentation must be pro	
defining said health ris	sk that requires a co			isk occu	pants between the ages of	5 and 49.
		Testing I				
		e that it is operable a	_	_	-	
		o ensure proper insta	ıllation of uı	nit and d	uct systems	
	on equipment, inspe					
		proper installation, r			ges	
o Test	Combustion Appli	iance Zones(CAZ) for	or depressur	ization		
 For solid fuel 	l units, inspect:					
o Wal	ls, mantels, ceilings	s and surrounding ar	eas for soot	(fire haz	zard)	
o Chir	nneys and flues for	proper installation,	restriction a	ınd dama	ages	
o To i	nsure that no creose	ote staining in near f	flue pipe			
Auditors mus	st insure unit would	l not meet ECM reau	irements us	ing a DO	OE approved method.	

Client Education

- Client must be provided paperwork, manuals and warranty information for any installed equipment
- If a new thermostat is installed, the client must be given a tutorial on how to use it.
- Client must be informed on the appropriate use and maintenance requirements of installed equipment.
- If combustible equipment is installed, client must be provided with safety information on how to recognize depressurization.

Training

- WAP Bootcamp (refer to section 1.0 for description of training curriculum)
- Building Performance Institute- Building Analyst (BPI BA)
- Installers must meet the requirements for the state of Arizona on licensing, certifications, and contracting.
- Installers must have training on building science principles including CAZ depressurization testing and inspection.

7.2 - Asbestos - All

What is the blower door testing policy when suspected Asbestos Containing Material (ACM) is identified?

Depressurization testing will not be allowed on homes that contain ACMs. A Pressurization test can be performed on the home if it's determined that it will not disturb the ACM, making it airborne in the client's home. If the auditor determines there is Friable ACM (material can be crumbled, pulverized, or reduced to powder by the pressure of an ordinary human hand), testing will not be allowed and the home must be deferred until the ACM's have been remediated.

7.2a – Asbestos - in siding, walls, ceilings, etc. Concurrence, Alternative, or Deferral Concurrence with Guidance Alternative Guidance Results in Deferral Funding DOE LIHEAP □ State □ Utility □ Other □

How do you address suspected ACM's in siding, walls, or ceilings that will be disturbed through the course of weatherization work?

Asbestos found inside of the dwelling that needs addressing, directly or incidentally, is not allowable under H&S. Testing by an Asbestos Laws and Regulations Act (AHERA) professional for Asbestos is an allowable H&S cost. However, abatement of asbestos is not an allowable H&S cost. Policies have been in effect for asbestos presence and related work practices for many years. The approach is not to disturb, cut or drill contaminated material and avoid those measures that might do so. In instances where measures can be completed without disturbing asbestos surfaces or materials, that approach should be used. In instances where a local authority, such as code enforcement, imposes specific guidelines or requirements, program staff are to make themselves aware of those restrictions and comply.

Prior to drilling or cutting an exterior wall, inspect the subsurface asbestos. If it is determined that weatherization work cannot be performed without creating a hazard, the project must be deferred. The client must be informed in writing of the potential hazard and the agency must not return to weatherize until an AHERA certified professional issues a clearance statement. Obtain a copy of this statement/report in the client file.

Testing Protocols

- Visually inspect exterior wall surface and subsurface, floors, walls, and ceilings for suspected ACM prior to drilling or cutting.
- Asbestos Hazard Emergency Response Act of 1986 (AHERA) sample collection and testing must be conducted by a certified tester. This is an allowable H&S cost.

Client Education

- Inform the client in writing that suspected ACMs are present and what precautions will be taken to ensure the occupants' and workers' safety during weatherization.
- Notify client in writing of results, if testing was performed. A copy of the letter must be put in the client file.

Training and Certification Requirements

- WAP Bootcamp (refer to section 1.0 for description of training curriculum)
- Licensing/certification for removal and reinstallation of asbestos siding if required by AHJ

7.2b – Asbestos - in vermiculite
Concurrence, Alternative, or Deferral
Concurrence with Guidance ✓ Alternative Guidance □ Results in Deferral □
Funding DOE ☑ LIHEAP □ State □ Utility □ Other □
DOE E LINEAL B State B Cunity B Cuter B
How do you address suspected ACM's in vermiculite that will be disturbed through the course of weatherization work?
When vermiculite is present, unless testing determines otherwise, the unit is to be deferred. Where blower door tests are performed, prior to asbestos free vermiculite certification, it is a best practice to perform pressurization instead of depressurization. Encapsulation by an appropriately trained professional is allowed. Removal costs are not reimbursable.
Testing Protocols
AHERA sample collection and testing must be conducted by a certified tester.
Baseline environmental asbestos sampling is an allowable cost. Client Education.
Client Education
 Instruct clients, in writing, not to disturb suspected ACM. Provide asbestos safety information to the client.
• Notify client in writing of results, if testing was performed. A copy of the letter must be put in the client file.
Training and Certification Requirements
AHERA or state certification to conduct testing
AHERA or other appropriate asbestos control professional certification/training for encapsulation
7.2c – Asbestos - on pipes, furnaces, other small covered surfaces
Concurrence, Alternative, or Deferral
Concurrence with Guidance ☐ Alternative Guidance ☐ Results in Deferral ☐
Eunding
Funding DOE ☑ LIHEAP □ State □ Utility □ Other □
DOLE LINEAR E State E Cunty E Cunty E
How do you address suspected ACM's (e.g., pipes, furnaces, other small surfaces) that will be disturbed through
the course of weatherization work? Assume asbestos is present in the 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 on a case-by-case basis with prior approval from ADOH.
Testing Protocols
Assess whether suspected ACMs are present.
AHERA sample collection and testing is allowed and must be conducted by a certified tester.
Client Education
Instruct clients, in writing, not to disturb suspected ACM.
Provide asbestos safety information to the client.
 Notify client in writing of results, if testing was performed. A copy of the letter must be put in the client file.
Training and Certification Requirements
WAP Bootcamp (refer to section 1.0 for description of training curriculum)
AHERA or other appropriate asbestos control professional certification/training is required to abate the ACM
7.5 – Biologicals and Unsanitary Conditions (odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)
(odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)
(odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.) Concurrence, Alternative, or Deferral
(odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.) Concurrence, Alternative, or Deferral Concurrence with Guidance ☑ Alternative Guidance □ Results in Deferral □
(odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.) Concurrence, Alternative, or Deferral Concurrence with Guidance ✓ Alternative Guidance □ Results in Deferral □ Unallowable Measure □
(odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.) Concurrence, Alternative, or Deferral Concurrence with Guidance ☑ Alternative Guidance □ Results in Deferral □

