



NH WAP HEALTH & SAFETY PLAN

For Program Year 2024



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NH DEPARTMENT OF ENERGY
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Weatherization Grantee Health and Safety Plan New Hampshire

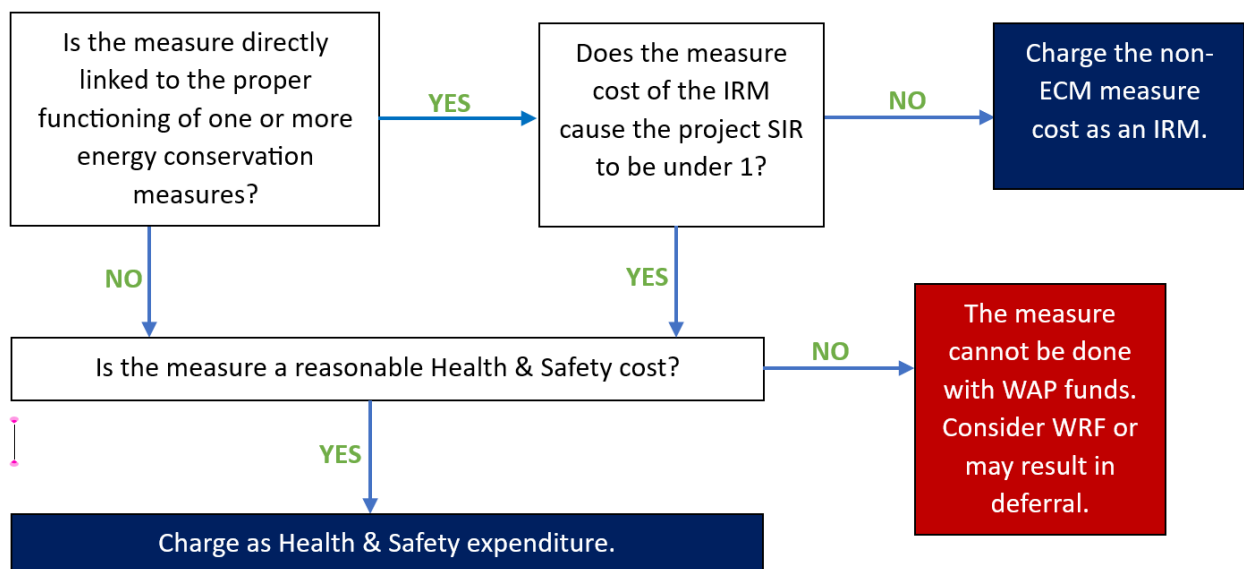
Program Year 2024

POLICY SUBMITTED WITH PLAN ☒

1.0 – GENERAL INFORMATION

Grantees are encouraged to enter additional information that does not neatly fit into one of the other sections of this document.

- **Weatherization Readiness Funds:** Subgrantees are encouraged to use WRF to the maximum extent possible to resolve issues leading to deferrals of otherwise eligible dwellings. The rules for utilizing WRF are found in the PY24 Annual WAP State Plan, Section V.1.2.
- Ancillary items are included with the appropriate ECM defined in the NH WAP Policies and Procedures Manual.
- Many repair issues can be identified as potential Incidental Repair Measures. The definitions and flow chart are provided to support Subgrantee determinations of whether a measure is Health & Safety or an Incidental repair.
- **Health and Safety (H&S) Measure** – The actions taken to eliminate a health and safety hazard, the elimination of which is necessary to perform weatherization work, or the actions effectively are necessary as a result of weatherization work. H&S measures do not have to be cost-justified by the audit and are not considered in the SIR calculation or the Average Cost per Unit (ACPU). For questions related to specific H&S issues and allowability, refer to the most recent Health and Safety Guidance (WPN 22-7 at the time of this writing).
- **Incidental Repair Measure (IRM)** – A repair necessary for the effective performance or preservation of newly installed weatherization materials but not part of a standard installation. IRM installations must be associated with a specific ECM or group of ECMs. **IRM must be justified by written and photo documentation in the client file.** IRM costs must be included in the SIR calculation of the total package of weatherization measures.



2.0 – BUDGETING

Grantees are encouraged to budget Health & Safety (H&S) costs as a separate category and, thereby, exclude such costs from the average cost per unit cost (ACPU) limitation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. Grantees are reminded that if H&S costs are budgeted and reported under the program operations category rather than the H&S category, the related H&S costs must be included in the calculation of the ACPU and cost-justified through the approved energy audit.

Select which option is used below.

Separate Health and Safety Budget Contained in Program Operations

Beginning on July 1, 2024, NH will use 15% of the expected ACPU to determine the allowable H&S spending. This is an increase from the initial allocation of 8%. The increase is related to reduced Health and Safety support from the low-income utility program in New Hampshire and ongoing technical assistance provided by the Grantee regarding using H&S funds.

3.0 – HEALTH AND SAFETY EXPENDITURE LIMITS

Pursuant to 10 CFR 440.16(h), Grantees must set H&S expenditure limits for their Programs, justifying their decisions by explaining the basis for setting these limits and providing related historical experience.

Low percentages should include a statement of what other funding is being used to support H&S costs, while larger percentages will require greater justification and relevant historical support. It is possible that these limits may vary depending upon conditions found in different geographical areas. These limits must be expressed as a percentage of the ACPU. For example, if the ACPU is \$5,000, then an average expenditure of \$750 per dwelling would equal 15 percent expenditures for H&S.

15 percent is not a limit on H&S expenditures but exceeding this amount will require ample justification. These funds are to be expended by the Program in direct weatherization activities. While required as a percentage of the ACPU, if budgeted separately, the H&S costs are not calculated into the per-house limitation. DOE strongly encourages using the table below in developing justification for the requested H&S budget amount. Each H&S measure the Grantee anticipates addressing with H&S funds should be listed along with an associated cost for each measure, and by using historical data the estimated frequency that each measure is installed over the total production for the year.

It is also recommended to review recent budget requests, versus expenditures to see if previous budget estimates have been accurate. The resulting “Total Average H&S Cost per Unit” multiplied by the Grantee’s production estimate in the Annual File should correlate to the H&S budget amount listed in the Grantee’s state plan.

Should a Grantee request to have more than 15 percent of Program Operations used for health and safety purposes, DOE will conduct a secondary level of review. DOE strongly encourages use of this H&S template and matrix to help expedite this process.

4.0 – INCIDENTAL REPAIR MEASURES

If Grantees choose to identify any H&S measures as incidental repair measures (IRMs), they must be implemented as such under the Grantee’s weatherization program in all cases – meaning, they can never be applied to the H&S budget category. In order to be considered IRMs, the measure must fit the following definition and be ~~cost-justified~~cost-justified along with the associated efficiency measure;

Incidental Repairs means those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include, but are not limited to, framing or repairing windows and doors which could not otherwise be caulked or weather-stripped and providing protective materials, such as paint, used to seal materials installed under this program. (10 CFR 440 “Definitions”)

See the process outlined under 1.0 above.

5.0 – DEFERRAL/REFERRAL POLICY

Deferral of services may be necessary if H&S issues cannot be adequately addressed according to WPN 22-07 guidance. The decision to defer work in a dwelling is difficult but necessary in some cases. This does not mean that assistance will never be available, but that work must be postponed until the problems can be resolved and/or alternative sources of help are found. If, in the judgment of the auditor, any conditions exist that may endanger the health and/or safety of the workers or occupants, the unit should be deferred until the conditions are corrected. Deferral may also be necessary where occupants are uncooperative, abusive, or threatening. Grantees must be specific in their approach and provide the process for clients to be notified in writing of the deferral and what conditions must be met for weatherization to continue. Grantees must also provide a process for the client to appeal the deferral decision to a higher level in the organization.

Grantee has adopted a comprehensive written deferral/referral policy that covers both H&S and other deferral reasons.

Yes No

Where can this deferral/referral policy be accessed?

State of NH Weatherization Assistance Program – Policies and Procedures Manual 2020 Edition, Section 2.11 and in the PY24 New Hampshire State Plan, Section V.1.2.

NH WAP Subgrantees have access to Weatherization Readiness Funds (WRF), which are intended for use in pre-weatherization situations where structural and/or other health and safety issues must be addressed prior to utilizing WAP funds. The rules for utilizing WRF are found in the PY24 Annual WAP State Plan, Section V.1.2.

6.0 – HAZARD IDENTIFICATION AND NOTIFICATION FORM(S)

Documentation forms must be developed that include, at a minimum, the client's name and address, dates of the audit/assessment and when the client was informed of a potential H&S issue, a clear description of the problem, a statement indicating if, or when weatherization could continue, and the client(s) signature(s) indicating that they understand and have been informed of their rights and options.

Documentation Form(s) have been developed and comply with guidance?

Yes No

A hazard identification and notification process are part of our updated Policies and Procedures Manual and relies on the Energy Auditor's proper use of the Building Test Data Information Sheet (BTDIS).

