



Connecticut Weatherization Assistance Program Health and Safety Plan

1.0 – GENERAL INFORMATION

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

In PY24 CT Weatherization Assistance Program Subgrantees will utilize the Oakridge National Laboratory’s Health and Safety Audit Tool to identify all Health and Safety Barriers to weatherization. Funding for these assessments will be billed to Program Operations. The successful utilization of this Health and Safety Audit will allow for the otherwise deferred household to be referred to the Connecticut Residential Energy Preparation Services (REPS) to address the barriers to Weatherization utilizing braided funding from Weatherization Readiness Funds (WRF), Low-Income Energy Assistance Program (LIHEAP) and, American Rescue Plan Act (ARPA)

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.

CT WAP plans on dedicating 15% of the grant for H&S measures and all allocated WRF funds for addressing H&S barriers.

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.

TO BE ADDED AFTER CT DEEP MEASURE MATRIX REVIEW

None



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

CT WAP Guidance #14

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

CT WAP Guidance #14

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

CT WAP Forms #10,14, Hazard Identification Forms # 10,13,14,22, Radon Informed Consent CT WAP Guidance #40, Forms #41,42, REPS Referral Form (<https://portal.ct.gov/DEEP/Energy/Conservation-and-Load-Management/Weatherization-Barrier-Mitigation>)

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 a 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

Allowed with Alternative Funds

None

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

CT WAP Guidance # 46,45, Form #46, CT WAP Operations and Training Manual Sections- 304.2, 308, 308.1, 308.2, 308.5, 308.7, 312.1, 401, 408, 408.1, 408.2, 408.3, 408.4, 408.5, 410, 411, 309.4, CT WAP Field Guide Chapters- 1.5, 8.10, 8.10.1,8.10.2, 8.10.2 8.10.3, 8.2.3, 8.2.4

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.

* CT WAP Operations and Training Manual Sections- 313,313.1, 407, 601.6, CT WAP Field Guide Sections- 1.5, 8.1, 8.1.2,

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

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 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

CT WAP Operations and Training Manual Sections- 204.1, 301.8,305, 400,402, 407, 417, 417.1, 417.2, 423.3, 424.1, CT WAP Forms # 10, 14, CT WAP Field Guide Chapters-1.7.2, 3.7, 3.7.1, 12.2.2

Grantee Blower Door Testing Policy When Suspected ACM Exists

CT WAP operations and Training Manual Sections- 301.8, 305, 417, 417.1, 417.2, 423.3, 503.1, CT WAP Field Guide Section- 12.2.2

Allowable Actions

Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
CT WAP Operations and Training Manual Sections- 417.1, 417.2, CT WAP Field Guide Chapters-1.7.2, 3.7, 3.7.1, 12.2.2	



Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
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"/>	
<ul style="list-style-type: none"> • 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. • Testing is allowable by an AHERA Certified Professional on a case-by-case basis with prior approval from the Grantee • Limited encapsulation of friable ACM is allowable by an AHERA Certified Professional on a case-by-case basis with prior approval from the Grantee • Removal of small amounts of vermiculite and ACM is allowable by an AHERA Certified professional on a case-by-case basis with prior approval from the Grantee 		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
CT WAP Operations and Training Manual Sections- 417, 417.1, 417.2		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
<ul style="list-style-type: none"> • Formally notify the occupant, and landlord if applicable, in writing: <ul style="list-style-type: none"> ○ 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 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 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 checked="" type="checkbox"/>		Allowed with Alternative Funds <input type="checkbox"/>	
CT WAP Operations and Training Manual Sections- 417.7, 424.1			
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"/>	
CT WAP Operations and Training Manual Sections- 417, 417.1, 417.2, CT WAP Forms- 10,14			
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"/>	
CT WAP Operations and Training Manual Sections- 312, 416, 420, 420.1, 420.2, 702, 702.10			
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. Using DOE WAP H&S funds for building rehabilitation is prohibited			



