

**BUDGET INFORMATION - Non-Construction Programs**

|                                                                                                    |  |                                                               |                                  |
|----------------------------------------------------------------------------------------------------|--|---------------------------------------------------------------|----------------------------------|
| 1. Program/Project Identification No.<br>EE0007955                                                 |  | 2. Program/Project Title<br>Weatherization Assistance Program |                                  |
| 3. Name and Address<br>Virgin Island Energy Office<br>4101 Mars Hill<br>Frederiksted, VI 008404474 |  | 4. Program/Project Start Date<br>07/01/2021                   | 5. Completion Date<br>06/30/2022 |

**SECTION A - BUDGET SUMMARY**

| Grant Program<br>Function or<br>Activity<br>(a) | Federal<br>Catalog No.<br>(b) | Estimated Unobligated Funds |                    | New or Revised Budget |                    |               |
|-------------------------------------------------|-------------------------------|-----------------------------|--------------------|-----------------------|--------------------|---------------|
|                                                 |                               | Federal<br>(c)              | Non-Federal<br>(d) | Federal<br>(e)        | Non-Federal<br>(f) | Total<br>(g)  |
| 1. DOE 2021 WAP<br>Formula Funds                | 81.042                        | \$ 352,587.00               |                    | \$ 230,784.00         |                    | \$ 583,371.00 |
| 2.                                              |                               |                             |                    |                       |                    |               |
| 3.                                              |                               |                             |                    |                       |                    |               |
| 4.                                              |                               |                             |                    |                       |                    |               |
| 5. TOTAL                                        | 81.042                        | \$ 352,587.00               | \$ 0.00            | \$ 230,784.00         | \$ 0.00            | \$ 583,371.00 |

**SECTION B - BUDGET CATEGORIES**

| 6. Object Class Categories | Grant Program, Function or Activity |                       |                           |                          | Total<br>(5)  |
|----------------------------|-------------------------------------|-----------------------|---------------------------|--------------------------|---------------|
|                            | (1) GRANTEE<br>ADMINISTRA           | (2) 6023ANTEE<br>T&TA | (3) PROGRAM<br>OPERATIONS | (4) HEALTH<br>AND SAFETY |               |
| a. Personnel               | \$ 12,906.00                        | \$ 6,023.00           | \$ 42,158.00              | \$ 12,045.00             | \$ 73,132.00  |
| b. Fringe Benefits         | \$ 2,107.00                         | \$ 4,449.00           | \$ 31,144.00              | \$ 8,898.00              | \$ 46,598.00  |
| c. Travel                  | \$ 0.00                             | \$ 5,300.00           | \$ 36,714.00              | \$ 0.00                  | \$ 42,014.00  |
| d. Equipment               | \$ 0.00                             | \$ 0.00               | \$ 0.00                   | \$ 0.00                  | \$ 0.00       |
| e. Supplies                | \$ 400.00                           | \$ 36,040.00          | \$ 79,302.00              | \$ 80,626.00             | \$ 196,368.00 |
| f. Contract                | \$ 1,100.00                         | \$ 79,756.00          | \$ 45,750.00              | \$ 32,950.00             | \$ 159,556.00 |
| g. Construction            | \$ 0.00                             | \$ 0.00               | \$ 0.00                   | \$ 0.00                  | \$ 0.00       |
| h. Other Direct Costs      | \$ 796.00                           | \$ 17,140.00          | \$ 20,100.00              | \$ 27,667.00             | \$ 65,703.00  |
| i. Total Direct Charges    | \$ 17,309.00                        | \$ 148,708.00         | \$ 255,168.00             | \$ 162,186.00            | \$ 583,371.00 |
| j. Indirect Costs          | \$ 0.00                             | \$ 0.00               | \$ 0.00                   | \$ 0.00                  | \$ 0.00       |
| k. Totals                  | \$ 17,309.00                        | \$ 148,708.00         | \$ 255,168.00             | \$ 162,186.00            | \$ 583,371.00 |
| 7. Program Income          | \$ 0.00                             | \$ 0.00               | \$ 0.00                   | \$ 0.00                  | \$ 0.00       |

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**WEATHERIZATION ANNUAL FILE WORKSHEET**

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**IV.1 Subgrantees**

| Subgrantee (City)                          | Planned Funds/Units              |
|--------------------------------------------|----------------------------------|
| Virgin Islands Energy Office (St. Thomas ) | \$208,677.00<br>35               |
| Virgin Islands Energy Office (St. Croix)   | \$208,677.00<br>35               |
| <b>Total:</b>                              | <b>\$417,354.00</b><br><b>70</b> |

**IV.2 WAP Production Schedule**

|                                                                                                   |                             |
|---------------------------------------------------------------------------------------------------|-----------------------------|
| Planned units by quarter or category are no longer required, no information required for persons. |                             |
| Weatherization Plans                                                                              | Units                       |
| Total Units (excluding reweatherized)                                                             | <div>70</div> <div>70</div> |
| Rewatherized Units                                                                                | <div>0</div> <div>0</div>   |
| Average Unit Costs, Units subject to DOE Project Rules                                            |                             |
| VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)                                    |                             |
| A Total Vehicles & Equipment (\$5,000 or more) Budget                                             | \$0.00                      |
| B Total Units Weatherized                                                                         | 70                          |
| C Total Units Reweatherized                                                                       | 0                           |
| D Total Dwelling Units to be Weatherized and Reweatherized (B + C)                                | 70                          |
| E Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)                         | \$0.00                      |
| AVERAGE COST PER DWELLING UNIT (DOE RULES)                                                        |                             |
| F Total Funds for Program Operations                                                              | \$255,168.00                |
| G Total Dwelling Units to be Weatherized and Reweatherized (from line D)                          | 70                          |
| H Average Program Operations Costs per Unit (F divided by G)                                      | \$3,645.26                  |
| I Average Vehicles & Equipment Acquisition Cost per Unit (from line E)                            | \$0.00                      |
| J Total Average Cost per Dwelling (H plus I)                                                      | \$3,645.26                  |

**IV.3 Energy Savings**

|                                                                                                                                     |       |                            |                |
|-------------------------------------------------------------------------------------------------------------------------------------|-------|----------------------------|----------------|
| Method used to calculate savings: <input checked="" type="checkbox"/> WAP algorithm <input type="checkbox"/> Other (describe below) |       |                            |                |
|                                                                                                                                     | Units | Savings Calculator (MBtus) | Energy Savings |
| This Year Estimate                                                                                                                  | 70    | 29.3                       | 2051           |
| Prior Year Estimate                                                                                                                 | 70    | 29.3                       | 2051           |
| Prior Year Actual                                                                                                                   | 6     | 29.3                       | 176            |

Method used to calculate savings description:

150 x 29.3 MBtu = 4395 MBtu

**IV.4 DOE-Funded Leveraging Activities**

§440.14(c)(6)(xiv) requires that grantees provide the amount of federal funds to be used, and an

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explanation of how they will be used, to increase the amount of weatherization assistance to low-income clients. Leveraging means securing by a state additional program-targeted non-federal cash or in-kind contributions as a result of the Weatherization Program-funded activities.

The VIEO will not be leveraging any funds. Leveraging is not applicable to the Virgin Islands at this time.

**IV.5 Policy Advisory Council Members**

☒ Check if an existing state council or commission serves in this category and add name below

|                      |                                                                                                                                                                                         |
|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Cassandra Dunn       | Type of organization: Other<br>Contact Name:<br>Phone: 3406266690<br>Email: <a href="mailto:onyxvi@gmail.com">onyxvi@gmail.com</a>                                                      |
| Dennise Singleton    | Type of organization: Non-profit (not a financial institution)<br>Contact Name:<br>Phone: 3402274516<br>Email: <a href="mailto:denycesingleton@gmail.com">denycesingleton@gmail.com</a> |
| Jean Nesbitt-Matthew | Type of organization: Unit of Local Government<br>Contact Name:<br>Phone: 3403323022<br>Email: <a href="mailto:jggmatth@yahoo.com">jggmatth@yahoo.com</a>                               |
| Karen Hunt           | Type of organization: Non-profit (not a financial institution)<br>Contact Name:<br>Phone: (340)713-8083<br>Email: <a href="mailto:khunt@vipistx.org">khunt@vipistx.org</a>              |

**IV.6 State Plan Hearings (Note: attach notes and transcripts to the SF-424)**

Date Held Newspapers that publicized the hearings and the dates the notice ran

04/17/2020 The original Public Hearing was scheduled for March 26, 2020 & the first notices posted in the local newspapers on both islands March 8, 2020. The hearing was rescheduled to April 17, 2020, due to the gathering restrictions as a result of the COVID-19 pandemic. The new announcements and notices were published beginning April 6th thru the 17th via the St. Thomas Daily News, which covers the islands of St. Thomas and St. John, on April 8th, 14th, & 17th. The St. Croix Avis newspaper posted their ads on April 7th, 15, & 17th of St. Croix. A notice was also placed on the VI Energy Office Facebook Page from April 1st thru the 17th. Copies of the ads or the bills are attached to the application.

04/22/2021 The VI Weatherization Assistance Program (WAP) was scheduled and advertised to take place on April 22, 2021, via video conference beginning at 5:30 PM and ending 6:30 PM. The ads were aired on the V.I. Government information/News channel running several times during a 24 hour period from 16th thru the day of the hearing. The WAP Hearing information was also carried on VI Energy Office Facebook Page and website, The Townhall meeting information was also announced every two hour from 7:00 AM through 5:00 P.M on radio shows daily beginning Monday, April 19th through Thursday, the day of the event.

**IV.7 Miscellaneous**

**Recipient Business Officer: Kyle D.Fleming**  
**Director**

**Virgin Islands Energy Office**  
**4100 Mars Hill**  
**Frederiksted, VI 00840** [kyle.fleming@eo.vi.gov](mailto:kyle.fleming@eo.vi.gov)  
**340-713-8436**

**Principle Investigator:**

**Leila Muller**  
**Grants Program Coordinator**  
**Virgin Islands Energy Office**  
**4100 Mars Hill**  
**Frederiksted, VI 00840** [leila.muller@eo.vi.gov](mailto:leila.muller@eo.vi.gov)  
**340-713-8436**

**The Virgin Islands will use the Poverty Guidelines for Hawaii**

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This worksheet should be completed as specified in Section III of the Weatherization Assistance Program Application Package.

**V.1 Eligibility**

**V.1.1 Approach to Determining Client Eligibility**

Provide a description of the definition of income used to determine eligibility

The Virgin Islands has published that the WAP will service families with children, elderly, low income, disabled, high energy use, and high energy burden if the household income is at or below the 200% poverty level.

The Virgin Islands has established and implemented the following procedures to ensure that no dwelling unit is reported as completed until the VI WAP has performed a prescribed final inspection.

This certification shall include a statement that measures have been inspected and installed in a professional manner and that the work was completed in compliance with territorial and federal regulations as outlined in this plan.

**Definitions**

Low-income: Any person or household meeting income eligibility based on 200% of the current federal poverty guidelines for Hawaii.