version 1.0
What guidance do you provide Sub-grantees for dealing with biological and/or unsanitary conditions in homes slated for weatherization?
Remediation of conditions that may lead to or promote biological concerns and unsanitary conditions is
allowable expense up to \$300.Addressing bacteria and viruses is not an allowable cost.
 See Mold and Moisture section for more information.
Testing Protocols
Sensory inspection.
Client Education
 Inform client in writing of observed conditions. Provide information on how to maintain a sanitary home.
Training
WAP Bootcamp (refer to section 1.0 for description of training curriculum)
7.6 – Building Structure and Roofing Concurrence, Alternative, or Deferral
Concurrence with Guidance ✓ Alternative Guidance □ Results in Deferral □
Funding
DOE ☑ LIHEAP □ State □ Utility □ Other □
What guidance do you provide Sub-grantees for dealing with structural issues (e.g., roofing, wall, foundation) in
homes slated for weatherization?
Building rehabilitation is beyond the scope of the WAP. H&S funds should not be used when the repair is a component of
an ECM. In that case, the repair should be cost justified as an incidental repair. Clients must be notified of structurally
comprised areas, if applicable.
• Evaluate building structure & roofing visually so that no existing conditions are disturbed.
See Mold and Moisture, Code Compliance, and Pests sections for more information.
Testing
• 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.
How do you define "minor" or allowable structure and roofing repairs, and at what point are repairs considered beyond the scope of weatherization?
Repairs that cannot be included in the ECM and do not exceed \$300. These repairs are recognized as a H&S issue when it
puts the client, sub-grantee, or contractor at risk of harm. This would include (but not limited to):
Unsafe entry stairs
Minor roof leaks to prevent mold
 Inoperable/broken entry doors If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific
audit required?
N/A
Client Education
Notify client in writing of structurally compromised areas.
Training
WAP Bootcamp (refer to section 1.0 for description of training curriculum)
7.7 – Code Compliance
Concurrence, Alternative, or Deferral
Concurrence with Guidance ☑ Alternative Guidance □ Results in Deferral □
Funding DOE ☑ LIHEAP □ State □ Utility □ Other □
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What guidance do you provide Sub-grantees for dealing with code compliance issues in homes receiving weatherization measures?

- Correction of preexisting code compliance issues is not an allowable cost unless triggered by weatherization measures being installed in a specific room or area of the home.
- When correction of preexisting code compliance issues is triggered and paid for with WAP funds, cite specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue in the client file.
- Follow State and local or AHJ codes while installing weatherization measures, including H&S measures.
- Properties where "red tagged" H&S conditions exist that cannot be corrected under this guidance must be deferred.
- If a permit is required for weatherization work to be completed and the local jurisdiction requires additional measures for code compliance due to permit being pulled, those measures are allowable costs. Permits should be billed to program operations, not H&S.
- H&S funds should not be used when the repair is a component of an ECM, such as fixing a light fixture in order to install a CFL bulb. These costs should be cost justified as an ECM with the associated incidental repair.

Testing

Visual inspection.

What specific situations commonly trigger code compliance work requirements for your network? How are they addressed?

When a permit is pulled to install any measure, it requires the installation of hard-wired smoke detectors, on their own circuit. In this case, smoke detectors would be installed per code.

Client Education

• Inform client in writing of observed code compliance issues.

Training

As Arizona is a home rule, state code compliance is very complicated. Knowledge of codes in each area is
essential in performing weatherization work. Each sub-grantee should reach out the AHJ's for their area for
proper code compliance details.