Define “major” repairs		
CT WAP Operations and Training Manual Sections- 702,702.10		
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 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.		
Allowable Testing/Inspection		
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” testing, detail them here.		
Prohibited Testing/Inspection		
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.		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
Notify occupant in writing of structurally compromised areas.		
6.5 – Code Compliance		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
CT WAP Operations and Training Manual Sections- 418		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		



- Using DOE WAP H&S funds for correction of preexisting code compliance issues not directly related to the installation of specific weatherization measures in the home is prohibited.
- Using DOE WAP funds for work on condemned properties and properties where H&S conditions exist that cannot be corrected under this guidance is prohibited

Required Testing/Inspection

Concur with DOE Guidance Alternative Guidance Results in Deferral/Referral

DOE WAP H&S Funds Alternative Funds

Visual 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.

Required Occupant Education

Concur with DOE Guidance Alternative Guidance

CT WAP Operations and Training Manual Sections- 418, Forms- 10,14

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

CT WAP Operations and Training Manual Sections- 306, 306.3, 309.1, 309.3, 311, 400, 402, 408.1, 408.1.1, 412, 421, 422, 424.1, CT WAP Form -7 CT WAAP Field Guide Chapters- 1.8, 1.8.1, 1.9, 2.1.2, 2.2.3, 4.2.2, 5.3.1, 6.4, 8, 11.4.2

Prohibited Actions

Concur with DOE Guidance



Using DOE WAP H&S funds for <i>major</i> electrical repairs as defined by the Grantee’s H&S plan is prohibited		
Define “major” repairs		
CT WAP Operations and Training Manual Sections- 311		
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 type="checkbox"/>		Alternative Funds <input type="checkbox"/>
<ul style="list-style-type: none"> • 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 <input checked="" type="checkbox"/>		Allowed with Alternative Funds <input type="checkbox"/>
CT WAP Operations and Training Manual Sections- 309.3, 408.1, 412, 421, 422, CT WAP Form-7		
Required Occupant Education		
Concur with DOE Guidance <input type="checkbox"/>		Alternative Guidance <input type="checkbox"/>
<ul style="list-style-type: none"> • 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"/>
<ul style="list-style-type: none"> • 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"/>



CT WAP Operations and Training Manual Sections- 314.4, 402, 422

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

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

- 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

Allowed with Alternative Funds

CT WAP Operations and Training Manual Sections- 314, 408.1, 422, CT WAP Field Guide Chapters-2.3.2, 8.2.2, 8.5, 8.8.2, 11.7

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

Alternative Guidance

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

CT WAP Operations and Training Manual Sections- 402,





Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Using DOE WAP H&S funds for replacement of gas ovens/ranges/stovetops 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 type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> • 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		
CT WAP Operations and Training Manual Sections- 402, 408.3, 412, CT WAP Field Guide Chapter 1.5		
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.		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
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 <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"/>	



- 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

CT WAP Operations and Training Manual Sections- 417.1 (Asbestos)

Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

CT WAP Operations and Training Manual Sections- 406, 406.3, 406.4, 417.1 (Asbestos), 417.4 (VOCs), 417.9 (Refrigerant, Hazardous Disposals), CT WAP Field Guide Chapter 1.9, 4.2.1

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

CT WAP Operations and Training Manual Sections- 417.1 (Asbestos), CT WAP Field Guide

Prohibited Testing/Inspection

Concur with DOE Guidance

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.





Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>		Alternative Guidance <input type="checkbox"/>
<ul style="list-style-type: none"> • Inform occupant in writing of hazards associated with hazardous waste materials being generated/handled in the home. • Inform occupant in writing of observed hazardous condition and associated risks. • Provide occupant written materials on safety issues and proper disposal of household pollutants. 		
6.10 - Injury Prevention of Occupants		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>		Allowed with Alternative Funds <input type="checkbox"/>
CT WAP Operations and Training Manual Sections- 406.3, 406.4, 406.5, 406.6,420, 420.1,		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Using DOE WAP H&S funds for major repairs, as defined by the Grantee’s H&S Plan is prohibited		
Define “major” repairs		
CT WAP Operations and Training Manual Sections- 702		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>		Alternative Guidance <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" 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.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>		Allowed with Alternative Funds <input type="checkbox"/>
CT WAP Operations and Training Manual Sections- 406.3, 406.4, 406.5, 406.6,420, 420.1, CT WAP Field Guide Chapters- 1.6.7, 1.9, 1.9.6		
Required Occupant Education		
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.