(1) Is at or below 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget, except that the Secretary may establish a higher level if the Secretary, after consulting with the Secretary of Agriculture and the Secretary of Health and Human Services, determines that such a higher level is necessary to carry out the purposes of this part and is consistent with the eligibility criteria established for the weatherization program under Section 222(a)(12) of the Economic Opportunity Act of 1964;

**DEFINITION OF INCOME**

**A. INCOME:** Income means Cash Receipts earned and/or received by the applicant before taxes during applicable tax year(s) **but not** the Income Exclusions listed below in **Section C**. Gross Income is to be used, not Net Income.

**B. CASH RECEIPTS:** Cash Receipts include the following:

1. Money, wages and salaries before any deductions;
2. Net receipts from non-farm or farm self-employment (receipts from a person's own business or from an owned or rented farm after deductions for business or farm expenses);
3. Regular payments from social security, railroad retirement, unemployment compensation, strike benefits from union funds, worker's compensation, veteran's payments, training stipends, alimony, and military family allotments;
4. Private pensions, government employee pensions (including military retirement pay), and regular insurance or annuity payments;
5. Dividends and/or interest;
6. Net rental income and net royalties;
7. Periodic receipts from estates or trusts; and
8. Net gambling or lottery winnings.

**C. INCOME EXCLUSIONS:** The following Cash Receipts **are not** considered sources of Income for the purposes of determining applicant eligibility:

1. Capital gains;
2. Any assets drawn down as withdrawals from a bank;
3. Money received from the sale of a property, house, or car;
4. One-time payments from a welfare agency to a family or person who is in temporary financial difficulty;
5. Tax refunds;
6. Gifts, loans, or lump-sum inheritances;
7. College scholarships;
8. One-time insurance payments, or compensation for injury;
9. Non-cash benefits, such as the employer-paid or union-paid portion of health insurance;
10. Employee fringe benefits, food or housing received in lieu of wages;

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11. The value of food and fuel produced and consumed on farms;
12. The imputed value of rent from owner-occupied non-farm or farm housing;
13. Depreciation for farm or business assets;
14. Federal non-cash benefit programs such as Medicare, Medicaid, Food Stamps, school lunches, and housing assistance;
15. Combat zone pay to the military; and
16. Child support, as defined below in **Section E**.
17. Reverse mortgages;
18. Payments for care of Foster Children;

**PROOF OF ELIGIBILITY:** Grantees and subgrantees are reminded that proof of income eligibility should be included in the client file.

1. Availability of Supporting Documentation: For purposes of review and audit, each client file must contain an application from the client that contains the required demographics and income for the entire family living in the residence. The file must also contain evidence provided by the subgrantee that the client is eligible to receive WAP services. This evidence may include, but is not limited to, a memorandum from a third party certification office stipulating the income levels of the family or source documentation for each income source listed on the application. These documents can be stored electronically or retained in hard copy for each client.
2. Eligibility Determined by Outside Agency/Program: If income eligibility is determined by an outside agency or program, i.e. Low-Income Home Energy Assistance Program (LIHEAP) or the U.S. Department of Housing and Urban Development (HUD), any document used to determine eligibility, such as a copy of LIHEAP eligibility or a copy of the HUD building list, will suffice as evidence of client eligibility. This document and any related documents must be retained in the client file. The HUD eligible building list can be found at: [http://www1.eere.energy.gov/wip/multifamily\\_guidance.html](http://www1.eere.energy.gov/wip/multifamily_guidance.html)
3. Self-Certification: After all other avenues of documenting income eligibility are exhausted, self-certification is allowable. However, evidence of the various attempts at proving eligibility must be contained in the client file, including a notarized statement signed by the potential applicant indicating that he has no other proof of income.

**E. CHILD SUPPORT:** Child Support payments, whether received by the Payee or paid by the Payor, **are not** considered Sources of Income to be added to the payee income or deducted from the payor income for the purposes of determining applicant eligibility.

1. Payee: Where an applicant receives child support from any state program or individual during an applicable tax year, such assistance is not considered Income for the purposes of determining eligibility (i.e., where an applicant receives Child Support, he or she does not add that amount to his or her calculation of income for purposes of determining eligibility).
2. Payor: Where an applicant pays child support through a state program and/or to an individual, such assistance is not considered a deduction to Income for the purposes of determining eligibility (i.e., where an applicant pays Child Support, he or she may not deduct said assistance from his or her calculation of Income for the purposes of determining eligibility).

**ANNUALIZATION OF INCOME:** Where an applicant receives income for a part of the applicable tax year, their partial income may be annualized to determine eligibility. Example: Applicant A received income during January, February and March. The method of annualizing income to determine eligibility could be multiplied by four to determine the amount of income received during the year. The method of calculating annualized income is to be determined by the Grantee and must be applied uniformly by all subgrantees.

**RE-CERTIFICATION:** An applicant must be re-certified when eligibility lapses due to the length of time the applicant was waiting to receive Weatherization services. As a reminder, re-certification of eligibility must occur at least every 12 months. The Grantee must outline the method of determining re-certification in their Annual Plan for approval by DOE.

Children: Age 5 or younger

Describe what household eligibility basis will be used in the Program

**Household Verification** – Collects personal identifying information about the applicant.

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This section must be completed by the head of household and/or owner/renter of the unit to be weatherized. The head of household is considered the applicant and must provide all pertinent personal information.

- **Gross Monthly Income** – Records income for all household members. The total gross monthly income of the household is used to determine eligibility in the program. Refer to the income guidelines in *Section I, Appendix I*.

Applicant must provide verification of income issued by the employer or any source for the past six months. Applicant must also provide verification for everyone in the household 16 years and older who received income from any source.

The amount to be recorded is the gross, not net, amount. See *Section I, Acceptable Income Documentation* for acceptable documentation of income.

- **Household Occupant Information** – this section list all occupants of the household, including the applicant. This information is used to document and track the makeup of homes participating in the WAP, and the information collected in the questionnaire is used to document the makeup of the types of units being weatherized.

List all household members, beginning with the applicant (head of household).

- **VIWAP Liability Release** – this section requests permission to use any information collected in the media and releases the VI WAP of any liability. This section also grants us permission to request information and directs WAPA to make records available to obtain data to evaluate energy usage and the effectiveness of the program.

Explain the liability release to applicant before signing. Applicant must sign this release.

- **VI WAP Disclaimer** – this section requires applicants to acknowledge that providing false statements or misrepresentation in their application is a federal offence for which they can be fined or imprisoned. VIEO reserves the right to stop the program in a dwelling if there's a discrepancy on the application and actual household occupancy.

- **Privacy Act and Acknowledgement** – every applicant for WAP services must be provided with a copy of the Personal Privacy Protection Law Provisions. Federal law requires that individuals providing confidential information affecting their eligibility be advised of their rights under the Personal Privacy Protection Law Provisions. All information collected will be kept confidential by the agency, its employees, and its representatives.

Explain the Privacy Act to applicant. Leave a copy of the Privacy Act with the applicant. Every applicant for WAP service must be provided with a copy of the Personal Privacy Protection Law Provisions. Applicants should be asked if they understand the Personal Privacy Protection Law Provisions before they sign the application. A copy of the Privacy Act must be given to the applicant, who must sign to acknowledge receipt.

- **WAPA Release of Information** - this section collects information regarding the servicing of the building/unit's utility service. It also identifies the utility that supplies electric services and allows the electric service provider to release information on the recipient's bills, past and future, to the VI WAP. This information is necessary for VI WAP to assess the amount of reduction in electric service expenditures resulting from providing WAP services. This information is also required for any post electric service consumption analysis.

This section must be completed by the owner/renter of the unit to be weatherized. This form must be signed by the person named on the electric service bill for that dwelling unit. This allows the electric service provider to release information on the recipient's bills, past and future, to the VI WAP.

Describe the process for ensuring qualified aliens are eligible for weatherization benefits

VI WAP will follow the guidelines for qualified aliens receiving weatherization benefits that have been approved by the US Department of Health and Human Services (HHS) under the 2015 Low Income Home Energy Assistance Program (LIHEAP) State Plan for the VI Department of Human Services.

### **V.1.2 Approach to Determining Building Eligibility**

Procedures to determine that units weatherized have eligibility documentation

A dwelling unit shall be eligible for weatherization assistance after documenting that priority is given to identify and provide weatherization assistance to elderly persons, persons with disabilities, families with children, high residential energy users and households with a high energy burden.

Rental units will require written permission from the building owner or his representative before commencing work. Low-income tenants residing in such unit will be the primary recipient of the weatherization services. The household will not be subjected to rent increases as a direct result of the weatherization work

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completed. No excessive enhancement shall increase the value of the dwelling unit.

Describe Reweatherization compliance

No reweatherization. VI WAP is not eligible to re-weatherize any homes based on WAP Memo 075 new requirements.

Describe what structures are eligible for weatherization

**Site-Built Dwellings** - Energy audits for single family dwellings will be in accordance with applicable DOE rules and regulations.

**Multi-family dwellings -**

Most small multifamily buildings, especially garden-style apartments, have very little or no common space. Those are more straightforward, and a priority list might apply, subject to the DOE review. If there is significant common space, then a whole building audit is required. DOE will review and approve those specific building audits on a case-by-case basis.

Describe how Rental Units/Multifamily Buildings will be addressed

## Rental Procedures

No leased/rented dwelling shall be weatherized without first obtaining the written permission of the owner of the dwelling unit or the agent. The benefits of weatherization assistance shall accrue primarily to the low-income tenants. Rents shall not be raised because of the weatherization assistance provided by this grant; and no undue or excessive enhancement will occur to the value of the dwelling units. Signed statements will be obtained from the owners or their agents certifying that rents will not be raised because of work done because of this assistance.

The VIEO has established policy to ensure that when VI WAP weatherizes rental units, financial eligibility is determined and written permission of the owner or his agent is obtained. In multiple unit buildings, the VI WAP ensures that 66 percent of the building (50 percent in the case of duplexes or quadruplexes) are eligible units. The policy also ensures that the benefits of weatherization accrue primarily to the tenant, including units where the tenants pay for their energy through their rent.

VI WAP policy for rental units will state that the landlord must agree in writing that for a reasonable period of time, not less than 12 months, the tenant will not be subjected to rent increases unless those increases can be demonstrated to be related matter and conditions other than the weatherization measures performed. State policy also provides an avenue for complaint in such matters. Tenants and landlords are informed in writing that no undue or excessive enhancement shall be provided to the rental unit or building by weatherization assistance.

Describe the deferral Process

## Notice of Ineligibility

Applicants must receive written notification of their eligibility status within 30 days after a completed application has been submitted to the VI WAP Intake Agency Representative. A Notice of Ineligibility must include the reason(s) for denial of WAP services. A copy of the applicant's Notice of Ineligibility must be sent to the intake agency representative and placed in the applicant's files. In multifamily buildings where a notification is posted, one copy should be in the building file.