7.8 – Combustion Gases						
		Concurrence, Alter	native, or Deferral			
Concurrence with	Guidance ☑	Alternative Gui	dance	Results in Deferral □		
	Funding					
DOE 🗹	LIHEAP	State □	Utility 🗖	Other		
Testing Protocols and Requirements						
Increations by the auditor as listed above must include:						

Inspections by the auditor as listed above must include

- Combustion safety testing is required when combustion appliances are present.
- Proper venting to the outside for combustion appliances, including gas dryers, furnaces, vented space heaters and water heaters is required.
 - o Correct venting when testing indicates a problem.
 - o Inspect venting of combustion appliances and confirm adequate clearances.
- Inspection of cooking burners for operability and flame quality.
 - o Repair of cooking burners is an allowable H&S cost if CO readings are high and/or another H&S concern is found. Replacement of cook stoves is not an allowable cost.
- Testing by approved WAP procedures of ambient air in combustion appliance zones & undiluted flue on applicable appliances are above the allowable limits.
- If unsafe conditions whose remediation is necessary to perform weatherization cannot be remedied by repair or tuning, replacement is an allowable H&S measure unless prevented by other guidance herein.
- Maintain documentation justifying the replacement with a cost comparison between replacement and repair in the client file.
- Replacement units must meet safety guidelines as determined in the State Plan or Technical Field Guide.
- Test naturally drafting appliances for spillage and CO during CAZ depressurization testing pre- and postweatherization and before leaving the home on any day when work has been done that could affect draft (e.g., tightening the home, adding exhaust).

How are crews instructed to handle problems discovered during testing, and what are the specific protocols for addressing hazards that require an immediate response?

Crews should address any issue(s) that they are qualified to repair and are an allowable expense(s). If unable to repair, they must have a qualified individual complete the work. Follow BPI standards on combustion safety and protocols. When CO issues arise, crews should follow BPI standards on action levels and protocols.

Ambient Combustion Safety Test Action Levels *CO testing is started at time of entry to the home			
CO Test Results*	Retrofit Action		
9-35 ppm	Open windows and doors, determine source, service unit		
36-69 ppm	Open windows and doors, disable responsible appliance, service unit		
>69 ppm	Terminate inspection. Evacuate building, call emergency services from outside the home		

CO Thresholds for Fossil-Fuel Fired Combustion Appliances *CO testing is started steady state				
Appliance	Threshold Limit*	Retrofit Action		
Central Furnace (all categories)	400 ppm air free	UNACCEPTABLE CO LEVEL:		
Boiler	400 ppm air free	Sub-grantee/contractor must service or replace the		
Floor Furnace	400 ppm air free	appliance. If issue cannot be addressed under the		
Gravity Furnace	400 ppm air free	weatherization program, advise the		
Wall Furnace (BIV)	200 ppm air free	homeowner/occupant that the appliance should be		
Wall Furnace (Direct Vent)	400 ppm air free	serviced or replaced. Work may not commence		
Vented Room Heater	200 ppm air free	until the issue is resolved.		
Unvented Room Heater	200 ppm air free	N. 10 11 (001 1 1 1 1 1 1 1 1 1 1 1 1 1 1		
Water Heater	200 ppm air free	Note: If ambient CO levels do not exceed 70 ppm,		
Oven/Broiler	225 ppm air free	testing of other appliances and other audit		
Clothes Dryer	200 ppm air free	procedures may continue at the discretion of the auditor.		
Refrigerator	400 ppm air free	auditor.		
Gas Log (gas fireplace)	25 ppm air free	ACCEPTABLE CO LEVEL:		
Gas Log (installed in wood burning fireplace)	400 ppm air free	No action required.		

Follow BPI standards on CAZ:

Action Levels for Spillage in Combustion Appliances If CAZ zone is lower (more negative) than -3 pa corrective action must be performed to alleviate the condition			
Test Result	Action Required		
If greatest CAZ depressurization occurs with the air handler on*	Conduct further analysis of the distribution system to determine if leaky ducts or other HVAC-induced		
	imbalances are the cause of the spillage. If so, recommend distribution system repairs that will reduce or eliminate the CAZ depressurization		
If greatest CAZ depressurization occurs with the door to CAZ closed, but is alleviated when door to CAZ is open*	Recommend measures to improve air transfer between the CAZ and the core of the house		
If the Cause of spillage has been traced to excessive exhaust** independent of CAZ door position, air handler, or a problem with the flue***	Verify that sufficient combustion air is available per ANSI Z223.1/NFPA 54 for gas-fired appliances and NFPA 31 for oil-fired appliances or recommend verification by a qualified professional		
	And/or Recommend further evaluation/service by a qualified professional to address the venting/combustion air issues		

^{*}In the case where both spillage and excessive CO are present, in addition to the specific recommendations above, recommend that the appliance be shut down until it can be serviced by a qualified professional.

^{**}Refers to exhaust caused by mechanical ventilation and/or other means of exfiltration.

^{***}When a recommendation to replace atmospherically-vented combustion equipment inside the pressure boundary is made, and when cost-effective, recommend replacement with direct-vented, or power-vented equipment (or non-combustion equipment, such as a heat pump).

Client Education

- Provide client with combustion safety and hazards information.
- Clients must be provided with information and an explanation of combustion safety and hazards information, including the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO.

Training

- WAP Bootcamp (refer to section 1.0 for description of training curriculum)
- BPI BA

		7.9 – Electric	al	
		Concurrence, Alternative	e, or Deferra	
Concurrence	with Guidance ✓	Alternative Guidance		Results in Deferral □
		Funding		
DOE 🗹	LIHEAP □	State	Utility 🗖	Other
What guida	nce do you provide Sub-g	rantees for dealing with e homes slated for weatl		ards, including knob & tube wiring, in
Who Inspections in Visu Che	sures or the health and safe Installation of a GFCI Replacement of wall o Replacement of bad by Relocating an electrical addressing homes with k Evaluate and if necess Voltage drop and voltate Damming is required palready included in the	ty of the occupant(s), such in wet locations butlets that are broken reakers all outlet to allow a dryer to mob and tube wiring: ary provide sufficient overage detection testing are all prior to insulating building to ECM.	be relocated to current protections become costs to components of the costs of the	o ensure proper ventilation. etion when determining conditions of wiring. ontaining knob and tube wiring, if not
How do yo	u define "minor" or allow	able electrical repairs, an scope of weatheriz		int are repairs considered beyond the
Repairs that of	cannot be included in the E0			
			Incidental Re	epairs, at what point is a site-specific
N/A				
		Client Educati		
	grantees are required to discelectrical safety/risks and		on to the clier	nt on the hazards of overloading circuits,
_		Training		
WABPI	P Bootcamp (refer to section BA	on 1.0 for description of train	ning curricult	um)