7.0 – HEALTH AND SAFETY CATEGORIES

For each of the following H&S categories identified by DOE:

- *Explain whether you concur with existing guidance from WPN 22-7 and how that guidance will be implemented in your Program, if you are proposing an alternative action/allowability, or if the identified category will not be addressed and will always result in deferral. Alternatives must be comprehensively explained and meet the intent of DOE guidance.*
- *Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 22-7, Grantees must concur or choose to defer all units where the specific category is encountered.*
- *"Allowable" items under WPN 22-7 leave room for Grantees to determine if the category or testing will be addressed and under what circumstances.*
- *Declare whether DOE funds or alternate funding source(s) will be used to address the particular category.*
- *Describe the explicit methods to remedy the specific category.*
- *Describe what testing protocols (if any) will be used.*
- *Define minimum thresholds that determine minor and major repairs.*
- *Identify minimum documentation requirements for at-risk occupants.*
- *Discuss what explicit steps will be taken to educate the client, if any, on the specific category if this is not explained elsewhere in the Plan. Some categories, like mold and moisture, require client education.*
- *Discuss how training and certification requirements will be provided for the specific category. Some categories, like Lead Based Paint, require training.*
- *Describe how occupant health and safety concerns and conditions will be solicited and documented.*

Grantees may include additional H&S categories for their particular Programs. Additional categories must include, at a minimum, all of the same data fields as the DOE-provided categories. Two additional tables have been created to utilize.

7.1 – Air Conditioning and Heating Systems

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Air Conditioning Unallowable Measure Heating Unallowable Measure

Funding

DOE LIHEAP State Utility Other

How do you address unsafe or non-functioning primary heating/cooling systems?

From DOE Issues

Action/Allowability

When a space conditioning system repair or replacement measure does not qualify as an ECM, the following conditions must be met before the unit can be replaced or repaired with Health and Safety funds:

- *“Red tagged,” inoperable, or nonexistent primary heating system may be replaced, repaired, or installed where climate conditions warrant, consistent with this guidance.*
- *Primary air conditioning system replacement, repair, or installation is allowed only in homes where current occupants meet Grantee’s definition of “at-risk” AND climate conditions warrant. “System” can mean a central unit or several individually operating units; however, when a central unit is in place, it shall be considered the primary unit, and all other units will be considered secondary.*
- *When installing or replacing a heating or cooling appliance, use proper sizing protocols (Manual J, State Approved sizing protocols, NEAT/MHEA outputs, etc.) based on post-weatherization housing characteristics, including installed mechanical ventilation.*
- *Unsafe primary units must be repaired, replaced, removed, or rendered inoperable, or deferral is required.*
- *Replacement or installation of secondary units is not allowed.*
- *Unsafe secondary units, including space heaters, must be repaired, removed, or rendered inoperable, or deferral is required.*
- *See Hazardous Materials Disposal section for more information.*
- *See also WPN 22-7 Table of Issues for additional guidance.*

Cooling Systems

- Extreme heat events can pose a health threat to high-risk individuals, particularly older people, so auditors are empowered to specify the improvement of ventilation, the repair of air conditioning equipment, and the installation of air conditioning units.

Primary Heating Source Appliances

- Repair, modification (adding a zone or another essential component, for example), and replacement of a central, space, and solid fuel (wood, pellet, etc.) heating appliance (indoor units only) may be charged as H&S under the following situations:
 - Where no operable heating appliance exists (as when a system has failed and has not been replaced due to the client's lack of funds).
 - When the appliance is "red-tagged" or inoperable.
 - (Inoperable is defined as the appliance or the heating system, including distribution, etc., is not functioning as intended).

How do you address unsafe or non-functioning secondary heating systems, including unvented secondary space heaters?

Secondary Vented Systems:

- Replacement is not allowed.
- Maintenance and repair are allowed where testing determines action is required for H&S purposes (such as high CO, leaking gas, etc.).
- If maintenance and repair cannot be performed because of the age of the system or inability to procure parts, removal and disposal costs are allowed. If the client refuses, the dwelling unit must be deferred.

Secondary Unvented Systems:

- Removal required if considered unsafe:
 - Not ANSI Z21.11.2 listed and labeled
 - 40K BTU/hr
 - Located in bedroom AND >10K BTU/hr
 - Located in bathroom AND >6K BTU/hr
 - Operating in an unsafe manner
 - High CO
 - Close to combustibles
 - Lack of sufficient combustion air.
 - Not permitted by AHJ.
- Removal and disposal costs allowed.
- Maintenance, repair, and replacement are at the owner/client's expense. If the client refuses, then the dwelling unit must be deferred.

Unvented fossil fuel combustion appliances are not allowed in Manufactured Homes. Work must be deferred until removed.

Fossil fuel combustion appliances must get combustion air from outside with the following exceptions:

- Ranges
- Ovens
- Illuminating appliances
- Clothes dryers
- Solid fuel-burning fireplaces
- Solid fuel-burning stoves

Indicate Documentation Required for At-Risk Occupants

An “at-risk occupant,” eligible for cooling technology services as part of weatherization work, is one who a) is a member of the WAP-eligible household living in the WAP-eligible dwelling and b) the client has a note from a medical provider that states that space cooling is needed for health reasons. If the client does not have a medical provider, or if the cost is prohibitive, the agency may refer the client to social service organizations that might be able to assist the client in locating a medical provider and assist the client in paying for the medical evaluation and written medical order.

Testing Protocols

From DOE Issues

- *Make sure primary systems are present, operable, and performing correctly.*
- *Check the DOE-approved audit to determine if the system can be installed as an energy conservation measure (ECM) before being replaced as an H&S measure.*
- *Determine and document the presence of “at-risk” current occupants when installing air-conditioning as a Health and Safety (H&S) measure.*
- *Inspect the chimney and flue on combustion equipment and test for Combustion Appliance Zone (CAZ) depressurization.*
- *For solid fuel appliances, look for visual evidence of soot on the walls, mantel, or ceiling or creosote staining near the flue pipe.*
- *See also WPN 22-7 Table of Issues for additional guidance.*

Testing all combustion appliances in every home for carbon monoxide and gas leaks (propane and natural gas) is required. Carbon monoxide levels are tested in the flue/vent of vented appliances, the exterior exhaust for sealed-combustion units, and near the exhaust of un-vented appliances. Draft and draft-ability of flues are diagnosed by performing Combustion Appliance Zone (CAZ) depressurization testing, start-up spillage at flues and adequacy of combustion air, and testing for gas leaks at all exposed and accessible piping and joints. Auditors must also monitor ambient carbon monoxide in the vicinity of combustion appliances and should continue to monitor ambient air in all living spaces.

No blower door depressurization/pressurization should occur while a fireplace or wood stove operates.

Solid fuel heating sources also create a Combustion Appliance Zone (CAZ). If this CAZ is located away from the other combustion appliances, it must also be tested for depressurization. If CAZ depressurization diagnostics are performed, auditors must be aware of and alert to the potential for back-drafting.

Combustion appliance testing includes, as applicable to the appliances present:

- CAZ depressurization test
- Carbon monoxide testing, both in-flue and ambient CAZ
- Spillage
- Steady state efficiency
- Temperature rise (forced air systems)
- Vent connector sizing, configuration, and condition per NFPA codes.
- Gas leak detecting, at least at accessible locations, or using pressure testing.
- Gas oven vent carbon monoxide testing, gas cook-top inspection for operability, flame quality, and cleanliness

Where only sealed combustion or non-combustion appliances exist (electric heat, etc.), CAZ depressurization and CAZ spillage testing are not required.

Gas Leak Testing

Leak testing can be done by auditors using “sniffer” equipment designed for this purpose or by a qualified contractor engaged to perform a pressure test of the piping and joints. If an auditor working with “sniffer” equipment is not comfortable that all possible leak sources are accessible to them for testing, or if a leak is detected and more comprehensive testing is prudent, then a qualified contractor may be engaged to conduct a more expensive and more thorough pressure test of the entire system. Health and Safety funds can be used for such a contractor and test.

Client Education

From DOE Issues –

- *When deferral is necessary, provide information to the client, in writing, describing conditions that must be met for weatherization to commence. A copy of this notification must also be placed in the client file.*
- *Discuss appropriate use and maintenance of units.*
- *Provide all paperwork and manuals for any installed equipment.*
- *Discuss and provide information on the proper disposal of bulk fuel tanks when not removed as part of the weatherization work.*

Where combustion equipment is present, provide safety information, including how to recognize depressurization.

Training

From DOE Issues –

- *WAP H&S policy training on allowable activities.*
- *Licensing and/or certification for HVAC installers as required by the authority having jurisdiction (AHJ).*
- *CAZ depressurization test and inspection training.*
- *All auditors are required to meet Building Performance Institute testing standards. In addition, periodic continuing education combustion training will be offered to auditors and quality control inspectors.*

7.2 – Asbestos – All

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

Asbestos inside the home must be encapsulated by an NH Certified Asbestos Contractor before conducting blower door testing. Vermiculite is assumed to contain asbestos. Blower door testing will not be conducted when asbestos or vermiculite inside the home is present (and not encapsulated) or suspected.

7.2a – Asbestos – in siding, walls, ceilings, etc.

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

How do you address suspected ACMs in siding, walls, or ceilings that will be disturbed during weatherization work?