## Appeals of Ineligibility



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When WAP determines that a household is ineligible, WAP must provide a written denial to the client. A copy of the denial letter with the appeal procedure that was sent to the client must be placed in the client's file.

The appeals process for ineligibility determination is as follows:

1. Applicant will notify VI WAP, in writing, of intent and reason(s) for appeal.
2. VI WAP Admin Assistant will submit applicant's file an appeal letter to the VI WAP grants program coordinator.
3. The WAP Grants Program Coordinator will review the file and make a recommendation to the VI Energy Office Director.
4. The VI Energy Office Director will make a final decision on the eligibility status and a letter will be sent notifying the client in writing of the eligibility determination decision.

## **Grievance Procedure**

1. VIEO has the responsibility to resolve all client complaints, including applicant denials, project deferrals, and work quality issues.
  1. a grievance must be filed in writing for VIEO to take action.
  2. VIEO's process must include the following client rights:
    - (1) have a representative speak on behalf of the client – including an interpreter if needed.
    - (2) review and obtain copies of the client's file
    - (3) present oral and written statements
    - (4) call witnesses and to question or cross-examine witnesses
- c. The client must be informed of a decision to the resolution process within ten (10) working days of complaint receipt.
2. VIEO will inform all clients of their right to file a grievance in their notice of ineligibility.
3. Clients may withdraw a grievance at any time with the understanding that they may re-enter the process at the point they withdrew if a complaint is not resolved.
4. VIEO must:
  - a. document each step of a grievance proceeding, including communication with the client.
  - b. inform client and IAR of final resolution if compliant or grievance is settled quickly.
  - c. provide IAR of all applicable complaint and grievance documentation of the case.
5. Provide a formal ruling on each case within 30 days of receipt of case documentation.

### **V.1.3 Definition of Children**

Definition of children (below age): 5

### **V.1.4 Approach to Tribal Organizations**

☐ Recommend tribal organization(s) be treated as local applicant?

If YES, Recommendation. If NO, Statement that assistance to low-income tribe members and other low-income persons is equal.

At present no Native American tribes are registered the Virgin Islands. However, the Virgin Islands Weatherization Assistance Program does not discriminate against Native Americans or any low income clients no matter what their ethnic origin.

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**V.2 Selection of Areas to Be Served**

The service area will include targeted population on all three (3) main United States Virgin Islands: St. Thomas, St. John, and St. Croix.

**V.3 Priorities**

Applicants' information shall be kept on file with any priorities given to certain portions of the eligible population receiving weatherization assistance. Specifically, as required by §440.16(b), briefly describe procedures to ensure that priority is given to the elderly and persons with disabilities.

**Priorities**

In identifying and providing weatherization assistance, priority is given to elderly and disabled low-income persons, families with small children, and other high energy consuming dwelling units according to the following standard territory wide prioritization procedures. Priority points shall be awarded initially at the time the application is received. Total possible priority points an applicant can receive 40 points. The clients selected for service are based on the applications with the highest number of priority points. Those dwellings are weatherized first.

However, anytime the program deviates from the usual procedure of selecting dwellings to be weatherized, a written explanation for the decision should be documented in the client's folder. These procedures are based upon a Priority Point System in which points are assigned as follows:

**PRIORITY POINT SYSTEM**

- |                                                                                              |           |
|----------------------------------------------------------------------------------------------|-----------|
| 1. Household with disabled person                                                            | 10 points |
| 2. Household with elderly person (60 or over)                                                | 10 points |
| 3. Household with children under 5 years of age                                              | 10 points |
| 4. High energy burden (20% or more of the household income is going towards the energy bill) | 5 points  |
| 5. High utility bill using more than 500 KWH a month or more than \$200.00 a month           | 5 points  |

**V.4 Climatic Conditions**

The following data was accessed from the Southeast Regional Climate Center (SERCC) and is still relevant.

**CHARLOTTE AMALIE, ST THOMAS, VIRGIN ISLANDS**

**Period of Record General Climate Summary - Cooling Degree Days**

-----  
From Year=1972 To Year=2012

Station:(678905) CHARLOTTE AMALIE HAR

Averages Daily Extremes

Cooling Degree Days for Selected Base Temperature (F)

| Base        | Jan. | Feb. | Mar. | Apr. | May | Jun. | Jul. | Aug. | Sep. | Oct. | Nov. |     |      |
|-------------|------|------|------|------|-----|------|------|------|------|------|------|-----|------|
| Dec. Annual |      |      |      |      |     |      |      |      |      |      |      |     |      |
| 65          | 418  | 384  | 437  | 459  | 522 | 551  | 588  | 592  | 556  | 546  | 482  | 446 | 5982 |

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**ST CROIX FAA HAMILTON, VIRGIN ISLANDS**

**Period of Record General Climate Summary - Cooling Degree Days**

**U.S. Department of Energy  
WEATHERIZATION ASSISTANCE PROGRAM (WAP)  
STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0007955, State: VI, Program Year: 2021)**

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From Year=1972 To Year=2012
Station:(670198) ST CROIX FAA HAMILTO
Averages Daily Extremes
Cooling Degree Days for Selected Base Temperature (F)
Base   Jan.   Feb.   Mar.   Apr.   May   Jun.   Jul.   Aug.   Sep.   Oct.   Nov.
Dec.   Annual
65      399    369    419    446    508    542    574    577    538    529    462    429    5794
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**V.5 Type of Weatherization Work to Be Done**

**V.5.1 Technical Guides and Materials**

The purpose of the WAP is to install energy conservation measures in the homes of income eligible persons, especially homes occupied by the elderly, persons with disabilities, and children. Funds are targeted to the most cost-effective conservation measures, determined from an on-site energy audit of a dwelling. The program is intended to reduce national energy consumption and to reduce the impact of higher energy costs on low-income families.

The program is administered by the Virgin Islands Energy Office (VIEO) which will provide energy conservation services through their own trained personnel and by contracting work to local contractors. The contractors will be selected via a competitive Request for Quotes. Energy conservation measures funded through the program range from replacing old, inefficient refrigerators and possibly freezer with Energy Star refrigerators, replacing existing incandescent bulbs with LEDs, installing low-flow shower heads, installing faucet aerators, timers on water heaters, installing motion sensor power strips, replacement of air conditioning units, Energy Star ceiling fans and water heaters. The program assists all types of housing units, from self standing single family homes to multi-family apartment buildings.

Field guide types approval dates

Single-Family: 7/2/2019  
Manufactured Housing:  
Multi-Family:

**V.5.2 Energy Audit Procedures**

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family  
Audit Name: Other (specify)  
The Priority List was approved in May 2016 and consists of the following for single family dwelling: Energy Star Refrigerators, Water heater timers, Low-flow shower heads, Faucet Aerators, LEDs, Air Conditioner, ceiling fans & Water heater replacement.  
Approval Date: 3/8/2017

Audit Procedure: Manufactured Housing  
Audit Name: Other (specify)  
No manufactured homes will be weatherized.  
Approval Date: 3/8/2017

Audit Procedure: Multi-Family  
Audit Name: Other (specify)  
The Priority List was approved in May 2016 and consists of the following for single family dwelling is still being used for both single family dwellings and multi-family. This priority list was updated and approved by DOE.  
Approval Date:

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Comments

**Site-Built Dwellings**

Energy audits will be in accordance with applicable DOE rules and regulations.

**Priority List: Site-Built Dwellings**

VI WAP has identified priority list materials that have been approved by DOE.

*1. LEDs*

- Replace incandescent bulbs used more than one to two hours per day with Energy Star rated LEDs or new fixtures.
- Maintain or moderately improve existing lighting levels (lumens), while minimizing wattage.
- Choose the highest efficacy (lumens per watt) bulbs. Be sure to install bulbs that are suitable replacement bulbs, i.e.: dimmable LEDs in fixtures controlled by dimmer switches; outdoor bulbs in exposed outdoor fixtures.

*2. Refrigerator Replacement*

- Estimate annual electricity consumption by metering or locate usage in a database. If metering, a minimum 2 hour test should be done. If the existing refrigerator uses more electricity than the minimum use threshold below, it can be replaced with a new unit.
  - Refrigerator Size
  - Minimum
  - KWH / 1 Hour (if metering)
  - Minimum
  - KWH / 2 Hour (if metering)
  - Minimum Annual kWh to Qualify for Replacement (if using database)
  - 15 cu. ft. or less .09 .18 788 kWh/yr
  - 16 - 19 cu. ft. .10 .20 876 kWh/yr
  - 20 - 24 cu. ft. .11 .22 964 kWh/yr
  - 25 cu. ft. s-b-s or larger
  - .14 .28 1,266 kWh/yr
- Existing Refrigerator and Freezer Testing Data
- KWh Guidelines for Replacement: Test units for as long as possible but adjust the test results back to a two hour reading. In order to meet the daily minimum guidelines for replacement, the kWh must reach the Minimum kWh/Hour listed above by the end of one hour of monitoring. If at any time during the first hour of monitoring the Brultech reaches the Minimum kWh/Hour, the Auditor will know that the refrigerator is likely to qualify for replacement.
- To get kWh/hour test result:
  1. Divide total kWhs recorded by the meter, by the number of minutes that the meter has been on. Your answer will be the number of kWhs consumed per minute. Multiply this by 60 minutes to get the kWhs used for one hour. This is shown by the formula below:
  2. Total kWhs recorded by meter = kWhs per minute X 60 minutes = kWhs/ one hour
  3. Number of minutes monitored
- If the unit is cooling to a temperature that is too low (wasteful), you may adjust the temperature. See Baseline Electricity Reduction section below.
- If the client uses more than **one refrigerator and/or freezer** and all qualify to be replaced, encourage the client to do with one, new, larger unit. The Energy Auditor/Educator must show the customer a picture of the new refrigerator, measure to ensure the new refrigerator will fit in the client's home, and have the client sign off on the audit form.
- Cost must include purchase, delivery and installation of the new refrigerator, and removal and environmentally responsible de-manufacturing of the old unit.
- Replacement should be determined by using Energy Star guides and formulas designed for the VI that takes into consideration ambient temperatures in the Virgin Islands.

*3. Air Conditioners*

- Replace inefficient air conditioners with Energy Star air conditioners. For all clients whose annual electricity use exceeds 7,000 kWh, you may replace all room air conditioners with an EER of 8 or less with new, Energy Star rated room air conditioners with an EER of 10 or higher. Be sure to properly size the new unit(s) according to the Energy Star recommendations. Choosing the right size when shopping for a room air conditioner is extremely important. Units that are bigger than necessary may not be able to remove the humidity effectively, resulting in an uncomfortable room.