	7.10 – Formaldehyde, Volatile Organic Compounds (VOCs),					
	Fla	mmable Liquids, a	nd other Air Polluta	ants		
		Concurrence, Alte	rnative, or Deferral			
Concurrence wi	Concurrence with Guidance ☑ Alternative Guidance □ Results in Deferral □					
	Funding					
DOE ☑	LIHEAP 🗖	State □	Utility 🗖	Other		
What guidance do you provide Sub-grantees for dealing with formaldehyde, VOCs, flammable liquids, and other						
	air polluta	nts identified in ho	mes slated for weatl	herization?		

Formaldehyde and Volatile Organic Compounds (VOCs) – Formaldehyde, tobacco smoke, thinners, solvents, cleaners, and any other substances capable of negatively impacting indoor air quality must be identified during the initial audit. Basic strategies such as proper storage and ventilation are used to eliminate problems. Air sealing thresholds are maintained so that the presence of these pollutants are not concentrated and allowed to reach toxic levels. However, this is primarily the responsibility of the client. In some cases, deferral may be necessary.

Allowable actions:

- Removal of pollutants is allowed and is required if they pose a risk to workers.
- Removal of pollutants that are not necessary to perform weatherization (e.g. cleaning old paint cans and oil out of the garages) is not allowed.
- 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 Hazardous Materials Disposal section for more information. Testing Protocols Sensory inspection. Client Education Inform client in writing of observed hazardous condition and associated risks. If necessary, provide client written materials on safety issues and proper disposal of household pollutants. Training WAP Bootcamp (refer to section 1.0 for description of training curriculum)

	(nlease	indicate specific fuel	uel Leaks Ltype if policy differ:	s hy type)	
	(picuse		rnative, or Deferra		
Concurrence w	ith Guidance ☑	Alternative Gu		Results in Deferral □	
		Fun	ding		
DOE 🗹	LIHEAP □	State □	Utility 🗖	Other	
			on Protocols		
	_	•	•	service must be contacted before work	
* *	roceed. Work can comm	•			
	eaks that are the responsi	•	•	•	
				the responsibility of the utility,	
	rarily halt work and notif	fy the utility. Work c	an commence when	the utility considers it safe.	
Testing	1 1 0 0 1	1 1 0	1 1.1	1	
		-		ughout, the home using BPI standards.	
	ict sensory inspection on				
			e responsible party.	If it is the client's responsibility, it can	be
	ed as an incidental repair		-vhat naint and nan	airs considered havend the seens of	
now do yo	u define anowable fuel	<u>=</u>	what point are rep rization?	airs considered beyond the scope of	
Repairs that car	nnot be included in the E				
		Client E	ducation		
• Inform	n clients in writing if fuel	leaks are detected.			
			ining		
• WAP	Bootcamp (refer to section	on 1.0 for description	of training curricul	um)	
BPI B	A				

7.12 – Gas Ovens / Stovetops / Ranges							
	Concurrence, Alternative, or Deferral						
Concurrence wit	Concurrence with Guidance ☐ Alternative Guidance ☐ Results in Deferral ☐						
Funding							
DOE ☑	LIHEAP □	State	Utility 🗖	Other			

What guidance do you provide Sub-grantees for addressing unsafe gas ovens/stoves/ranges in homes slated for weatherization?

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

Testing Protocols

- Test gas ovens for CO.
- Inspect cooking burners and ovens for operability and flame quality.
- Follow BPI standards on combustion safety and protocols. (See section 7.8 above)

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

Training

- WAP Bootcamp (refer to section 1.0 for description of training curriculum)
- BPI BA

7.13 – Hazardous Materials Disposal [Lead, Refrigerant, Asbestos, Mercury (including CFLs/fluorescents), etc.]					
		Concurrence, Alterr	native, or Deferral		
Concurrence with Guida	nce 🗹	Alternative Guid	ance	Results in Deferral	
		Fund	ing		
DOE ☑ L	IHEAP □	State □	Utility 🗖	Other \square	
		Client Ed			
 Inform client in home. 	morni chem in writing of nazaras associated with nazaras as waste materials come generated national in the				
		Train	ing		
	1	n 1.0 for description of	_	/	
			(PPE) for working	with hazardous waste mater	ials.
	 Health and environmental risks related to hazardous materials. 				
	•	afety Data Sheet (SDS	5) Training.		
LEAD Renovation	LEAD Renovation, Repair and Paint (RRP)				
		Procedures and Doo			
	_			rk shall be disposed of acco	ording to all
_		ederal guidelines, as a	* *		
 Document prop 	er disposal requ	irements in contract la	inguage with respor	sible party.	

7.14 – Injury Prevention of Occupants and Weatherization Workers (Measures such as repairing stairs and replacing handrails)							
		Concurrence, Alter	native, or Deferral				
Concurrence with Guidance ☐ Alternative Guidance ☐ Results in Deferral ☐							
		Fun	ding				
DOE 🗹	LIHEAP 🗖	State	Utility 🗖	Other			
V	What guidance do you provide Sub-grantees regarding allowable injury-related repairs (e.g., stairs, handrails, porch deck board)?						

Version 1.0

- When necessary to effectively weatherize the home, workers may make minor repairs and installations, such as, but not limited to:
 - o Unsafe entry stairs
 - Loose or broken hand rails
 - o Trip/fall hazards
- Inspect for dangers that would prevent weatherization.
- If conditions will not be repaired, inform client in writing of observed hazards and associated risks.

How do you define "minor" or allowable injury prevention measures, and at what point are repairs considered beyond the scope of weatherization? Quantify "minor" or allowable injury prevention measures.

Repairs that cannot be included in the ECM and do not exceed \$300.

Training

- WAP Bootcamp (refer to section 1.0 for description of training curriculum)
- OSHA 10

		7.15 – Lead	Based Paint				
Concurrence, Alternative, or Deferral							
Concurrence with Guidance ✓		Alternative Guid	dance	Results in Deferral □			
		Func	ling				
DOE 🗹	LIHEAP □	State	Utility 🗖	Other			
		Safe Work	Protocols				
• Crews	must follow EPA's Lead	Renovation, Repair	and Painting Progra	m (RRP) when working in pre-1978			
	ng unless testing confirms			. ,			
 Deferr 	ral is required when the ex	stent and condition of	f lead-based paint in	the house would potentially create			
further	r H&S hazards.		•	• •			
 Only t 	hose costs directly associ	ated with the testing	and lead safe practic	es for surfaces directly disturbed during			
•	erization activities are allo	_					
 Docur 	nentation in the client file	must include					
0	Certified Renovator ce	rtification					
0	any training provided of	on-site					
0	description of specific						
0	lead testing and assessi	ment documentation					
0	photos of site and cont	ainment set up (inclu	de the location of ph	notos referenced if not in file)			
 All cre 	ews and contractors are re	quired to:					
0	Carry a High-Efficienc	y Particulate Air (HI	EPA) vacuum.				
0	Wear a tight fitting res	pirator and disposabl	e coveralls.				
0	Seal work areas within	a home using tape a	nd plastic. Cover fur	niture, carpet, and other surfaces with			
	plastic drop cloths or ta	arps.					
0	Spray water on disturb	ed areas to minimize	dust.				
0	Clean-up work area ea	ch day. Sweep carefu	lly and wet mop, as	needed. Use a HEPA vacuum cleaner to			
	collect dust and paint of						
0	Keep children away fro	om work area at all ti	mes.				
		Testing P					
• Testin	g to determine the present	ce of lead in paint tha	nt will be disturbed b	y WAP measure installation is allowed			
with E	EPA-approved testing met	hods.					

Client Education

Testing methods must be economically feasible and justified i.e. test swabs. Job site set up and cleaning verification by a Certified Renovator is required.

Grantees must verify that crews are using lead safe work practices during monitoring.

- Follow pre-renovation education provisions for RRP.
- Provide a copy of "Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools" to an adult occupant prior to work commencing on the home, within the EPA guidelines. Written acknowledgement must be received.

Training and Certification Requirements

- All employees and contractors working on pre-1978 homes must receive training to install measures in a leadsafe manner in accordance with the SWS and EPA protocols, and installation must be overseen by an EPA Certified Renovator.
- Grantee Monitors and Inspectors must be Certified Renovators.
- Any agency/contractor that works in a pre-1978 home, must be a Lead Certified Firm.
- WAP Bootcamp, including Lead Safe Weatherization (refer to section 1.0 for description of training curriculum)
- Lead RRP Certification

Documentation Requirements

- Sub-grantees will be required to show that all lead based paint protocols are up to date and in compliance to all regulations, including:
 - Client communication
 - Lead safe work practices
 - Proper equipment including (but not limited to):
 - Tyvek Suit
 - **Booties**
 - Respirators
 - Hoods
 - Goggles

■ Tack pad							
	7.16 – Mold and Moisture (Including but not limited to: drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, vapor retarders, moisture barriers, etc.)						
C	oncurrence, Alternative,	or Deferral					
Concurrence with Guidance ✓	Alternative Guidance	<u> </u>	Results in Deferral □				
	Funding						
DOE ☑ LIHEAP □	State	Utility 🗖	Other 🗆				
What guidance do you provide Sub-gran spouts, moisture barriers, dehumidifier							
 order to weatherize the home and Source control (i.e. correction of a weatherize the home and to ensure independent of latent damage and Where severe Mold and Moisture Mold clean-up is not an allowable Surface preparation where weather order to apply caulk) must be charted the model of the model. Mold testing is not an allowable of the model. 	to ensure the long-term st moisture and mold creating the long-term stability at related repairs. issues cannot be addressed H&S cost. rization measures are beinged as part of the ECM, r	ability and dural g conditions) is and durability of ed, deferral is recong installed (e.g.	allowed when necessary in order to the measures. Source control is quired.				
Inspecting includes, (not limited to):	iar drainaga						
 Visual assessment including exter The use of diagnostic tools, such a inspection. 		commended at p	re-weatherization and at the final				

the scope of weatherization? Repairs that cannot be included in the ECM and do not exceed \$300.

