

# Weatherization Grantee Health and Safety (H&S) Plan- *Optional Template* **PA DCED**

## **1.0 – GENERAL INFORMATION**

### **Additional information that does not fit neatly in one of the other sections of this document.**

As a result of these H&S policies, subgrantees may find it necessary to defer homes based on a home's H&S requirements. If the H&S issues cannot be adequately addressed according to the 22-7 guidance or if H&S expenses on a home would force a subgrantee to exceed the up to 18% per-unit average overall H&S expenditure, the subgrantee may defer the home while referring it to an outside resource (i.e. local home repair program, HOME or CDBG program) capable of remedying the H&S issues, after which it may weatherize the home. The decision to defer work in a dwelling is difficult but necessary in some cases. This does not mean that assistance will never be available, but that work must be postponed until the problems can be resolved and/or alternative sources of help are found. If, in the judgment of the auditor, any conditions exist which may endanger the health and/or safety of the workers or occupants if the weatherization work was performed, the unit should be deferred until the conditions are corrected. Deferral may also be necessary for other reasons such as where occupants are uncooperative, abusive, or threatening or the client refuses critical weatherization measures.

Additionally, as per the PA Client File and Health & Safety Directives: The deferral

process includes a three-step process with the client:

- (1) The 'Notification of Potential Deferral of Weatherization Services Form' which describes the potential reasons for deferral which must be signed and dated by the client, generally at the time of application for the Weatherization Assistance Program. (Attachment E)
- (2) Conditions already existing in the home which may cause H&S hazards must be documented. A sample form, the Pre-Existing Conditions form (Attachment H), may be utilized to describe the hazards and the agency's recommendations regarding those hazards.
- (3) If the dwelling unit is deferred during the audit or at any time after the application has been approved, the "Deferral of Weatherization Services" form (Attachment F) must be utilized and provided to the client/landlord/property manager.

Agencies must maintain a list of all deferred clients who have received a Deferral of Weatherization Services notice. The deferred clients must be tracked by date and include a reason for deferral, if they were referred to another program and what program to which they were referred. A DOE-developed Deferral Tracking Spreadsheet will be attached to this plan and utilized for WAP Deferrals received from July 1 to June 30, annually. The Deferral Tracking Spreadsheet will be due annually with the DOE Reconciliation.

The Client File must contain a Client Appeals Process with a client sign-off. Every client, regardless of whether the client has been deferred or not, must receive a copy of the Client Appeals Process, and sign-off must indicate that the client has received and understands the Client Appeals Process. The Client Appeals Process must present a clear order in which the client may appeal any weatherization services-based decision or action with which the client disagrees. The order of the Client Appeals Process must proceed from the subgrantee's Weatherization Coordinator (that is, the person in charge of all weatherization services) to the subgrantee's Executive Director (that is, the person in charge of the entire subgrantee) to the Center for Community Services' Director. Additional sources of contact (for example, the Energy Auditor or Crew Leader associated with the dwelling unit's

weatherization services) may be added, but none of the three mentioned above may be removed from the appeals process and all must include sufficient contact information. With the exception of the Center for Community Services' Director, the Client Appeals Process must contain the name, mailing address, phone number and email address of all individuals or offices listed on the Client Appeals Process form (that is, this information is required for at least the Weatherization Coordinator and the Executive Director).

The Client Appeals Process must detail that the Center for Community Services' Director may only be contacted in writing after the other steps have been taken and the client feels that the issue is still unresolved. Sample Appeals template attached. (Attachment G).

If any of the reasons listed in the Deferral Policy as standards for deferral are true for a property at the time of client application or anytime during the weatherization period, then the property is not eligible for weatherization services until the condition is resolved. NOTE: If a dwelling unit falls within any of these categories during the weatherization process, all measures started must be completed; however, no new measures will be permitted. The job will be considered deferred. When deciding not to weatherize, agency must follow deferral process as defined in this Health and Safety Plan. For example, but not limited to, a subgrantee may choose not to weatherize a property under the following conditions which could occur during the weatherization process:

1. There are vermin, unsanitary, or other H&S problems on the property that present a hazard to the weatherization workers
2. The client or occupants are physically or verbally abusive

PA's Life-threatening Policy - DOE WAP is not an emergency program. However, there may be situations during the time spent in the home and after evaluating conditions in the home that an emergency or life-threatening situation is present. Some examples of situations which PA defines as life-threatening would be a suspected gas leak, suspected Carbon Monoxide (CO) leak/poisoning, heating system failure in November – March, significant fire, electrical or structural hazards, suspected elderly or child endangerment or abuse, or the presence of hazardous materials.

The subgrantees must protect themselves, notify client and possibly instruct the client to leave the home in the case of a significant gas leak or a home that has a high CO level test result and seek immediate safety. Then, the subgrantees must notify the appropriate authorities based on the issue. Some examples are:

- Gas leak- notify the utility company
- Carbon Monoxide level- please refer to SWS 2.0201.1 Combustion Appliance Zone (CAZ) testing for appropriate plan of action. According to SWS 2.0201.1, for levels over 70 ppm, the unit must be evacuated first
- Heating System failure (November – March) - refer client to LIHEAP Crisis program for assistance and offer temporary, auxiliary heat and/or blanket
- Significant fire, electrical or structural issues- Contact Local Codes Authorities or fire company depending on seriousness of issue
- Suspected elderly or adults with disabilities, endangerment or abuse-To report abuse of elderly individuals or adults with disabilities call the Protective Services Hotline: **1-800-490-8505**
- Suspected child endangerment or abuse- To report child abuse call **1-800-932-0313**. Mandated reporters can [report online](#).
- Presence of hazardous materials- Contact emergency service responsible for specific hazardous material

Some examples include:

- PA Department of Environmental Protection, reporting link: <http://www.dep.pa.gov/About/ReportanIncident/Pages/default.aspx>

- From US Environmental Protection Agency website:

For **emergencies and other sudden threats** to public health, such as:

- oil and/or chemical spills,
- radiation emergencies, and
- biological discharges

call the **National Response Center at 1-800-424-8802**.

## 2.0 – BUDGETING

Grantees are encouraged to budget H&S costs as a separate category and, thereby, exclude such costs from the Average Cost Per Unit (ACPU) cost limitation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. H&S costs that 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 Grantee’s Department of Energy (DOE)-approved energy audit tool.

Select which option used below.

Separate H&S Budget

Contained in Program Operations

## 3.0 – H&S EXPENDITURE LIMITS

Pursuant to [10 CFR 440.16\(h\)](#), Grantees must establish H&S expenditure limits for their Program and provide justification for those limits by explaining the basis and related historical H&S expenditures. DOE acknowledges that it may be necessary for Grantees to deviate from historical expenditures when certain circumstances arise (e.g., funding source changes).

[10 CFR 440.16\(h\)\(2\)](#) dictates that these limits must be expressed as a percentage of the ACPU. To calculate this percentage, use the following formula:

$$\text{Total Average H\&S Cost per Unit} = \frac{\text{H\&S budget amount}}{\text{Program Operations budget amount}}$$

For example, if the ACPU is \$5,000 and a Grantee’s Program expends an average of \$750 per dwelling on energy-related H&S measures, the Total Average H&S Cost per Unit would equal 15 percent. DOE acknowledges that this percentage may vary significantly between Grantees due to different geographical areas and depending upon the availability of other funding sources, resource availability, etc. Low percentages should include a statement of what other funding supports H&S costs, while larger percentages will require greater justification and relevant historical support.

15 percent is not a maximum limit on H&S expenditures. DOE will conduct a secondary level of review on H&S Plans with a Grantee request of more than 15 percent of Program Operations used for H&S purposes. **DOE strongly encourages using the table below in developing justification for the requested H&S budget amount.** In accordance with [10 CFR 440.18\(d\)\(15\)](#), these funds are to be expended by the Program in direct weatherization activities, “of which is necessary before, or because of, installation of weatherization materials.” This same section of the regulation excludes the H&S costs from the ACPU limitation if H&S costs are budgeted separately.

*DOE recommends reviewing recent budget requests and compare those to actual H&S 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 annual plan.*

**H&S expenditure limits and justification explaining the basis for setting the limits.**

Per-Unit Average Percent: up to 18%

Pennsylvania estimates that the average for H&S expenditures as a percentage of average cost per unit (hereafter referred to as "H&S Percentage"). For the 2022 program year the H&S Percentage will be up to 18% for budgeting purposes.

Each subgrantee will be responsible for management of their H&S budget and will be required to bill H&S repairs as a separate budget line item. Subgrantees are also reminded that H&S expenses in their overall budget expenditures which exceed the Health and Safety allowance may be disallowed costs.

For your budget, the following formula should be used:

Start with your agency's established average cost per unit, multiply that figure by 18%. That sum multiplied by the number of units to be completed will be the maximum Health and Safety budget amount.

Cost basis for H&S measures table: \$1,442 per unit.

**Utilizing the spreadsheet embedded below, provide a full list of H&S measures using historical data from your program, including average cost, and frequency rate. If installing more than a single instance of one measure in a unit (e.g. multiple CO alarms), Grantees may aggregate costs so that frequency does not exceed 100%, or enter a justification into the measure column, which explains why that measure has a frequency rate of over 100%. The spreadsheet will auto calculate your expected Total Average H&S Cost per Unit.**

**Instructions: Double-click icon directly below to open, view and edit Measure Matrix Spreadsheet. Complete the spreadsheet by entering the required information. To save, close the spreadsheet and it will save to this document.**



Measure Matrix  
Final.xlsx

## **4.0 – INCIDENTAL REPAIR MEASURES**

*Any measures that could potentially be identified as H&S, but the Grantee chooses to instead identify and treat those measures as incidental repair measures (IRMs), must be implemented consistently throughout the Grantee's weatherization program. The measure must fit the regulatory definition of an IRM and be cost justified along with the associated energy conservation measure and/or package of measures. [10 CFR 440.3](#) defines Incidental Repairs as, "those repairs necessary for the effective performance or preservation of weatherization materials."*

**H&S measures identified and treated as IRMs within your Program.**

List any H&S measures from the Table of Issues which are instead addressed as IRM with DOE WAP Funds Potential Incidental Repairs Measures (IRM) will be installed only when necessary for the effective performance or preservation of a weatherization measure. The list provided is not exhaustive as any repair (other than those herein defined as “H&S”) necessary for the effective performance or preservation of weatherization materials may be considered incidental, but the list is to be used to identify specific IRM in contrast to H&S measures. Measures not found on the attached list or not defined as H&S but that meet the definition of an IRM may still be installed as an IRM. The incidental repair costs included in the completion of a unit will be included in the program operations budget category. There is no cost limit of the IRM. However, the results of the whole-house standardized energy audit for the unit must have an SIR of 1 or greater and subgrantees are held to the allowable overall average cost per unit of \$8,009. The list of IRMs is included in the PA Measure Selection Identification List attached to this document. It includes measures such as but not limited to framing or repairing windows and doors which could not otherwise be caulked or weather-stripped and repairing walls, floors, ceilings and general carpentry repairs needed to protect the weatherization measure.

List any H&S measures from the Table of Issues which are instead addressed as IRM with DOE WAP Funds Vent Connectors, Repair Plumbing Leaks, Clear Drain Line, Window and Door Repairs

## 5.0 – OCCUPANT PRE-EXISTING OR POTENTIAL HEALTH CONDITIONS AND HAZARD IDENTIFICATION AND NOTIFICATION FORM(S)

Grantees must develop a written policy that includes, at a minimum, the following documentation relating to H&S Plan implementation and maintain signed copies in each client file. Each notification must include the occupant(s) (and landlord if applicable) name and address, be signed and dated by the occupant (and landlord if applicable) indicating that they understand and have been informed of their rights and options and signed by the Subgrantee personnel collecting the information.

Required topics are:

### ▪ **Occupant Pre-existing or Potential Health Condition Screening**

- Provides documentation that allows occupant(s) to self-report known or suspected health concerns as part of initial application for weatherization, during the energy audit, or other part of the weatherization process as specified. Must minimally contain the following:
  - Any known risks associated with the measures and materials being installed
  - Subgrantee point of contact information for occupant(s)
  - Date of screening

### ▪ **Hazard Identification Notification**

- Provides documentation that the occupant and landlord (if applicable), have been informed of any potential hazards identified during the energy audit or intake process. Must minimally contain the following:
  - Date(s) of the energy audit/assessment and when the occupant(s) (and landlord, if applicable) was informed of a potential H&S issue
  - A clear description of the problem, including any testing results
  - A statement indicating if, or when weatherization could continue

### **Radon Informed Consent Form**

- Provides documentation that the occupant(s) (and landlord if applicable) have been informed of any potential hazards associated with radon in weatherized dwellings. The form must minimally contain the following:

- An explanation on the potential small risk of increasing radon levels when building tightness is improved. This is based on the results of the [Buildings Assessment of Radon Reduction Interventions with Energy retrofits Expansion Study \(The BEX Study\)](#)
- A list of precautionary measures WAP will install based on [EPA Healthy Indoor Environment Protocols](#).
- Some of the benefits of Weatherization including energy savings, energy cost savings, improved home comfort, and increased safety.