From DOE Issues - Take all reasonable and necessary precautions to prevent asbestos contamination in the home. Grantees must have a policy for identifying and managing suspected asbestos-containing materials (ACM).

- *Grantees must state in the H&S Plan the policy on blower door testing where friable suspected ACM is present. “Friable” means the material can be crumbled, pulverized, or reduced to powder by the pressure of an ordinary human hand. Grantees seeking guidance on safe policies and procedures should contact training providers or a local asbestos action office for technical support.*
- *The existence of asbestos siding that is in good condition does not prevent installing dense-pack insulation from the exterior.*
- *Siding may be removed and reinstalled in order to perform the ECM and the associated costs may be charged as part of the ECM.*
- *General abatement of asbestos siding or replacement with new siding is not an allowable H&S cost.*

Removal and replacement of asbestos siding is permissible for purposes of installing wall insulation. Cutting and drilling of siding containing asbestos is not allowed. Contractors working with asbestos siding must attend OSHA-specific training regarding asbestos awareness. It is recommended and preferred to perform interior blows when access allows. All Subgrantees should have at least one contractor qualified to work with this type of material to ensure eligible clients receive all the measures for which they are qualified. Any “excess” costs incurred because of asbestos health and safety activities may be charged to H&S.

Testing Protocols

From DOE Issues -

- *Visually inspect exterior wall surface and subsurface, floors, walls, and ceilings for suspected ACM prior to drilling or cutting.*
- *Under the Asbestos Hazard Emergency Response Act of 1986 (AHERA), sample collection and testing must be conducted by a certified tester.*

Client Education

From DOE Issues -

- *Formally notify the client in writing of results if testing was performed.*
- *Inform the client in writing that suspected ACMs are present and what precautions will be taken to ensure the occupants' and workers' safety during weatherization.*

Materials containing or suspected of containing asbestos identified during the evaluation will be brought to the attention of the owner/occupant. The condition of the asbestos will be assessed, and occupants will be advised not to disturb the material. The client will receive the EPA pamphlet “*Asbestos in the Home, a Homeowners Guide.*”

Training and Certification Requirements

From DOE Issues -

- *Safe practices for siding removal and replacement.*
- *How to identify suspected ACM.*
- *Licensing/certification for removal and reinstallation of asbestos siding if required by AHJ.*

All auditors must attend formal asbestos awareness training to learn about identifying asbestos-containing materials and when they may pose a hazard to clients or workers. The CAP agencies must maintain a database regarding the credentials held by the personnel working for them, and that database must be available for review by NH DOE at any time.

7.2b – Asbestos – in vermiculite

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

How do you address suspected ACMs in vermiculite that will be disturbed through the course of weatherization work?

From DOE issues -

- *When vermiculite is present, assume it contains asbestos.*
- *Do not perform a blower door test if it will disturb the vermiculite.*
- *Use proper respiratory protection while in areas containing vermiculite.*
- *The H&S Plan must include the Grantee’s policy on blower door testing where suspected friable ACM is present. “Friable” means the material can be crumbled, pulverized, or reduced to powder by the pressure of an ordinary human hand.*
- *Encapsulation by an appropriately trained asbestos control professional is allowed.*
- *Removal is not allowed.*
- *When deferral is necessary due to asbestos, the occupant must provide documentation that a certified professional performed the remediation before work continues.*

Vermiculite should always be approached as if it contains asbestos. The EPA does not recognize testing of vermiculite as a reliable method for determining the presence of asbestos (see EPA fact sheet at: <http://www2.epa.gov/asbestos/protect-your-family-asbestos-contaminated-vermiculite-insulation>). For PY23, the following guidelines must be followed when dealing with vermiculite in NH WAP jobs:

- Removal of vermiculite is not allowed using WAP money; the cost is too high and is deemed “unreasonable” as an H&S expense.
- Encapsulation of vermiculite is allowed by an appropriately trained asbestos control professional.
- Blowing insulation on top of vermiculite insulation is not allowed.
- Buildings that have vermiculite in the walls will not have insulation blown into the walls.
- Homes that contain vermiculite or friable asbestos are not to receive blower door testing.
- Auditors and installers shall receive training on recognizing vermiculite insulation.
- Personnel should utilize personal air monitoring devices when in attics.

Testing Protocols

Testing of vermiculite for asbestos content will not be conducted.

Client Education

From DOE issues -

- *Instruct clients in writing not to disturb suspected ACM.*
- *Provide asbestos safety information to the client.*
- *Formally notify the client in writing of results if testing was performed.*

- *When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.*

Materials containing or suspected of containing asbestos identified during the evaluation will be brought to the attention of the owner/occupant. The condition of the asbestos will be assessed, and occupants will be advised not to disturb the material. The client will receive the EPA pamphlet “*Asbestos in the Home, a Homeowners Guide.*”

Non-program funds may be available to assist in the remediation of vermiculite in certain dwellings under specific instances. The client may be referred to the following websites:

www.zonoliteatticinsulation.com

www.zaitrust.com

Inquiries and questions may also be directed to the Zonolite Trust at 844-924-2255 (844-ZAI-CALL) or by emailing the Zonolite Trust at: info@zaitrust.com

Training and Certification Requirements

From DOE issues -

- *Training on how to recognize vermiculite.*
- *AHERA or state certification to conduct testing.*
- *AHERA or other appropriate asbestos control professional certification/training for encapsulation.*

All auditors must attend formal asbestos awareness training to learn about identifying asbestos-containing materials and when they may pose a hazard to clients or workers. The CAP agencies must maintain a database regarding the credentials held by the personnel working for them, and that database must be available for review by NH DOE at any time.

7.2c – Asbestos – on pipes, furnaces, other small uncovered surfaces

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

How do you address suspected ACM’s (e.g., pipes, furnaces, other small surfaces) that will be disturbed through the course of weatherization work?

From DOE Issues -

- *Assume asbestos is present in suspect covering materials.*
- *When suspected friable ACM is present, take precautionary measures as if it is asbestos unless testing determines otherwise.*
- *Grantees must state in the **PY24** H&S Plan the policy on blower door testing when friable suspected ACM is present. “Friable” means the material can be crumbled, pulverized, or reduced to powder by the pressure of an ordinary human hand.*
- *Encapsulation by an appropriately trained asbestos control professional is allowed and should be conducted prior to blower door testing if the materials are friable.*
- *Grantee may allow removal by an appropriately trained professional on a case-by-case basis. Grantees must state in the H&S Plan what criteria the Grantee uses when reviewing requests.*
- *Charge only those costs directly associated with the testing, encapsulation, or removal to the H&S budget category.*
- *When deferral is necessary due to asbestos, the occupant must provide documentation that a certified professional performed the remediation before work continues.*

It should be assumed that covering materials on pipes, boilers, and other small appliances in older homes contain asbestos and, if determined to be in poor/damaged condition, is to be encapsulated by an NH Certified Asbestos Contractor prior to conducting blower door testing. Coverings that are obviously not asbestos (foam, paper-covered fiberglass, etc.) do not require encapsulation.

The removal of asbestos on existing pipes and other heating appliance surfaces to replace a heating system is allowed; removal must be performed by a NH Certified Asbestos Contractor. When asbestos is removed, only the amount necessary to make the final connections, plus 3 feet, is allowed. The remainder should be encapsulated if necessary.

Testing Protocols

Testing for asbestos must be done by an NH Certified Asbestos Consultant.

Client Education

From DOE Issues -

- *Instruct clients in writing not to disturb suspected ACM.*
- *Provide asbestos safety information to the client.*
- *Formally notify the client in writing of results if testing was performed.*
- *When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.*

Materials containing or suspected of containing asbestos identified during the evaluation will be brought to the attention of the owner/occupant. The condition of the asbestos will be assessed, and occupants will be advised not to disturb the material. The client will receive the EPA pamphlet “Asbestos in the Home, a Homeowners Guide.”

Training and Certification Requirements

From DOE Issues -

- *How to recognize suspected ACM.*
- *AHERA or other appropriate asbestos control professional certification/training is required to abate the ACM.*

All auditors must attend formal asbestos awareness training to learn about identifying asbestos-containing materials and when they may pose a hazard to clients or workers. The CAP agencies must maintain a database regarding the credentials held by the personnel working for them, and that database must be available for review by NH DOE at any time.

7.5 – Biologicals and Unsanitary Conditions

(odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Unallowable Measure

Funding

DOE

LIHEAP

State

Utility

Other

What guidance do you provide Subgrantees for dealing with biological and/or unsanitary conditions in homes slated for weatherization?

From DOE Issues -

- *Limited Remediation/cleaning of conditions that may lead to or promote biological concerns and unsanitary conditions is allowed.*
- *Addressing bacteria and viruses is not an allowable cost.*

- *Testing for biological presence in household materials is not an allowable cost.*
- *Deferral may be necessary in cases where conditions in the home pose a health risk to occupants and/or weatherization workers or where the biological impacts in the home may be worsened by weatherization.*
- *See the Mold and Moisture section for more information.*

Repair of a condition which is creating a biological hazard in a building may include but is not limited to things such as the following:

- Repair of plumbing and sewer leaks inside the home or plumbing leaks outside the home such as hose bibs (garden hose faucets) that may be leaking and draining against the foundation.
- Repair of water-damaged materials that must be repaired to allow for installation of energy-saving materials. Repair of water-damaged material that will dry after the repair of the offending cause is complete and is not required to perform weatherization **IS NOT allowed.**

Testing Protocols

From DOE Issues - Sensory inspection.