Client Education

How do you define "minor" or allowable moisture-related measures, and at what point is work considered beyond

- Provide client written notification and disclaimer on mold and moisture awareness.
- Provide information, when necessary, on the following (not limited to):
 - The importance of cleaning and maintaining drainage systems.
 - Proper landscape design and how this impacts site drainage and moisture control.
 - Proper bathroom ventilation to release humidity and moisture.

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Training

• WAP Bootcamp (refer to section 1.0 for description of training curriculum)

		D (
	7.17 –				
Concurrence with Guidance ☑	Concurrence, Alter Alternative Guid		Results in Deferral		
Concurrence with Guidance	Alternative Guid	ianec 🗖	Results in Deterrar 🗖		
	Func	ling			
DOE ☑ LIHEAP □	State	Utility 🛘	Other 🗆		
	What guidance do you provide Sub-grantees for dealing with pests and pest intrusion prevention in homes slated for weatherization?				
 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 H&S concern for workers. Screening of windows and points of access, and incorporating pest exclusion into air sealing practices to prevent intrusion is allowed. 					
	ation Thresholds, Bey	ond Which Weather	rization Is Deferred		
The cost of pest control cannot exceed					
	Testing P				
 Assessment of presence and 					
	Client Ed				
Inform client in writing of or					
	<u>Train</u>		2 1 11		
How to assess presence and or	degree of infestation, ass	sociated risks, and de	eferral policy		
	7 10	Dadon			
	7.18 – I				
Concurrence with Guidance ☑	Concurrence, Alter	native, or Deferral	Results in Deferral □		
Concurrence with Guidance ☑		native, or Deferral	Results in Deferral □		
Concurrence with Guidance 🗹	Concurrence, Alter	native, or Deferral	Results in Deferral		
Concurrence with Guidance DOE LIHEAP	Concurrence, Alter Alternative Guid	native, or Deferral	Results in Deferral Other Other		
DOE ☑ LIHEAP □	Concurrence, Alter Alternative Guid Fund State	native, or Deferral dance □ ling Utility □	Other 🗆		
DOE ☑ LIHEAP □ What gu	Concurrence, Alter Alternative Guid Fund State iidance do you provide	native, or Deferral dance □ ling Utility □	Other 🗆		
DOE LIHEAP What gu Radon mitigation is not an al	Concurrence, Alter Alternative Guid Fund State sidance do you provide lowable H&S cost.	native, or Deferral lance ling Utility Sub-grantees arou	Other 🗆		
DOE LIHEAP What gu Radon mitigation is not an al Clients must sign an informe the client file. In homes where radon may be	Alternative Guid Fund State midance do you provide lowable H&S cost. d consent form prior to the present, work scope so	Inative, or Deferral dance Utility Utility E Sub-grantees arou receiving weatheriza hould include precau	Other □ nd radon?		
DOE	Concurrence, Alter Alternative Guid Func State iidance do you provide lowable H&S cost. d consent form prior to be present, work scope so Protocols for Home En	Inative, or Deferral lance Utility Utility Exub-grantees arou receiving weatherizathould include precautergy Upgrades, to refloors within the pre	Other nd radon? tion services. This form must be kept in tionary measures based on EPA		
DOE ☑ LIHEAP ☐ What gu Radon mitigation is not an al Clients must sign an informe the client file. In homes where radon may be Healthy Indoor Environment issues worse. Whenever site conditions per greater) polyethylene sheetin penetrations. Other precautions may include	Alternative Guid Fund State iidance do you provide lowable H&S cost. d consent form prior to be present, work scope so Protocols for Home En cmit, cover exposed dirt g, lapped at least 12" ar de, (but are not limited t	Inative, or Deferral dance Utility Utility Esub-grantees arouse receiving weatherizathould include precautergy Upgrades, to refloors within the predict sealed with approprojection.	Other nd radon? tion services. This form must be kept in tionary measures based on EPA duce the possibility of making radon ssure/thermal boundary with 6 mil (or priate sealant at all seams, walls and		
DOE ☑ LIHEAP ☐ What gu Radon mitigation is not an allowing the client file. In homes where radon may be Healthy Indoor Environment issues worse. Whenever site conditions per greater) polyethylene sheeting penetrations. Other precautions may include Sealing any observer.	Alternative Guid Fund State iidance do you provide lowable H&S cost. d consent form prior to be present, work scope so Protocols for Home En emit, cover exposed dirt g, lapped at least 12" ar de, (but are not limited to de floor and/or foundation	Inative, or Deferral dance Utility Utility Esub-grantees arouse receiving weatherizathould include precautergy Upgrades, to refloors within the predict sealed with appropriate on penetrations, included and sealed with appropriate or penetrations.	Other nd radon? tion services. This form must be kept in tionary measures based on EPA duce the possibility of making radon ssure/thermal boundary with 6 mil (or priate sealant at all seams, walls and		
DOE ☑ LIHEAP ☐ What gu Radon mitigation is not an all Clients must sign an informe the client file. In homes where radon may be Healthy Indoor Environment issues worse. Whenever site conditions per greater) polyethylene sheeting penetrations. Other precautions may include Sealing any observed Isolating the basement	Alternative Guid Fund State iidance do you provide lowable H&S cost. d consent form prior to be present, work scope st Protocols for Home En rmit, cover exposed dirt g, lapped at least 12" and de, (but are not limited to d floor and/or foundationed	Inative, or Deferral dance Utility Utility Esub-grantees arouse receiving weatherizathould include precautergy Upgrades, to refloors within the predict sealed with appropriate on penetrations, included and sealed with appropriate or penetrations.	Other nd radon? tion services. This form must be kept in tionary measures based on EPA duce the possibility of making radon ssure/thermal boundary with 6 mil (or priate sealant at all seams, walls and		
DOE ☑ LIHEAP ☐ What gu Radon mitigation is not an all Clients must sign an informe the client file. In homes where radon may be Healthy Indoor Environment issues worse. Whenever site conditions per greater) polyethylene sheeting penetrations. Other precautions may include ○ Sealing any observer ○ Isolating the basement	Alternative Guid Fund State idance do you provide lowable H&S cost. d consent form prior to be present, work scope si Protocols for Home En mit, cover exposed dirt, g, lapped at least 12" ar de, (but are not limited to de floor and/or foundation ent from the conditioned the venting is installed.	Ing Utility ESub-grantees arou receiving weatherizathould include precautergy Upgrades, to read sealed with appropriate space on penetrations, included space	Other nd radon? tion services. This form must be kept in tionary measures based on EPA duce the possibility of making radon ssure/thermal boundary with 6 mil (or priate sealant at all seams, walls and		
DOE ☑ LIHEAP ☐ What gu Radon mitigation is not an all Clients must sign an informe the client file. In homes where radon may be Healthy Indoor Environment issues worse. Whenever site conditions per greater) polyethylene sheeting penetrations. Other precautions may include Sealing any observed Isolating the basement	Alternative Guid Funce State iidance do you provide lowable H&S cost. d consent form prior to be present, work scope si Protocols for Home En rmit, cover exposed dirt g, lapped at least 12" and de, (but are not limited to def loor and/or foundation ent from the conditioned eventing is installed. Testing P	Inative, or Deferral lance Image	Other nd radon? tion services. This form must be kept in tionary measures based on EPA duce the possibility of making radon ssure/thermal boundary with 6 mil (or priate sealant at all seams, walls and ding open sump pits		