**Procedure for soliciting occupants' health and safety concerns related to components of their homes**

Subgrantee staff are instructed to interview the client and ask questions about pre-existing and/or potential health conditions. This interview can take place during the application process initially and then must be followed up on during the audit when the auditor is at the home. The client health and safety interview should also be conducted on the first day of weatherization work and throughout the weatherization process. When a person's health may be at risk and/or the work activities could constitute a health or safety hazard, the occupant at risk will be required to take appropriate action based on the severity of risk. Failure or the inability to take appropriate action must result in deferral.

Homes will be deferred if the client has known health problems which may be exacerbated by installation of weatherization materials such as insulation, caulking, two-part foam, etc.

**Procedure for determining whether occupants suffer from health conditions which may be negatively impacted by the act of weatherizing their dwelling**

Occupants will be required to reveal known or suspected health concerns will be screened during the audit. Subgrantees will be required to provide at-risk clients (refers to occupants with health conditions such as respiratory issues or allergic reactions that could be affected by the weatherization process) with worker contact information (in the form of subgrantee weatherization office staff phone numbers) so clients can inform workers of any issues. Additionally, subgrantees will be required to provide the client with information of any known risks to the client's condition(s). Identification of Occupant Health Condition form attached (Attachment D).

**Procedure for addressing potential health concerns including pre-existing health conditions when they are identified**

Describe Guidance Provided To Subgrantees Here If health conditions are identified, the auditor is required to provide the client with information regarding all the weatherization materials and installation techniques that could affect the medical condition. In addition, the auditor must discuss ways that processes may have to be amended so that the medical condition is not affected.

According to the PA Client File and Health and Safety Directives, the Hazard Identification and Notification process is the second step of the Deferral process. The deferral process as described includes a three-step process:

- 1) The 'Notification of Potential Deferral of Weatherization Services Form' which describes the potential reasons for deferral which must be signed and dated by the client, generally at the time of application for the Weatherization Assistance Program. (Attachment E)
- 2) Conditions already existing in the home which may cause H&S hazards must be documented. A sample form, the Pre-Existing Conditions form (Attachment H), may be utilized to describe the hazards and the agency's recommendations regarding those hazards. A Radon Information Form (Attachment M) is used to specifically make clients aware of Radon. It is used in combination with EPA's, "A Citizen's Guide to Radon."
- 3) If the dwelling unit is deferred, the "Deferral of Weatherization Services" form (Attachment F) must be utilized and provided to the client/landlord/property manager.

The Client File must also contain a Client Appeals Process with a client sign-off. Every client, regardless of whether the client has been deferred or not, must receive a copy of the Client Appeals Process, and sign-off must indicate that the client has received and understands the Client Appeals Process.

**Location where forms have been uploaded/submitted**

Separate attachment to SF424

Separate attachment to H&S Plan

## 6.0 – HEALTH AND SAFETY CATEGORIES

*For each of the following H&S categories identified by DOE in the following tables, follow the directions below.*

- Any section that is “Required” below must be explicitly detailed in the H&S Plan regardless of funding source used. If the Grantee checks the box for “Concurrence with DOE Guidance” the contents of the box may be left as it exists or reference the section/location within Grantee Policy and Procedure manual that contains language or insert Grantee specific language. If the “Alternative Guidance” box is checked, the Grantee must provide that alternative guidance in the box.
  - If a Grantee is proposing an alternative action/allowability for a “Required” item, the alternative requires comprehensive explanation of how it meets the intent of the DOE program notice.
  - If a “Required” item/category will not be addressed with any funding source and will always result in deferral, the H&S Plan must state that.
- Any section that is “Allowable” below must be detailed only if DOE WAP funds are used to implement the measures. If the Grantee uses DOE funds for any “Allowable” activities from the Table of Issues then they must be described here in detail, including defining “minor”, “major”, “limited”, “case-by-case”, and “at-risk” if the term is applied. If you only check the box “Allowed with Alternative Funds” then no additional information is required.
- Any section that is “Prohibited” below may not be addressed with DOE WAP H&S funds and does not need to be specifically addressed in the H&S Plan. The Grantee simply needs to check the “Concur with DOE guidance” box and indicate if the condition will result in deferral/referral.
- The Grantee H&S Plan may address additional H&S hazards specific to their program that are not included in the Table of Issues. If a Grantee chooses to include additional measures as DOE WAP funded H&S costs, the H&S Plan must include details pertaining to the measures allowed, testing required, and client education for these specific hazards.
- All required “Testing/Inspection” related items must be documented in the client file to verify completion and results.

## 6.1 – Air-Conditioning, Heating Systems, and Combustion Appliances

### Required Actions

|  |   |   |
|--|---|---|
| Concur with DOE Guidance <input checked="" type="checkbox"/> | Alternative Guidance <input type="checkbox"/> | Results in Deferral/Referral <input type="checkbox"/> |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>        | Alternative Funds <input type="checkbox"/>    |   |

- Replace, repair, or install primary heating systems when existing primary heating systems are unsafe, inoperable, or nonexistent. No home may be left without a safe primary heating system after weatherization where climate conditions require heating (i.e., all climate zones except zone 1 as defined by ASHRAE). If unable to meet this requirement, deferral is required.
- No DOE-funded weatherization work is permitted if the completed dwelling unit will be heated with an unvented combustion space heater as the primary heat source. The primary heat source must be replaced with a vented unit prior to or by weatherization. The replacement unit must be sized to heat the entire dwelling unit.
- Unsafe secondary units, including space heaters, must be repaired, or removed and disposed of, or deferral is required. Secondary unvented space heaters are considered unsafe if they:
  - are not listed and labeled as meeting ANSI Z21.11.2;
  - have an input rating of more than 40,000 BTU/hour;
  - are in a bedroom and have an input rating of more than 10,000 BTU/hour;
  - are in a bathroom and have an input rating of more than 6,000 BTU/hour;
  - are operating in an unsafe manner (e.g., high carbon monoxide (CO) readings, too close to combustible materials, lack sufficient combustion air volume);
  - or are not permitted by the Authority Having Jurisdiction (AHJ).
- DOE WAP Grantees must comply with the Manufactured Home Construction and Safety Standards which mandates that:
  - All fuel-burning appliances in manufactured homes except: ranges, ovens, illuminating appliances, clothes dryers, solid fuel-burning fireplaces and solid fuel-burning stoves, must be installed to provide for the complete separation of the combustion system from the interior atmosphere of the manufactured home (i.e., to draw their combustion air from outside), and be vented to outside the dwelling.
  - All appliances installed by or left in place after weatherization in manufactured homes must meet these standards, including secondary heating sources. If an occupant will not allow the removal of an unsafe combustion appliance from the home, deferral is required.
  - Repair or replace combustion gas venting to ensure proper combustion gas venting to outside the dwelling for all combustion appliances, including but not limited to gas dryers and refrigerators, furnaces, vented space heaters, and water heaters.
- If weatherization installs an appliance that is vented into a masonry chimney, the chimney must be lined in compliance with the International Fuel Gas Code (IFGC) or local AHJ if more stringent.
- Install adequate combustion air for all combustion appliances left after weatherization.
- If permits are required for heating/cooling system work, they must be secured and are a program operation cost if the installation is an ECM or may be included in the H&S cost if installed as a H&S measure.
- If unsafe conditions relating to existing combustion appliances require remediation to safely perform weatherization and cannot be remedied by repair or tuning, replacement is an allowable H&S measure unless prevented by other guidance herein.
- Documentation justifying the replacement with a cost comparison between replacement and repair must be maintained in the client file.

### Allowable Actions

|  |   |
|--|---|
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/> | Allowed with Alternative Funds <input type="checkbox"/> |
|--|---|



If DOE WAP H&S funds are used for any “allowable” actions, detail them here. Unsafe, and inoperable, or “Red tagged” heating system replacement, repair or installation is allowed.

The number of heating degree days within a 5-year timeframe in Pennsylvania ranges, on average, from a low of 2571 in Philadelphia County to a high of 4167 in McKean County. This large number of heating degree days in all areas of the state is justification for the repair, replacement, or installation of heating systems. This is justified due to the potential client death or illness due to cold weather conditions especially to the most vulnerable people such as the elderly and families with small children.

When furnace replacement doesn’t achieve a Savings to Investment (SIR) of one or greater and when the furnace, in its current condition, presents a clear and present danger to the occupants, Pennsylvania allows the use of DOE H&S funds for furnace replacement, repair, clean/tune, or installation only where other funds are unavailable.

Maintenance, repair, and replacement of primary indoor solid fuel heating units is allowed where occupant H&S is a concern. Maintenance, repair, or replacement of secondary solid fuel heating sources is not allowed with DOE H&S funds.

Repair, replacement, or installation of stand-alone electric space heaters is not allowed with DOE WAP funds and, **when possible**, removal is required. An alternate code-compliant source of heat will be provided if the heater is the primary heating source and is going to be removed.

For Vented, Combustion Space Heaters used as primary heat source, unsafe and inoperable heating system replacement, repair or installation is allowed and treated as a furnace replacement.

Pennsylvania recommends to subgrantees that, when possible, LIHEAP or other sources of funding be utilized for all heating-related issues in the home.

Although Pennsylvania can still be considered a “heating” state due to the number of heating degree days, over the past 40 years, the number of cooling degree days has increased in even the cooler parts of the state such as McKean County. According to the statistics, the mean for cooling days for Bradford in McKean County went from 282 to 316 and changed even more significantly in the warmer part of our state, Philadelphia which went from 1359 to 1583. The cooling degree day differences in all areas of the state has prompted PA to include repair and/or replacement of existing air-cooling systems in homes with vulnerable residents as an allowable health and safety measure, if other funds are not available to resolve the issue. This is justified due to the potential client death or illness due to hot weather conditions especially to the most vulnerable people such as the elderly, families with small children and people with medical conditions which are defined with a current doctor’s excuse.

Pennsylvania recommends to subgrantees that, when possible, LIHEAP or other sources of funding be utilized for all cooling issues in the home. However, PA will allow a cooling unit request via a process to be used to allow for exceptions when other funds are not available and elderly clients and families with young children where health and safety would be at risk.

Pennsylvania will repair or replace unsafe, inoperable and/or “red-tagged” primary heating systems as a health and safety measure only when no other funds are available and when the replacement doesn’t achieve an SIR of one or greater. Although consideration for heating system replacement will be given to the elderly, families with small children and people with medical conditions documented with a doctor’s note, occupants do not have to be “at risk” to be considered for heating system replacement. PA encourages the use of other funds for all furnace replacements that do not achieve and SIR of 1 or greater. For cooling system repairs and/or replacements, the exception process will be required for at risk clients defined as:

1. Elderly (60 years or older), as described in the application, State ID is required at WAP application time
2. Families with small children under 6 years of age, as described in WAP application
3. Residents with a current doctor’s note identifying a condition which would require a cooling system

Proper venting to the exterior of the structure for all combustion appliances, including gas dryers, refrigerators, furnaces, vented space heaters, and water heaters is required. Appropriate venting and venting materials are required.

Unsafe or leaking water heaters may be replaced with a hot water source that meets occupant needs at the lowest possible cost of installation and operation. Appliance options will be based on the needs and desires of the occupant with saving water and energy in mind while at the same time protecting the environment. As such, the potential for heat pump hot water heater or other renewable energy systems should be considered when selecting hot water equipment.

Repair and cleaning of water heaters and minor cleaning of other appliances is allowed if necessary, to perform weatherization measures.

DOE H&S funds may be utilized only for the replacement of broken water heaters, refrigerators and minor cleaning of other appliances. Replacement, installation, or repair of appliances other than those named is not allowable with DOE funds. The replacement of water heaters must be considered a H&S measure.

Maintain documentation justifying the replacement with a cost comparison between replacement and repair in the client file.