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- A quick and easy way to determine the right size is to refer to the chart below.
  - Area To Be Cooled (sq. ft.) Capacity Needed(Btu/Hour)
  - 100 to 150 5,000
  - 150 to 250 6,000
  - 250 to 300 7,000
  - 300 to 350 8,000
  - 350 to 400 9,000
  - 400 to 450 10,000
  - 450 to 550 12,000
  - 550 to 700 14,000
  - 700 to 1000 18,000
  - 1,000 to 1,200 21,000
  - 1,200 to 1,400 23,000
  - 1,400 to 1,500 24,000
  - 1,500 to 2,000 30,000
- Make adjustments for the following circumstances:
  - If the room is heavily shaded, reduce capacity by 10%.
  - If the room is very sunny, increase capacity by 10%.
  - If more than two people regularly occupy the room, add 600 BTUs for each additional person.
  - If the unit is used in a kitchen, increase capacity by 4,000 BTUs.
- Consider where you install the unit. If you are mounting an air conditioner near the corner of a room, look for a unit that can send the airflow in the right direction.
- For the purpose of this chart, rooms that are connected by permanently open entryways wider than five feet ought to be considered as one room and their square footage should be combined.
- The old air conditioners must be handled according to EPA Clean Air Act, section 608.

**4. Water Heating Packages**

- Check the temperature of the hot water at a sink. Run the hot water for a minute or two and then place the high temperature thermometer in a container and check the temperature. If the temperature is over 130 degrees, offer to set the hot water temperature to 120 degrees and educate client as to why this setting is chosen.
- Install timers on hot water heaters when the client's lifestyle allows.
- Replace inefficient water heaters (planned for the 2nd and 3rd year)

**5. Baseline Electricity Reduction**

- Install power strips to household appliances and electrical equipment for a true "off" of appliances, entertainment equipment, computers and peripherals. Choose "smart" power strips with one or more outlets always on, when appropriate. Choose clamping voltage (how much electricity will trigger it) of at least 330 volts, energy dissipation rating (how much electricity will cause it to fail) of at least 400 joules, and a response time of 10 nanoseconds or less.
- Set freezer temperature between 0 degrees and 5 degrees and refrigerator temperature between 38 degrees and 40 degrees.
- Replace refrigerator with energy-efficient model if testing shows annual consumption is high enough to justify measure cost.
- If the electricity use is high, investigate pump problems. Water leaks can cause the pump to run longer or more often, increasing electricity use. If you hear a pump turn on and off in quick succession, there is likely a problem. WAP doesn't specifically address pump replacement or repair, but if an inefficient or faulty pump is causing high electricity use, it should be fixed.

**6. Heat Loss Reduction**

- Install a low-flow shower head when the existing shower flow exceeds 3 gallons per minute.
- Install faucet aerators on all faucets that don't already have aerators. Be sure the client understands that there will be a decreased flow, which means hot water will take longer to reach the faucet than it did prior to the installation of the new shower head or aerator.
- Solar hot water heaters and heat pump water heaters replacement for families whose energy usage is above average as a result of household composition or unusual needs for energy.

**7. Gas Range Carbon Monoxide Testing**

- Follow this procedure when testing gas ranges and ovens:
- Be sure to monitor ambient air around the oven during testing for client safety.
- See Action Levels below for ambient CO ppm thresholds.

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Range tops:

- Remove all pots and foil from the burner area
- Turn each range top burner on high and allow to warm
- Test burner combustion gases 1 foot above the flame

Ovens:

- Turn the oven on and allow to warm
- Make sure the oven is clear of pots and foil
- Test the gases inside the oven vent sleeve, before dilution air
- Measure CO at steady state, usually after 5-10 minutes of operation, at the highest settings.
- When measuring CO in gas ovens, it is recommended to turn on the exhaust hood and open a window to reduce risk of exposure to elevated ambient CO levels.

Gas Oven/Range Action Levels

If the CO level in the ambient air is 35 ppm at any time, turn off the appliance and make appropriate repair and cleaning recommendations.

If the CO level in the undiluted gases in the oven vent sleeve is 100 ppm to 300 ppm during the testing, the test fails. Investigate the cause and remediate if possible (see steps below). If not possible, abort the test procedure and have the customer clean the oven and/or arrange to have the unit fixed or repaired. Ask the customer to buy and install a CO alarm.

If the CO level in the undiluted gasses in the oven vent sleeve is greater than 300 ppm, the oven must be serviced prior to air sealing measures.

- If any test fails, follow these steps:
  1. Adjust the burners or call in a specialist to mitigate the CO problem
  2. If the CO in the oven vent remains at 300 ppm or greater after servicing, consider seeking approval for:
    1. replacing the unit
    2. installation of an outdoor vented range hood with 25 CFM continuous or 100 CFM intermittent capacity.

Oven/Stove Replacement Policy

Electric ovens/stoves will not be replaced by the program.

Gas ovens/stoves will be tested for CO levels and where the levels are found to exceed thresholds, an attempt will be made to correct the problem, if possible. If the problem cannot be corrected, the client will be advised of the condition of the unit and the client must sign a form acknowledging they understand the risks. If the unit is in such poor condition that servicing will not be effective, the unit may be replaced, but only with approval. All replacement oven/stoves will be equipped with electronic ignition devices.

*8. Walkaways*

The decision to walk away from a dwelling without providing weatherization services is difficult but necessary in some cases. Many problems encountered in low-income housing are beyond the scope of the Weatherization Assistance Program. Walk-away does not mean that assistance will never be available, but that any work must be postponed until the problems can be resolved and alternative sources of help be found as necessary. VI WAP will develop guidelines and a standardized form. The form should include the client's name and address, date of the audit/assessment and when the client was informed, a clear description of the problem, conditions under which weatherization could continue, the responsibility of all parties involved, and the client's signature indicating that they understand and have been informed of their rights and options.

Walk-away conditions may include:

1. The client has known health conditions that prohibit the installation of insulation and other weatherization materials.
2. The building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent and the conditions cannot be resolved in a cost-effective manner.
3. The house has sewage or other sanitary problems so that to begin work on the house would further endanger the client and the weatherization installers.
4. The house has been condemned or electrical, heating, plumbing, or other equipment has been "red tagged" by the local building official or utilities.
5. Moisture problems are so severe they cannot be resolved under existing health and safety measures and minor repairs.
6. Dangerous conditions exist due to high carbon monoxide levels in combustible appliances and cannot be resolved under existing health and safety measures.
7. The client is uncooperative, abusive, or threatening to crew, subcontractors, monitors, inspectors, or others who must work on or visit the house.
8. Contractors/crews are expected to actively pursue all alternative options on behalf of the client, including referrals, and use good judgment in dealing with difficult situations.

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### V.5.3 Final Inspection

Each dwelling unit (100% of jobs weatherized or where base load measures were installed) that is being reported as complete for the purpose of obtaining DOE funds must have in the job file an inspection form signed by a representative designated by VI WAP. The inspection form must have information that indicates that all measures designated to be installed were installed in a workmanlike manner. The signed inspection form certifies that measures installed should under reasonable conditions save energy and make the dwelling more comfortable for the inhabitants. If a designated measure is not installed, then a written explanation must be included in the file and noted on the inspection form.

**Note:** A DOE Weatherized unit is a dwelling unit on which a DOE-approved energy audit or priority list has been applied. As funds allow, the DOE measures installed on this unit have an SIR of 1.0 or greater, but also may include any necessary energy-related health and safety measures. Therefore, a dwelling unit that meets both the definition of a DOE weatherized unit and has DOE funds used directly on it must be counted as a DOE completed unit.

### V.6 Weatherization Analysis of Effectiveness

To effectively calculate the most accurate energy savings for the VI WAP, it will track energy usage information from occupants of the dwellings weatherized. The energy records will cover the period twelve (12) months prior to and twelve (12) months after weatherization. The usage information will be used to compare projected and actual energy savings as well as assist in determining training and technical assistance deficiency and subsequent needs.

The Virgin Islands WAP has begun and will continue to develop policy for evaluating program effectiveness as follows:

#### **Program Administration**

- Complete program implementation oversight
- Maintaining program files and accuracy
- Timely completion and submission of reports
- Work quality and oversight
- Monitoring reports
- Timely submission of all required reports
- Provide accurate budget oversight

#### **Performance Analysis**

- Income eligibility.
- Number of Elderly, Disabled, Children, High Energy User, and Households with High Energy Burden served.
- Expenditures versus number of dwellings weatherized. Production quotas and expenditures.
- Refrigerator testing, and water heating testing
- Client education.
- Health and safety.
- Referrals from ECAP and other nonprofits.
- Proper use of Priority Measures/Weatherization measures selected.
- Final inspection/Re-inspections and follow-up.
- Personnel training and client education.
- Program files and accuracy and timely completion/submission of reports.
- Work quality and oversight.
- Monitoring reports.

### V.7 Health and Safety

**Budgeting:**

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Separate Health & Safety Budget

**Incidental Repairs (List repairs, if any, that will be removed as health and safety measures and implemented as incidental repairs.):**

Incidental repairs necessary for installation of weatherization measures are NOT considered H&S, but will be added to the cost of the efficiency measure and included in the calculated saving to investment ratio (SIR). Such repairs include, but are not limited to:

- Minor electrical, light socket, and switch plates repair for fluorescent lighting installation
- Adequate electrical outlets for room A/C, refrigerator installation, and solar thermal system.
- Protective covering for exterior hot water tanks installed by DOE WAP
- Repair of walls or window frames for room A/C installation
- Minor roof repair for solar hot water collector installation
- Sealing and weather-stripping to prevent air leakage from conditioned rooms to unconditioned space

**Health and Safety Expenditure Limits (Provide a per-unit average percentage and justification relative to the amount. Low percentages should include a statement of what other funding is being used to support health and safety costs, while larger percentages will require greater justification and relevant historical support.):**

Per-Unit Average Percent: 1%

Typical efficiency measures are base load only. 100% of homes have no central air or heating systems and rely totally on natural ventilation. Therefore, there is no air sealing measures or pressure diagnostics performed. With very limited WAP funding available, grantee would like to limit H&S items to only those absolutely necessary to safely complete work. Work over the past few years has indicated that only a minimal amount of H&S would apply to this housing stock and weatherization measures being provided.

**Deferral Policy (Provide a detailed narrative of the grantees overall deferral policy):**

Agency shall utilize the Weatherization Deferral/Referral Notice to provide written notice to clients in dwellings where problems exist that are outside the scope of Weatherization. Clients will be given 30 days as stated on the Deferral Notice to take corrective action. If the client is able to take corrective action within 30 days, work should resume as soon as possible after the Agency receives notification from the client. If problems identified in the Deferral Notice are not corrected within 30 days, the subgrantee places the job in an inactive file. The client can reapply when and if the problems noted on the Deferral Notice have been corrected.

Deferral conditions may include:

- Building structure or its electrical system is in a state of disrepair and failure is imminent.
- Extensive moisture/mildew is severe and cannot be resolved under the existing health and safety measures.
- Improperly stored chemicals, combustible materials, or other fire hazards that present a danger to the occupants or the workers.
- Major remodeling is in progress, which limits the proper completion of major weatherization measures.
- Occupant has known health problems that prohibit the installation of weatherization materials.
- The client is hostile, uncooperative, abusive, threatening to the auditors, crews or staff that must work or visit the dwelling.
- The extent of the lead-based paint in the dwelling would potentially create further health and safety hazards.
- The presence of sewage or animal feces in the home will endanger the workers/crews and client if the weatherization work is performed.
- There is not adequate interior space to install hot water tank and exterior location is exposed to the elements. Cost of constructing an exterior shelter is beyond the scope of the program.
- Other:

**Procedure for Identifying Occupant Health Concerns:**

At the time of application, the client must complete a "Client Health Survey", identifying potential health issues of the applicant and all occupants of the dwelling. This survey will be inserted into the client file for future reference. The energy auditor will review the survey with the client at the time of the initial on-site assessment and verify that information appears to be accurate. The information collected during this process will be used to aid in determining the best material and course of action for the weatherization process. When an occupant's health is fragile and/or work activities would constitute a health or safety hazard, the occupant(s) at risk will be required to leave the home during work activities. Weatherization funds cannot be used to relocate clients. If the client is unable to leave the home and the intended work may exacerbate an occupant's health condition, the home may need to be deferred.

A "Weatherization Deferral/Referral Notice" will be developed for use in the program. This form will include client's name, address, date of audit/assessment, clear description of health and safety issues, when and under what conditions weatherization work could continue, client's signature and date they were informed indicating they were informed of their rights and options. A "Client Health Survey" will also be developed as part of the application package to identify any



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existing health concerns which could be affected by weatherization work.

**Air Conditioning and Heating Systems**

There will be no heating system replacement, repair, or installation with DOE funds as there are no heating systems in grantee's territory.

Central air conditioning systems will not be addressed as the climate does not warrant the need for central A/C. Room air conditioner replacements/repair or installation must first be attempted through cost justification on the priority list before using H & S funding. If this is not possible, air conditioner installation will be allowed in homes of the at-risk occupants as defined as an occupant who has a documented medical need to have conditioned air.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funds will be used for the above activity.

If the measure is beyond the scope of DOE WAP, the client will be notified by the "Weatherization Deferral/Referral" form.

WAP crews will test any existing room air conditioner to determine if it is operable. If it is not and the client meets the at-risk criteria, a replacement room A/C unit that meets the criteria of the priority list will be installed.

When serious electrical hazards, gross overloads, or electrical wiring exposure are present, the energy auditor shall notify the owner and defer the proposed installation of weatherization measures in the unit until such hazards are remedied.

If repair/replacement is beyond the project scope of DOE either for efficiency or health and safety reasons, the client will be notified in writing by the "Weatherization Deferral/Referral" form, and if possible referred to local agencies that could assist.

Training will not be needed, as room air conditioner repair/replacement will be performed by a General Contractor or Vendor. WAP auditor/inspector would verify that installation is complete and adequately installed with no problems.

Auditor/inspector will provide client education on appropriate operation and maintenance of A/C units. An operations manual and any warranty information will be left with the client.

Replaced units will be disposed of according to the environmental standards in the Clean Air Act 1990, Section 608, as implemented by 40 CFR 82 (7/1/2006). Materials shall be disposed of by an EPA-approved section 608 type I or universal certified contractor/vendor, and so noted in the file. Disposed units will be recycled when possible.

Room A/C units will be installed as specified in the grantee priority list and installation standards. Room A/C units that cannot be repaired/replaced through the priority list, and are being repaired/replaced for H & S, will be justified by being located in Climate Zone 1 and identifying at-risk occupants as defined by documented medical reasons for needing A/C.

**Appliances and Water Heaters**

Replacement of water heaters for health and safety is allowed on a case by case basis. Replacement of water heaters with solar or hybrid heat pump water heaters will first be attempted through the priority list. Replacement and installation of other not related appliances are not allowed.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funds may be used for the above activity.

If the measure is beyond the scope of DOE WAP, the client will be notified by the "Weatherization Deferral/Referral" form.

Hot water tanks that are leaking water, producing high carbon monoxide or drafting poorly will be assessed for repair or replacement. Combustion safety testing will be performed on all gas-fired water tanks. If repair is not possible, tank can be replaced. All plumbing work is performed by licensed contractors and must comply with local codes. Local agency staff will confirm installation and that unit is working properly.

If serious electrical hazards, gross overloads, or electrical wiring exposure are present, the energy auditor shall notify the owner and document in the client's file. If such condition is present, the client's home shall be deferred to resolve such major problems prior to any weatherization work.

If repair/replacement is beyond the project scope, agency will make every attempt to refer client to other local agencies who may be able to assist.

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Water heater repair/replacement will be performed by a licensed plumber. Agency inspector will be trained to determine if installation is adequate (hooked up, producing hot water, etc.)

Clients are provided with operating instructions, operating manual, and warranty from the manufacturer.

Disposal of appliances shall be according to the environmental standards in the Clean Air Act 1990, Section 608, as implemented by 40 CFR 82 (7/1/2006). Disposal shall be by contractor/vendor. Disposed units will be recycled when possible.

**Asbestos - in siding, walls, ceilings, etc.**

Any surfaces to be altered in the weatherization process shall be inspected for asbestos prior to alteration. Crews and contractors must work around any asbestos-containing material. Testing or abatement of asbestos is not an allowable H&S expense.

DOE funds will not be used for asbestos testing or removal.

If asbestos is present in any area which will be disturbed during weatherization, the asbestos must be remediated prior to weatherization work using non-DOE funds.

All auditors must attend a formal asbestos awareness training to learn to identify asbestos-containing materials and when it may pose a hazard to clients or workers.

Work will be deferred if crews are unable to perform weatherization due to the presence of asbestos.

If possible, clients will be referred to other possible non-profit community agencies, referral services and private contractors who are licensed and have expertise to perform asbestos removal.

Agency auditors/assessors will be required to take an Asbestos Hazard Emergency Response Act (AHERA) course to be able to identify asbestos.

If asbestos is identified by crew, client shall be instructed not to disturb any suspected surface and given the EPA pamphlet "Asbestos in the Home, a Homeowners Guide."

No asbestos removal work will be performed.

**Asbestos - in vermiculite**

The presence of vermiculite in grantee territory is unlikely as we do not look into the attic. Grantee does not perform any insulation, air sealing, or blower door testing. All measures are base load. However, auditor/assessors will be trained to recognize vermiculite and notify client of its presence.

DOE funding will not be used for testing or removal of vermiculite.

If vermiculite is discovered, the client will be notified and instructed not to disturb the material.

No weatherization work will occur which could possibly disturb vermiculite.

If vermiculite is present in a dwelling and weatherization work would disturb it, the unit would be deferred until the vermiculite is removed.

If possible, client will be referred to local agencies if vermiculite is present.

Agency auditors/assessors will be required to take an AHERA course to be able to identify asbestos in vermiculite.

Clients will be notified of potential hazard and provided with the EPA pamphlet on asbestos in the home.

There will be no removal or disposal of vermiculite allowed.

**Asbestos - on pipes, furnaces, other small covered surfaces**

There are no furnaces in grantee territory. There is nothing to assess.

No DOE funds will be used for this H&S measure.

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This measure is not applicable to grantee territory.

Not applicable. This measure will not be done.

Not applicable, nothing to defer.

Not applicable, nothing to refer.

Not applicable. Assessor/auditors will have AHERA training to identify any potential asbestos.

Since there are no furnaces, it is unlikely that there will be asbestos covering on any pipes. However, if it is identified, client will be notified of asbestos hazard.

Grantee will not be removing or disposing of any asbestos.

**Biologicals and Unsanitary Conditions - odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.**

Remediation of conditions that may lead to or promote biological concerns and unsanitary conditions is allowable. Addressing bacteria and viruses is not an allowable cost. Deferral may be necessary in cases where a known agent is present in the home that may create a serious risk to occupants or weatherization workers.

DOE funds may be used to remediate conditions that may lead to or promote biological concerns or unsanitary conditions. This would typically be a plumbing leak or water drainage under a home.

Client will be asked to correct problem or will be deferred to other agencies who may be able to assist.

Minor plumbing leaks or drainage problems could be remedied with DOE funds.

Deferral may be necessary in cases where a known agent is present in the home that may create a serious risk to occupants or weatherization workers.

Client will be referred to local health and social service agencies who can assist in resolving the issues.

Training for sensory recognition of moisture problems is part of the DOE Mold Awareness training. All auditors/assessors will be required to take basic mold/moisture awareness training.

In homes where mold and moisture has been identified as a problem, clients will be given a copy of "A Brief Guide to Mold, Moisture and Your Home" and given an explanation of conditions that cause deferral.

Disposal of all moisture damaged materials must be in accordance with DOE mold guidance.

**Building Structure and Roofing**

Building structure and major roofing repairs are not allowable. Minor roof repairs and construction of enclosures to protect and preserve DOE WAP installed hot water tanks will be allowed, but this will be included in the installation cost of the measure and must meet the SIR.

Building structure and major roofing repairs are not allowable with DOE funds.

If the repairs and installation cost cannot meet the SIR for the weatherization measure, the unit will be deferred.

There is no remedy. Unit will be deferred.

If dwelling requires structural or roofing repairs, weatherization will be deferred until that work is complete.

Client will be referred to local agencies if repair/replacement is beyond the project scope.

Auditor/assessors will be trained to identify if building structure and roofing is not safe.

Client will be notified that structure is unsafe and referred to housing repair agencies if know.

There will be no removal or disposal of structural or roofing materials.

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**Code Compliance**

Local building code requirements must be followed at all times. This is particularly important when installing solar hot water systems and hybrid hot water heat pump units. Correction of pre-existing code violations in a dwelling is not allowed unless the code corrective action is required due to the installation of a weatherization measures.

DOE funds will be used to comply with local codes in the installation of weatherization materials.

Weatherization work should be deferred if the property has been condemned or red tagged for any code violations which cannot be corrected under this guidance.

Work must meet current applicable code requirements. Work will include obtaining permits and inspection from the local building departments when required.

If the cost of meeting code compliance is excessive and beyond the allowable average cost for the efficiency measure according to the SIR, the property should be deferred until alternative sources of funds are identified to correct the problems.

Client will be referred to other programs or agencies if necessary to bring structure up to code.

Grantee and subgrantees will become familiar with code requirements for installation of weatherization materials by meeting with local code officials. Field personnel are strongly encouraged to attend "building/construction code" instructional classes. The intent of training is not to learn all codes for all trades, but to be aware of codes in the areas that weatherization auditors and crews/contractors commonly encounter. Domestic hot water installation is performed by contractors. Training for code compliance is the responsibility of the installation contractor.

Clients will be informed of changes to their homes as the result of code compliance. They will also be notified by the deferral/referral form if their home cannot be weatherized due to not meeting code compliance.

There are no disposal procedures for this element.

**Combustion Gases**

Combustion safety testing is required when combustion appliances are present. This will include gas water heaters, gas cook stoves, and any other gas appliance located inside the home. Appliances will be tested for carbon monoxide and gas leaks. If air sealing is done due to air conditioning or heating, natural draft appliances will be tested for draft and spillage under worst-case conditions before and after air sealing. This will be done before leaving the home on any day when work has been done that could affect draft (i.e. tightening the home, adding exhaust).