Client Education

From DOE Issues -

- *Inform the client in writing of observed conditions.*
- *Provide information on how to maintain a sanitary home.*
- *When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.*

Training

From DOE Issues -

- *How to recognize unsafe conditions and when to defer.*
- *Safe work practices when encountering such conditions.*

7.6 – Building Structure and Roofing

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

What guidance do you provide Subgrantees for dealing with structural issues (e.g., roofing, wall, foundation) in homes slated for weatherization?

From DOE Issues -

- *Building rehabilitation is beyond the scope of the Weatherization Assistance Program.*
- *Homes that require more than minor repairs must be deferred.*

- *See Mold and Moisture, Code Compliance, and Pests sections for more information.*

The following are allowable:

- Roofing repairs necessary to allow for effective weatherization.
- Minor structural repairs that are necessary to allow for effective weatherization.
- Other such moisture control measures necessary to prevent moisture infiltration into the building structure.

From DOE Issues on Testing -

- *Visual inspection.*
- *Ensure that access to the portions of the home where weatherization will occur is safe for entry and performance of assessments, work, and inspections.*

How do you define “minor” or allowable structure and roofing repairs, and at what point are repairs considered beyond the scope of weatherization?

- Health and Safety repairs are generally limited to \$1,250 (15% of ACPU for PY24) per dwelling. These will be considered minor repairs.
- Health and Safety repairs over \$1,250 per dwelling are considered major repairs and may be allowable if the cost does not result in exceeding the Subgrantee’s H&S expenditure percentage. Such repairs require an explanatory note in the client file.
- Roof repairs are limited to an area of no more than 50 Square Feet.

If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?

A priority list is not being used.

Client Education

From DOE Issues -

- *Notify the client in writing of structurally compromised areas.*
- *When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.*
- *The Subgrantee may use Weatherization Readiness Funds (WRF) to address deferrals and allow weatherization work to proceed.*

Training

From DOE Issues - How to identify structural and roofing issues.

7.7 – Code Compliance

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

What guidance do you provide Subgrantees for dealing with code compliance issues in homes receiving weatherization measures?

From DOE Issues –

- *Correction of preexisting code compliance issues is not an allowable cost unless triggered by weatherization measures being installed in a specific room or area of the home.*
- *When correction of preexisting code compliance issues is triggered and paid for with WAP funds, cite specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue in the client file.*
- *Follow State and local or AHJ codes while installing weatherization measures, including H&S measures.*
- *Condemned properties and properties where “red tagged” H&S conditions exist that cannot be corrected under this guidance must be deferred.*
- *Testing is done through visual inspection.*

State and local (often referred to as the authority having jurisdiction, or AHJ) codes must be followed when installing weatherization measures. Condemned properties and properties where “red tagged” health and safety conditions cannot be corrected under these standards should be deferred.

Code corrections that are required because of weatherization but are not a direct component of an ECM may be charged as H&S.

It is the Subgrantees’ responsibility to ensure that all weatherization-related work conforms with applicable codes in jurisdictions where the work is being performed.

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

Electrical deficiencies and combustion venting are the most common code compliance issues. Contractors must meet Federal, State, and local codes.

Client Education

From DOE Issues -

- *Inform the client in writing of observed code compliance issues when they result in a deferral.*
- *When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.*

Training

From DOE Issues – How to determine what code compliance may be required.

All field personnel (including auditors) are strongly encouraged to attend “building/construction code” instructional classes. The intent of the 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 them.

7.8 – Combustion Gases

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

Testing Protocols

From DOE Issues -

- *Combustion safety testing and visual inspection of combustion appliances and related venting is required when combustion appliances are present.*
- *Test naturally drafting appliances for spillage and CO during CAZ depressurization testing pre- and post-weatherization and before leaving the home on any day when work has been done that could affect draft (e.g., tightening the home, adding exhaust).*
- *Inspect venting of combustion appliances and confirm adequate clearances*
- *Safety inspections related to space heaters, fireplaces, and woodstoves must include, but not be limited to, verification of adequate floor protection and code-compliant clearances to walls and other combustible materials.*

See issue 7.1 above.

Weatherization contractors are required to conduct CAZ testing at the end of each air sealing day and document the results.

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

Crews are to immediately notify the agency of the problem. If possible, they must temporarily alleviate the problem until a specialist can evaluate the situation and develop a more permanent solution. The Subgrantee will dispatch a specialist as soon as possible after being notified. Urgency will depend upon the severity of the situation.

Client Education

From DOE Issues - Provide clients with combustion safety and hazard information.

The client will be notified of problems found. Solutions will be discussed and agreed upon, and the client's responsibilities will be clearly outlined.

Training

From DOE Issues -

- *How to perform appropriate testing, determine when a building is excessively depressurized, and the difference between air-free and as-measured CO.*

- *CO action levels.*

See issue 7.1 above.

At least one member of the weatherization installers must have training in CAZ testing.

7.9 – Electrical

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

What guidance do you provide Subgrantees for dealing with electrical hazards, including knob & tube wiring, in homes slated for weatherization?

From DOE Issues –

Action/Allowability

- *When the H&S of the occupant/worker(s) is at risk, minor repairs, as defined by the Grantee, are allowed when necessary for weatherization measures.*
- *Evaluate and if necessary, provide sufficient over-current protection and damming (if required) prior to insulating building components containing knob and tube wiring, as required by the AHJ.*

Testing

- *Visual inspection for the presence and condition of knob-and-tube wiring.*
- *Check for alterations that may create an electrical hazard.*
- *Voltage drop and voltage detection testing are allowed.*

When K&T wiring is present in a home, it should be determined if the walls and attic have active K&T present. Walls that have live K&T present are not to be insulated by the weatherization program. Attics that have live K&T present can have insulation installed up to just below the wire but must be reliably and durably dammed to the sides and above to provide a minimum of 2” clear space between the wire and the dam, using rigid and fixed material; damming activities are included in the cost of installing the insulation. The K&T “run” should be “marked” using surveyor-type tape or other marking devices such as lawn flags. Open junction boxes located in the attic where insulation will be installed must be appropriately covered with metal covers and should also be marked with tape or other signage indicating their location for future service. K&T inspections and voltage drop detection are allowable health and safety expenses if they are necessary and the costs are reasonable. All electrical work and testing must be performed by a NH licensed electrician.

Weatherization measures that involve the installation of new equipment, such as heating appliances or electric water heaters, can exacerbate previously marginal overload problems to hazardous levels. The problem should also be noted in the client file. Installing or repairing circuits to allow for new ECM appliances or “systems” is allowed and should be included in the cost of the ECM.

How do you define “minor” or allowable electrical repairs, and at what point are repairs considered beyond the scope of weatherization?

Repairs that do not lower the project SIR below 1 are allowable. Repairs that lower the project SIR below 1 and are not reasonable Health and Safety measures are beyond the scope of weatherization and must be funded by another source, or the project will be deferred.

If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?

A priority list is not being used.

Client Education

From DOE Issues—When electrical issues cause a deferral, provide the client with information on over-current protection, overloading circuits, and basic electrical safety/risks.

When overloaded circuits are present, serious electrical hazards exist. If an auditor or crew finds such problems, they should notify the owner.

The client/owner must be notified if any unsafe conditions are found that cannot be addressed through weatherization, either during the auditor's assessment or during the crew/contractor's work.

Training

From DOE Issues -

- *How to identify electrical hazards.*
- *Local (or AHJ) code compliance.*

**7.10 – Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, other Air Pollutants
Concurrence, Alternative, or Deferral**

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

What guidance do you provide Subgrantees for dealing with formaldehyde, VOCs, flammable liquids, and other air pollutants identified in homes slated for weatherization?

From DOE Issues -

- *Removal of pollutants is allowed and is required if they pose a risk to workers.*
- *If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client, the unit must be deferred.*
- *Refer to the Hazardous Materials Disposal section for more information.*

Pollutant removal is allowed and required if they pose a risk to workers. If removal isn't possible or allowed by the client, the unit must be deferred.

Testing Protocols

From DOE Issues - Sensory inspection.

Client Education

From DOE Issues -

- *Inform the client in writing of observed hazardous conditions and associated risks.*
- *Provide client written materials on safety issues and proper disposal of household pollutants.*
- *When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.*

Training

From DOE Issues - How to recognize potential hazards and when removal is necessary.

7.11 – Fuel Leaks

(please indicate specific fuel type if policy differs by type)

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

Remediation Protocols

From DOE Issues –

- *When a minor gas leak is found on the utility side of the service, the utility service must be contacted before work may proceed.*
- *Fuel leaks that are the client's responsibility (vs. the utility's) must be repaired before weatherizing a unit.*
- *Notify utilities and temporarily halt work when leaks are discovered that are the responsibility of the utility to address.*

Testing

- *Test exposed gas lines for fuel leaks from utility coupling into, and throughout, the home.*
- *Conduct sensory inspection on bulk fuels to determine if leaks exist.*

Gas leaks must be repaired as part of the project, or the project must be deferred.