Replacement units must meet the safety, selection and installation requirements in the PA SWS Field Guide.

Water heaters which have been replaced must be removed from the client’s home and property and properly disposed of by the subgrantee.

**Prohibited Actions**

Concur with DOE Guidance

Using DOE WAP H&S funds for replacement or installation of secondary heat sources is prohibited.

**Required Testing/Inspection**

Concur with DOE Guidance

Alternative Guidance

- Verify that primary heating systems are present, operable, and performing correctly.
- Conduct combustion appliance testing and visual inspection of all combustion appliances and their related venting.
- Depressurization and spillage testing is required for all Category 1 appliances pre- and post-weatherization and before leaving the home on any day when work has been done that could affect draft (e.g., air or duct sealing, adding exhaust ventilation).
- CO testing is required for all combustion appliances, regardless of venting type.
- Verify proper clearances for all combustion venting types
- Visually inspect the entirety of solid fuel-fired appliance installations (e.g., wood stoves, coal stoves, pellet stoves, fireplaces) including the venting system to ensure it adheres to the applicable code or local authority having jurisdiction. Appliances must be inspected pre- and post-weatherization.
- Conduct pre- and post- weatherization worst case CAZ depressurization testing in spaces having a fireplace or woodstove. Since there is no consensus method for verifying safe operation of fireplaces and woodstoves, Grantees can propose testing policies and limits. If the Grantee does not propose a policy and fireplaces or woodstoves are left operational, the vent must meet national or local codes, or the home cannot be weatherized.
- 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.

**Grantee Combustion Testing Action Levels**

Primary heating system must be present, operable and performing correctly. On combustion equipment, inspect chimney and flue 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. Manual J calculations must be documented for all furnace replacements.

For electric space heaters being used as a heat source, check circuitry to ensure adequate power supply for existing space heaters.

For unvented combustion space heaters, testing for air-free carbon monoxide (CO) is required. If unvented combustion space heater is secondary heat source and NOT in a manufactured or mobile home, check units for ANSI Z21.11.2 label and confirm that the unvented combustion space does not fall into any of the unsafe conditions listed above in 6.1 bullet point 3.

CAZ testing must be conducted according to the BPI 1200 Standards. However, the requirements for unvented combustion space heaters must be followed according to this plan. Complete details can be found at: <http://www.bpi.org/sites/default/files/CST%20PROCEDURE%20FOR%20GAS%20OVENS%2C%20DIRECT%20C%20POWER-VENTED%20OR%20VENT-FREE%20APPLIANCES.pdf>

| <b>70 ppm or greater</b>   | <b>36 ppm – 69 ppm</b>  | <b>9 ppm – 35 ppm</b>  |
|--|---|--|
| <ul style="list-style-type: none"> <li>• Terminate the inspection.</li> <li>• Notify the homeowner – occupant of the need for all building occupants to evacuate the building</li> <li>• Leave the building and the appropriate emergency services shall be notified from outside the home.</li> </ul> | <ul style="list-style-type: none"> <li>• Advise the homeowner – occupant that the elevated levels of ambient CO have been detected</li> <li>• Open windows and doors. Recommend that all possible sources of CO be turned off immediately.</li> <li>• Where it appears that the source of CO is a permanently installed appliance, recommend that the appliance be turned off and advise homeowner – occupant to contact a qualified professional.</li> </ul> | <ul style="list-style-type: none"> <li>• Advise the homeowner- occupant that CO has been detected.</li> <li>• Recommend that all possible sources of CO be checked and windows and doors opened.</li> </ul> <p>Where it appears that the source of CO is a permanently installed appliance, advise the homeowner – occupant to contact a qualified professional.</p> |

Inspect venting of combustion appliances and confirm adequate clearances.

If unsafe conditions whose remediation is necessary to perform weatherization cannot be remedied by repair or tuning, replacement is not an allowable H&S measure. Pennsylvania will allow weatherization in a home regardless of the existence of appliances (other than water heaters) broken beyond repair, as long as the broken appliance(s) do not interfere with the weatherization process or cause an imminent H&S problem.

Homes with broken appliances which interfere with the weatherization process or create an imminent H&S problem (for example, there are dangerous levels of hazardous gases from other appliances) will be deferred immediately unless an alternate funding source can be found.

Proper ventilation must be installed, and workers must take precautions to avoid dangerous situations. The subgrantee must inform the client in writing of any excessive CO that cannot be corrected.

**Grantee Woodstove & Fireplace inspection/testing policy including actions/limits**

Concur with DOE Guidance

Alternative Guidance

Fireplace or woodstove venting that is left operational after weatherization must meet current local or national standards or the home must be deferred.

**Required Occupant Education**

Concur with DOE Guidance

Alternative Guidance

- Appropriate use and maintenance of units.
- Provide all paperwork and manuals for any equipment installed by weatherization.
- Discuss and provide information on proper disposal of bulk fuel tanks when not removed as part of the weatherization work.
- Where combustion equipment is present, provide combustion safety and hazards information including how to recognize depressurization, dangers of CO poisoning, and fire risks associated with combustion appliance use.

**6.2 – Asbestos (Confirmed and/or Presumed Asbestos Containing Material)**

**Required Actions**

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

- When suspected friable Asbestos Containing Materials (ACM) are present, including vermiculite, assume they contain asbestos and take precautionary measures to prevent disturbing it during the audit and work unless testing determines otherwise.
- Grantees must have written policy included in their H&S plan for:
  - Identifying and managing suspected ACM that provides for reasonable and necessary precautions to prevent asbestos contamination in the home.
  - Addressing blower door testing where suspected friable ACM is present (as defined by EPA), including vermiculite.

**Grantee ACM policy**

Describe Grantee’s policy for identifying and managing suspected ACM Assume asbestos is present in covering materials. Any material appearing to contain asbestos should not be disturbed, except when furnace replacement is necessary (see prior guidance on furnace replacement); in which case testing and removal should be conducted first and is allowed by only a PA Labor and Industry certified/licensed professional.

DOE H&S funds may be utilized for asbestos on pipes, furnaces or other small, covered surfaces only when furnace replacement is necessary.

**Grantee Blower Door Testing Policy When Suspected ACM Exists**

PA recommends doing a pressurized blower door testing.

Any necessary removal of asbestos should be disposed of by a certified remediation professional and according to all applicable regulations and standards.

**Allowable Actions**

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

If the siding is friable or weathered to the point of disintegration and you cannot access from the inside to perform sidewall insulation, then the home's sidewalls may not be insulated.

Subgrantees are required to document all aspects of any weatherization measures not possible due to H&S concerns.

Asbestos siding not re-installed onto the client's home must be removed from the client's home and property and properly disposed of by the subgrantee.

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 an 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.

**Prohibited Actions**

Concur with DOE Guidance

Using DOE WAP H&S funds for general abatement/removal/or replacement of asbestos siding, thermal system insulation (TSI) or Transite, or vermiculite is prohibited.

**Required Testing/Inspection**

|  |   |   |
|--|---|---|
| Concur with DOE Guidance <input checked="" type="checkbox"/> | Alternative Guidance <input type="checkbox"/> | Results in Deferral/Referral <input type="checkbox"/> |
|--|---|---|

|   |  |
|---|--|
| DOE WAP H&S Funds <input checked="" type="checkbox"/> | Alternative Funds <input type="checkbox"/> |
|---|--|

- Visually inspect all surfaces (i.e., walls, floors, ceilings, roofs) for suspected ACM prior to drilling or cutting.
- Assume asbestos is present in suspect materials unless testing reveals otherwise.

**Allowable Testing/Inspection**

|  |  |
|--|--|
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/> | Allowed with Alternative Funds <input checked="" type="checkbox"/> |
|--|--|

If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.  
 In general, all homes containing vermiculite are assumed to have asbestos, and testing will not usually be an allowable H&S expense. However, Pennsylvania may allow some testing by subgrantees but only if testing for asbestos in vermiculite is conducted by a PA Labor and Industry certified/licensed professional and is a baseline environmental asbestos sampling. Proper respiratory protection must be used while in areas containing vermiculite.

If testing is conducted with other funding, according to Asbestos Hazard Emergency Response Act of 1986 (AHERA), sample collection and testing must be conducted by a PA Labor and Industry certified/licensed professional to perform renovation projects involving asbestos.

Assume asbestos is present in covering materials. Any material appearing to contain asbestos should not be disturbed, in which case, baseline environmental testing and removal should be conducted first and is allowed by only a PA Labor and Industry certified/licensed professional.

If testing is conducted, the results must be added to client file. If asbestos is found in attic, results must be posted there with insulation certification.

**Required Occupant Education**

|  |   |
|--|---|
| Concur with DOE Guidance <input checked="" type="checkbox"/> | Alternative Guidance <input type="checkbox"/> |
|--|---|

- Formally notify the occupant, and landlord if applicable, in writing:
  - of suspected ACMs that are present and what precautions will be taken to ensure the occupants’ and workers’ safety during weatherization;
  - of results if testing was performed;
  - not to disturb suspected ACM;
  - When deferral is necessary due to asbestos, occupant, or landlord if applicable, must provide documentation that a certified professional performed the remediation before work continues.

### 6.3 – Biologicals and Unsanitary Conditions

| Required Actions  |   |  |
|---|---|--|
| Concur with DOE Guidance <input type="checkbox"/>   | Alternative Guidance <input type="checkbox"/>           | Results in Deferral/Referral <input checked="" type="checkbox"/> |
| DOE WAP H&S Funds <input type="checkbox"/>  | Alternative Funds <input type="checkbox"/>              |  |
| Deferral where conditions (odors, bacteria, raw sewage, rotting wood, etc.) in the home pose a health risk to occupants and/or weatherization workers or may be worsened by weatherization activities (e.g., air sealing) and will not be resolved by weatherization. |   |  |
| Allowed Actions   |   |  |
| Allowed with DOE WAP H&S Funds <input type="checkbox"/>   | Allowed with Alternative Funds <input type="checkbox"/> |  |
| If DOE Funds are used for any “allowable” actions, detail them here.  |   |  |
| Required Testing/Inspection   |   |  |
| Concur with DOE Guidance <input checked="" type="checkbox"/>  | Alternative Guidance <input type="checkbox"/>           | Results in Deferral/Referral <input type="checkbox"/>            |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>   | Alternative Funds <input type="checkbox"/>              |  |
| Sensory inspection of interior, exterior, attics, and subspaces of the dwelling.  |   |  |
| Prohibited Testing/Inspection   |   |  |
| Concur with DOE Guidance <input checked="" type="checkbox"/>  |   |  |
| DOE WAP H&S funds may not be used for testing of materials for biological contaminants.   |   |  |
| Required Occupant Education   |   |  |
| Concur with DOE Guidance <input checked="" type="checkbox"/>  | Alternative Guidance <input type="checkbox"/>           |  |
| Inform occupant in writing of observed biological and unsanitary conditions.  |   |  |

### 6.4 – Building Structure and Roofing (e.g., roofing, wall, foundation)

| Allowable Actions  |   |
|--|---|
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>   | Allowed with Alternative Funds <input type="checkbox"/> |
| Minor building repairs (for example, patching a leak or sealing around chimney flashing) or any other building repairs may only be conducted when necessary for the effective performance or preservation of weatherization materials, and as such, will only be funded as a cost-justified incidental repair. DOE H&S funds will not be utilized for building rehabilitation. Subgrantee is encouraged to find other resources to address these types of repairs.                                 |   |
| When repairs are necessary but cannot be cost-justified with the accompanying ECM, meaning that the overall measure will have an SIR of less than 1 as determined by the audit, and no other funding source is available, the home may be deferred. Subgrantees may request that a client whose home requires non-cost-justifiable building rehabilitation spend his/her own private funds on building rehabilitation in order for the subgrantee to complete weatherization services at the home. |   |
| Prohibited Actions   |   |
| Concur with DOE Guidance <input checked="" type="checkbox"/>   |   |

|  |   |   |
|--|---|---|
| Using DOE WAP H&S funds for <i>major</i> repairs as defined by Grantee’s H&S Plan.<br>Using DOE WAP H&S funds for building rehabilitation is prohibited  |   |   |
| <b>Define “major” repairs</b>  |   |   |
| Repairs that exceed the agency maximum Health and Safety expenditure limit and result in the need to defer the unit, agency should consider alternative funding to complete the readiness work in order to weatherize the home. Building rehabilitation is prohibited. |   |   |
| <b>Required Testing/Inspection</b>   |   |   |
| Concur with DOE Guidance <input checked="" type="checkbox"/>   | Alternative Guidance <input type="checkbox"/>           | Results in Deferral/Referral <input type="checkbox"/> |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>  | Alternative Funds <input type="checkbox"/>              |   |
| Visual inspection of building structure and roofing for damages that compromise building durability and to verify that portions of the home where weatherization will occur are safe for entry and performance of assessments, work, and inspections.                  |   |   |
| <b>Allowable Testing/Inspection</b>  |   |   |
| Allowed with DOE WAP H&S Funds <input type="checkbox"/>  | Allowed with Alternative Funds <input type="checkbox"/> |   |
| If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.   |   |   |
| <b>Prohibited Testing/Inspection</b>   |   |   |
| Concur with DOE Guidance <input checked="" type="checkbox"/>   |   |   |
| Using DOE WAP H&S funds for any testing/evaluation of structural materials by a third-party is prohibited.   |   |   |
| <b>Required Occupant Education</b>   |   |   |
| Concur with DOE Guidance <input checked="" type="checkbox"/>   | Alternative Guidance <input type="checkbox"/>           |   |
| Notify occupant in writing of structurally compromised areas.  |   |   |

|  |   |   |
|--|---|---|
| <b>6.5 – Code Compliance</b>   |   |   |
| <b>Allowable Actions</b>   |   |   |
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>   | Allowed with Alternative Funds <input type="checkbox"/> |   |
| Except where specifically noted elsewhere in this plan as a H&S measure (for example, code requirements of smoke/CO detectors are considered H&S), correction of preexisting code compliance is not an allowable cost other than where weatherization measures are being conducted. State and local (or jurisdiction having authority) codes must be followed while installing weatherization measures. Condemned properties and properties where utilities, local or state officials determine that H&S conditions exist that cannot be corrected under this guidance should be deferred. |   |   |
| Correction of code compliance may only be conducted when necessary for the effective performance or preservation of weatherization materials, and as such, will only be funded as a cost-justified incidental repair. DOE H&S funds will not be utilized for code compliance except when related to H&S repair (for example, follow code when installing a furnace or water heater for H&S) or as instructed elsewhere in this guidance.   |   |   |
| <b>Prohibited Actions</b>  |   |   |
| Concur with DOE Guidance <input checked="" type="checkbox"/>   |   |   |
| <ul style="list-style-type: none"> <li>Using DOE WAP H&amp;S funds for correction of preexisting code compliance issues not directly related to the installation of specific weatherization measures in the home is prohibited.</li> <li>Using DOE WAP funds for work on condemned properties and properties where H&amp;S conditions exist that cannot be corrected under this guidance is prohibited</li> </ul>  |   |   |
| <b>Required Testing/Inspection</b>   |   |   |
| Concur with DOE Guidance <input checked="" type="checkbox"/>   | Alternative Guidance <input type="checkbox"/>           | Results in Deferral/Referral <input type="checkbox"/> |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>  | Alternative Funds <input type="checkbox"/>              |   |
| Visual inspection.   |   |   |
| <b>Allowable Testing/Inspection</b>  |   |   |
| Allowed with DOE WAP H&S Funds <input type="checkbox"/>  | Allowed with Alternative Funds <input type="checkbox"/> |   |

If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.

**Required Occupant Education**

Concur with DOE Guidance

Alternative Guidance

Inform occupant in writing of observed code compliance issues when it results in a deferral.

**6.6 – Electrical**

**Required Actions**

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

Provide sufficient over-current protection and damming prior to insulating building components containing knob and tube wiring, as required by the AHJ.

**Allowable Actions**

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Minor electrical repairs, including knob and tube remediation are allowed where H&S of the occupant is at risk. Installation must be by a qualified electrician and inspected by a qualified, procured and certified electrical inspector. Minor repairs will not exceed the agency’s maximum Health and Safety expenditure limit. For repairs that exceed the agency maximum Health and Safety expenditure limit and result in the need to defer the unit, agency should consider alternative funding to complete the readiness work in order to weatherize the home.

Removed knob and tube wiring must be removed from the client’s home and property and properly disposed of by the subgrantee. DOE H&S funds will be utilized for this measure.

When dangerous conditions exist, and remediation would be cost-prohibitive, or the dwelling unit has been condemned for electrical, plumbing, or other issues, the home will be deferred.

**Prohibited Actions**

Concur with DOE Guidance

Using DOE WAP H&S funds for *major* electrical repairs as defined by the Grantee’s H&S plan is prohibited

**Define “major” repairs**

Repairs that exceed the agency maximum Health and Safety expenditure limit and result in the need to defer the unit, the agency should consider alternative funding to complete the readiness work in order to weatherize the home.

**Required Testing/Inspection**

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

- Visual inspection for presence and condition of knob-and-tube wiring.
- Evaluate knob-and-tube wiring for safety prior to work.
- Check for alterations that may create an electrical hazard.

**Allowable Testing/Inspection**

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Voltage drop and voltage detection testing are allowed when deemed necessary

**Required Occupant Education**

Concur with DOE Guidance

Alternative Guidance

- Provide occupant with written documentation of any electrical hazards identified that will not be addressed by weatherization
- Provide information to occupant on over-current protection, overloading circuits, and basic electrical safety/risks if conditions warrant.



## 6.7 – Fuel Leaks

### Required Actions

|  |   |   |
|--|---|---|
| Concur with DOE Guidance <input checked="" type="checkbox"/> | Alternative Guidance <input type="checkbox"/> | Results in Deferral/Referral <input type="checkbox"/> |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>        | Alternative Funds <input type="checkbox"/>    |   |

- When a gas leak is found on the utility side of service, the utility service must be contacted, work must be temporarily halted, and the leak must be repaired before work may proceed.
- Fuel leaks that are the responsibility of the occupant (vs. the utility) must be repaired before installing weatherization measures in the home.

### Allowable Actions

|  |   |
|--|---|
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/> | Allowed with Alternative Funds <input type="checkbox"/> |
|--|---|

When a minor gas leak is found on the utility side of service, the utility service must be contacted before work may proceed.

Fuel leaks that are the responsibility of the client (vs. the utility) must be repaired before weatherizing the unit.

If the fuel leak is considered the client’s responsibility, subgrantees may fix minor fuel leaks. The costs of fixing the minor fuel leak should not cause the agency to exceed their maximum Health and Safety budget. For repairs that exceed the agency maximum Health and Safety expenditure limit and result in the need to defer the unit, agency should consider alternative funding to complete the readiness work in order to weatherize the home.

Major excavation or landscaping may not be covered with DOE funds.

For oil leaks, the oil vendor or PA Department of Environmental Protection may need to be contacted. PA DEP link:  
<http://www.dep.pa.gov/Business/Land/SiteRemediation/Storage-Tank-Cleanup-Program/Pages/Underground-Heating-Oil-Tank-Cleanup-Reimbursement-Program.aspx>

### Prohibited Actions

Concur with DOE Guidance

- Using DOE WAP H&S funds to repair leaks that are the responsibility of the utility to correct is prohibited.
- Using DOE WAP H&S funds for environmental cleanup resulting from bulk fuel leaks is prohibited

### Required Testing/Inspection

|  |   |   |
|--|---|---|
| Concur with DOE Guidance <input checked="" type="checkbox"/> | Alternative Guidance <input type="checkbox"/> | Results in Deferral/Referral <input type="checkbox"/> |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>        | Alternative Funds <input type="checkbox"/>    |   |

- Test all exposed gas lines, fittings, valves, and connections for fuel leaks from utility connection to the appliance throughout the home.
- Test all gas appliances for fuel leaks at all connections, valves, fittings, and burners.
- Conduct sensory inspection of all bulk fuels lines and storage tanks to determine if leaks exist.

### Allowable Testing/Inspection

|  |   |
|--|---|
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/> | Allowed with Alternative Funds <input type="checkbox"/> |
|--|---|

For all fuel leaks testing, we follow ANSI/BPI-1200-S-2017 Standard Practice for Basic Analysis of Buildings

<http://www.bpi.org/sites/default/files/ANSI%20BPI-1200-S-2017%20Standard%20Practice%20for%20Basic%20Analysis%20of%20Buildings.pdf>

### Prohibited Testing/Inspection

Concur with DOE Guidance

Using DOE WAP H&S funds for environmental testing of soil or water is prohibited.

### Required Occupant Education

|  |   |
|--|---|
| Concur with DOE Guidance <input checked="" type="checkbox"/> | Alternative Guidance <input type="checkbox"/> |
|--|---|

Inform occupants in writing of fuel leak testing results, including specific location if fuel leaks are detected.

## 6.8 – Gas Ovens/Stovetops/Ranges

### Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Inspect stove tops/gas ovens/ranges for operability, flame quality, and CO. Replacement of stove tops/gas ovens/ranges is not allowed although clean and tune is allowed.

### Prohibited Actions

Concur with DOE Guidance

Using DOE WAP H&S funds for replacement of gas ovens/ranges/stovetops is prohibited.

### Required Testing/Inspection

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

- Test gas ovens for CO.
- Grantee H&S plan must define action levels and resulting actions.
- Visually inspect cooking burners and ovens for operability and flame quality.

### Define action levels for oven CO testing and resulting actions

Define action levels for oven CO testing and resulting actions.

**Table 1: CO Thresholds for Fossil-Fuel Fired Combustion Appliances**

| Appliance    | Threshold Limit     |
|--------------|---------------------|
| Oven/Broiler | 225 ppm as measured |

### Action Levels for CO in Combustion Appliances

#### TEST RESULT

#### ACTION REQUIRED

Unacceptable CO Level

Advise the homeowner/occupant that the appliance should be serviced immediately by a qualified professional

NOTE: if ambient CO levels do not exceed 70 ppm, testing of other appliances and other audit procedures may continue at the discretion of the auditor

Acceptable CO Level

No Action Required

NOTE: The Action Levels above are based on the following criteria:

- CO measured at 5 minutes of main burner operation
- CO level at or below threshold in Table 1 for the appliance being tested is ACCEPTABLE
- CO level exceeding threshold in Table 1 for the appliance being tested is UNACCEPTABLE

### Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Gas stove testing must be done according to BPI Standards, see this link or copy and paste into your browser:

<http://www.bpi.org/sites/default/files/CST%20PROCEDURE%20FOR%20GAS%20OVENS%2C%20DIRECT%20C%20POWER-VENTED%20OR%20VENT-FREE%20APPLIANCES.pdf>

Gas Ovens and Range Tops Gas ovens must be tested for vented CO and range top burners must be visually inspected. Perform appliance testing procedures following the manufacturer’s appliance procedure. In the absence of the manufacturer’s appliance procedure, use the following testing procedures and action levels.

- A. With appliance off, complete the following visual inspection:
  - 1) Check the oven cavity for any stored materials and remove before testing.
  - 2) Inspect the oven cavity for cleanliness. If the oven area is dirty enough to adversely impact the combustion process recommend that the oven be cleaned to reduce the possibility of unacceptable emissions.
  - 3) Check the bottom surface inside of the oven cabinet for air venting that may be present. Any air vent obstruction, such as aluminum foil or silicone liners, must be removed before oven CO testing.
  - 4) Check for air blockage at the bottom of the range and drawer and/or broiler compartment under the oven and remove any obstructions before testing.
  - 5) Inspect range top burners for cleanliness. If the burners are excessively dirty, recommend that they be cleaned to reduce the possibility of unacceptable emissions.
- B. Turn the oven on to a bake temperature of 500°F. Do not turn the oven all the way up to the broil setting or self-cleaning setting.
- C. After 5 minutes of the oven’s main burner operation, place the test probe of a CO analyzing tool into the throat of the oven exhaust vent and measure undiluted CO.
- D. Record the CO measurement once the CO level has become a stable reading.
- E. Compare the CO measurement as in tables above

**Required Occupant Education**

Concur with DOE Guidance

Alternative Guidance

Inform occupants of the importance of using exhaust ventilation when cooking and the importance of keeping burners and broilers clean to limit the production of CO.

**6.9 – Hazardous Materials**

**Required Actions**

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

- Hazardous Waste Materials generated by weatherization work (e.g., refrigerant, asbestos, lead, mercury, CFL lighting bulb/ballasts, etc.) must be disposed of according to all local and federal laws, regulations, and guidelines, as applicable. Costs specifically related to disposal may be charged as a H&S expense.
- Subgrantees must document disposal requirements in contract language with the responsible party.
- **Limited** removal of pollutants that pose a risk to workers is required (e.g., flammable liquids, hazardous chemicals, and other air pollutants) as defined the Grantee’s H&S Plan.
- If removal cannot be performed or is not allowed by the occupant, the unit must be deferred.

**Define “limited” removal of pollutants**

The costs of removing pollutants will not exceed the agency's maximum Health and Safety expenditure limit.

**Allowable Actions**

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Hazardous waste materials generated in the course of weatherization work shall be disposed of according to local laws, regulations and/or Federal guidelines, as applicable.

Lead and Asbestos disposal are also covered in their respective sections of this plan.

For Refrigerant, reclaim refrigerant per Clean Air Act 1990, section 608, as amended by 40 CFR82, 5/14/1993.

Refrigerators may only be removed and replaced when the total cost of removal and decommissioning (including reclaiming refrigerant) of the current refrigerator in conjunction with the installation of the new refrigerator can be cost-justified through the standardized energy audit (HEAT) using the existing refrigerator's energy rating information. Refrigerator replacement is further discussed in the PA SWS Field Guide. The reclamation of refrigerant of any refrigerator replaced through DOE WAP funds will be within the scope of DOE WAP. Refrigerant reclamation of refrigerator replacements funded through utilities or some other funding source will be included in the overall cost of refrigerator replacement through that funding source.

For Mercury, thermostats, CFLs and fluorescent bulbs must be disposed of according to EPA requirements. See information at this link: <https://www.epa.gov/cfl/recycling-and-disposal-cfls-and-other-bulbs-contain-mercury>

PA State law requires mandatory mercury thermostat recycling: <https://www.thermostat-recycle.org/statelaws/Pennsylvania>

If posing a risk to workers, removal of pollutants by the client is required before weatherization work can be performed. DOE H&S funds may be utilized for this measure, but generally speaking, clients should be removing these pollutants themselves or paying a qualified professional to do so. Subgrantees are not allowed to use DOE funds to remove pollutants that do not affect workers or the weatherization process.

If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client, the unit must be deferred.

Pollutants removed from the client's home or property must be properly disposed of by the subgrantee.

**Prohibited Actions**

Concur with DOE Guidance

Using DOE WAP H&S funds for Lead, Asbestos, and Radon abatement is prohibited.

**Required Testing/Inspection**

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

Sensory inspection.

**Allowable Testing/Inspection**

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.

| <b>Prohibited Testing/Inspection</b>   |   |
|--|---|
| Concur with DOE Guidance <input checked="" type="checkbox"/>   |   |
| Using DOE WAP H&S funds for any testing for hazardous materials other than that specifically permitted in the asbestos, lead, and radon sections of this document is prohibited.   |   |
| <b>Required Occupant Education</b>   |   |
| Concur with DOE Guidance <input checked="" type="checkbox"/>   | Alternative Guidance <input type="checkbox"/> |
| <ul style="list-style-type: none"> <li>• Inform occupant in writing of hazards associated with hazardous waste materials being generated/handled in the home.</li> <li>• Inform occupant in writing of observed hazardous condition and associated risks.</li> <li>• Provide occupant written materials on safety issues and proper disposal of household pollutants.</li> </ul> |   |

| <b>6.10 - Injury Prevention of Occupants</b>  |   |   |
|---|---|---|
| <b>Allowable Actions</b>  |   |   |
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>  | Allowed with Alternative Funds <input type="checkbox"/> |   |
| When necessary to effectively weatherize the home, workers may make minor repairs and installations. Workers must follow OSHA standards and Safety Data Sheets (SDS) and take precautions to ensure the H&S of themselves and other workers. SDS must be posted wherever there may be exposure to hazardous materials. Please refer to section 6.19 Worker safety for further guidance. |   |   |
| <b>Prohibited Actions</b>   |   |   |
| Concur with DOE Guidance <input checked="" type="checkbox"/>  |   |   |
| Using DOE WAP H&S funds for <i>major</i> repairs, as defined by the Grantee's H&S Plan is prohibited  |   |   |
| <b>Define "major" repairs</b>   |   |   |
| If the agency's maximum Health and Safety expenditure limit is exceeded, which would result in deferral, it is considered to be a major repair and the agency should consider alternative funding to complete the readiness work in order to weatherize the home.   |   |   |
| <b>Required Testing/Inspection</b>  |   |   |
| Concur with DOE Guidance <input checked="" type="checkbox"/>  | Alternative Guidance <input type="checkbox"/>           | Results in Deferral/Referral <input type="checkbox"/> |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>   | Alternative Funds <input type="checkbox"/>              |   |
| Visually inspect for dangers that would prevent weatherization.   |   |   |
| <b>Allowable Testing/Inspection</b>   |   |   |
| Allowed with DOE WAP H&S Funds <input type="checkbox"/>   | Allowed with Alternative Funds <input type="checkbox"/> |   |
| If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.  |   |   |
| <b>Required Occupant Education</b>  |   |   |
| Concur with DOE Guidance <input checked="" type="checkbox"/>  | Alternative Guidance <input type="checkbox"/>           |   |
| If identified hazardous conditions will not be corrected during weatherization, inform occupant in writing of observed hazards and associated risks utilizing the "Hazard Identification Notification Form" required by WPN 22-7.   |   |   |

| <b>6.11 – Lead-Based Surface Coverings (Paint, Varnishes, Roofing, etc.)</b> |   |   |
|--|---|---|
| <b>Required Actions</b>  |   |   |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                 | Alternative Guidance <input type="checkbox"/> | Results in Deferral/Referral <input type="checkbox"/> |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>                        | Alternative Funds <input type="checkbox"/>    |   |

- Subgrantees must comply with EPA's Lead; Renovation, Repair and Painting Program (RRP) rules when working in pre-1978 housing unless testing confirms the work area to be lead free. This includes, but is not limited to:
  - Client file documentation including the Certified Renovator's certification; any training provided on-site; description of specific actions taken; lead testing and assessment documentation; and photos of site and containment set up. Include the location of photos referenced if not in file.
  - Certification and training requirements of the RRP rule.
  - Job site set up and cleaning verification by a Certified Renovator.
- Only those costs directly associated with lead safe work practices for surfaces directly disturbed during weatherization activities are allowable WAP H&S expenses.

**Allowable Actions**

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Pennsylvania follows guidelines established in EPA's Lead: Renovation, Repair, and Painting Program (RRP), with workers trained accordingly. To reduce production costs associated with measures requiring LSW, H&S funds must be used to cover those costs directly associated with conducting LSW, although deferral is required when weatherization work could create H&S hazards due to the extent and condition of lead-based paint in the home.

Homes will be deferred when the extent and condition of lead-based paint in the house would create further H&S hazards (for example, extensive paint blistering or peeling throughout the home).

Follow EPA regulations for disposal purposes. See link: <https://www.epa.gov/lead/regulatory-status-waste-generated-contractors-and-residents-lead-based-paint-activities>

All clients will receive the EPA Lead Booklet (Renovate Right), located at this website: <https://www.epa.gov/lead/lead-safety-documents-and-outreach-materials> at the time of the assessment/energy audit. The Client signs the Pre-Existing Conditions Form, which includes Lead-Safe client acknowledgement and states that they have received the information at the time of assessment.

**Prohibited Actions**

Concur with DOE Guidance

- Using DOE WAP H&S funds for lead abatement is prohibited.
- Using DOE WAP H&S funds for purchase, resourcing, or maintenance of X-ray Fluorescence (XRF) devices is prohibited.

**Allowable Testing/Inspection**

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

In general, all homes built prior to 1978 are assumed to have lead, and testing will not be a common allowable H&S expense. However, Pennsylvania may allow some lead testing by subgrantees who can justify the need due to the presence of lead in paint that will be disturbed by WAP measure installation. Any testing must be done with EPA-approved testing method and must be economically feasible. A Certified Renovator is required to conduct jobsite set-up and cleaning verification.

Monitors will review client files containing proof of lead safe practices. Follow EPA RRP requirements. Photo documentation is required in the client files of all jobs where LSW is necessary. EPA Renovation Recordkeeping checklist attached (Attachment L).

**Required Occupant Education**

Concur with DOE Guidance

Alternative Guidance

Follow pre-renovation education requirements per EPA RRP rules.

**6.12 – Mold and Moisture**

**Allowable Actions**

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Repair of limited water damage may only be conducted when necessary for the effective performance or preservation of weatherization materials, and as such, will only be funded as a cost-justified incidental repair. For example, sump pumps and dehumidifiers can be replaced as cost-justified IRM. For dirt floors in basements and crawl spaces under mobile homes, vapor retarders or moisture barriers may be used to protect insulation.

DOE H&S funds will not be utilized for water damage repair.

Drainage repairs may only be conducted when necessary for the effective performance or preservation of weatherization materials, and as such, will only be funded as a cost-justified incidental repair. Vapor retarders and moisture barriers cannot be used when unit is prone to flooding. DOE H&S funds will not be utilized to resolve drainage issues.

When drainage repairs are required but cannot be cost-justified with the accompanying ECM, and no other funding source is available, the home may be deferred. Subgrantees may request that a client whose home requires non-cost-justifiable drainage repairs spend his/her own private funds on drainage repairs in order for the subgrantee to complete weatherization services at the home.

When water damage repairs are required but cannot be cost-justified with the accompanying ECM or when mold remediation (which cannot be funded through DOE) is required, and no other funding resource is available, the home may be deferred. Subgrantees may require that a client whose home requires non-cost justifiable water damage repairs spend his/her own private funds on water damage repairs in order for the subgrantee to complete weatherization services at the home.

Window and door repairs are an allowable H&S costs or may be done as an Incidental Repair Measure. For window and door repairs to be conducted as Health and Safety measures, there must be signs and documentation of biological growth such as mold and/or mildew.

**Prohibited Actions**

Concur with DOE Guidance

- Using DOE WAP H&S funds for mold cleanup is prohibited.
- Using DOE WAP H&S funds for window and door replacements is prohibited

**Required Testing/Inspection**

|  |   |   |
|--|---|---|
| Concur with DOE Guidance <input checked="" type="checkbox"/> | Alternative Guidance <input type="checkbox"/> | Results in Deferral/Referral <input type="checkbox"/> |
|--|---|---|

|   |  |
|---|--|
| DOE WAP H&S Funds <input checked="" type="checkbox"/> | Alternative Funds <input type="checkbox"/> |
|---|--|

Visual assessment for moisture or mold damage including exterior drainage.

**Allowable Testing/Inspection**

|   |   |
|---|---|
| Allowed with DOE WAP H&S Funds <input type="checkbox"/> | Allowed with Alternative Funds <input type="checkbox"/> |
|---|---|

If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.

**Prohibited Testing/Inspection**

Concur with DOE Guidance

Using DOE WAP H&S funds for mold testing of any type is prohibited.

**Required Occupant Education**

|  |   |
|--|---|
| Concur with DOE Guidance <input checked="" type="checkbox"/> | Alternative Guidance <input type="checkbox"/> |
|--|---|

Provide occupant written notification of identified mold/moisture hazards and information regarding the associated hazard.

**6.13 - Occupant Pre-existing or Potential Health Conditions**

**Required Actions**

|  |   |   |
|--|---|---|
| Concur with DOE Guidance <input checked="" type="checkbox"/> | Alternative Guidance <input type="checkbox"/> | Results in Deferral/Referral <input type="checkbox"/> |
|--|---|---|

|   |   |   |  |
|---|---|---|--|
| DOE WAP H&S Funds <input checked="" type="checkbox"/>   |   | Alternative Funds <input type="checkbox"/>              |  |
| <ul style="list-style-type: none"> <li>When a person's health may be at risk and/or WAP work activities could constitute an H&amp;S hazard, the occupant is required to take appropriate action based on severity of risk.</li> <li>Deferral, if occupant risk cannot be mitigated.</li> </ul>                                |   |   |  |
| <b>Allowable Actions</b>  |   |   |  |
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>  |   | Allowed with Alternative Funds <input type="checkbox"/> |  |
| See beginning of this plan for procedures for soliciting client's health risks, helping identify potential health risks and addressing the issues to include client notification.   |   |   |  |
| <b>Required Testing/Inspection</b>  |   |   |  |
| Concur with DOE Guidance <input checked="" type="checkbox"/>  | Alternative Guidance <input type="checkbox"/> | Results in Deferral/Referral <input type="checkbox"/>   |  |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>   |   | Alternative Funds <input type="checkbox"/>              |  |
| <ul style="list-style-type: none"> <li>Screen occupants for known or suspected health concerns either as part of initial application for weatherization, during the audit, or both.</li> <li>This is done utilizing the "Occupant Pre-existing or Potential Health Condition Screening Form" required by WPN 22-7.</li> </ul> |   |   |  |
| <b>Allowable Testing/Inspection</b>   |   |   |  |
| Allowed with DOE WAP H&S Funds <input type="checkbox"/>   |   | Allowed with Alternative Funds <input type="checkbox"/> |  |
| If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.  |   |   |  |
| <b>Required Occupant Education</b>  |   |   |  |
| Concur with DOE Guidance <input checked="" type="checkbox"/>  |   | Alternative Guidance <input type="checkbox"/>           |  |
| <ul style="list-style-type: none"> <li>Inform occupant in writing of any known risks and provide pre-weatherization screening form.</li> <li>Provide occupant with Subgrantee point of contact information in writing.</li> </ul>   |   |   |  |

| 6.14 – Pests   |   |   |  |
|--|---|---|--|
| <b>Required Actions</b>  |   |   |  |
| Concur with DOE Guidance <input checked="" type="checkbox"/>   | Alternative Guidance <input type="checkbox"/> | Results in Deferral/Referral <input type="checkbox"/>   |  |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>  |   | Alternative Funds <input type="checkbox"/>              |  |
| Deferral of homes where infestation of pests cannot be reasonably removed or poses H&S concern for workers.  |   |   |  |
| <b>Allowable Actions</b>   |   |   |  |
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>   |   | Allowed with Alternative Funds <input type="checkbox"/> |  |
| Pest removal and containment/control is allowed only when infestation would prevent weatherization. Infestation of pests is grounds for deferral if infestation cannot be remediated and/or poses a H&S concern for workers. Proof of professional pest removal is necessary to weatherize a home deferred on grounds of pest infestation. |   |   |  |
| Pest remediation cannot exceed the total overall agency Health and Safety budget. If client refuses to correct the pest infestation, the home must be deferred.  |   |   |  |
| <b>Allowable Testing/Inspection</b>  |   |   |  |
| Allowed with DOE WAP H&S Funds <input type="checkbox"/>  |   | Allowed with Alternative Funds <input type="checkbox"/> |  |
| If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.   |   |   |  |
| <b>Required Occupant Education</b>   |   |   |  |
| Concur with DOE Guidance <input checked="" type="checkbox"/>   |   | Alternative Guidance <input type="checkbox"/>           |  |
| Inform occupant in writing of observed conditions and associated risks.  |   |   |  |

| 6.15 – Radon            |  |
|-------------------------|--|
| <b>Required Actions</b> |  |



|   |   |   |
|---|---|---|
| Concur with DOE Guidance <input checked="" type="checkbox"/>  | Alternative Guidance <input type="checkbox"/>           | Results in Deferral/Referral <input type="checkbox"/> |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>   | Alternative Funds <input type="checkbox"/>              |   |
| <ul style="list-style-type: none"> <li>Cover exposed dirt floors within the pressure/thermal boundary with a sealed soil gas retarder</li> <li>Cover sump well/pits with airtight covers</li> <li>Implement ventilation as required by ASHRAE 62.2-2016</li> </ul>  |   |   |
| <b>Allowable Actions</b>  |   |   |
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>  | Allowed with Alternative Funds <input type="checkbox"/> |   |
| <p>The use of DOE funds for radon remediation is not an allowable Weatherization expense. DOE H&amp;S funds will be utilized only for basic precautions to reduce the likelihood of making radon issues worse (for example, covering exposed dirt with a vapor barrier, sealing foundations and/or covering sump pit).</p> <p>Homes where known radon levels are 4pCi/L or higher will be deferred until the client provides accurate and plausible test results indicating that radon levels no longer present a dangerous situation.</p> <p>In homes where radon may be present, work scope should include precautionary measures based on EPA Healthy Indoor Environment Protocols found here: <a href="https://www.epa.gov/sites/production/files/2014-12/documents/epa_retrofit_protocols.pdf">https://www.epa.gov/sites/production/files/2014-12/documents/epa_retrofit_protocols.pdf</a></p> |   |   |
| <b>Prohibited Actions</b>   |   |   |
| Concur with DOE Guidance <input checked="" type="checkbox"/>  |   |   |
| Using DOE WAP H&S funds for radon mitigation is prohibited.   |   |   |
| <b>Allowable Testing/Inspection</b>   |   |   |
| Allowed with DOE WAP H&S Funds <input type="checkbox"/>   | Allowed with Alternative Funds <input type="checkbox"/> |   |
| Although testing is not an allowed Health & Safety expense, if results are obtained, they must be shared in writing with the client.  |   |   |
| <b>Required Occupant Education</b>  |   |   |
| Concur with DOE Guidance <input checked="" type="checkbox"/>  | Alternative Guidance <input type="checkbox"/>           |   |
| <ul style="list-style-type: none"> <li>Provide all occupants EPA's A Citizen's Guide to Radon and inform them of radon related risks.</li> <li>Occupants must sign an informed consent form prior to receiving weatherization services.</li> </ul>  |   |   |

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

|   |   |   |
|---|---|---|
| <b>Required Actions</b>   |   |   |
| Concur with DOE Guidance <input checked="" type="checkbox"/>  | Alternative Guidance <input type="checkbox"/>           | Results in Deferral/Referral <input type="checkbox"/> |
| DOE WAP H&S Funds <input type="checkbox"/>  | Alternative Funds <input type="checkbox"/>              |   |
| <p>Install CO alarms in every home where alarms are not present or are inoperable in compliance with ASHRAE 62.2-2016 which references NFPA 720 (note: NFPA 720 has been incorporated into NFPA 72).</p>  |   |   |
| <b>Allowable Actions</b>  |   |   |
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>  | Allowed with Alternative Funds <input type="checkbox"/> |   |
| If DOE WAP H&S Funds are used for any "allowable" actions, detail them here.  |   |   |
| <p>Grantee encourages the use of combination CO/Smoke Alarms when possible.</p> <p>Smoke Alarms: Except where otherwise required by code, installation of smoke alarms/detectors is only allowed when detectors are not present, are inoperable or are beyond the manufacturer's stated lifetime (usually 10 years). For inoperable or beyond manufacturer's lifetime replacements, smoke alarms/detectors are placed according to the PA SWS Field Guide which references NFPA 72 with material rated in accordance with UL 217 and replacements must have a minimum of a 10-year manufacturer's warranty and contain internal, non-replaceable batteries.</p> |   |   |

Carbon Monoxide Alarms: Except where otherwise required by code, installation of CO alarms/detectors is only allowed where detectors are not present, are inoperable or are beyond the manufacturer’s stated lifetime (usually 10 years). For inoperable or beyond manufacturer’s lifetime replacements, CO alarms/detectors are to be placed according the PA SWS Field Guide which references NFPA 720 and replacements must have a minimum of a 10-year manufacturer’s warranty and contain internal, non-replaceable batteries.

Fire Extinguishers: Pennsylvania does not allow subgrantees to utilize DOE WAP funds to provide fire extinguishers.

**Prohibited Actions**

Concur with DOE Guidance

Using DOE WAP H&S funds for replacement of functional smoke or CO alarms that are not beyond the manufacturer’s stated lifetime is prohibited.

**Required Testing/Inspection**

Concur with DOE Guidance  Alternative Guidance  Results in Deferral/Referral

DOE WAP H&S Funds  Alternative Funds

Verify operation and age of installed alarms.

**Allowable Testing/Inspection**

Allowed with DOE WAP H&S Funds  Allowed with Alternative Funds

If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.

**Required Occupant Education**

Concur with DOE Guidance  Alternative Guidance

Provide occupant with verbal and written information on use of newly installed devices and the potential risks of not properly maintaining these devices.

**6.17 – Ventilation and Indoor Air Quality**

**Required Actions**

Concur with DOE Guidance  Alternative Guidance  Results in Deferral/Referral

DOE WAP H&S Funds  Alternative Funds

Install ventilation as required by ASHRAE 62.2 - 2016. If occupant refuses ventilation as required by ASHRAE 62.2, the home must be deferred.

**Allowable Actions**

Allowed with DOE WAP H&S Funds  Allowed with Alternative Funds

ASHRAE 62.2-2016 must be followed to determine the Required Mechanical Ventilation Rate for all structures covered under the ASHRAE 62.2-2016 standard. For existing structures, ASHRAE 62.2-2016 Appendix A, Existing Buildings, will be utilized as appropriate.

Air leakage must provide fresh outdoor air when no mechanical ventilation system exists because the air leaks are the home’s only means of fresh air intake and pollutant removal. Follow the current ASHRAE 62.2 2016 standards to determine the Required Mechanical Ventilation Rate.

**Required Testing/Inspection**

Concur with DOE Guidance  Alternative Guidance  Results in Deferral/Referral

DOE WAP H&S Funds  Alternative Funds

- ASHRAE 62.2 evaluation to determine required post-weatherization ventilation.
- Measure fan flow of existing fans and of installed equipment to verify performance.

**Allowable Testing/Inspection**

Allowed with DOE WAP H&S Funds  Allowed with Alternative Funds

ASHRAE 62.2-2016 Required Mechanical Ventilation Rate evaluation, fan flow, and follow up testing are required to ensure compliance. Actions will be taken to prevent zonal pressure differences greater than 3 pascals.

Measure fan flow of existing fans and of installed equipment to verify performance.

**Required Occupant Education**

Concur with DOE Guidance

Alternative Guidance

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

**6.18 – Water Heaters**

*(see Combustion Appliances for combustion related requirements)*

**Allowable Actions**

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Gas hot water heater repairs and replacements are covered in combustion appliance section.

Electric water heaters can be repaired if the water heater is inoperable or unsafe. Minor repairs are defined as temperature and pressure relief valve replacement, expansion tank replacement, heating element replacement, tank maintenance or fixing leaking valves and/or minor plumbing connections.

Electric hot water heaters can only be replaced if they pose a health and safety risk such as a leaking tank, which cannot be repaired, such as excessive tank corrosion causing a leak which can't be repaired, a leak which is creating electrical issues and/or causing major mold growth in the surrounding area which will be remediated by replacing the hot water tank.

If hot water heater needs replaced but doesn't pose a health and safety risk, as defined above, other funds must be utilized to replace the appliance.

**Required Testing/Inspection**

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

- Visual inspection of all water heaters and related piping for safety and leaks
- See Combustion Appliances section for related combustion safety testing requirements.

**Allowable Testing/Inspection**

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

**Required Occupant Education**

Concur with DOE Guidance

Alternative Guidance

- Appropriate use and maintenance of units.
- Provide all paperwork and manuals for any installed equipment.
- Where combustion equipment is present, provide combustion safety and hazards information including how to recognize depressurization, dangers of CO poisoning, and fire risks associated with combustion appliance use.

**6.19 – Worker Safety**

| Required Actions   |   |   |
|--|---|---|
| Concur with DOE Guidance <input checked="" type="checkbox"/>   | Alternative Guidance <input type="checkbox"/>           | Results in Deferral/Referral <input type="checkbox"/> |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>  | Alternative Funds <input type="checkbox"/>              |   |
| Adherence to all federal, state, and local worker safety regulations (e.g., OSHA, EPA).  |   |   |
| Allowable Actions  |   |   |
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>   | Allowed with Alternative Funds <input type="checkbox"/> |   |
| <p>When workers or clients may be exposed to hazardous materials, sub grantees and their subcontractors will develop and maintain a written hazard communication program conforming to the Hazard Communications Standard 29 Code of Federal Regulations 1910.1200 that at least describes sub grantees and/or their subcontractors program for: 1. Labeling of hazardous chemicals and other forms of warning, safety data sheets, and employee information and training, and 2. Maintaining a list of the hazardous chemicals known to be present on the job site using a product identifier that is referenced on the appropriate safety data sheet (the list may be compiled for the workplace as a whole or for individual work areas); and, 3. Methods used to inform employees of other employers and, when appropriate residents, of hazardous chemicals in use on the job site.</p> <p>All sub-grantees and contractors must maintain compliance with the current OSHA Hazard Communication Standard, including on-site organized Safety Data Sheets (SDS) Workers must follow OSHA standards and Safety Data Sheets (SDS) and take precautions to ensure the H&amp;S of themselves and other workers. SDS must be posted wherever there may be exposure to hazardous materials.</p> <p>Spray Polyurethane Foam (SPF) is considered a weatherization ECM.</p> <p>SPF is allowed if appropriate precautions are taken and if OSHA Confined Space requirements are followed if applicable. Use EPA recommendation (available online at polyurethane foam.html) when working (or when SPF fumes come evident) within the conditioned space. When working outside the building envelope, isolate the area where foam will be applied take precautions so that fumes will not transfer inside conditioned space, and exhaust fumes outside the home. Manufacturer recommendations must be followed.</p> <p>When necessary to effectively weatherize the home, workers may make minor repairs and installations, which do not exceed the agency's H &amp; S budget. Workers must follow OSHA standards and Safety Data Sheets (SDS) and take precautions to ensure the H&amp;S of themselves and other workers. SDS must be posted wherever there may be exposure to hazardous materials.</p> |   |   |
| Prohibited Actions   |   |   |
| Concur with DOE Guidance <input checked="" type="checkbox"/>   |   |   |
| Using DOE WAP H&S funds for <i>major</i> repairs as defined by the Grantee's H&S Plan is prohibited.   |   |   |
| Define "major" repairs   |   |   |
| If the agency's maximum Health and Safety expenditure limit is exceeded, which would result in a deferral, it is considered to be a major repair and the agency should consider alternative funding to complete the readiness work in order to weatherize the home.  |   |   |
| Allowable Testing  |   |   |
| Allowed with DOE WAP H&S Funds <input type="checkbox"/>  | Allowed with Alternative Funds <input type="checkbox"/> |   |
| If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.   |   |   |

## 6.X – (Insert Additional H&S Items for Use of DOE WAP H&S funds)

### Required Actions

|   |   |   |
|---|---|---|
| Concur with DOE Guidance <input type="checkbox"/> | Alternative Guidance <input type="checkbox"/> | Results in Deferral/Referral <input type="checkbox"/> |
| DOE WAP H&S Funds <input type="checkbox"/>        |   | Alternative Funds <input type="checkbox"/>            |

Insert required item text

### Allowable Actions

|   |   |
|---|---|
| Allowed with DOE WAP H&S Funds <input type="checkbox"/> | Allowed with Alternative Funds <input type="checkbox"/> |
|---|---|

If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.

### Prohibited Actions

Concur with DOE Guidance

What is prohibited

### Required Testing/Inspection

|   |   |   |
|---|---|---|
| Concur with DOE Guidance <input type="checkbox"/> | Alternative Guidance <input type="checkbox"/> | Results in Deferral/Referral <input type="checkbox"/> |
| DOE WAP H&S Funds <input type="checkbox"/>        |   | Alternative Funds <input type="checkbox"/>            |

Insert required item text

### Allowable Testing/Inspection

|   |   |
|---|---|
| Allowed with DOE WAP H&S Funds <input type="checkbox"/> | Allowed with Alternative Funds <input type="checkbox"/> |
|---|---|

If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.

### Prohibited Testing/Inspection

Concur with DOE Guidance

What is prohibited

### Required Occupant Education

|   |   |
|---|---|
| Concur with DOE Guidance <input type="checkbox"/> | Alternative Guidance <input type="checkbox"/> |
|---|---|

Insert required item text

### **Identification of Occupant Health Conditions**

Please list any known or suspected health conditions which could affect you or a member of your household during or as a result of the weatherization process (for example, respiratory issues or allergic reactions that could be affected by the weatherization process):

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**SIGN AND DATE AT TIME OF APPLICATION:** Please sign below to indicate that you have listed all known or suspected health conditions which could affect you or a member of your household during or as a result of the weatherization process.

|                                 |                       |      |
|---------------------------------|-----------------------|------|
| Applicant's Name (please print) | Applicant's Signature | Date |
| Staff Name (please print)       | Staff Signature       | Date |

**SIGN AND DATE AT TIME OF AUDIT:** Please sign below to indicate the following:

- That the above list of health conditions is correct at the time of the weatherization audit (if necessary, update the list now);
- That you have received worker contact information allowing you to quickly inform workers of any medical issues caused by the weatherization process;
- That you promise to inform workers immediately if any medical issues arise;
- That you have received information on weatherization materials and installation techniques that could affect the medical conditions you have listed;
- That you have worked with your auditor to ensure that if necessary, the weatherization process is amended so that it does not affect any listed medical conditions;
- That you consent to the weatherization process continuing.

|                                 |                       |      |
|---------------------------------|-----------------------|------|
| Applicant's Name (please print) | Applicant's Signature | Date |
| Staff Name (please print)       | Staff Signature       | Date |

**SIGN AND DATE AT FIRST DAY OF WORK:** Please sign below to indicate that you have listed all known or suspected health conditions which could affect you or a member of your household during or as a result of the weatherization process.

|                                 |                       |      |
|---------------------------------|-----------------------|------|
| Applicant's Name (please print) | Applicant's Signature | Date |
| Staff Name (please print)       | Staff Signature       | Date |

**NOTIFICATION OF POTENTIAL DEFERRAL OF WEATHERIZATION SERVICES FORM**  
**PLEASE READ, SIGN AND DATE**

The Pennsylvania Weatherization Assistance Program is providing you with this information in the event that your application is deferred. If an application is deferred, the applicant's home will not receive weatherization services until after the reason(s) for deferral have been corrected and a new application is submitted. Listed below are reasons why an application may be deferred:

- Reported household income may exceed federal poverty guidelines set for the program;
- Property received weatherization services on \_\_\_\_\_, which falls within the 15-year limit;
- The house has been condemned or has electrical, heating, plumbing, or other equipment issues which have caused the local or state building officials or utilities to prohibit work in the building;
- The property becomes owned by a bank or other financial entity or is in foreclosure proceedings;
- The property becomes for sale or rent or unoccupied or the client is moving or scheduled for sheriff sale;
- The building structure or its mechanical systems are in such a state of disrepair that the conditions cannot be resolved cost-effectively;
- The structure is not secured to a permanent foundation and connected to utilities;
- The structure is a camper, recreational vehicle, boat, railroad car, bus, or other structure which does not have a mailing address and is designed and constructed as temporary, non-stationary, living quarters.
- Dangerous conditions exist due to high carbon monoxide levels in combustion appliances that cannot be resolved under existing health and safety measures and with only minor repairs;
- The dwelling unit or surrounding property exhibits problems with pet containment;
- The extent of and condition of lead-based paint or friable asbestos in the house would create further health and safety hazards.
- Moisture problems are so severe that they cannot be resolved under existing health and safety measures and with only minor repairs;
- The client denies access to every room at unit;
- Criminal behavior is observed in the household;
- The client refuses critical weatherization measures;
- The client creates a health and safety issue and refuses to correct the problem, or the dwelling unit has sewage or sanitary problems which will further endanger the client and installers;

- The client refuses recommended health and safety measures;
- The client or a household member acts in an uncooperative, threatening or abusive manner;
- The client has known health problems which preclude insulation or other weatherization materials from being installed;
- If testing is done with other funding, test results must be included for lead paint, asbestos, and Radon. If Radon testing is known, defer home if over 4pCi/L.
- Other Must Specify: \_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Applicant's Name (please print)

\_\_\_\_\_  
Applicant's Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Staff Name (please print)

\_\_\_\_\_  
Staff Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Address of Property



**DEFERRAL OF WEATHERIZATION SERVICES FORM**  
**PLEASE READ, SIGN AND DATE**

The Pennsylvania Weatherization Assistance Program is providing you with this information as a result of your audit on \_\_\_\_\_. Your home will not receive weatherization services until the reason(s) for deferral have been corrected and an updated application may need submitted. Listed below are reasons why your home is deferred:

- The reported household income exceeds federal poverty guidelines set for the program;
- Property received weatherization services on \_\_\_\_\_, which falls within the 15-year limit;
- The house has been condemned or has electrical, heating, plumbing, or other equipment issues which have caused the local or state building officials or utilities to prohibit work in the building;
- The property is owned by a bank or other financial entity or is in foreclosure proceedings;
- The property is currently for sale or rent or unoccupied or the client is moving or scheduled for sheriff sale;
- The building structure or its mechanical systems are in such a state of disrepair that the conditions cannot be resolved cost-effectively;
- The structure is not secured to a permanent foundation and connected to utilities;
- The structure is a camper, recreational vehicle, boat, railroad car, bus, or other structure which does not have a mailing address and is designed and constructed as temporary, non-stationary, living quarters.
- Dangerous conditions exist due to high carbon monoxide levels in combustion appliances that cannot be resolved under existing health and safety measures and with only minor repairs;
- The dwelling unit or surrounding property exhibits problems with pet containment;
- The extent of and condition of lead-based paint or friable asbestos in the house would create further health and safety hazards.
- Moisture problems are so severe that they cannot be resolved under existing health and safety measures and with only minor repairs;
- The client has denied access to every room at unit;
- Criminal behavior is observed in the household;
- The client refused critical weatherization measures;
- The client created a health and safety issue and refuses to correct the problem, or the dwelling unit has sewage or sanitary problems which will further endanger the client and installers;

- The client refuses recommended health and safety measures;
- The client or a household member acts in an uncooperative, threatening or abusive manner;
- The client has known health problems which preclude insulation or other weatherization materials from being installed;
- If testing is done with other funding, test results must be included for lead paint, asbestos, and Radon. If Radon testing is known, defer home if over 4pCi/L.
- Other Must Specify: \_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Applicant's Name (please print)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Staff Name (please print)

\_\_\_\_\_  
Staff Signature

\_\_\_\_\_  
Address of Property

Department of Community and Economic Development  
Center for Community Services

**Client Appeals Process**

Appeals should be followed in numerical order as listed below, with the client only proceeding to the next level of appeal if the previous level did not adequately satisfy the client's concerns. This document must contain the printed name and dated signature of both the client and the subgrantee staff administering this document, unless it has been mailed to the client as part of the Deferral Process.

- 1. Subgrantee Weatherization Coordinator** – The name, address, phone number, and email address of each applicable person at a given subgrantee is required.
- 2. Subgrantee Executive Director** – The name, address, phone number, and email address of the subgrantee's Executive Director is required.
- 3. Department of Community and Economic Development/Center for Community Services** – The office should only be contacted regarding a formal appeal/complaint in writing and only in cases that have escalated beyond all other attempts at resolution. **Submission must include details regarding the subgrantee's involvement and responses to the client appeal/complaint.** An example is attached to this process to provide guidance to a client submitting a formal complaint. Use the following contact information:

Center Director  
Department of Community and Economic Development  
Center for Community Services  
Commonwealth Keystone Building  
400 North Street, 4th Floor  
Harrisburg, PA 17120-0225

|                              |                              |               |
|------------------------------|------------------------------|---------------|
| _____<br>Client Printed Name | _____<br>Client<br>Signature | _____<br>Date |
| _____<br>Staff Printed Name  | _____<br>Staff Signature     | _____<br>Date |

Department of Community and Economic Development  
Center for Community Services

**Client Guidance for Filing a Formal complaint with DCED**

When should you file a complaint/appeal with DCED?

If you have tried to resolve the issue yourself and you have exhausted all your efforts to resolve the issue without success.

Steps to follow when filing the formal complaint:

1. Identify the problem. What has been done to resolve the problem and what are your expectations to resolve the problem? What is a fair solution to the problem?
2. Gather the information regarding the problem and what has been done to resolve it. Who has been contacted? What was their response? Keep notes regarding who you talked to, when you talked to that person, and what was said.
3. Writing the formal complaint/appeal must include:
  - a. Your name and complete address, best phone number to reach you and an email address (if possible)
  - b. The agency name and address
  - c. Name of the people at the agency with whom you spoke
  - d. Describe your complaint briefly, remember to include what happened, who was there, and when it happened.
  - e. Describe what has been done so far to resolve the issue, who has been contacted, when were they contacted, and what was their reply?
  - f. What are your expectations to resolve the issue? Are your expectations possible and reasonable?

Other tips for writing the letter:

1. Remember to include important facts about the services received
2. Avoid angry, sarcastic or threatening language
3. Type your letter, if possible. If handwritten, make sure the writing is clear

# Pennsylvania Weatherization Assistance Program Pre-Existing Conditions Form

HOME OWNER/CLIENT NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

The following information is intended to help you understand certain conditions in the home which may prevent weatherization work from being performed, or which may require other actions.

The pre-existing conditions in my home have been explained and I also have been informed of possible conditions that may occur from altering weatherization work performed in my home. Understanding these issues, I agree to allow weatherization work to be performed and to follow the recommendations provided by the agency.

I understand that if my heating system is found to be a serious health or fire hazard, the service technician may be legally required to shut the unit down, and weatherization discontinued until the unit is repaired to run safely. I may be required to pay for heating system repairs if funding is not available in order to receive weatherization.

I agree to receive Energy Education as part of this program.

I acknowledge I have received the EPA Lead Booklet (Renovate Right).

I understand and agree that I shall not hold \_\_\_\_\_ and its employees liable for damage resulting from weatherization.

\_\_\_\_\_ agrees to work with the homeowner to resolve any complaints resulting from weatherization.

\_\_\_\_\_  
(HOME OWNER / CLIENT SIGNATURE)

\_\_\_\_\_  
(DATE)

\_\_\_\_\_  
(HOME OWNER / CLIENT SIGNATURE)

\_\_\_\_\_  
(DATE)

\_\_\_\_\_  
(AGENCY REPRESENTATIVE NAME)

\_\_\_\_\_  
(AGENCY REPRESENTATIVE SIGNATURE)

\_\_\_\_\_  
(DATE)

**Pre-existing conditions:**

**Appliances-**

- Clothes dryer:
  - vented to outside
  - un-vented

**Space Heater-**

- vented to outside
- un-vented

**Exhaust Fans-**

- Bathroom:
  - vented to outside
  - un-vented
- Kitchen:
  - vented to outside
  - un-vented
- Other: \_\_\_\_\_

**Heating System-**

- Wood  Oil  Gas  Other: \_\_\_\_\_
- Heating system installation meets standards
- Heating system DOES NOT meet standards

**DHW (hot water) -**

- Oil  Gas  Electric

**Chimney/Vent Condition-**

- Acceptable
- Un-acceptable

**Moisture Levels-**

- Acceptable
- Un-acceptable

**Test Results (if applicable):**

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**Health and Safety Concerns:**

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**General Comments:**

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**Pre-existing conditions:**

**Appliances-**

- Clothes dryer:
  - vented to outside
  - un-vented

**Space Heater-**

- vented to outside
- un-vented

**Exhaust Fans-**

- Bathroom:
  - vented to outside
  - un-vented
- Kitchen:
  - vented to outside
  - un-vented
- Other: \_\_\_\_\_

**Heating System-**

- Wood  Oil  Gas  Other: \_\_\_\_\_
- Heating system installation meets standards
- Heating system DOES NOT meet standards

**DHW (hot water) -**

- Oil  Gas  Electric

**Chimney/Vent Condition-**

- Acceptable
- Un-acceptable

**Moisture Levels-**

- Acceptable
- Un-acceptable

**Test Results (if applicable):**

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**Health and Safety Concerns:**

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**General Comments:**

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Department of Community and Economic Development  
Center for Community Services

**Whole House Moisture Assessment**

Date: \_\_\_\_\_ Client: \_\_\_\_\_  
Job Number: \_\_\_\_\_ Auditor: \_\_\_\_\_

Weather conditions at the time of the audit: \_\_\_\_\_

Attic access is best described as:  Hatch  Door  None  
Attic Ventilation:  Yes  No  Other

Description: \_\_\_\_\_

Mechanical ventilation:  Dryer  Range hood  Bath fan  Other  
Are the mechanical vents properly extended?  Yes  No

If no, explain: \_\_\_\_\_

Water Moisture Symptoms:  
 Efflorescence  Stains  Rotted wood  Damp floor/walls  
 Visible mold growth  Mildew/odor  Rust stains on appliances, etc.  Other

If so, where do they appear in the home? \_\_\_\_\_

**Pictures Taken for Client File:**  Yes  No

Moisture Contributing Factors:  Wet basement  Roof leaks  Plumbing leaks  Other  
If other, explain: \_\_\_\_\_

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Do any children or elderly reside or frequently visit?  Yes  No  
Does anyone residing in the home have health issues?  Yes  No

If yes, explain: \_\_\_\_\_

Repairs recommended prior to weatherization?  Yes  No

Repair description: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Repairs to be completed by:  Landlord  Homeowner  Other  
Repair completion verified by: \_\_\_\_\_

The above statement regarding moisture history of this dwelling is true and correct to the best of my knowledge.

**Recommended repairs must be completed prior to any measures being installed in the home.**

Client Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
Auditor Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
Reviewed By: \_\_\_\_\_





Department of Community and Economic Development  
Center for Community Services

**Weatherization Mold Assessment and Release Form**

Date: \_\_\_\_\_ Client: \_\_\_\_\_  
Job Number: \_\_\_\_\_ Auditor: \_\_\_\_\_

Mold can be a problem in any home, but especially in those where there is an excessive amount of moisture or humidity present. In addition, if there are several people, pets, plants, or fish aquariums present, conditions may exist for mold to grow. An assessment of your home included a visual check for mold. This is not a mold inspection and the person making this assessment is not a mold inspector. Testing and identification of specific molds is beyond the scope of this program and we are not liable for mold that was not found during this inspection.

During an energy audit on (date) \_\_\_\_\_ our personnel identified mold growth in the following room(s) of your home located at: \_\_\_\_\_

- |   |   |   |   |
|---|---|---|---|
| <input type="checkbox"/> Living/Bedroom Areas | <input type="checkbox"/> Bathroom Areas | <input type="checkbox"/> Laundry Areas  | <input type="checkbox"/> Combustion Areas |
| <input type="checkbox"/> Crawlspace Areas     | <input type="checkbox"/> Attic Areas    | <input type="checkbox"/> Basement Areas | <input type="checkbox"/> Other Location   |

(Other Location) \_\_\_\_\_

**Moldy or musty odors are an indicator that there may be hidden mold growth.**

Moldy or Musty Odors:  Are present  Are not present

The U.S. Department of Energy generally does not allow Weatherization agencies to remedy mold problems, but some actions associated with a cost effective energy saving measure may be taken to reduce moisture problems. We will take the following measures that may help to resolve existing moisture problems:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Check and Sign One of the Following Disclaimers:**

**Moisture/Mold Disclaimer:** By signing below, I acknowledge that I have received information concerning moisture and mold conditions in my home prior to any weatherization work being done and I will take steps to reduce excessive moisture. I agree to hold the agency performing weatherization harmless for any future moisture or mold problems that are not associated with the weatherization work.

Weatherization Client: \_\_\_\_\_ Date: \_\_\_\_\_  
Agency Auditor/Estimator: \_\_\_\_\_ Date: \_\_\_\_\_

**Deferral Disclaimer:** By signing below, I acknowledge that I have been notified there is existing mold in the home prior to any weatherization work being done. I have been advised that the agency performing weatherization cannot cost effectively resolve the identified mold or moisture and that weatherization work must be deferred until the mold or moisture is remedied.

Weatherization Client: \_\_\_\_\_ Date: \_\_\_\_\_  
Agency Auditor/Estimator: \_\_\_\_\_ Date: \_\_\_\_\_

## Weatherization Assistance Program Asbestos Assessment and Release Form

Date: \_\_\_\_\_ Client: \_\_\_\_\_

Job Number: \_\_\_\_\_ Auditor: \_\_\_\_\_

Asbestos is a problem in many homes. An assessment of your home included a visual check for asbestos. This is not an asbestos inspection and the person making this assessment is not an asbestos inspector. Testing and abatement of asbestos is beyond the scope of this program and the Weatherization Agency is not liable for asbestos found during this inspection.

After a visual inspection of the home, asbestos was found present.     \_\_Yes \_\_No

Asbestos was found in the following areas of the home:

Living/Bedroom    Bathroom    Laundry    Mechanical room

Crawlspace        Attic        Basement    Home Exterior

Other Locations \_\_\_\_\_

Description \_\_\_\_\_

\_\_\_\_\_

### Disclaimer:

**Asbestos Disclaimer:** By signing below, I acknowledge that I have received information concerning asbestos in my home prior to weatherization work being done. I agree to hold the \_\_\_\_\_ harmless for any asbestos health related problems after weatherization has been performed.

Client: \_\_\_\_\_

Date: \_\_\_\_\_

Agency Staff: \_\_\_\_\_

Date: \_\_\_\_\_

**Deferral Disclaimer:** By signing below, I acknowledge that I have been notified there is existing asbestos in my home. I have been advised by the \_\_\_\_\_ that weatherization work must be deferred until asbestos has been removed by a certified asbestos abatement company.

Client: \_\_\_\_\_

Date: \_\_\_\_\_

Agency Staff: \_\_\_\_\_

Date: \_\_\_\_\_

# EPA Renovation Recordkeeping Checklist

Name of Firm: \_\_\_\_\_

Date and Location of Renovation: \_\_\_\_\_

Brief Description of Renovation: \_\_\_\_\_

\_\_\_\_\_

Name of Assigned Renovator: \_\_\_\_\_

Name(s) of Trained Worker(s), if used: \_\_\_\_\_

Name of Dust Sampling Technician, Inspector, or Risk Assessor, if used: \_\_\_\_\_

\_\_\_\_\_

- D Copies of renovator and dust sampling technician qualifications (training certificates, certifications) on file.
- D Certified renovator provided training to workers on (check all that apply):
  - D Posting warning signs
  - D Maintaining containment
  - D Waste handling
  - D Setting up plastic containment barriers
  - D Avoiding spread of dust to adjacent areas
  - D Post-renovation cleaning
- D Test kits used by certified renovator to determine whether lead was present on components affected by renovation (identify kits used and describe sampling locations and results): \_\_\_\_\_

- D Warning signs posted at entrance to work area.
  - D Work area contained to prevent spread of dust and debris
  - D All objects in the work area removed or covered (interiors)
  - D HVAC ducts in the work area closed and covered (interiors)
  - D Windows in the work area closed (interiors)
  - D Windows in and within 20 feet of the work area closed (exteriors)
  - D Doors in the work area closed and sealed (interiors)
  - D Doors in and within 20 feet of the work area closed and sealed (exteriors)
  - D Doors that must be used in the work area covered to allow passage but prevent spread of dust
  - D Floors in the work area covered with taped-down plastic (interiors)
  - D Ground covered by plastic extending 10 feet from work area—plastic anchored to building and weighed down by heavy objects (exteriors)
  - D If necessary, vertical containment installed to prevent migration of dust and debris to adjacent property (exteriors)
- D Waste contained on-site and while being transported off-site.
- D Work site properly cleaned after renovation
  - D All chips and debris picked up, protective sheeting misted, folded dirty side inward, and taped for removal
  - D Work area surfaces and objects cleaned using HEPA vacuum and/or wet cloths or mops (interiors)
- D Certified renovator performed post-renovation cleaning verification (describe results, including the number of wet and dry cloths used): \_\_\_\_\_

D If dust clearance testing was performed instead, attach a copy of report

- D I certify under penalty of law that the above information is true and complete.

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

## Radon Information Form

Weatherization achieves energy and cost savings and improved comfort, health and safety of homes through a variety of home retrofit measures, including some which improve the airtightness of the building. According to the Department of Energy (DOE) sponsored study, "[Weatherization and Indoor Air Quality: Measured Impacts in Single-family Homes under the Weatherization Assistance Program](#)," there is a small risk of increased radon levels in homes when the building air tightness levels are improved. These increases are smaller in manufactured housing everywhere, and all homes in low-radon potential counties, and higher in site built homes in high-radon-potential counties. There is some evidence that the installation of continuous mechanical ventilation reduces radon levels in homes, and counteracts any radon increases that are due to improved building air tightness levels.

**Precautionary Measures:** Since your house is located in a county identified as having moderate- to high-potential-radon levels<sup>1</sup>, precautionary measures indicated below will be installed as part of weatherization:

- Exposed dirt floors covered and sealed
- Floor/foundation penetrations sealed
- Open sump pit capped
- Crawl space venting inspected and/or improved
- Basement isolated (air sealed) from living space
- Other: \_\_\_\_\_

**I am aware that weatherization may result in increased levels of radon, and that mechanical ventilation may counteract those increases. I have received the Environmental Protection Agency's (EPA's) "A Citizen's Guide to Radon," and radon-related risks were discussed. I have chosen to go forward with weatherization, and accept all risks of injury or damages.**

I have carefully read this informed consent form and have signed it of my own free will.

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Client Name: \_\_\_\_\_

Client Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Intake Worker Name: \_\_\_\_\_

Intake Worker Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Property Address: \_\_\_\_\_

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<sup>1</sup> Defined as counties with predicted indoor radon screening levels at or above 2 pico Curies per liter of air (pCi/L). Link to EPA interactive zonal radon map: <https://www.epa.gov/radon/find-information-about-local-radon-zones-and-state-contact-information#radonmap>