Combustion appliances must vent to the outside. Correction of venting and gas line leaks is allowed when testing indicates a problem. If problems affecting the immediate safety of the occupants are discovered, the client is immediately notified and the appliance disconnected.

Gas ovens will be tested for CO. Cooking burners will be inspected for operability, CO, and flame quality.

DOE funds may be used for combustion testing and venting if required. Correction of venting and gas line leaks is allowable. Repair and cleaning of cook stoves is allowable, replacement is not allowable.

If a combustion appliance cannot be repaired or replaced with DOE funds, it is beyond the scope of WAP and the job will be deferred until the situation is corrected.

If problems are found during combustion gas testing, appliances may be repaired or replaced if allowable under DOE rules. Gas water heaters may be repaired or replaced if repair is not possible. Cook stoves can be cleaned and repaired, but cannot be replaced with DOE funds. Gas dryers can be repaired, but not replaced. (see Appliance and Water Heater section)

Problems found with combustion appliances cannot be corrected with DOE funds and will be deferred.

Whenever possible, clients will be referred to local agencies if repair/replacement is beyond the project scope.

Agency staff and/or contractors shall be trained in CAS testing using proper instruments. Results of testing will be documented in the client files.

Clients with combustion appliances in the home will be provided information and 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.

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No disposal is required for testing.

If a problem exists affecting the immediate safety of the occupant, the client is immediately notified, and if necessary, the appliance is disconnected.

**Drainage - gutters, down spouts, extensions, flashing, sump pumps, landscape, etc.**

Correction of minor drainage, gutters or downspouts to direct rain water away from the building is allowable if within the cost limitations. Installation of gutters, down spouts, extensions, flashing, sump pumps, landscape, is not an allowable cost.

DOE funds can be used to correct minor drainage problems.

Extensive installation of gutters, downspouts, sump pumps or landscaping is beyond the scope of WAP and not allowable.

Drainage problems beyond the cost limitation will not be corrected with DOE funds.

If drainage problems beyond the scope of WAP will affect the operation of any weatherization measures, the work will be deferred until such problems are corrected.

Client will be notified of serious drainage problems that are creating health and safety issues or detrimental to installation of weatherization measures. The client will be asked to correct such problems prior to weatherization and/or referred to local agencies who may be able to assist.

Agency staff will be trained to visually identify any drainage problems.

Client will be notified of health and safety concerns regarding poor drainage and the effect this may have on any weatherization work.

Disposal of any material removed from the structure will be done in an environmentally acceptable manner.

**Electrical, other than Knob-and-Tube Wiring**

Minor electrical repairs are allowed where health and safety of the occupant is at risk. Upgrades and repairs are allowed when necessary to perform specific weatherization measures. Typical repairs may be installing switch plate or outlet protectors, replace ceramic light bulb fixtures, or other means to eliminate exposed wiring. Repair or replacement of faulty electrical outlets for A/C, water heater, or refrigerators is also allowable. Upgrades and repairs for weatherization measures are allowable such as relocation of electrical outlet to allow a gas dryer to be relocated for proper ventilation or proper connection of an existing water heater.

DOE funds will be used for minor electrical repairs associated with weatherization work.

Electrical work beyond minor repairs are beyond the scope of WAP.

Visual inspection will be performed. Crews will check for alterations that may create an electrical hazard. Voltage drop and voltage detection testing are allowed.

When serious electrical hazards, gross overloads, or electrical wiring exposure are present, the energy auditor(s) and crews shall notify the owner and document in the client's file. In such condition, the client shall be deferred to resolve such major problems prior to the installation of weatherization services, ensuring electrical base load is within the electrical safety standards. Weatherization measures that effect electric load include air conditioner(s), refrigerator, and hot water tank replacement.

Client may be referred to other local agencies if repair/replacement is beyond the project scope.

Crews will be trained in basic electrical safety, how to identify electrical hazards, and local code compliance.

Installation contractors are responsible for proper electrical installation of appliances.

Clients will be provided with information and explanation of the hazards of overloading circuits, basic electrical safety/risks and over current protection (where applicable)

Any electrical materials removed from homes will be disposed of per EPA guidelines.

**Electrical, Knob-and-Tube Wiring**

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Since no attic insulation will be installed in grantee's service territory, there will be no inspection for knob-and-tube wiring.

No DOE funds will be used. There will be no insulation placed over knob-and-tube wiring.

This is beyond the scope of the grantee's weatherization program.

No testing will be done, no attic insulation.

No work will be done in attics with knob-and-tube wiring.

If knob-and tube wiring is discovered, client will be referred to other programs as this is beyond the project scope.

No training will occur as no work will be performed in this area.

No client education will be done as no work will be performed in this area.

No disposal procedures are necessary as no work will be performed in this area.

**Fire Hazards**

Current inspection criteria take into account fire hazards. These include combustion appliance venting systems and required clearances. Auditors also identify any flammable material close to combustion appliances and existence of electrical circuit overloads.

DOE funds may be used for identification and correction of fire hazards when necessary to perform weatherization work.

Gross fire hazards that are beyond the scope of weatherization will require deferral of the job until hazards are corrected.

Fire hazards will be ameliorated or removed prior to weatherization work.

If the fire hazards are beyond the scope of WAP, the job will be deferred until the hazard has been remedied.

Client will be referred to other agencies/programs if repair/removal is beyond the project scope.

Auditors/crews will be trained in basic fire hazard safety.

Clients will be notified of any potential fire hazards in the home.

Any flammable material will be disposed of according to EPA guidelines.

**Formaldehyde, Volatile Organic Compounds (VOCs), and other Air Pollutants**

Air pollutants will be identified by auditor/assessors prior to any work on the job. 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 work (old paint cans, oil in garages, etc.) is not allowed.

DOE funds may be used to remove pollutants that are of danger to weatherization workers.

Removal of pollutants not related to weatherization work is not allowable.

Dangerous air pollutants will be removed prior to any work.

If pollutants cannot be removed, the work will be deferred until the situation is remedied.

Client will be referred to other programs/agencies if pollutants are beyond the project this scope.

Weatherization auditor/assessors will be trained to recognize common household pollutants including formaldehyde, tobacco smoke, thinners, solvents, cleaners, and any other substances capable of negatively impacting indoor air quality.

Clients will be informed of observed conditions and associated risks. Client will be given written information and explanation on safety and proper disposal of

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household pollutants.

Pollutants will be disposed of following EPA procedures.

**Injury Prevention of Occupants and Weatherization**

*Workers – Measures such as repairing stairs and replacing handrails.*

Workers must take all reasonable precaution against performing work on homes that will subject workers or occupants to health and safety risks. Minor repairs and installation may be conducted only when necessary to effectively weatherize the home. Otherwise, these measures are not allowed.

DOE funds will not be used to make general home repairs.

This is beyond the scope of the DOE WAP and home repairs will not be made.

Stairs, handrails, and other general repairs will not be made with DOE funds.

If worksite is not safe, weatherization will be deferred until a safe work environment can be created by client.

Client will be referred to other local social service agencies if repair/replacement is beyond the project scope.

Assessors will be made aware of general hazards which could prevent weatherization.

Client will be informed of dangerous and unsafe condition of the home.

No disposal, as no work will be performed in this area.

**Lead Based Paint**

Work that disturbs painted surfaces on pre-1978 housing must be in accordance with the EPA's Lead RRP requirements. All testing, job site set-up and clean-up must be supervised by a Certified Renovator and each crew member must be accompanied by a Certified Renovator. (Currently only HCAP and MEO have received certification). Typical work that may disturb lead paint in pre-1978 homes could include window or through wall Room Air Conditioners.

Solar or hybrid hot water system installed with through the wall penetrations will also follow LRRP and LSW. It is doubtful that the disturbance of paint will be affected beyond the minimum levels for these measures, but if it will, the job will be deferred.

DOE funds will be used for lead paint testing, site set-up, clean-up, and verification on all pre-1978 homes.

If it appears that extensive amounts of lead paint will be disturbed by weatherization creating further health and safety hazards, the client will be notified that the job will be deferred.

Workers will follow EPA's RRP requirements and DOE protocols for lead safe weatherization (LSW).

Deferral is required when the condition of the lead based paint in the house is potentially a health and safety hazard.

Client will be referred to local lead abatement agencies if the condition of lead paint appears dangerous to health.

All workers must be trained in LSW and Certified Renovators must attend EPA training.

Where lead paint is present, clients must receive and acknowledge with signature, the most current EPA "Renovate Right" pamphlet.

Proper disposal of lead-paint debris must be in accordance with EPA LRRP protocols.

All weatherization staff must complete LSW training within 30 days of grant approval and 30 days from hire subsequently. The grantee maintains records of staff trained and certifications.

**Mold and Moisture**

Grantee will not be correcting any mold and moisture problems. If these problems are encountered during assessment, home will be deferred until problems are

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resolved.

DOE funds will not be used to eliminate mold and moisture.

With limited grantee funds, this issue will not be treated.

Weatherization will be deferred if mold or moisture exists in home.

Water damaged homes shall be deferred

Client will be asked to resolve mold and moisture problems prior to weatherization work. If mold and moisture problems are severe, they may be referred to other local agencies for assistance.

All workers will receive Mold and Moisture training on how to recognize problems.

Clients shall receive "Mold Resources: <http://www.epa.gov/mold/moldresources.html> ; "A Brief Guide to Mold, Moisture and Your Home: U.S. Environmental Protection Agency (EPA), Indoor Environments Division (IED). [www.epa.gov/](http://www.epa.gov/)

No disposal, as no work will be done on this item.

Suspected mold or severe moisture problems will be identified, using sight and smell, during the early stages of an assessment and a determination made of the severity or extent of the problem. If problem is too severe to weatherize home, client will be notified and job deferred until problem is resolved.

**Occupant Preexisting or Potential Health Conditions**

During application intake and home assessment, subgrantee will determine if a person's health may be at risk and/or the work activities could constitute a health or safety hazard. The occupant at risk will be required to take appropriate action based on severity of risk. Temporary relocation of at-risk occupants may be allowed on a case by case basis. Failure or the inability to take appropriate actions must result in a deferral.

No DOE funds will be spent on this item.

This is beyond the scope of DOE WAP and home will be deferred if weatherization cannot be done with risk of health and safety of occupants.

Occupants at-risk will be asked to leave home during weatherization or home will be deferred.

If at-risk occupants cannot be relocated during weatherization, the home shall be deferred.

Client may be referred to other social service agencies for assistance.

Training will be provided on how to assess occupant pre-existing conditions and determining course of action is required.

Client will be provided with information on any known risks to their health conditions.

No disposal, as no work will be done.

**Occupational Safety and Health**

Administration (OSHA) and Crew Safety

All workers must follow OSHA standards and Material Safety Data Sheets (MSDS) and take precautions to ensure the health and safety of themselves and other workers. MSDS must be posted wherever workers may be exposed to hazardous materials.