Imminent or current bulk fuel leaks may be corrected as part of the weatherization project. Normally, oil tank replacements will be made through the NH State Safe Tank program.

How do you define allowable fuel leak repairs, and at what point are repairs considered beyond the scope of weatherization?

Repairs that do not drop the project SIR below 1 are considered allowable. Repairs that drop the project SIR below 1 are beyond the scope of weatherization and must be funded by another source, or the project must be deferred.

Client Education

From DOE Issues - Inform clients in writing if fuel leaks are detected.

Training

From DOE Issues - Fuel leak testing.

7.12 – Gas Ovens / Stovetops / Ranges

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

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

From DOE Issues -

- *When testing indicates a problem, entities may perform minor cleaning or repair of gas cooktops and ovens.*
- *Replacement is not allowed.*

Testing Protocols

From DOE Issues -

- *Test gas ovens for CO.*
- *Inspect cooking burners and ovens for operability and flame quality.*

Client Education

From DOE Issues –

- *Inform clients of the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO.*
- *Grantee H&S plan must define action levels and resulting actions.*

Training

From DOE Issues -

- *Testing techniques*
- *CO action levels*

7.13 – Hazardous Materials Disposal

[Lead, Refrigerant, Asbestos, Mercury (including CFLs/fluorescents), etc.]
(please indicate material where policy differs by material)

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

Client Education

From DOE Issues: Inform the client in writing of the hazards associated with hazardous waste materials being generated/handled in the home.

Refer the client to the NH Department of Environmental Services fact sheet on household hazardous waste. It can be found at:

<https://www.des.nh.gov/organization/commissioner/pip/factsheets/hw/documents/hw-3.pdf>

Training

From DOE Issues -

- *Appropriate Personal Protective Equipment (PPE) for working with hazardous waste materials.*
- *Disposal requirements and locations. Health and environmental risks related to hazardous materials.*

Disposal Procedures and Documentation Requirements

From DOE Issues -

- *Hazardous Waste Materials generated in the course of weatherization work shall be disposed of according to all local laws, regulations and/or Federal guidelines, as applicable.*
- *Document proper disposal requirements in contract language with responsible party.*
- *Refer to Lead and Asbestos sections for more information on those topics.*

Disposal of all hazardous materials, as part of the DOE WAP, must be done in accordance with all applicable Federal and New Hampshire state and local laws. Each Subgrantee must develop a disposal plan and submit it to the State Program Manager.

Questions concerning hazardous waste disposal in New Hampshire should be directed to:

NHDES Waste Management Division Hazardous Waste Management Bureau
hwcomp@des.nh.gov
(603) 271-2942

7.14 – Injury Prevention of Occupants and Weatherization Workers

(Measures such as repairing stairs and replacing handrails)

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

What guidance do you provide Subgrantees regarding allowable injury-related repairs (e.g., stairs, handrails, porch deck board)?

From DOE Issues -

- When necessary to effectively weatherize the home, workers may make minor repairs and installations, as defined by the Grantee; otherwise, these measures are not allowed.
- Inspect for dangers that would prevent weatherization.

If conditions will not be repaired, inform the client in writing of observed hazards and associated risks. Utilize the Hazard Identification Notification Form.

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

Repairs that do not drop the SIR of the project below 1 are considered allowable. Repairs that drop the project below a SIR of 1 are beyond the scope of weatherization and must be funded by another source, including H&S funding, or the project will be deferred. Repairs must be minor in nature.

Training

From DOE Issues - Hazard identification.

7.15 – Lead-Based Paint

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Lead abatement under the weatherization assistance program is not an allowable expense. Necessary lead-safe practices are allowable. Agencies must defer weatherization and make referrals on homes that require lead paint abatement.

Deferral is required when the extent and condition of lead-based paint in the house would potentially create further health and safety hazards.

Funding

DOE ☒

LIHEAP ☒

State ☒

Utility ☒

Other ☒

Safe Work Protocols

Level 1 Containment

Level 1 Containment is required in pre-1978 homes when LESS than 6 square feet of interior painted surface per room or LESS than 20 square feet of exterior painted surface will be disturbed.

Level 1 Containment consists of methods and means for preventing dust generation and contains debris generated during the work process. The specific containment used should be of the appropriate type and size for the work being performed.

Measures that may fall within this guideline include but are not limited to:

- Installing or replacing a thermostat.
- Drilling and patching test holes.
- Replacing HEPA filters and cleaning HEPA vacuums.
- Changing furnace filter.
- Removing caulk or window putty (interior or exterior).
- Removing weather-stripping.

Level 2 Containment

Level 2 Containment is required when weatherization activities will disturb MORE than 6 square feet of interior surface per room or MORE than 20 square feet of exterior surfaces. Level 2 Containment consists of methods that define a work area that will not allow any dust or debris from the work area to spread. Level 2 Containment requires the covering of all horizontal surfaces, constructing barrier walls, sealing doorways, covering HVAC registers with approved materials, and closing windows to prevent the spread of dust and debris.

Measures requiring Level 2 Containment MAY include:

- Drilling holes in interior walls for installing insulation.
- Drilling holes and/or removing siding on exterior walls.
- Cutting attic access into ceiling or knee walls.
- Planning a door in place.
- Replacing door jambs and thresholds.
- Replacing windows or doors.
- Furnace replacements.
- Window replacements.
- Demolition of painted surfaces using any of the following methods:
 - open flame burning or torching,
 - machines to remove paint through high-speed operation without HEPA exhaust control or
 - operating a heat gun at temperatures at or above 1100 degrees Fahrenheit.

MANUFACTURED HOUSING (“MOBILE HOMES”)

Often, the interiors of manufactured homes were not painted, but rather, paneling was applied to the surfaces. Therefore, pre-1978 mobile homes that were not painted by the manufacturer, occupant, landlord, or past owner of the unit before 1978 may be exempt from RRP. However, Weatherization

Programs must verify that the areas receiving weatherization services have never been painted or were painted for the first time after 1978. If this is not verifiable, then RRP protocols must be followed. Painted exterior surfaces on pre-1978 units should not be drilled, scraped, sanded, or receive any other work that disturbs the paint.

Testing Protocols

From DOE Issues -

- *Testing to determine the presence of lead in paint that will be disturbed by WAP measure installation is allowed with EPA-approved testing methods.*
- *Testing methods must be economically feasible and justified.*
- *Job site setup and cleaning verification by a Certified Renovator is required.*
- *Grantees must verify that crews are using lead-safe work practices during monitoring.*

One of the following methods must be used to determine that the paint to be disturbed is not lead-based paint:

- a) Written determination by an NH-licensed lead inspector or risk assessor.
- OR
- b) Proper use of the EPA-recognized test kit provided to agencies (documenting manufacturer and model of test kit used, description and location of components tested, and test kit results).
Note: beginning in 2010, tests must be performed by a Certified Renovator, per EPA final rule.
- OR
- c) A State-approved lead-based paint test protocol (e.g., XRF scans verifying the absence of lead paint).

In addition, the New Hampshire Housing Finance Authority (NHHFA) maintains a list of the lead abatement projects they have done, so any dwelling unit on their list would not need further testing to determine the presence of lead paint. That list of abatement projects may be found at:
http://www.nhhfa.org/assets/pdf/Lead_Safe_Registry_Full_6-8-16.pdf

Client Education

From DOE Issues -

- *Follow pre-renovation education provisions for RRP.*
- *When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.*

For occupied homes, the weatherization staff, crew, or contractor must have an adult tenant or homeowner sign an acknowledgment after receiving the EPA Renovate Right pamphlet. The Renovate Right pamphlet can also be sent by certified mail with a return receipt to be placed in the customer file.

The Subgrantee must:

- Provide written notice to each affected unit (notice must describe the general nature and locations of the planned renovation activities, the expected start and end dates, and provide information on how an occupant can obtain a Renovate Right pamphlet at no charge); or
- Post informational signage (signs must describe the general nature and locations of the renovation and the anticipated completion date) and post the EPA Renovate Right pamphlet. (If

the Renovate Right pamphlet is not posted, then agencies are required to provide information on how interested occupants can review a copy of the Renovate Right pamphlet or obtain a copy at no cost from the Weatherization Program).

- Deliver to the owner/occupant the Acknowledgement of the Lead Notice. If unable to hand-deliver, acknowledgment can be sent by certified mail, return receipt requested. A copy of the receipt then goes into the client's file. The owner/occupant must acknowledge receipt of the EPA Renovate Right pamphlet indicating the address of the unit undergoing renovation, the name, and signature of the owner or occupant, and the date of signature prior to the start of renovations. It must be in the same language as the "contract for renovation" for owner-occupied target housing (or the same language as the lease for an occupant of non-owner occupied).

If the Weatherization Program cannot obtain a signed acknowledgment (either the occupant is not home or refuses to sign the form), then a self-certification form must be signed to prove delivery. This can be found at the back of the Renovate Right brochure.

The acknowledgment form must be filed and remain with the client. In addition to providing a copy of the Renovate Right pamphlet to owners and occupants, designated local Subgrantee staff (e.g., auditor/inspector, crew chief) must discuss the hazards associated with lead-based paint and lead dust and describe how they will conduct RRP in the home.