6.11 – Lead-Based Surface Coverings (Paint, Varnishes, Roofing, etc.)

Required Actions

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

- 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

CT WAP Operations and Training Manual Sections- 108, 118.1, 204.1, 206.3, 301.1, 301.4, 302.4, 307, 313.1 400, 402, 403.2, 406.3, 406.4, 406.7, 419, 420.3, 424.1, 501.3.1, 601.4.2, CT WAP Guidance- 3, 27, CT WAP Field Guide Chapters- 1, 1.7.3, 1.9, 2.1.3, 2.5.1, 7, 7.2.1, 7.3.2, 7.6, 7.7, 12.2.2

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

CT WAP Operations and Training Manual Sections- 406.7, 419

Required Occupant Education





Concur with DOE Guidance <input checked="" type="checkbox"/>		Alternative Guidance <input type="checkbox"/>	
Follow pre-renovation education requirements per EPA RRP rules.			
6.12 – Mold and Moisture			
Allowable Actions			
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>		Allowed with Alternative Funds <input type="checkbox"/>	
CT WAP Operations and Training Manual Sections- 311, 313.1, 400, 416, 601.6, CT WAP Forms- 12, 13, 13a, CT WAP Field Guide chapters- 1.6, 1.6.2, 1.6.3, 1.6.4, 1.6.5, 1.6.6, 1.6.7, 7.3.2, 9.1.1, 9.9.1, 9.10			
Prohibited Actions			
Concur with DOE Guidance <input checked="" type="checkbox"/>			
<ul style="list-style-type: none"> 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 checked="" type="checkbox"/>		Allowed with Alternative Funds <input type="checkbox"/>	
None			
Prohibited Testing/Inspection			
Concur with DOE Guidance <input checked="" type="checkbox"/>			
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"> When a person’s health may be at risk and/or WAP work activities could constitute an H&S hazard, the occupant is required to take appropriate action based on severity of risk. Deferral, if occupant risk cannot be mitigated. 		

Allowable Actions

Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
CT WAP Operations and Training Manual Sections- 301.7, 400,406.3, CT WAP Guidance-14, CT WAP Form- 40, CT WAP Field Guide Chapter-1	

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"/>
<ul style="list-style-type: none"> Screen occupants for known or suspected health concerns either as part of initial application for weatherization, during the audit, or both. This is done utilizing the “Occupant Pre-existing or Potential Health Condition Screening Form” required by WPN 22-7. 		

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.	

Required Occupant Education

Concur with DOE Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
<ul style="list-style-type: none"> Inform occupant in writing of any known risks and provide pre-weatherization screening form. Provide occupant with Subgrantee point of contact information in writing. 	

6.14 – Pests

Required Actions

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
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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.			
Allowable Actions			
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>		Allowed with Alternative Funds <input type="checkbox"/>	
CT WAP Operations and Training Manual Sections- 204, 204.1, 400, 402, 417.8 CT WAP Forms- 10, 14, CT WAP Field Guide Chapters- 6.5.1, 9.3.2, 9.9.3			
Allowable Testing/Inspection			
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" testing, detail them here.			
Required Occupant Education			
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			
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"> • Cover exposed dirt floors within the pressure/thermal boundary with a sealed soil gas retarder • Cover sump well/pits with airtight covers • Implement ventilation as required by ASHRAE 62.2-2016 			
Allowable Actions			
Allowed with DOE WAP H&S Funds <input type="checkbox"/>		Allowed with Alternative Funds <input type="checkbox"/>	
CT WAP Operations and Training Manual Sections- 313.1, 400, 402, 407, 417, CT WAP Guidance- 40, CT WAP Forms- 41, 42, CT WAP Field Guide Chapters- 1, 1.6.5, 1.7.1			
Prohibited Actions			
Concur with DOE Guidance <input checked="" type="checkbox"/>			