DOE funds will be used for OSHA training.

DOE funds will be used to provide 10-hour OSHA safety training to all on-site assessors/inspectors. The on-site staff performs initial assessment, install LEDs and water flow restrictors, and perform final inspections. Since the grantee program is very small and only base load measures are installed. It is felt that the 30-hour OSHA course would not provide any additional useful information for the type of work being conducted. Installation of solar hot water systems and hybrid heat pump water heater will be done by contractors. Room air conditioners and refrigerators are delivered and installed by vendors. Old units are disposed of by vendors per EPA guidelines.



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**Pests**

Pest removal will not be done under DOE WAP.

DOE funds will not be used for pest removal.

If the presence of pest interferes with weatherization, job will be deferred until pests are removed.

Infestations of pests may be cause for deferral where it poses a health and safety concern for workers.

Client may be referred to other local agencies if pest infestation is severe and client cannot correct problem themselves.

Training will be provided on how to assess presence and degree of infestation, associated risks, and deferral criteria.

Client will be provided with information on observed condition and associated risks and reasons for deferral.

No disposal, as no work will be done.

**Radon**

Since homes will not be sealed due to natural ventilation, there will be no testing for radon. Only base load measures will be installed which should not affect infiltration or concentration of radon in homes.

No DOE funding will be used for radon testing.

This is beyond the scope of the grantees weatherization program.

Radon will not be tested.

Radon will not be addressed as no homes will be tightened as a result of weatherization.

Client will be referred to EPA if they have concerns about radon.

There will be no training for radon testing or amelioration as this will not be address by grantee.

Client will be referred to EPA consumer's guide to radon if they express a concern.

No disposal, as radon will not be addressed.

**Refrigerant**

Refrigerant will be disposed of as per Clean Air Act 1990, section 608, as amended by 40 CFR82, 5/14/93. Refrigerator and room A/C vendors will provide documentation to subgrantee regarding proper disposal of old units. Subgrantee will maintain records in client files. Every attempt will be made to recycle old appliances.

H & S funds will not be used to pay for removal and disposal of old refrigerator and room A/C units. This cost will be included with the cost of the energy efficiency measure.

No new units will be installed and old removed unless a vendor can certify to the above EPA regulations.

Refrigerant will be disposed of per the EPA guidelines mentioned above.

If refrigerant cannot be disposed of per EPA guidelines, refrigerator will not be removed, and a new refrigerator will not be installed.

We see no instance were referral would be recommended.

Assessors/inspectors will provide assurance that contractors/vendors are following the above regulations. State will monitor local agencies and local agencies will monitor contractors/vendors to assure compliance.

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Clients will be informed why and how refrigerant must be disposed of safely.

Disposal will be per EPA regulations mentioned above.

**Smoke, Carbon Monoxide Detectors, and Fire Extinguishers**

Installation or replacement of smoke/CO detectors is allowed where detectors are not present or are inoperable. Replacement of operable smoke/CO detectors is not allowable. Providing fire extinguishers are not allowable.

DOE funds can be used for installation of smoke/CO detectors in homes receiving weatherization measures.

Grantee does not envision this to be beyond the scope of DOE WAP.

Smoke detectors may be installed in all dwellings weatherized where detectors are not present or are inoperable. CO detectors or combination smoke/CO detectors may be installed in homes with combustion appliances.

Where available, client can be referred to local agencies such as fire departments for installation of smoke alarms.

Training will be provided to assessors in installation of smoke/CO alarms.

Clients will be educated on the operation of smoke/CO detectors installed by weatherization crews.

Inoperable units will be removed when possible and disposed of per EPA guidelines.

Smoke/CO detectors can be installed per manufacturer's guidelines in all dwellings where detectors are not present or are inoperable. Agency may install as many units as are recommended/required under current local building code. Agencies will include a clause in their initial application packet that releases the Agency and or staff from any liability as a result of weatherization work done to the client's home. Agency will provide instruction for use and maintenance of the installed device(s).

**Solid Fuel Heating (Wood Stoves, etc.)**

There are very few wood stoves in grantees territory due to the mild climate.

These would only be found at very high elevations. It is not anticipated that any will be found in client homes. However, maintenance, repair, and replacement of primary indoor heating units is allowed where occupant health and safety is a concern. Maintenance and repair of secondary heating units is allowed.

DOE funds can be used for this measure, but very few, if any, are expected.

If solid fuel heating units are beyond the scope of WAP, the unit would be deferred.

A licensed contractor would be hired to inspect the wood stove for safety, proper installation and venting. If the unit is found defective, it will be repaired or replaced with a safe, energy efficient unit.

If the cost of repair/replacement is beyond the scope of WAP, the unit would be deferred.

Client may be referred to other local social service agencies for assistance.

No training will be provided to WAP crews. Only a licensed contractor will be hired to perform this work.

Client will be educated as to the dangers of an improperly burning combustion appliance in the home.

Disposal of any old units will be done by the vendor.

**Space Heaters, Stand Alone Electric**

Because of grantee mild climate very few space heaters are found in client homes. Repair, replacement, or installation is not allowed. Removal is recommended.

DOE funds will not be used for space heaters.

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This is beyond the scope of DOE WAP and will not be addressed.

Crew will check circuitry to ensure adequate power supply for existing space heaters.

No work will be done on space heaters.

Clients may be referred to other agencies if units are unsafe.

Crews will be trained on basic electrical safety.

Agency staff will inform clients of the hazards and collect a signed waiver if client does not permit removal of unit.

Space heaters will be disposed of per local regulations.

**Space Heaters, Unvented Combustion**

Because of grantee's mild climate very few space heater are anticipated to be found.

If they are found, removal is required, except if unit conforms to ANSI Z21.11.2, prior to any weatherization.

DOE funds may be used for testing for air-free carbon monoxide (CO) and checking for ANSI labeling.

If unit is determined to not meet the ANSI standard and client refuses removal, weatherization cannot be performed.

Unsafe units will be removed from home. Testing for air-free carbon monoxide is allowed.

Weatherization will be deferred if unsafe units are not removed from home.

Client may be referred to other agencies for heating assistance.

Crews will be trained to understand the dangers of unvented space heaters and to perform air-free CO testing (or hire a licensed contractor to do so).

Crew will inform client of dangers of unvented space heaters- CO, moisture, and NO2.

Old units will be disposed of per local regulations.

**Space Heaters, Vented Combustion**

It is not anticipated that these heaters will be found in grantees territory due to the mild climate. However, if vented space heaters are discovered, venting will be tested consistent with furnaces. Draft and CO testing will be conducted, and for steady state efficiency, if possible.

DOE funds can be used to test vented space heater. Repair and replacement is not allowed.

Only if the costs go beyond the allowable cost of weatherization would this be beyond the scope.

Repair or replacement of the faulty space heater by a licensed contractor.

Work would be deferred if the cost of repair or replacement was beyond the DOE allowable cost per unit.

Clients may be referred to other agencies if work is beyond the scope of DOE.

Agency crew will be trained to recognize and test vented combustion space heaters.

Clients will be educated as to the dangers of CO from space heaters that are not properly vented.

Disposal of any heaters removed would be according to local codes.

**Spray Polyurethane Foam (SPF)**

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No spray polyurethane foam will be used as no air sealing is done to homes in grantees territory due to the mild climate.

**Ventilation**

When no air sealing measures are performed on a home, grantee is requesting an exception from whole house ventilation and local exhaust provisions of ASHRAE 62.2 - 2016, Ventilation and Acceptable Indoor Air Quality in Low-Rise Buildings. Grantee will follow option B of ASHRAE 62.2-2016.

DOE funds will be used for comply with ASHRAE 62.2-2016 Ventilation requirements whenever air sealing is performed on a home. However, because few low-income weatherization-eligible homes have central A/C and are open to natural ventilation, it is not anticipated that air sealing will be done at this time.

If a home is assessed that has central A/C or appears to not have adequate natural ventilation, it will be deferred until a proper assessment can be made by a "licensed design professional. "

If it becomes too expensive or difficult to have home comply with the ventilation requirement, work will be deferred.

Client will be referred to local agencies if repair/replacement is beyond the project scope.

Training will be provided to local agencies on meeting this requirement. Training will take place in next six months and grantee has one year to demonstrate full compliance to this requirement.

Client will be provided with information regarding adequate ventilation and how it can enhance indoor air quality and prevent pollutants and moisture from accumulating in the home.

Any materials used in meeting the ventilation requirement will be disposed of per local code requirements.

In meeting the provisions of ASHRAE 62.2-2016, grantee proposes an exception to Section 4. Whole-Building Ventilation. Grantee feels they have met the criteria for exception as defined by a) residential buildings in grantees territory have no central mechanical cooling systems and are located in Climate Zone 1, and b) authority having jurisdiction has determined that window operation is a locally permissible method of providing ventilation. Homes being weatherized have no "pressure boundary" as defined by ASHRAE 62.2-2016. In essence, there is no separation of indoor and outdoor air as almost all homes in grantee territory have windows and doors open to natural ventilation most of the year. Most Hawaii homes have around a ratio of 14% window area to floor area, far exceeding 62.2 -2016, and ensures a free flow-through, virtually eliminating IAQ and mold problems.

Due to the constant average temperatures where even the extreme highs and lows are near or above the typical design of 65F, envelope air sealing and insulation is determined to not be cost effective and will not be a part of the program. The only A/C in weatherized homes will be individual room A/C and will be primarily operated at night in bedrooms and the bedroom will likely be openly ventilated during the day. As the relative humidity is typically high, both exhaust and intake ventilation to a room with A/C would only serve to introduce additional moisture into the room. This would make the room uncomfortable, cause higher energy consumption by the A/C, and would likely decrease IAQ as increased condensation may occur on cooled surfaces in the room promoting the growth of mold and mildew.

Regarding Section 5, Local Exhaust, if there are signs of mold in often closed rooms with a high internal moisture source and potential for strong odors, spot ventilation will be installed. This means a low sone bath exhaust fan with a minimum 70 cfm will be installed in bathrooms with existing moisture problems evident to the pre-weatherization assessor.

In order to meet Section 6 of ASHRAE 62.2-2016, measures will be taken to minimize air movement across envelope components separating dwelling units from attached garages to avoid any possible CO infiltration. Since the homes are not conditioned, there is no point in sealing off unconditioned crawl spaces and attics.

Clothes dryers will be exhausted directly to the outdoors.

Although rare, grantee will assess any combustion and solid-fuel burning appliances as indicated earlier in this document and assure that they are provided with adequate combustion and ventilation air and vented in accordance with manufacturer's instructions.

Grantee proposes to train all weatherization staff on identification of ventilation, IAQ, mold, and moisture issues within the next 6 months and provide ventilation assessment as part of the H&S home assessment procedures. Contractors will be identified who are capable of installing exhaust fans and venting dryers where necessary. Grantee will have procedures and protocols in place by the beginning of the FY13 program year.

**Window and Door Replacement, Window Guards**

Window and Door replacement are not an allowable weatherization cost.