Training and Certification Requirements

From DOE Issues –

- *All employees and contractors working on pre-1978 homes must receive training to install measures in a lead-safe manner in accordance with the SWS and EPA protocols, and installation must be overseen by an EPA Certified Renovator.*
- *Grantee Monitors and Inspectors must be Certified Renovators.*

Training for RRP is readily available in NH by qualified instructors. All contractors are required to receive RRP training. NH DOE field representatives are required to be RRP Certified Renovators. All NH Subgrantees that utilize crews have and will maintain their EPA Certified Firm certifications as required by the EPA. All contractors working in homes with lead-based paint are required to have a designated Certified Renovator responsible for the job as required by the RRP rule. All Subgrantees are to maintain copies of crew and contractor Certified Renovator certificates on file.

Documentation and Other Compliance Requirements

NH DOE has created and provided all agencies with a Lead Guide Sheet to aid in compliance with DOE's lead documentation and verification requirements. This form is required in all client files when the home is dated before 1978.

The following information is required with the Lead Guide Sheet or as separate information in the client file:

- Client sign-off indicating they received the Renovate Right brochure (Consent and Agreement form).
- Name of certified renovator responsible for the job (insert at top of Lead guide sheet).

- Lead paint test results or lead-free report produced from a NH Licensed Lead Paint Inspector or assessor (certified renovator lead test results or lead report must be attached to Lead Guide Sheet).
- Photos of the site.
- Photos of the containment areas.
- Cleaning verification results.

Subgrantees must ask if a resident of a pre-1978 home has been identified as being lead poisoned while living in the home. If the answer is yes, proceed with the inspection, but coordinate with the local health department before disturbing any paint. If a child has lead poisoning, deferral is required until the child has been treated and the lead source in the home has been remediated in such a way as to remove the possibility of further human injury.

RRP compliance is reviewed as part of NH DOE's annual monitoring of each Subgrantee:

- Subgrantee tracking of RRP certifications among staff and contractors is reviewed. The Subgrantee tracking tool must:
 - List staff and contractor positions requiring RRP certification.
 - Show the most recent certification / re-certification date for each person.
 - Show the next required re-certification date for each person.
 - Track CEUs or other necessary precursors to re-certification.
- Client file documentation must:
 - Contain evidence of the assessment done to determine the presence of lead in the home.
 - Include test results when testing is part of the assessment.
 - Include the work scope for the job, with RRP instructions for the installation crew.
 - Confirm that RRP work practices were used when necessary.
 - A brief explanation of why RRP work practices were not necessary, if applicable.
 - Include photo documentation (may be hard copies or digital), showing:
 - Areas where lead was present.
 - The work crew implementing the RRP practices.
 - The work areas after the RRP practices have been completed.
 - Include the QC Inspection report containing reference to RRP review of compliance.
 - Include the Quality Assurance Inspection report if the job received such an inspection.
 - Include evidence that the client received education regarding lead and lead hazards:
 - The "Renovate Right" pamphlet is an example of appropriate client educational materials.

Inaccurate or incomplete tracking and implementation of RRP requirements will require the Subgrantee to create and implement a corrective action plan to address the deficiency.

If a local Subgrantee crew or contractor is found to be non-compliant with the RRP policies, procedures, and minimum standards, NH DOE will notify the local Subgrantee in writing of the non-compliance. The local Subgrantee will be required to submit a written corrective action plan to NH DOE. Monitoring for compliance with the corrective action plan and RRP policies is likely to occur.

7.16 – Mold and Moisture

(Including but not limited to drainage, gutters, downspouts, extensions, flashing, sump pumps, dehumidifiers, landscape, vapor retarders, moisture barriers, etc.)

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

What guidance do you provide Subgrantees for dealing with moisture-related issues (e.g., drainage, gutters, downspouts, moisture barriers, dehumidifiers, vapor barriers on bare earth floors) in homes slated for weatherization?

From DOE Issues -

- ~~Limited~~ *Minor* water damage repairs that can be addressed by weatherization workers are allowed when necessary to weatherize the home and ensure the long-term stability and durability of the measures.
- Source control (i.e., correction of moisture and mold-creating conditions) is allowed when necessary to weatherize the home and ensure the long-term stability and durability of the measures. Source control is independent of latent damage and related repairs.
- Where severe Mold and Moisture issues cannot be addressed, deferral is required.
- Mold cleanup is not an allowable H&S cost.
- Window and door replacement is not an allowable H&S cost.
- Surface preparation where weatherization measures are being installed (e.g., cleaning mold off window trim to apply caulk) must be charged as part of the ECM, not to the H&S budget category.

Testing

- Visual assessment, including exterior drainage.
- Diagnostics such as moisture meters are recommended for pre-weatherization and at the final inspection.
- Mold testing is not an allowable cost.

Managing moisture is crucial to controlling mold. DOE funds may be used only to remediate conditions that may lead to or promote biological concerns and unsanitary conditions where these conditions must be remedied to allow effective weatherization work, assure the immediate or future health of workers and clients, and ensure that cumulative H&S costs are reasonable. Examples of allowed activities for moisture management include installing moisture/vapor barriers over dirt floors, minor repairs to plumbing or sanitary leaks, gutter repairs, splash blocks to direct gutter drainage, and sump pumps.

The following Health & Safety improvements are all “allowable” WAP expenditures and may be treated as either IRMs or H&S expenses depending on the overall job SIR and the budget management strategy of the Subgrantee:

- a) **Biologicals and Unsanitary Conditions, Odors, Mustiness, Bacteria, Viruses, Raw Sewage, Rotting Wood, etc.** Repair of a condition which is creating a biological hazard in a building may include but is not limited to things such as the following:
- Repair of plumbing and sewer leaks inside the home or plumbing leaks outside the home such as hose bibs (garden hose faucets) that may be leaking and draining against the foundation.
 - Repair of water-damaged materials that must be repaired to allow for installation of energy-saving materials. Repair of water-damaged material that will dry after the repair of the offending cause is complete and is not required to perform weatherization IS NOT allowed.
- b) **Building Structure and Roofing**
- Roofing repairs that are necessary to allow for effective weatherization.
 - Structural repairs that are necessary to allow for effective weatherization.
 - Other such moisture control measures as necessary to prevent moisture infiltration into the building structure.
- c) **Drainage, Gutters, Down Spouts, Extensions, Flashing, Sump Pumps, Landscape, etc.**
- Installation or repair of gutters, downspouts, downspout splash blocks or extensions when basements/crawl spaces have evidence of moisture infiltration.
 - Installation of flashings to direct water away from the building and or foundation where evidence of moisture damage due to long-term water exposure is evident.
 - Installation of sump pumps and associated plumbing and electrical to prevent bulk moisture build-up in basements/crawl spaces.
 - Minor drainage or landscape modifications necessary to divert roof or natural water run-off from infiltrating into the foundation that does not require motorized earth-moving equipment.
 - Other non-weatherization repairs necessary to control moisture infiltration into the building.
- d) **Electrical (other than knob and tube)**
- The installation of an electrical ECM may require the repair of an existing hazardous or undersized circuit or the installation of a new circuit.
 - Minor electrical repairs (except knob and tube) necessary to perform weatherization (install insulation).
- e) **Mold and Moisture**
- Repairing conditions that cause or create mold or moist conditions in a home as indicated above in Biologicals and Drainage.
 - Installing a sealed moisture/vapor barrier over dirt spaces. Moisture barriers over dirt spaces also help reduce Radon infiltration into homes.
- f) **Ventilation**
- All costs associated with installation, repair, or replacement of mechanical ventilation systems or their associated components.
 - Repair or replacement of venting material for dryers that do not currently vent directly to the exterior. All mechanical venting must exhaust to the exterior of the building.
- g) **Window and Door Replacement and Window Guards to Reduce Moisture Infiltration**
- Window assemblies cannot be replaced unless the measure either achieves a SIR of at least 1 on its own or it is implemented as an IRM, the cost of which, when factored into the whole house package of ECMs, does not cause the SIR of that whole package to fall below 1. Windows cannot be replaced as H&S measures because the cost would always have to be evaluated as “unreasonable.”

- Windows that leak water and have visible evidence of moisture damage (beyond water staining) and deterioration of the window assembly or building material around the window can be repaired under this section.
- Repair of trim and/or flashings around windows or doors to prevent water infiltration is allowed.
- Repair or replacement of window sashes that allow water infiltration into a building structure is allowed.
- Repair or replacement of a door panel that allows water infiltration into a building structure is allowed. Only the panel should be replaced unless the door jambs or threshold also allow moisture into the building or a door panel of the same size is not available.

How do you define “minor” or allowable moisture-related measures, and at what point is work considered beyond the scope of weatherization?

Repairs that do not drop the SIR of the project below 1 are considered allowable. Repairs that drop the project below an SIR of 1 are beyond the scope of weatherization and must be funded by another source, including H&S funding, or the project will be deferred.

Client Education

From DOE Issues -

- *Provide client written notification and disclaimer on mold and moisture awareness.*
- *Provide information on the importance of cleaning and maintaining drainage systems.*
- *Provide information on proper landscape design and how this impacts site drainage and moisture control.*
- *When deferral is necessary, provide information in writing describing conditions that must be met for weatherization to commence.*

Training

From DOE Issues -

- *National curriculum on mold and moisture or equivalent.*
- *How to recognize drainage issues.*

7.17 – Pests

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

What guidance do you provide Subgrantees for dealing with pests and pest intrusion prevention in homes slated for weatherization?

From DOE Issues -

- *Limited Pest removal is allowed only where infestation would prevent weatherization.*
- *Infestation of pests may be cause for deferral where it cannot be reasonably removed or poses H&S concern for workers.*
- *Screening of windows and points of access and incorporating pest exclusion into air sealing practices to prevent intrusion is allowed.*

Pest removal and the materials used to target removal and verify exclusion are allowed with WAP health and safety funds. The use of traps (especially for mice) to help target exclusion and verify the effectiveness of pest exclusion measures is allowed where costs are reasonable. Likewise, pest removal services may be employed where costs are reasonable. Exclusion methods such as copper mesh or screening materials are allowed to cover existing penetrations to protect the weatherization materials and alleviate potential air quality concerns. If combining work with air sealing or other efficiency measures, only those components (time and materials) related to pest exclusion can and must be charged to the health and safety budget category.

Define Pest Infestation Thresholds Beyond Which Weatherization Is Deferred

Repairs that do not drop the SIR of the project below 1 are considered allowable. Repairs that drop the project below an SIR of 1 are beyond the scope of weatherization and must be funded by another source, including H&S funding, or the project will be deferred.

Testing Protocols

From DOE Issues - Assessment of presence and degree of infestation and risk to the worker.

Client Education

From DOE Issues -

- *Inform the client in writing of the observed condition and associated risks.*
- *When deferral is necessary, provide information in writing describing conditions that must be met for weatherization to commence.*
- *Clients must be educated on continued exclusion techniques and pest prevention and are responsible for the long-term success of any pest control strategy.*

Training

From DOE Issues - How to assess the presence and degree of infestation, associated risks, and deferral policy.

7.18 – Radon

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

What guidance do you provide Subgrantees around radon?

From DOE Issues -

- *Radon mitigation is not an allowable H&S cost.*
- *Clients must sign an informed consent form prior to receiving weatherization services. This form must be kept in the client file.*
- *In homes where radon may be present, work scope should include precautionary measures based on EPA Healthy Indoor Environment Protocols for Home Energy Upgrades to reduce the possibility of making radon issues worse.*
- *Whenever site conditions permit, cover exposed dirt floors within the pressure/thermal boundary with 6 mils (or greater) polyethylene sheeting, lapped at least 12” and sealed with appropriate sealant at all seams, walls, and penetrations; and cover and seal open sump pits using airtight covers.*
- *Other precautions may include but are not limited to sealing any observed floor and/or foundation penetrations, isolating the basement from the conditioned space, and ensuring crawl space venting is installed.*

Testing Protocols

From DOE Issues - Grantees may allow limited testing at their discretion in areas with high radon potential.

Client Education

From DOE Issues -

- *Provide all clients with EPA’s A Citizen’s Guide to Radon and inform them of radon-related risks.*
- *Informed consent form must include:*
- *Information from the results of the IAQ Study shows that there is a small risk of increasing radon levels when building tightness is improved.*
- *A list of precautionary measures WAP will install based on EPA Healthy Indoor Environment Protocols.*
- *Some of the benefits of Weatherization include energy savings, energy cost savings, improved home comfort, and increased safety.*
- *ASRAE 62.2 ventilation measures*

Training and Certification Requirements

From DOE Issues -

- Auditors, assessors, and inspectors must have knowledge of radon, what it is, and how it occurs, including what factors may make radon worse and precautionary measures that may be helpful.
- Workers must be trained in proper vapor retarder installation.
- A zonal map can be located at: <http://www.epa.gov/radon/pdfs/zonemapcolor.pdf>

Documentation Requirements

From DOE Issues - Confirmation that EPA’s A Citizen’s Guide to Radon was received and radon-related risks discussed with the client.

7.19 – Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

What is your policy for the installation or replacement of the following:

From DOE Issues –

- o *Smoke alarms may be installed where alarms are not present or are inoperable.*
- o *CO alarms must be installed where alarms are not present or are inoperable:*
- o *Reference ASHRAE 62.2-2016: NFPA 72*
- o *Where solid fuel burning equipment is present, fire extinguishers may be provided as an allowable H&S measure.*
- o *H&S funding for replacing smoke or CO alarms prior to manufacturers’ stated lifetime use is prohibited.*

Smoke Alarms: It is allowed to install smoke alarms where none exist or where the existing one(s) are inoperable. If smoke alarms are inoperable or non-existent, one battery-operated alarm may be installed on every floor of a weatherized dwelling. If existing hard-wired smoke alarms are inoperable or broken, they may be replaced with compatible units.

Carbon Monoxide Alarms: When a dwelling has one (1) or more combustion appliances or an attached garage, at least one functioning carbon monoxide (CO) alarm must be present in the dwelling. The manufacturer’s installation recommendations will be used to locate the appropriate mounting location when a new alarm is installed; typically, this would be where clients spend most of their time, such as near bedrooms. If an entire multi-family building is to receive weatherization services, a functioning CO alarm should be present or installed in each unit of the complex, as necessary, unless the complex does not have any combustion appliances, including gas stoves.

Further guidance for locations of CO detector installation is provided in NH Field Guide 2021.

Fire Extinguishers: Providing fire extinguishers for Solid Fuel Heating only is an allowable cost.

Testing Protocols

From DOE Issues -

- Check existing alarms for operation.
- Verify the operation of installed alarms.

Client Education

From DOE Issues - Provide the client with verbal and written information on the use of the devices installed.

Training

From DOE Issues -

- Where to install alarms.
- Local code compliance.

7.20 – Occupant Health and Safety Concerns and Conditions

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

What guidance do you provide Subgrantees for soliciting the occupants’ health and safety concerns related to components of their homes?

From DOE Issues: Screen occupants to reveal known or suspected health concerns, either as part of the initial application for weatherization, during the audit, or both. Utilize the Occupant Pre-Existing Health Condition screening form.

The sub-grantee must discuss the weatherization work to be completed in the dwelling and ask the client if any residents in the home have any health conditions that might be impacted by the planned weatherization work to be completed.

What guidance do you provide Subgrantees for determining whether occupants suffer from health conditions that may be negatively affected by the act of weatherizing their home?

The Energy Auditor must discuss the weatherization work to be completed in the dwelling and ask the client if any residents in the home have health conditions (e.g., asthma-like respiratory issues, etc.) that

might be impacted by the planned weatherization work. If the dwelling is not deferred, the energy auditor must use their professional judgment to determine the appropriate work scope.

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

From DOE Issues -

- *When a person's health may be at risk and/or WAP work activities could constitute an H&S hazard, the occupant will be required to take appropriate action based on the severity of the risk.*
- *Failure or the inability to take appropriate actions must result in deferral.*

Health and safety problems found during the building evaluation will result in the CAA taking one of four actions:

- 1) If the problem does not prevent the dwelling from being weatherized and installing the weatherization measures will not exacerbate the problem, the CAA can proceed with weatherization.
- 2) If the problem must be remedied before or during weatherization, the corrective action is allowable under this guidance, and if the cost is reasonable, weatherization can proceed. The health and safety issues must be corrected prior to job completion.
- 3) If the problem must be remedied before weatherization measures can be installed and the corrective action is not allowable under this guidance, or the cost is not reasonable, then correction of the health and safety issue becomes the client/owner's responsibility. The CAA must defer weatherization until the issue can be corrected. The CAA must also refer the client/owner to any known resource that may be able to help correct the problem.
- 4) Alternatively, in cases of weatherization deferral due to health and safety issues, agencies may consider performing partial weatherization, with pre-approval from the Department of Energy (DOE) Project Officer (to be obtained by working through the NH DOE Weatherization Program Manager), where installed measures do not affect the building shell or air sealing. If partial weatherization is performed, it is also permissible to install allowable health and safety measures. Agencies should use this option with prudence because once the unit has been weatherized, it may be a long time, if ever, before that unit is again eligible for weatherization.

Client Education

From DOE Issues -

- *Inform the client in writing of any known risks.*
- *Provide client with Subgrantee point of contact information in writing so client can inform of any issues.*
- *When deferral is necessary, provide information in writing describing conditions that must be met for weatherization to commence.*

The Subgrantee must notify the client of all found health and safety issues on the Health and Safety Notification form. A copy of this written list shall be inserted into the client file. The evaluation is in no way intended to be a code compliance inspection and should not be construed as such. The list will also indicate repairs the client/owner is responsible for conducting prior to weatherization, if applicable. The client will also be informed that corrective action on all items is recommended and that it is the client's responsibility to do so. It is very important for the Subgrantee to document all found health and safety problems and/or conditions that could potentially result in health and safety problems. Documentation must include photos. Careful and complete documentation can protect the Subgrantee from future client claims regarding the results of weatherization.