- Provide all clients with EPA's A Citizen's Guide to Radon and inform them of radon related risks. Confirmation that EPA's A Citizen's Guide to Radon was received must be in the client file.
- If other funds are used for testing, informed consent form must include:
 - o Information from the results of the IAQ Study that there is a small risk of increasing radon levels when building tightness is improved;
 - A list of precautionary measures WAP will install based on EPA Healthy Indoor Environment Protocols;
 - Some of the benefits of Weatherization including energy savings, energy cost savings, improved home comfort, and increased safety; and

Training and Certification Requirements

- WAP Bootcamp (refer to section 1.0 for description of training curriculum)
- A zonal map can be located at http://www.epa.gov/radon/pdfs/zonemapcolor.pdf
- EPA Healthy Indoor Environment Protocols

Documentation Requirements

• Confirmation that EPA's A Citizen's Guide to Radon was received must be in the client file.

	7.19 – Safety Devices:	Smoke and Carl	oon Monoxide Alarms	, Fire Extinguishers			
	Concurrence, Alternative, or Deferral						
Concurre	ence with Guidance 🗹	Alternative G	uidance	Results in Deferral □			
		Fu	nding				
DOE 🗹	LIHEAP □	State □	Utility 🗖	Other			
	What is your po	licy for installati	on or replacement of	the following:			
•	Smoke Alarms: must be installed	where alarms are	not present or are inop	perable.			
•	Carbon Monoxide Alarms: must	be installed where	e alarms are not present	or are inoperable.			
•	Fire Extinguishers: Where solid	fuel burning equip	ment is present, fire ex	tinguishers may be provided as an			
	allowable H&S measure.		_				
		Testing	Protocols				
Testing	Ţ.						
•	Check existing alarms for operati	ion. If they fail to	operate properly, they	must be replaced.			
•	Verify operation of installed alar	•		•			
		Client 1	Education				
•	Provide client with verbal and wi	ritten information	on use of devices insta	lled.			
		Tra	aining				
•	WAP Bootcamp (refer to section	1.0 for descriptio	n of training curriculun	n)			
•	Each sub-grantee should reach or	ut the AHJ's for th	neir area for proper cod	e compliance details.			

7.20 – Occupant Health and Safety Concerns and Conditions							
	Concurrence, Alternative, or Deferral						
Concurrence with Guidance ✓	Alternative Guidance		Results in Deferral □				
	Funding						
DOE ☑ LIHEAP □	State □	Utility 🗖	Other 🗆				
What guidance do you provide Sul	o-grantees for soliciting th	e occupants' l	realth and safety concerns r	elated to			
components of their homes?							
• When a person's health may be at risk and/or WAP work activities could constitute a H&S hazard, the occupant							
will be required to take appropriate action based on severity of risk.							
• Failure or the inability to take	appropriate actions must res	ult in deferral.	•				
What guidance do you provide Sub-g	rantees for determining w	hether occup	ants suffer from health cond	litions that			

may be negatively affected by the act of weatherizing their home?

A Special consideration should be given to at-risk clients. At risk clients include but are not limited to children (4 or younger); elderly (50 or older); person(s) currently under the care of a doctor for asthma or other conditions that could be affected by extreme heat or cold.

The use of Health and Safety Evaluation Form is required to screen occupants to reveal known or suspected health concerns as part of initial assessment/audit.

What guidance do you provide Sub-grantees for dealing with potential health concerns when they are identified?

- If it is determined there is a potential health risk with one or more materials to be used, an alternative material may be substituted if the cost is justified.
- If normal practices of material installation may put the client at-risk, alternative methods may be used. An example is: going through a gable to install insulation instead of going through an interior access point/attic hatch.

Client Education

- Review Health and Safety Evaluation Form with client and have client sign in acknowledgement. A copy of this signed form should be provided to the client.
- Provide client with Sub-grantee point of contact information in writing so client can inform of any issues.

 Documentation Form(s) have been developed and comply with guidance? Yes ☑ No □
- Health and Safety Evaluation Form, completed by auditor, signed by auditor and homeowner.

7.21 – Ventilation and Indoor Air Quality						
Concurrence, Alternative, or Deferral						
ith Guidance 🗹	Alternative Guida	nce 🗆	Results in Deferral □			
	Fundi	ng				
LIHEAP \square	State □	Utility 🗖	Other \square			
Identify the M	Iost Recent Version of	of ASHRAE 62.2	Implemented			
ventilation as required by	ASHRAE 62.2 - 2016	5.				
ASHRAE normative Appe	endix A is employed a	nd an existing far	is being replaced or upgraded to meet			
house ventilation require	ments, take actions to	prevent zonal pre	ssure differences greater than 3 pascals			
the closed door, if one ex	ists.	•				
Т	esting and Final Ver	ification Protoco	ols			
AE 62.2 calculator to dete	ermine required ventila	ation.				
re fan flow of existing far	ns and of installed equi	pment to verify p	performance.			
_	Client Edu	cation				
e client with information	on function, use, and r	naintenance (incl	uding location of service switch and			
cleaning instructions) of ventilation system and components.						
e client with equipment n	nanuals for installed ec	juipment.				
e disclaimer that ASHRA	E 62.2 does not accoun	nt for high polluti	ng sources or guarantee indoor air			
		0 1				
	Traini	ng				
Bootcamp (refer to section	n 1.0 for description of	f training curricul	um)			
AE 62.2 training, including	ng proper sizing, evalu	ation of existing	and new systems.			
	Identify the M ventilation as required by ASHRAE normative Apportance the closed door, if one ex TAE 62.2 calculator to detere fan flow of existing farmer that with information againstructions) of ventilation end client with equipment mention the disclaimer that ASHRA discontant for the	Concurrence, Alternative Guida Alternative Guida Fundii LIHEAP □ State □ Identify the Most Recent Version of the ventilation as required by ASHRAE 62.2 - 2016 ASHRAE normative Appendix A is employed a chouse ventilation requirements, take actions to get the closed door, if one exists. Testing and Final Veron AE 62.2 calculator to determine required ventilating re fan flow of existing fans and of installed equipment with information on function, use, and reginstructions) of ventilation system and compose elient with equipment manuals for installed expected disclaimer that ASHRAE 62.2 does not account the closed for the control of the closed of the control of the closed of the control of the closed of t	Concurrence, Alternative, or Deferration Guidance Alternative Guidance Funding LIHEAP State Utility Utility Utility Utility State ASHRAE 62.2 Ventilation as required by ASHRAE 62.2 - 2016. ASHRAE normative Appendix A is employed and an existing farm-house ventilation requirements, take actions to prevent zonal prethe closed door, if one exists. Testing and Final Verification Protocol AE 62.2 calculator to determine required ventilation. Tene fan flow of existing fans and of installed equipment to verify proceed to the client with information on function, use, and maintenance (incling instructions) of ventilation system and components. Teleint with equipment manuals for installed equipment. The client with equipment manuals for installed equipment. The client with equipment manuals for installed equipment.			

7.22 – Window and Door Replacement, Window Guards					
		Concurrence, Alter	rnative, or Deferral		
Concurrence w	rith Guidance ✓	Alternative Gui	dance	Results in Deferral □	
		Fun	ding		
DOE 🗹	LIHEAP □	State □	Utility 🗖	Other	
What guidance do you provide to Sub-grantees regarding window and door replacement and window guards?					
Replacement, repair, or installation is not an allowable H&S cost.					
 Repla 	cement, repair, or installa	tion is only allowabl	e as an ECM.		

	Testing Protocols			
N/A				
	Client Education			
•	If disturbing lead paint, follow lead safe weatherization practices and inform the client on lead risks, as indicated			
	in this H&S plan, when applicable.			
	Training			
•	WAP Bootcamp (refer to section 1.0 for description of training curriculum)			

WAY Bootcamp (telef to section 1.0 for description of training curriculum)					
		7.23 – Worker Sa	fety (OSHA, etc.)		
		Concurrence, Alter	native, or Deferral		
Concurrence wi	ith Guidance	Alternative Gui	dance	Results in Deferral	
		Fun	ding		
DOE ☑	LIHEAP □	State □	Utility 🗖	Other \square	
Н	Iow do you verify safe v	work practices? What	at is your policy for	· in-progress monitoring	?
		of Employee Certifica	tion Verification Fo	rm is required (including	OSHA
	cation(s)).				
• ADOH	I does in-progress monitor	oring when training a	nd technical assistar	ice is requested.	
•	 During monitoring ADOH staff will verify compliance with the current OSHA Hazard Communication 				
Standard, including on-site organized Safety Data Sheets (SDS).					
	7	Fraining and Certifi	cation Requiremen	ts	
• WAP	Bootcamp (refer to section	on 1.0 for description	of training curriculu	ım)	
	nd importance of Persona	l Protection Equipme	ent (PPE)		
 OSHA 	10 hour training				
Ongoin	ng training as required in	Hazard Communica	tion Program		
 Worke 	ers must follow OSHA st	andards where requir	ed and take precaution	ons to ensure the H&S of	themselves

and other workers.