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DOE funds will not be used to replace windows or doors.

This is beyond the scope of the grantees program.

If home is in total disrepair, weatherization will be deferred until repairs are made.

Client will be referred to other agencies for any window or door repair or replacement.

## **V.8 Program Management**

### **V.8.1 Overview and Organization**

The VIEO is organized to administer respective program functions through VI WAP and will serve as a direct service grantee with no subgrantees.

#### **The Virgin Islands Energy Office, through Federal funds:**

Is the primary administrator of energy programs in the Virgin Islands. The VIEO is charged with establishing and monitoring the integration of programs and policies relating to the conservation, use, control, and allocation of energy. The VIEO has embarked upon numerous undertakings that have positively impacted the economic and environmental sustainability of the Virgin Islands.

Provides technical assistance to local agencies and communities in developing and carrying out such programs;

Provides the Governor with information with respect to programs and policies of energy efficiency and renewable energy.

Acts as an advocate for energy efficiency and renewable energy at the territorial and national level and provides the Governor, Legislature and other public and private entities throughout the state with information on how energy impacts socio-economic conditions affecting all Virgin Islanders especially low-income Virgin Islanders as requested.

Mobilizes federal and territorial energy resources to enable the Governor to effectively respond to the needs of who are economically or socially disadvantaged;

Monitors, conducts, supervises and administers those matters pertaining to energy program funded. In Virgin Islands in coordination with pertinent state and federal agencies as directed by the Governor, or appropriate Federal authorities, with the concurrence of the Governor.

### **V.8.2 Administrative Expenditure Limits**

The Virgin Island Government will cover part of the administrative cost for WAP grant. The Virgin Island Government General Fund will pay:

50% of the Grants Program Coordinator's Salary which is \$25,000

50% of the Audit Inspector's Salary which is \$20,000. Responsibilities includes audits, installation of certain measures and Final Inspections in St. Croix.

### **V.8.3 Monitoring Activities**

**A. Approach.** The Grantee will conduct comprehensive monitoring of its operation and file a written report which will be available for review by the PO during the on-site visit. The comprehensive monitoring will be performed by Grantee staff and will include the following areas and details:

- **Programmatic and Management Monitoring**

- Financial/Administrative

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- Audits
- Payroll/Personnel
- Procurement
- Davis Bacon (Recovery Act only)
- Vehicles, Equipment, Inventory, Materials
- Eligibility
- Program Overview (Client File Review, Work Orders, etc.)
- Rental
- Feedback and Reporting
- Energy Audits
- Field Work
- Health & Safety
- Final Inspections
- Training & Technical Assistance
- Invoicing
- Records Retention
- SERC Monitoring (if applicable)
- Staff or entity performing the monitoring
- How monitoring results are handled and required follow-up procedures

**B. Production.** Direct Service Grantee will inspect 100 percent of all production and confirm the quality and completeness of work before reporting the completed unit to the Grantor for reimbursement, Grantees will complete reviews of at least 5 percent of each completed weatherized units (with DOE funds). The Grantee will also review units "in progress" beyond the 5 percent completed units, in order to assess: quality and compliance; appropriate and allowable materials; appropriateness and accuracy of energy audits (no missed opportunities); comprehensive final inspections; safe work practices, such as lead safe weatherization protocols; and other factors that are relevant to on-site work. If significant deficiencies are discovered, such as health and safety violations, poor quality installation of materials, major measures missed, then the Grantee must take appropriate corrective action to resolve the outstanding issues in a timely manner. The Grantee State Plan must describe the process for meeting this requirement. By the close of the program year, the Grantee will have completed a review of its latest financial audit. Failure to comply with this requirement is sufficient cause to require special conditions to the grant under 10 CFR 600.212.

**C. Visit.** The Grantee staff or contractor will follow the identified monitoring areas under the Approach section and ensure these areas are reviewed within the monitoring process. If Health and Safety issues that present imminent danger to people in the house are found during a visit, the Grantee will immediately resolve the issues. Sensitive or significant noncompliance findings, such as waste, fraud, or abuse will be reported to DOE immediately.

**D. Tracking and Analysis.** All the results of Grantees monitoring including, financial reviews, will be tracked by the Grantee to final resolution. The tracking record will include: findings, concerns, recommendations, commendations, best practices, corrective actions, deliverables, technical assistance and training provided, and resolutions.

**V.8.4 Training and Technical Assistance Approach and Activities**

**Training and Monitoring – See WAP training Plan Attached to Application**

The weatherization Program Specialist is responsible for maintaining the staff and contractor's weatherization health and safety program. Specific responsibilities may be delegated to adequately trained and competent personnel.

**1. Employee Training**

New employees should not begin working in the field until training is provided. Training will include:

- a. Conventional health and safety issues such as heavy lifting, safe ladder usage, electrical safety, power tools, other work practices, and conditions encountered in the weatherization program.
- b. Use, maintenance, and importance of protective equipment such as eye and ear protection, respirator, and gloves.

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c. Proper usage of hazardous chemicals and substances such as foams, sealants, and cleaners in the weatherization work environment.

d. The Material Safety Data Sheets (MSDS) provided by suppliers that describe the method to properly handle potentially hazardous materials. Inform employees where the MSDS are located, how to understand their content, and how to obtain and use appropriate hazard information.

**TRAINING AND TECHNICAL ASSISTANCE (T&TA)**

The VIEO and VI WAP will utilize T&TA funds for attending local and national weatherization training meetings and conferences.

Certification Trainings – (a) Building Analysts Recertification - 3 (b) Energy Auditing - 3

Specialized Trainings – Quality Control Inspector - 1

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**Percent of overall trainings**

Comprehensive Trainings: 47.5

Specific Trainings: 52.5

**Breakdown of T&TA training budget**

Percent of budget allocated to Auditor/QCI trainings: 28.0

Percent of budget allocated to Crew/Installer trainings: 24.5

Percent of budget allocated to Management/Financial trainings: 47.5

**V.9 Energy Crisis and Disaster Plan**

**DISASTER RELIEF**

The Virgin Islands Weatherization Assistance Program (VI WAP) Disaster Relief

Plan is to provide emergency services to low income individuals and families who at the time of the disaster have a six month notice of certification from the Dept. of Human Services Energy Crisis Assistance Program (ECAP) and have been affected by a disaster as determined by a Presidential or Gubernatorial order declaring either a Federal or State Emergency.

The plan will be in effect for a minimum of six months but could be extended dependent upon the anticipated recovery period.

Disaster relief services are only available to qualified low income households directly affected by the declared disaster. VI WAP may re-prioritize service requests from these households so that timely weatherization can be provided. Dwellings may only be provided weatherization services that are not paid for by insurance. The burden of proof of what is and is not covered by insurance is put on the policy holder.

Emergencies may be a result of natural or man made factors. The Weatherization Assistance Program works within the WAP guidelines in WPN 127 to assist the territory and community authorities in normalizing areas affected by a disaster by providing WAP resources to assist Virgin Islands low income citizens in recovering and rebuilding after the disaster. The Weatherization Program will adhere to the WAP guidelines when responding to any disasters in which the low

Disaster mitigation planning activities shall be implemented as soon as practical after the declaration of a disaster. The VI WAP shall not commit WAP resources (labor or financial) until it receives approval from the VIEO.

Any additional disaster related funds will be allocated based on the extent of the disaster in each district area. Funds must supplement, not supplant, other funds available for disaster assistance. All funds received by the client to cover damages must be considered prior to the allocation of WAP resources.

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*Attachment 1*, the Disaster Certification form located at the end of this section should be completed for each client requesting disaster assistance.

Safety measures, such as downed power lines, must be in place prior to mitigation activities. VI WAP staff should consult with local utilities to ensure electric, gas and sewer hazards have been corrected or repaired.

**Allowable disaster activities may include:**

Weatherization of eligible homes.

- The following VI WAP priority list is recommended for disaster homes.

· Replacing damaged refrigerators

**Eligibility Requirements**

VI WAP must ensure that applicants for disaster assistance (1) meet the current eligibility

requirements, (2) are located within the designated disaster area and (3) have been directly affected by the disaster. **Homes located in FEMA sanctioned areas are not eligible for assistance.**

Applicant homes must be certified as habitable, and a disaster certification form must be completed, signed and retained in the client file. The owner of a rental unit must list the property with Section 8 or provide other proof that the unit will remain exclusively for the low income.

Client income eligibility may be based on one month's income, and client certification will suffice if no documentation is available. Clients who have been qualified as eligible for services and have Vic electricity in their home at the time of the disaster will be served first. Other eligible clients will be served as soon as power is restored.

If disaster damaged dwellings have been previously weatherized, they may be reweatherized without regard to the initial date of weatherization if the damage is not covered by insurance. Victims may receive repair or replacement to domestic hot water heaters as a health and safety measure.

**Additional Funding**

If additional funds are received, the VI WAP may allocate up to \$6,000 per unit. If no additional funds are received, the state plan cost limits apply. Program operations money may be used to support mitigation and cleanup activities. No additional administrative funds will be provided for disaster work.

**Disaster Expenditures Accountability and Reporting**

Disaster expenditures must be accounted for and reported on the monthly and quarterly report.

**Contributions**

VI WAP will not require an owner/landlord for a co-participation match contribution at the time of disaster that hinders the client's chances for receiving services in the event the landlord does not agree or cannot afford to contribute.

**Virgin Islands Weatherization Assistance Program**

**DISASTER CERTIFICATION**

**APPLICANT'S**

NAME: \_\_\_\_\_ ECAP # \_\_\_\_\_

Address: \_\_\_\_\_ Phone: \_\_\_\_\_

**Prior to any work being performed on your house, the following information must be provided.**

Did you apply for or receive any funds from FEMA (disaster money) for damage to your house? Yes\_\_ No\_\_

Did you apply for or receive any funds from FEMA (individual and family grant program) for personal



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items? **Yes** \_\_\_\_ **No** \_\_\_\_

Do you rent or own where you are living ? Rent \_\_\_\_ Own \_\_\_\_

If you rent please give the name of your landlord and his contact number.

Name \_\_\_\_\_ Phone # \_\_\_\_\_

Do you plan to continue living in your house? **Yes** \_\_\_\_ **No** \_\_\_\_

Did you receive any funds from insurance or other sources because of the disaster? **Yes** \_\_\_\_ **No** \_\_\_\_

If yes, please provide a list showing the amounts, from whom, and for what the money was provided for.

**Provider's Name:** **Amount: \$** **For:** \_\_\_\_\_

**Provider's Name:** **Amount: \$** **For:** \_\_\_\_\_

**Provider's Name:** **Amount: \$** **For:** \_\_\_\_\_

All **FEDERAL** funds I have received have been spent on allowable measures? **Yes** **No**

I certify that the above information is true to the best of my knowledge.

\_\_\_\_\_

**Applicant's Signature**

\_\_\_\_\_

**DATE**

\_\_\_\_\_

**VI WAP Staff Signature**

\_\_\_\_\_

**DATE**