Using DOE WAP H&S funds for radon mitigation is prohibited.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

CT WAP Operations and Training Manual Sections- 417.3

Required Occupant Education

Concur with DOE Guidance

Alternative Guidance

- Provide all occupants EPA’s A Citizen’s Guide to Radon and inform them of radon related risks.
- Occupants must sign an informed consent form prior to receiving weatherization services.

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

Required Actions

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

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).

Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

CT WAP Operations and Training Manual Sections- 302.4, 310.2, 313.2, 400, 402, 414, 415, 422.1, 601, 601.6, CT WAP Guidance- 20, CT WP Forms- 4, 17, CT WAP Field Guide Chapters- 1.1, 1.2, 1.4

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

CT WAP Operations and Training Manual Sections- 314.4, 414, 415, 422.1

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

CT WAP Operations and Training Manual Sections- 305, 305.3, 314.3, 416, 423, 423.1, 423.2, 423.3, 601.4.1, 601.4.2, 601.6, 702.2, CT WAP Guidance- 34, 42, 44, CT WAP Form-9
CT WAP Field Guide Chapters- 1.6, 1.6.2, 2, 2.3.1, 2.3.2, 3.1, 8.2.6. 9. 9.1, 9.1.1, 9.2, 9.2.1, 9.2.2, 9.2.3, 9.2.4, 9.3, 9.3.1, 9.3.2, 9.3.3, 9.3.4, 9.4, 9.5, 9.5.1, 9.5.2, 9.5.3, 9.6

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 <input checked="" type="checkbox"/>		Allowed with Alternative Funds <input type="checkbox"/>	
CT WAP Operations and Training Manual Sections- 314.3, 314.4			
Required Occupant Education			
Concur with DOE Guidance <input checked="" type="checkbox"/>		Alternative Guidance <input type="checkbox"/>	
<ul style="list-style-type: none"> • 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			
<i>(see Combustion Appliances for combustion related requirements)</i>			
Allowable Actions			
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>		Allowed with Alternative Funds <input type="checkbox"/>	
CT WAP Operations and Training Manual Sections- 309.4, 309.4.1, 313.2, 407, 411, 702.7, CT WAP Guidance- 29, CT WAP Form- 29, CT WAP Field Guide Chapters-10.7.2, 10.8, 10.8.1, 10.8.2, 10.8.3, 10.9			
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"/>	
<ul style="list-style-type: none"> • 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 <input checked="" type="checkbox"/>		Allowed with Alternative Funds <input type="checkbox"/>	
CT WAP Operations and Training Manual Sections- 308.2, 309, 309.2, 309.11, 311, 313.2, 314.2, 314.3, 601.6			
Required Occupant Education			
Concur with DOE Guidance <input checked="" type="checkbox"/>		Alternative Guidance <input type="checkbox"/>	
<ul style="list-style-type: none"> • 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

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

Adherence to all federal, state, and local worker safety regulations (e.g., OSHA, EPA).

Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

CT WAP Operations and Training Manual Sections- 301, 301.1, 400, 402, 404, 406, 406.1, 406.4, 406.5, 501.3, 501.3.1, 501.3.3, CT WAP Guidance- 24,25, CT WAP Forms- 18-a, 36, 37, 38, 38a, CT WAP COVID Update #2, CT WAP Field Guide Chapters- 1, 1.1, 1.2, 1.7.1, 1.7.2, 1.7.3, 1.9, 1.9.1, 1.9.2, 1.9.5, 1.9.6, 1.9.7, 1.9.9, 1.9.11, 1.9.12

Prohibited Actions

Concur with DOE Guidance

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

Define “major” repairs

CT WAP Operations and Training Manual Sections- 311, 702

Allowable Testing

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds