# Connecticut Weatherization Assistance Program

## Program Year 2025

### Weatherization Assistance Program Health and Safety Plan

**Policy Updates Submitted with Plan ☐**

**1.0 Updated Policy**

*No policy updates in 2025.*

**2.0 – Budgeting**

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

Select which option is used below.

Separate Health and Safety Budget ☑ Contained in Program Operations ☐

**3.0 – Health and Safety Expenditure Limits**

*Pursuant to 10 CFR 440.16(h), Grantees must set H&S expenditure limits for their Program, providing justification by explaining the basis for setting these limits and providing related historical experience.*
*Low percentages should include a statement of what other funding is being used to support H&S costs, while larger percentages will require greater justification and relevant historical support. It is possible that these limits may vary depending upon conditions found in different geographical areas. These limits must be expressed as a percentage of the ACPU. For example, if the ACPU is $5,000, then an average expenditure of $750 per dwelling would equal 15 percent expenditures for H&S.*
*20 percent is not a limit on H&S expenditures but exceeding this amount will require ample justification. These funds are to be expended by the Program in direct weatherization activities. While required as a percentage of the ACPU, if budgeted separately, the H&S costs are not calculated into the per-house limitation. DOE strongly encourages using the table below in developing justification for the requested H&S budget amount. Each H&S measure the Grantee anticipates addressing with H&S funds should be listed along with an associated cost for each measure, and by using historical data the estimated frequency that each measure is installed over the total production for the year.*

*It is also recommended to review recent previous budget requests and compare versus expenditures, to see if previous budget estimates have been accurate. The resulting "Total Average H&S Cost per Unit" multiplied by the Grantee's production estimate in the Annual File should correlate to the H&S budget amount listed in the Grantee's state plan.*
*Should a Grantee request to have more than 20 percent of Program Operations used for health and safety purposes, DOE will conduct a secondary level of review. DOE strongly encourages use of this H&S template and matrix to help expedite this process.*

Subgrantees are required to budget health and safety costs in a separate budget category that is not included in the cost per unit calculation. Subgrantees will be allowed to budget up to 23% of their total allocation for health and safety in addition to Weatherization Readiness Funds for addressing health and safety barriers.

**4.0 – Incidental Repair Measures**

If Grantees choose to identify any H&S measures as incidental repair measures (IRMs), they must be implemented as such under the Grantee's weatherization program in all cases – meaning, they can never be applied to the H&S budget category. In order to be considered IRMs, the measure must fit the following definition and be cost justified along with the associated efficiency measure;
Incidental Repairs means those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include, but are not limited to, framing or repairing windows and doors which could not otherwise be caulked or weather-stripped and providing protective materials, such as paint, used to seal materials installed under this program. (10 CFR 440 "Definitions")

The incidental repair measure (IRM) category is intended for a measure that is not typically part of the installation of an ECM, or group of ECMs, and / or is outside the manufacturers or industry standard for installation.

Incidental repairs that are done to enable installation of energy efficiency work will not be billed as health and safety work. Incidental repairs that are not health and safety measures are only allowed when the repair is necessary to install an energy efficiency measure(s).

- Correction of moisture-creating conditions is allowed when necessary in order to ensure the long-term durability of the installed weatherization measures
- The installation of a chimney liner for an orphaned water heater may be considered an IRM when installed in combination with the replacement of a heating system
- Minor electrical repairs including the repair and replacement of knob and tube wiring, may be considered an IRM when associated with the installation and preservation of insulation in the attic or sidewalls.
- Roof repair may be considered an IRM when associated with the installation and preservation of insulation in the attic

More extensive conditions, such as serious structural problems or roof replacement, are beyond the scope of the Program and are not considered incidental repair work. WAP work will be deferred on buildings that need more extensive repairs until funding is identified to complete the needed repairs.

Subgrantees can use Weatherization Readiness Funds for approved measures and are expected to be familiar with other housing rehabilitation programs available in their service area to refer owners to programs that can provide assistance that is beyond the scope of weatherization.

**5.0 – Deferral/Referral Policy**

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

Grantee has developed a comprehensive written deferral/referral policy that covers both H&S, and other deferral reasons?

Yes ☑ No ☐

Where can this deferral/referral policy be accessed?

*The following Process applies whether the application is a CEAP client applying for weatherization or a Weatherization Applicant who is not also a CEAP client*

*Deferrals and Referrals*

There are circumstances under which weatherization for an individual unit may have to be deferred, such as when the performance of allowable weatherization services may present a health and safety issue to the occupants or workers. Subgrantees are to have a deferral process in place that informs the owner and applicant as to the status of the application whenever it changes. The Subgrantee shall adhere to its internal process, approved by DEEP, in all cases of deferrals and referrals.

If weatherization services are to be deferred, the Subgrantee must provide the applicant, either by hand delivery, electronic or regular mail, the Notice of Postponement of Services. The Subgrantee will send the Notice to the owner of the property, who is responsible for alleviating the issues, with a copy to the occupants of the unit.

The Notice of Postponement of Services must:

- Identify the specific reason(s) for deferral; and
- Include an adequate timeline for the owner to address the issues; and
- Be signed by the Client and the Service Provider; or
- Be completed by the Subgrantee representative and provided to the property owner.

Subgrantees should suggest solutions, including alternative resources that may be available to address each basis for deferral.

Deferrals may occur at any phase of the weatherization process. Subgrantee staff or weatherization contractors must recommend the deferral of work at any point when a health and safety risk to the occupants or workers is identified.

Deferrals are to be reviewed and approved by the Subgrantee management and fully documented in the client file.

*Reasons For Deferral*

Some circumstances under which a unit is to be deferred include, but are not limited to:

- Any existing condition that could endanger the health and/or safety of the work crew and/or contractor and cannot safely be remediated within the budget or scope of Weatherization, Health and Safety, and/or Weatherization Readiness Funding.
- Problems with building structure or the condition of its mechanical systems, including electrical, plumbing systems, and HVAC systems, that are in such a state of disrepair that failure is imminent, and they cannot safely be remediated within the budget or scope of Weatherization, Health, and Safety and/or Weatherization Readiness Funding.
- Extent and condition of lead-based paint or Asbestos in the house that would potentially create health and safety issues for the occupants or workers and cannot safely be remediated within the budget or scope of Weatherization, Health and Safety, and/or Weatherization Readiness Funding.
- Existing Moisture or Mold conditions with resulting problems that cannot safely be remediated within the budget or scope of Weatherization, Health and Safety, and/or Weatherization Readiness Funding.
- Sewage or sanitary problems that endanger the occupants or weatherization workers that cannot safely be remediated within the budget or scope of Weatherization, Health and Safety, and/or Weatherization Readiness Funding.
- A contagious or otherwise dangerous health condition of an occupant.
- An occupant who is uncooperative, abusive, or threatening to weatherization workers who must work on or visit the property.
- Evident illegal or dangerous activities that may occur in or about the property.

*Resources for Referral*

Where appropriate, referrals may be made to alternative resources, where effective lines of communication must be made between the Subgrantee staff and the referral agency staff. Several example programs include:

- U.S. Department of Housing and Urban Development (HUD) - HOME Program
- HUD - Community Development Block Grant
- U.S. Department of Health and Human Services - Community Services Block Grant
- U.S. Department of Agriculture - Rural Economic Community Development
- State-funded housing and rehabilitation programs
- Low-income program funds provided by local utilities
- City-funded housing and rehabilitation programs
- Donations or financial participation from landlords
- Donations from local churches or community groups
- Local Department of Health or Social Services Department

*Deferral Resolution*

If the issues specified on the Notice of Postponement of Services are not addressed by the property owner within the allowed timeframe and the property is not referred to another program to address the issues, Subgrantees may deny further weatherization services. In this instance, a written denial notice must be issued to the applicant. Time extensions may be granted, if in the judgment of the Subgrantee's weatherization program management, the owner is making progress on the underlying issues and may be expected to resolve the problem within a reasonably extended time period. Because such extensions tie up Subgrantee resources and prevent the use of funds on other eligible units, it is recommended that no more than two (2) extensions be granted. Once the specified deferral issues are adequately addressed, the process may continue as authorized by the Subgrantee.

**6.0 – Hazard Identification and Notification Form(s)**

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

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

Yes ☑ No ☐

**7.0 – Health and Safety Categories**

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

- *The health and safety plan is updated annually and included in the Grantee File, SectionV7. Subgrantees and the PAC receive a copy of our health and safety plan which is developed in accordance with the health and safety committee. Testing is allowable as per the guidance in PPM Section 5. In the absence of DOE funds for remediation and testing the subgrantee will utilize resources available from the EPA and local environmental protection agencies and health departments. Incidental Repair Measures (IRMs) are determined in accordance with the regulatory threshold set by 10 CFR 440.3 and are cost justified with the associated energy efficiency measure and/or package of measures. Documentation for at risk occupants is voluntary and provided via a form on site while client education notices are posted regarding potential health impacts. Training and certification is done in compliance with training and technical assistance partners to meet DOE regulations and regular certification achievements and updates are monitored by the Grantee. "Allowable" items under WPN 22-07 leave room for Grantees to determine if the category, or testing, will be addressed and in what circumstances.*
- *Declare whether DOE funds or alternate funding source(s) will be used to address the particular category.*
- *Describe the explicit methods to remedy the specific category.*
- *Describe what testing protocols (if any) will be used.*
- *Define minimum thresholds that determine minor and major repairs.*
- *Identify minimum documentation requirements for at-risk occupants.*
- *Discuss what explicit steps will be taken to educate the client, if any, on the specific category if this is not explained elsewhere in the Plan. Some categories, like mold and moisture, require client education.*
- *Discuss how training and certification requirements will be provided for the specific category. Some categories, like Lead Based Paint, require training.*
- *Describe how occupant health and safety concerns and conditions will be solicited and documented.*

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

**7.1 – Air Conditioning and Heating Systems**

**Concurrence, Alternative, or Deferral**

Concurrence with Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

Air Conditioning Unallowable Measure ☐ Heating Unallowable Measure ☐

**Funding**

DOE ☑ LIHEAP ☐ State ☐ Utility ☐ Other ☐

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

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.

If the heating system is operable, the system must be run through NEAT/MHEA first to determine if it is allowable to be replaced as an energy conservation measure. "Red tagged," inoperable or nonexistent heating system replacement, repair, or installation is allowed with DOE funds and LIHEAP funds. Repairs can be charged as DOE Health and Safety cost. The subgrantee must first determine whether repairs can effectively be made to the heating system to enable it to operate safely, rather than require a replacement.

Sub-grantees are allowed to replace heating systems in the following circumstances:

- A verifiable condition exists that allows combustion gases to enter the living environment. For example, a breach in the heat exchanger that allows combustion gases to mix with the air in the ductwork.
- An improper application of a non-sealed combustion furnace installed in a manufactured home. Manufactured homes are required to have furnaces that draw their combustion air from outside the carriage. All new furnace installations in manufactured homes must be approved for use in manufactured housing.
- Heating systems can be replaced when the NEAT/MHEA audit shows the replacement to meet an SIR of 1 or greater. Subgrantees must run a NEAT/MHEA audit when DOE funding is used to pay for a furnace replacement. The NEAT/MHEA work scope must be followed once a NEAT/MHEA audit has been performed on a structure.
- The cost of necessary repairs will exceed 50% of the cost of replacing the heating system.
- Replacement parts are no longer produced or available.
- New HVAC system selection must comply with SWS
- Documentation justifying the replacement with a cost comparison between replacement and repair must be maintained in the client file.

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.

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.

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

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).

Subgrantees must explain to owners and tenants, and record on the Health & Safety Notification form, that significant amounts of combustion by-products, including water vapor, CO, NO2, and particulates are produced by these systems. The client is informed of the issue by the auditor and given the option to repair or replace it on their own or they are issued a notice of postponement with the reason behind deferral documented

Subgrantees must complete the Health & Safety Notification form and require the applicant to sign the form before proceeding with work. WAP funds cannot be used to purchase or install any type of unvented or vent-less combustion appliance.

Please also see CT Weatherization Operations Manual sections 308.7, 408, and 410.2

**Indicate Documentation Required for At-Risk Occupants**

Health and Safety Notification form

**Testing Protocols**

Verify that primary heating systems are present, operable, and performing correctly.

All vented combustion appliances are tested for CO in undiluted flue gas and the results documented. CO testing is required for all combustion appliances, regardless of venting type.

Gas leak detection tests are conducted along accessible gas lines throughout the interior and exterior of the building, and the findings recorded. All accessible gas lines and piping are tested for gas leaks. For significant leaks, combustion appliances are disabled, the area evacuated and ventilated, and the fuel supplier notified for shut-off until repairs are completed. Minor leaks may be addressed at the time of inspection or specified for repair. Testing is performed at audit, after any workon the gas piping is complete, and at post inspection. if a gas leak is detected on the utility side of the gas line the utility company is informed so the leak can be addressed prior to the weatherization work. IF the gas leak is identified on the customer side of the line the gas leak must be repaired prior to the start of weatherization work

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.

An SSE test is required on every heating system, where appropriate, except for wood or coal stoves and those positive pressure systems that are rated as Category III or IV appliances that are not outfitted with SSE testing ports. Pre- and post-weatherization SSE test results are recorded and affixed to the heating appliance.

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).

BPI combustion safety test procedures are followed, and appropriate actions taken based on the test results. The worst-case CAZ configuration for each appliance zone is established and recorded in the client project file. The worst-case negative pressure is measured in all vented CAZs. Any zone or area of the building that contains a vented combustion appliance, including space heaters and water heaters, is considered a CAZ.

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.

Please also see 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

**Client Education**

Subgrantees educate owners and tenants about the importance of smoke and CO detectors working properly, the importance of heating system monitoring and maintenance for efficiency benefits, the dangers of poorly maintained heating systems, such as high CO levels, and fire hazards associated with using unvented space heaters. Discuss and provide information on proper disposal of bulk fuel tanks when not removed as part of the weatherization work, and 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.

**Training**

Regular mandatory training is required and currently provided for Subgrantee auditors, crew chiefs, crews, and heating technicians; it is renewed every 3 years and includes, but is not limited to, Health & Safety and OSHA 10-hour worksite safety. SF auditors are required to hold BPI certifications in both Heating Professional and Building Analyst titles, training for which is also provided.

**7.2 - Asbestos – All**

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

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.