The Subgrantee may provide a list of resources and make referrals for specific safety corrections. Potential referral resources include but may not be limited to:

- Childhood Lead Poisoning Prevention Program
- Lead Hazard Control
- Head Start
- Maternal and Child Health Home Visiting programs
- Housing and Urban Development
- City or town welfare
- Rural economic development
- Landlords/homeowners
- Any other such sources known by community action programs to be available.

When a client's health is fragile and/or the work activities could constitute a health or safety hazard, the occupants at risk will be required to leave the home during these work activities and requested to return at least 1 hour (or a reasonable time as determined by the installers) after installers are scheduled to leave to allow for clean-up/ventilation of the home. Weatherization funds cannot be used to relocate clients or reimburse them for any such costs incurred because of the requirement to leave during the workday. Consideration should be given to possible client sensitivities to blown-in insulation or other allergens, like dust, that the client may be exposed to during the weatherization process.

When two-part foam insulation is to be used, clients must be made aware of the potential off-gassing during the curing period and the associated risks and required to leave their homes. If they are unable to leave their home due to a lack of resources or alternative lodging, Health and Safety funds may be used as a last resort to assist in their relocation.

In such cases, the relocation support is ~~limited to capped at~~ a maximum of two nights, and the cost must not exceed the government rate as established by the General Services Administration (GSA). If a client refuses relocation, deferral must be considered.

Documentation Form(s) have been developed and comply with guidance? Yes No

7.21 – Ventilation and Indoor Air Quality

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

Identify the Most Recent Version of ASHRAE 62.2 Implemented (optional: identify Addenda used)

ASHRAE 62.2-2016. A client's refusal of required ventilation is a mandated deferral.

Testing and Final Verification Protocols

From DOE Issues -

- *ASHRAE 62.2 evaluation to determine required ventilation.*
- *Measure fan flow of existing fans and of installed equipment to verify performance.*
- *If a client refuses ventilation as required by ASHRAE 62.2, the home must be deferred.*

Client Education

From DOE Issues -

- *Provide client with information on function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation system and components.*
- *Provide clients with equipment manuals for installed equipment.*
- *Include a disclaimer that ASHRAE 62.2 does not account for high-polluting sources or guarantee indoor air quality.*

Training

From DOE Issues -

- *ASHRAE 62.2 training, including proper sizing and evaluation of existing and new systems.*
- *If the Grantee opts to adopt a new version of ASHRAE 62.2, then training and technical assistance should be planned to prepare crews to implement the new Standard.*

7.22 – Window and Door Replacement, Window Guards

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

What guidance do you provide to Subgrantees regarding window and door replacement and window guards?

- Window and door replacements must first be modeled and treated as ECM(s) if cost justified. They shall not be included in the air sealing ECM. They are allowable as IRMs to preserve the integrity of the associated ECM(s). Assemblies cannot be replaced unless the measure either achieves an SIR of at least 1 on its own or it is implemented as an IRM, the cost of which, when factored into the whole house package of ECMs, does not cause the SIR of that whole package to fall below 1. Windows cannot be replaced as H&S measures because the cost would always have to be evaluated as “unreasonable.”
- Windows that leak water and have visible evidence of moisture damage (beyond water staining) and deterioration of the window assembly or building material around the window can be repaired under this section.
- Repair or replacement of a door between an attached garage and a living space is allowable to prevent CO flow or to provide for fire safety.
- Repair of trim and/or flashings around windows or doors to prevent water infiltration is allowed.
- Repair or replacement of window sashes that allow water infiltration into a building structure is allowed.
- Repair or replacement of a door blank that allows water infiltration into a building structure is allowed. Only the panel should be replaced unless the door jambs or threshold also allow moisture into the building or a door panel of the same size is not available.
- Roof repairs are allowable as IRMs to preserve the integrity of the associated ECM. They are allowable as an H&S measure if they resolve a bulk water intrusion that is causing visible biological growth and falls under limitations established in the grantee’s annual plan and the repair is well documented with a written explanation and photos of the biological growth.
- Roof repairs are only allowable as an ancillary cost to an ECM that would typically require such repair as part of the installation, such as ceiling/roof insulation.

Testing Protocols

Not applicable.

Client Education

From DOE Issues -Provide written information on lead risks wherever issues are identified.

Training

From DOE Issues -Awareness of guidance.

7.23 – Worker Safety (OSHA, etc.)

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

How do you verify safe work practices? What is your policy for in-progress monitoring?

From DOE Issues -

- *Workers must follow OSHA standards where required and take precautions to ensure the H&S of themselves and other workers.*
- *All Subgrantees and contractors must maintain compliance with the current OSHA Hazard Communication Standard, including on-site organized Safety Data Sheets (SDS) (formerly called MSDS).*

This H&S plan is a state plan, to inform and guide Subgrantee operations.

It is the responsibility of each NH WAP Subgrantee to ensure that its crews and/or contractors conduct their weatherization work in compliance with all applicable health and safety rules and practices. Each CAA is responsible for safety on the job. Each Subgrantee shall organize itself to empower any weatherization worker on a job site to inspect work-site practices and to stop work if necessary to correct unsafe conditions or practices.

In PY24, NH DOE/WAP will continue to refine how “in process” inspections of WAP jobs will be done. The Policies and Procedures Manual:

- Defines the extent to which Subgrantees themselves will perform, during the implementation of the work order, a minimum number of in-process inspections on their own jobs.
- Continues the practice of contracting with a third-party Quality Assurance Inspector to sample, on a random basis, the in-process work and safety practices of all Subgrantees and their contractors.
- Includes a clear and effective format for reporting in-process inspections, including space to record T&TA opportunities and to indicate the degree to which WAP standards were being met for:
 - The thoroughness of job scope.
 - The professionalism of implementation.
 - The health and safety of all involved at the work site.

Training and Certification Requirements

From DOE Issues -

- *Use and importance of PPE.*
- *Safety training appropriate for job requirements. OSHA 10-hour training meets this requirement.*
- *Ongoing training as required in the Hazard Communication Program.*

Subgrantee crews and contractors must comply with Occupational Safety and Health Administration (OSHA) requirements in all activities. This includes implementing the confined space protocols when the

job situation calls for it. OSHA standards apply to all Subgrantee personnel and the contractors they hire. At the federal level, DOE has rescinded the requirement that Subgrantee staff and contractors be OSHA certified, but in New Hampshire, NH DOE has retained the requirement that all WAP personnel working in the field, including auditors, are required to attend, at a minimum, a 10-hour OSHA construction training, which includes training on the use of the confined space protocols. Subgrantees will utilize their training and technical assistance (T&TA) funds to attend necessary training to comply with this and other requirements and to monitor their crews and/or contractors to ensure this requirement is met.

Subgrantees are encouraged to offer training to their contractors, though it is not required. Contractors that are currently under contract with Subgrantees to perform work in the WAP are eligible to receive training with T&TA funding; however, contractor retention agreements are required and further defined in the New Hampshire Weatherization Policies and Procedures Manual (NH PPM). Contractor training expenses may also include hourly costs of the contractors' pertinent staff to attend the training. NH DOE requires that Subgrantees notify NH DOE when T&TA funds will be used to train contractors. Eligible training includes all training that provides a benefit to the overall weatherization goal. As of the beginning of PY12, all newly hired contractors in the NH WAP must have the required OSHA training or receive it within 30 days of hiring. This remains true in New Hampshire despite the DOE's Program Memorandum 003 of July 18, 2014, which rescinded the DOE requirement that workers employed in the WAP have OSHA certification.

Each subgrantee must have a Health and Safety Plan as part of its annual Management Plan. The plan should include Subgrantee-specific information, including planned training and target dates, emergency contact information, emergency exit procedures, etc. Agencies must have a written safety plan in effect and must ensure that their employees and contractors receive a copy.

Subgrantees or their contractors must provide personal protective equipment (PPE) to weatherization workers during projects that have known or suspected hazards. PPE includes, but is not limited to, eye, ear, and face protection and respiratory equipment as necessary. The Subgrantee or its contractor is responsible for requiring personnel to wear appropriate PPE in all operations where there is an exposure to hazardous conditions or as required by OSHA. NH DOE will monitor Subgrantees on their inventory and use of PPE as well as on the credentialing of their personnel for addressing known or suspected hazards.

Safety Data Sheets (SDS) for all products being used should be available on-site in a 3-ring binder; additionally, the SDS must be posted for any materials being used that may contain hazardous products. Costs for local agencies to comply with on-site OSHA standards may be charged under health and safety, tools and equipment, or incidental repairs as appropriate and as approved in the Subgrantee's Management Plan. All costs associated with subcontractor compliance with these requirements are the responsibility of the subcontractor and cannot be charged separately as "additional" costs.

Because of the wide range of activities involved in weatherizing a house, ensuring crew health and safety requires a broad knowledge of the appropriate OSHA standards. These should be consulted for further details. Other useful information may be included on Safety Data Sheets that identify potential health risks and describe the proper use, handling, and storage of a wide variety of materials, including some common weatherization materials. They also suggest personal protective equipment, and they address first aid measures.

7.24 – <Add in Topic>

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

Remediation Protocols

Testing Protocols

Client Education

Training