If friable asbestos is identified in a home, would be exposed to the direct flow of air and become disturbed during blower door testing, then the blower door depressurization testing cannot be performed, unless that room or space where such materials are present can be isolated from the rest of the building, by closing a door, or other means. If the space where the suspected friable asbestos can be isolated, the blower door test can be performed but at a reduced pressure of CFM 25. In addition, if concerns still remain regarding performing the blower door test at reduced pressure, then a blower door pressurization test must not be performed.

Please also see 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

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

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

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

Intact asbestos is not a hazard. It becomes a hazard when damaged or deteriorated and friable asbestos particles are released into the air. First, subgrantees are to determine and document if asbestos is present, friable, and if it presents a potential problem.

The subgrantee is advised to proceed cautiously when preparing to weatherize a dwelling unit where the presence of lead, mold, asbestos, vermiculite, or any other potentially toxic substances may be suspected. Subgrantees are required to inform building owners and occupants of the presence of any toxic or potentially toxic materials and/or conditions and to consider the impact on weatherization work scopes to ensure that weatherization will not exacerbate existing conditions resulting in harm to building occupants or to weatherization staff performing the work.

Generally, suspected asbestos-containing material (ACM) should never be disturbed. Subgrantees are advised to not cut, drill, scrape, sand or brush ACM surfaces. In cases where conditions prohibit installing side-wall insulation without disturbing asbestos materials, it is recommended that consideration be given, and costs proposals be prepared for insulation being installed through the interior of the home.

Subgrantees are to refer to DOE WPN 22-07, the CT WAP Field Guide, and the SWS for additional guidance on how to handle the presence of ACM. : In some cases, the presence of asbestos may mean the weatherization work is deferred. If the condition of the asbestos is such that it presents a potential health risk to the worker, or if the weatherization work will worsen the situation for the occupants, the work on the dwelling should be deferred. The occupant and/or owner must be notified of the conditions that are the deferral reason. To properly identify where asbestos should be addressed, the homeowner should be urged to have an inspection performed, and to have the asbestos removed, by a licensed asbestos abatement contractor. This determination should be left to the homeowner and not entered into by Subgrantees or contractors.

Please also see 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

**Testing Protocols**

Asbestos testing may be conducted with prior approval when the subgrantee suspects that ACM may be disturbed by installation of weatherization materials. Asbestos testing may only be conducted by a certified abatement specialist. If the presence of asbestos is confirmed, care is taken to not disturb the asbestos (for example, by drilling through asbestos siding). Removal or encapsulation, when approved by DEEP, isconducted prior to blower-door testing and can only be conducted by a certified abatement specialist, per the SWS.

Please also see CT WAP Operations and Training Manual Sections- 417, 417.1, 417.2

**Client Education**

Formally notify the occupant, and landlord if applicable, in writing:

- Suspected ACMs that are present and what precautions will be taken to ensure the occupants' and workers' safety during weatherization;
- Results if testing was performed;
- Instruction to 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.

Please also see CT Health and Safety Screening Guidance #38, Health and Safety Disclaimer Form #9

**Training and Certification Requirements**

Component of Auditor and H&S training and Healthy Home Principles

**7.2b – Asbestos - in vermiculite**

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

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

Assume vermiculite contains asbestos unless testing determines otherwise. Program policy prohibits removing or disturbing vermiculite. Subgrantees are not permitted to air seal or blow insulation over the top of vermiculite in open floored attics, or to perform a blower-door test in a building where friable asbestos or vermiculite is present.

**Testing Protocols**

WAP funding, including H&S funds may be used to address encapsulation of vermiculite by appropriately trained asbestos control professionals, provided testing performed by AHERA Certified sampling confirms the presence of asbestos. Baseline environmental testing is an allowable cost and must be conducted by an AHERA certified professional. Prior approval is required from the Grantee in all cases. CT WAP will review all encapsulation proposals on a case-by-case basis.

Please also see CT WAP Operations and Training Manual Sections- 417, 417.1, 417.2

**Client Education**

Subgrantees provide clients with the following guidance when vermiculite is present:

- Don't touch or disturb the insulation in your attic.
- Don't use your attic for storage.
- If possible, don't enter your attic.
- Don't allow children to play in the attic.
- Don't open your walls to see if there is vermiculite inside.
- Don't attempt to remove the vermiculite yourself. If you want to have the vermiculite removed, hire a certified asbestos abatement contractor
- for the job.
- Don't let untrained contractors — for example, electricians or cable installers — into your attic, since contractors may cause a new hazard
- where none existed.
- Install a warning sign near your attic access hatch reading, "Cancer Hazard: Insulation contains asbestos. Do not disturb or create dust."
- Remember, common dust masks are not effective against asbestos fibers.
- It's probably a good idea to seal any cracks in walls and/or the ceiling that may appear later (for example, cracks around ceiling-mounted
- electrical boxes) to reduce the chance that vermiculite dust will enter your home. This work should only be performed from below — never from the attic.

**Training and Certification Requirements**

Component of Auditor and H&S training

**7.2c – Asbestos - on pipes, furnaces, other small covered surfaces**

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

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

See section 7.2a

**Testing Protocols**

See section 7.2a

**Client Education**

See section 7.2a

**Training and Certification Requirements**

See section 7.2a

**7.3 – Biologicals and Unsanitary Conditions** (odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

Unallowable Measure ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

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

It is not an allowable H&S expenditure to address harmful bacteria not normally present in a dwelling unit. In all circumstances where harmful bacteria are present, work must be deferred. If harmful bacteria are suspected to be present, clients should be informed and be provided with information about maintaining a sanitary home. Where conditions (odors, 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, the work must be deferred.

Please also see CT WAP Opereations Manual Sections 417.7, 424.1

**Testing Protocols**

Sensory inspection of interior, exterior, attics, and subspaces of the dwelling.

**Client Education**

Applicants are advised of these possible hazards so they can make informed decisions regarding their well-being. Where necessary, applicants are advised to relocate from the unit during installation of energy conservation materials, to ensure the household's safety.

**Training**

| Component of auditor training |
| --- |

**7.4 – Building Structure and Roofing**

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

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

Certain structural repairs may be completed while providing WAP assistance. Repairs provided as part of WAP are incidental and designed to protect or supplement WAP measures or address a H&S issue. If a building or dwelling unit is found to have serious structural problems which make weatherization impractical or impossible, the energy auditor or crew leader reports these findings to their supervisor. If corrective action cannot be arranged, the subgrantee consults with DEEP before proceeding with deferring weatherization due to structural problems. When deferral is necessary, provide detailed documentation of all conditions that must be met in order for weatherization to commence.

Please also see CT WAP Operations and Training Manual Sections- 312, 416, 420, 420.1, 420.2, 702, 702.10

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

Minor Repairs which may be considered Incidental Repair measures are measures under $500. Repairs over $750 are considered major repairs and are not considered an incidental repair.

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

N/A

**Client Education**

Applicants are advised of any building or structural issues on the Health and Safety Disclaimer

**Training**

Component of Auditor training

**7.5 – Code Compliance**

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

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

DEEP requires subgrantees to ensure that work is performed in accordance with all state and local codes, and monitors compliance with this requirement during desk reviews and on-site inspections; however, the role of DEEP staff and of subgrantees is oversight. Code compliance is the responsibility of local officials. The visual inspection of the project includes an analysis of potential code violations in areas where work is being done, and subgrantees must obtain building permits for work performed when required by state or local codes prior to commencement of WAP work.

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

Local codes can vary greatly throughout CT. DEEP requires subgrantees ensure any work is performed in accordance with state and local codes. When, in the judgment of the energy auditor or crew leader, any condition exists, including a code compliance condition, which may endanger the health or safety of the client, work crew or subcontractor, the work is not to proceed until the condition is corrected.

- 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

If conditions cannot be corrected weatherization will be deferred until the condition is corrected.

**Client Education**

Applicants are advised of the possible code issues on the Health and Safety Disclaimer.
Please also see CT WAP Operations and Training Manual Sections- 418, Forms- 10,14

**Training**

| Component of Auditor training |
| --- |
| **7.6 – Combustion Gases** |
| **Concurrence, Alternative, or Deferral** |

Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

**Testing Protocols**

Gas leak detection tests are conducted along accessible gas lines throughout the interior and exterior of the building, and the findings recorded on the Combustion Appliance Safety Inspections and Testing form. Minor leaks may be addressed at the time of inspection or specified for repair. Testing is conducted at audit, after any work on the gas piping is complete, and at post inspection.

Please see Form #4

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

For significant leaks, combustion appliances are disabled, the area is evacuated and ventilated, and the fuel supplier is notified for shut-off until repairs are completed. The subgrantees are advised to contact the local gas company (companies) in their service area(s) to establish criteria for notifying the company regarding gas leaks.

**Client Education**

Applicants are advised of these possible hazards on the Health and Safety Disclaimer

**Training**

Component of Auditor H&S training

**7.7 – Electrical**

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

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

The visual inspection of the unit includes an analysis of electrical hazards. Subgrantees are to ensure that all electrical hazards that exist in areas where weatherization work is to be done are corrected prior to commencement of work. Subgrantees should provide sufficient over-current protection and damming prior to insulating building components containing knob and tube wiring, as required by the AHJ.

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

When the cost of an ECM and the cost of the electrical repair together results in an SIR equal to or greater than one, the electrical repair is allowable. If the electrical repair is not necessary to complete an ECM, or group of ECMs, or doesn't meet the definition of a H&S measure, or the ECM including the electrical repair does not result in an SIR equal to or greater than one, the "minor" repair is not allowable and is considered beyond the scope of WAP. The repairs can be made through WRF before weatherization takes place.

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

N/A

**Client Education**

Applicants are advised of these possible hazards on the Health and Safety Disclaimer, so they can make informed decisions regarding their safety.

- 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.

**Training**

Component of Auditor training

**7.8 – Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, and other Air Pollutants**

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

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

When these substances are suspected in a unit, subgrantees issue a Health and Safety Disclaimer form to the homeowner. EPA recommendations on air quality levels may be referenced. In cases where hazards exist that are beyond the scope of the program, work will be deferred and subgrantees will notify owners and occupants

**Testing Protocols**

Information on hazards are obtained through the client interviews and by means of the visual inspection. 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.

**Client Education**

Applicants are advised of these possible hazards on the Health and Safety Disclaimer to make informed decisions regarding their safety.

**Training**

Component of Auditor training

**7.9 – Fuel Leaks** *(please indicate specific fuel type if policy differs by type)*

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

**Remediation Protocols**

If fuel leak in line is minor and can be rectified by tightening of fitting, then it is an eligible H&S repair. Otherwise, the Health and Disclaimer is issued, and BPI safety protocols are followed:

- Inform homeowner/occupants of unsafe conditions
- Advise evacuation
- Auditor and all workers must leave building
- Emergency service provider notified

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.

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

Oil tank, piping and equipment are visually inspected for leaks (see above). If fuel leak in line is minor and can be rectified by tightening of fitting, then it is an eligible H&S repair.

**Client Education**

Applicants and/or owners are advised of leak/spill on the Health and Safety Disclaimer

**Training**

Component of Auditor training

**7.10 – Gas Ovens / Stovetops / Ranges**

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

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

Subgrantees are to follow BPI Combustion Safety procedures. Subgrantees are to test the oven for combustion safety following these steps and recommended actions. They are to measure CO in the ambient air in the kitchen during these tests. The EPA recommends that the ambient air should never be more than 35 parts per million (ppm) during the test. The basic procedure provided is:

1. Test for gas leaks in the gas piping in and around the range and oven.
2. Turn the oven on and set it to bake on high temperature. Sample the CO level in exhaust gases in the oven vent and in the ambient air nearby after **5** minutes.
3. If the vent CO reading is over 225 ppm as measured, or if the ambient-air reading exceeds 35 ppm as measured during the test, discontinue testing. In the case where both spillage and excessive CO are present, ventilate the area and recommend that the appliance be shut down immediately until it can be serviced.
4. Clean and tune the oven by removing aluminum foil, dirt, and corrosion around the burner. Many range and oven burners are equipped withadjustable needle-and seat valves. Adjust the burner's gas control to reduce CO if necessary.
5. If the vent CO reading remains over 225 ppm as measured, consider replacing the oven and range if ***non-DOE funds are available*** ; if not, issue a Health & Safety Disclaimer form and advise the homeowner/occupant that the appliance should be shut down and serviced immediately by a qualified professional**.**

**Testing Protocols**

BPI Combustion Safety Test Procedures and Action Levels can be found on BPI's Web site:
http://www.bpi.org/Web%20Download/BPI%20Standards/Building%20Analyst%20Professional_2-28- 05nNC-newCO.pdf.

**Client Education**

- 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.
- Never use a range burner or gas oven as a space heater.
- Open a window, and/or turn on the kitchen exhaust fan when using the range or oven.
- Never install aluminum foil around a gas range burner or gas oven burner because the foil could interfere with the flame.
- Keep range burners and ovens clean to prevent dirt from interfering with combustion.
- Gas burners should display hard blue flames. Call a service company if you notice yellow flames, white flames, wavering flames, or noisy flames.

**Training**

Component of Auditor training

**7.11 – Hazardous Materials Disposal [Lead, Refrigerant, Asbestos, Mercury (including CFLs/fluorescents), etc.]** *(please indicate material where policy differs by material)*

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

**Client Education**

Clients are advised of any possible hazards on the Health and Safety Disclaimer form in order to make informed decisions regarding their safety.

**Training**

OSHA 10-hour worksite training is a mandatory training per program policy. All technicians performing diagnostic tests or inspections must have access to all necessary personal protective equipment required by OSHA. Required protective equipment includes, but is not limited to, fitted respirators with canister filters, dust masks, gloves, protective clothing, safety glasses, and hard hats.
Technicians are trained in proper use and applications for these devices and must adhere to OSHA regulations when on the job site.
A copy of the Material Safety Data Sheets (MSDS or SDS) for all materials used on the job and installed in the unit is kept on each crew vehicle and made available to all workers and assisted households upon request.

**Disposal Procedures and Documentation Requirements**

All refrigerators containing hazardous material, as well as other possibly hazardous materials encountered (CFLs/Fluorescents, etc.), that are removed or replaced are de-manufactured or disposed of in accordance with local laws, regulations and EPA requirements, as applicable.

**7.12 – Injury Prevention of Occupants and Weatherization Workers**

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

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

Subgrantees are trained to take all reasonable precautions to reduce the risk of injury to workers or occupants of assisted buildings. In limited cases, minor repairs may be conducted to avoid injury risk. In cases where serious safety conditions exist, work will be deferred and subgrantees will notify owners and occupants.

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

Minor repairs are defined as reasonable, low-cost *precautions* deemed necessary to reduce the risk of injury to workers or occupants of assisted buildings that do not fall into the category of serious structural problems or are repairs necessary to protect or supplement WAP energy conservation measures over the course of their life, which would otherwise make weatherization impractical or impossible and would lead to deferral.

**Training**

Component of Auditor training

**7.13 – Lead Based Paint**

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

**Safe Work Protocols**

All work performed on homes built before 1978 is completed using LSW practices, pursuant to the EPA RRP and DOE's WPN 22-7 and SWS. The subgrantees are required to document lead-safe work in the job file. Field representatives verify LSW practices are being followed via in progress site visits and QA procedures.

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.

**Testing Protocols**

Per WPN 22-7, Subgrantees are reminded that testing for lead-containing substances is an allowable cost. All testing and post completion verification results must be documented and placed in the client file. Testing methods must be certified, approved, and economically feasible and justified in all cases.

- 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

**Client Education**

Owners and / or occupants of any dwelling built before 1978 that is to receive weatherization assistance will receive the pamphlet, "Renovate Right: Important Lead Hazard Information for Families, Childcare Providers, and Schools."

**Training and Certification Requirements**

EPA RRP

**Documentation Requirements**

Documentation of current EPA Certified Lead Renovation Firm status in program file; documentation of any Lead Clearance Testing, Signature page of the "Renovate Right: Important Lead Hazard Information for Families, Childcare Providers, and Schools," and of LSW practices in project files.

**7.14 – Mold and Moisture** (Including but not limited to:
drainage, gutters, down spouts, extensions, flashing, sump pumps, landscape, vapor retarders, moisture barriers, etc.)

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

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

Subgrantees inspect the building for signs of mold and moisture damage, locate and eliminate or reduce sources of excessive moisture wherever possible. Limited (incidental) water damage can be addressed. Correction of moisture and mold-creating conditions is allowed only when necessary to weatherize the home and ensure the long-term stability and durability of measures. Ventilation is installed if necessary and determined to rectify the issue; dehumidifiers are allowable. Where severe mold and moisture issues exist, typically these are the responsibility of the owner and cannot be addressed; deferral of WAP is recommended.

Please also see: 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

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

The following actions are allowable H&S measures related to water and moisture under Connecticut WAP:

- Drainage
- Gutters
- down spouts and extensions
- flashing
- sump pumps
- dehumidifiers
- landscaping
- leaking roofs
- vapor retarders
- moisture barriers
- Other bulk moisture control

Please also see CT WAP Operations Manual Section 416

**Client Education**

A copy of the EPA publication "A Brief Guide to Mold, Moisture and your Home" must always begiven to the family by the energy auditor for the purposes of client education

If mold or moisture conditions exist within the building, the Mold Disclaimer form is completed by the subgrantee and signed by the applicant. Sources of the problem, and any solutions, are to be discussed.

**Training**

Component of Auditor training

**7.15 – Pests**

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

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

Air sealing and installation of screens or barriers to prevent pest infestation is permitted when feasible and cost-effective. Pest removal is generally the responsibility of the owner. If a building is infested with rats, roaches, or other vermin, the subgrantee should refuse to weatherize until the condition is corrected. If conditions cannot be corrected weatherization may be denied.

Please also see 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

**Define Pest Infestation Thresholds, Beyond Which Weatherization Is Deferred**

Infestation as identified and confirmed by the subgrantee is the threshold; if the infestation condition cannot be remediated or will pose a H&S concern for workers deferral is recommended until such time as condition is remedied.

**Testing Protocols**

No testing protocol for infestation; visual / sensory inspection at time of audit.

**Client Education**

If an infestation condition is identified to exist within the building, Health and Safety Disclaimer form is completed by the subgrantee, signed by the client and deferral is explained.

**Training**

Component of Auditor training

**7.16 – Radon**

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☑ Results in Deferral ☐

**Funding**

| DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑ |
| --- |
| **What guidance do you provide Subgrantees around radon?** |

The following precautions are required whenever applicable (regardless of EPA radon zone), per WPN 22-7:

1) Cover exposed dirt floors within the pressure/thermal boundary with a sealed soil gas retarder.

2) cover sump well/pits with airtight covers.

3) implement ventilation as required by ASHRAE 62.2-2016. See WPN 22-7 for current radon guidance.

Sealing obvious penetrations in walls and floors of basements or crawl spaces is also allowed. Open sump pits will be capped, however drainage must be maintained, and crawl space venting inspected and/or improved. Separating the basement from the living space as part of air sealing efforts is another approach subgrantees may take to address radon. Regardless, precautions should be taken to reduce the possibility of making radon issues worse.

However, in projects where elevated radon levels are known to exist, mitigation is beyond the scope of the program per WPN 22-7, and work must be deferred.

**Testing Protocols**

**Client Education**

Assisted households will be provided with EPA information on radon hazards, and provided EPA's A Citizen's Guide to Radon

**Training and Certification Requirements**

Auditor Training and Healthy Home Principles

**Documentation Requirements**

EPA Radon information will be provided to all households. Owners will be required to sign an informed consent form, that subgrantees have been supplied, stating they have been provided EPA Radon information, are aware there is a small risk of increased radon levels when building tightness is improved, and are providing their consent to proceed with weatherization. Subgrantees will be required to maintain the signed consent forms in the project file.

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

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

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

Smoke Alarms:
Smoke detectors must be present and operational in all weatherized units. Subgrantees may not replace operable smoke detectors with WAP funds.

Carbon Monoxide Alarms:
CO detectors are installed in any dwelling unit that does not have a working CO detector. Subgrantees are to refer to manufacturer specifications for proper installation and educate the household about CO. Subgrantees may not replace operable CO detectors with WAP funds.

Fire Extinguishers:
Fire extinguishers are not provided, but owners and occupants are made aware of attendant hazards and that one is advisable in units with solid fuel burning appliances.

**Testing Protocols**

All alarms will be tested during the audit

**Client Education**

Subgrantees will refer to manufacturer specifications for proper installation and educate the household about CO and smoke alarms.

**Training**

Component of Auditor training

## 7.18 – Occupant Health and Safety Concerns and Conditions

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

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

Subgrantees are required to take all reasonable precautions against performing work on buildings that will subject workers or clients to health and safety risks. Subgrantees are trained to consider the health concerns of each occupant prior to initiating work on a residence. A client interview is completed before any work is begun to help assist in identifying existing building or household occupant health and safety problems / concerns.

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

When performing an energy audit, the energy auditor is trained to be referencing the information on the Client Health Intake Survey. This survey provides the auditor with information about the building and the lifestyle of its occupants to help the auditor identify, among other things, any potential health and safety concerns. Once identified, these areas can be dealt with through client education or adjustments to the work scope.

Please see Form #40

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

DEEP requires subgrantees to notify owners and occupants of any adverse health or safety conditions discovered in a building where weatherization work will be conducted, or where a decision to defer work has been made. Subgrantees are required to complete the Client Health Intake Survey form with client sign off to inform and educate occupants and owners of potential health or safety hazards present in the building. Subgrantees are trained to take all reasonable precautions against performing work on buildings that will subject workers or clients to health and safety risks. A daily safety check is required at the end ofeach work day, and any safety issues addressed, to ensure that no conditions exist that would compromise worker's or building occupants' health and safety as a result of the weatherization work that was performed that day. All work and testing is clearly documented in the client file on the appropriate forms.

**Client Education**

The auditor is also trained to complete a visual health and safety inspection and provide documentation of any concerns discovered. Where serious concerns are found, that can or cannot be addressed through weatherization, occupants are advised of these possible hazards in writing (Health and Safety Disclaimer form) by the subgrantee, and they are discussed with the client/owner in order that they may make informed decisions regarding their safety. Where necessary, occupants will be advised to relocate from the building or unit during installation of energy conservation materials to ensure the household's safety.

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

## 7.19 – Ventilation and Indoor Air Quality

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☑ Results in Deferral ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

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

CT WAP currently is following the ASHRAE 62.2-2016 standard.

**Testing and Final Verification Protocols**

Testing and verification is performed to ensure ventilation work meets the ASHRAE 62.2 2016 standard.

**Client Education**

Subgrantee is to provide the client information on purpose, use and function of any installed ventilation component, along with any manuals and warranty information.

**Training**

Component of ongoing Auditor training & standalone ASHRAE 62.2 2016 presentations

## 7.20 – Window and Door Replacement, Window Guards

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

**Funding**

DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑

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

| |
|---|
| Windows and doors will not be replaced as health and safety measures. |
| **Testing Protocols** |
| N/A |
| **Client Education** |
| When applicable, owners and applicants are advised of possible hazards on the Health and Safety Disclaimer form. Workscope components are reviewed prior to implementation and summarized at post w/ client. |
| **Training** |
| Component of Auditor training |
| **7.21 – Worker Safety (OSHA, etc.)** |
| **Concurrence, Alternative, or Deferral** |
| Concurrence w/ Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐ |
| **Funding** |
| DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☑ |
| **How do you verify safe work practices? What is your policy for in-progress monitoring?** |
| Compliance with safe work practices is monitored by field staff and recorded in the field visit reports. Any subgrantees that are not in compliance will be provided mandatory additional training. |
| **Training and Certification Requirements** |
| • Health and Safety Training, OSHA – 10, Confined Space |
| |