Weatherization Grantee Health and Safety Plan

Maine 2020

☑ POLICY SUBMITTED WITH PLAN

1.0 – GENERAL INFORMATION

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

Other funding identified is HUD Office of Healthy Homes and Lead Hazard Control dollars to address Healthy Home issues.

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.

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

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

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

**Double Click To Open For Editing**

<table>
<thead>
<tr>
<th>Measure ↓</th>
<th>Cost ↓</th>
<th>Frequency % ↓</th>
<th>Auto Calculates</th>
</tr>
</thead>
<tbody>
<tr>
<td>1/2&quot; plywood/underlayment/trim</td>
<td>$8.00</td>
<td>30.0%</td>
<td>$2.40</td>
</tr>
<tr>
<td>In-line fan w/ speed control</td>
<td>$213.00</td>
<td>10.0%</td>
<td>$21.30</td>
</tr>
<tr>
<td>Range hood with light</td>
<td>$229.00</td>
<td>30.0%</td>
<td>$68.70</td>
</tr>
<tr>
<td>Vapor retarder, poly, 6 mil</td>
<td>$333.00</td>
<td>45.0%</td>
<td>$149.85</td>
</tr>
<tr>
<td>Vapor retarder, EPDM</td>
<td>$130.00</td>
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<tr>
<td>Caulking, acrylic latex</td>
<td>$8.00</td>
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<td>$1.60</td>
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<tr>
<td>Caulking foam, 24 oz. can</td>
<td>$14.00</td>
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<td>$2.80</td>
</tr>
<tr>
<td>Bath fan w/ internal control, 80cfm</td>
<td>$491.00</td>
<td>25.0%</td>
<td>$122.75</td>
</tr>
<tr>
<td>Attic gable vent</td>
<td>$54.00</td>
<td>5.0%</td>
<td>$2.70</td>
</tr>
<tr>
<td>Vertical closure dryer vent, Hartland</td>
<td>$23.00</td>
<td>90.0%</td>
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</tr>
<tr>
<td>Vent pipe, flex/rigid</td>
<td>$32.00</td>
<td>90.0%</td>
<td>$28.80</td>
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<tr>
<td>Bath exhaust fan, 100cfm</td>
<td>$222.00</td>
<td>90.0%</td>
<td>$199.80</td>
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<tr>
<td>Sump pump</td>
<td>$237.00</td>
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<td>$47.40</td>
</tr>
<tr>
<td>Minor electrical repair</td>
<td>$85.00</td>
<td>40.0%</td>
<td>$34.00</td>
</tr>
<tr>
<td>Smoke alarm</td>
<td>$25.00</td>
<td>90.0%</td>
<td>$22.50</td>
</tr>
<tr>
<td>CO alarm</td>
<td>$35.00</td>
<td>90.0%</td>
<td>$31.50</td>
</tr>
<tr>
<td>Double pole switch for fan</td>
<td>$56.00</td>
<td>90.0%</td>
<td>$50.40</td>
</tr>
<tr>
<td>Program timer for fan</td>
<td>$78.00</td>
<td>90.0%</td>
<td>$70.20</td>
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<tr>
<td>Dehumidistat control for fan</td>
<td>$45.00</td>
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<td>$2.25</td>
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<tr>
<td>CO alarm</td>
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</tbody>
</table>

**Total Average H&S Cost Per Unit**

$918.65

**Enter Estimated Production (Annual File: IV.2 WAP Production Schedule)**

273

**Enter Estimated Program Operations Budget**

$1,667,559

**H&S Budget (Total Average H&S Cost Per Unit * Estimated Production)**

$250,791.45

**Requested H&S Percentage Per Unit (H&S Budget/Program Operations)**

15.0%

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### 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”*)

- Maine WAP uses WPN 19-5 for overarching guidance on Incidental Repair measures.
- Maine WAP policy requires that any tasks addressing Knob and Tube wiring with WAP funds be applied to Incidental Repair and not H&S. The goal of the program is to install insulation wherever possible rather than leaving clearance for K&T which would reduce energy savings. K&T removal costs impact H&S budgets for other measures, but in most cases retain an SIR of 1 or greater when assigned as IRMs. Extensive K&T costs outside the scope of weatherization result in deferral and referral to other funding.
5.0 – DEFERRAL/REFERRAL POLICY

Deferral of services may be necessary if H&S issues cannot be adequately addressed according to WPN 17-06 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?

- Deferral of Service; Maine 2020 DOE State Plan: Section V.1.2: Approach to Determining Building Eligibility- Deferral Process, page 5.

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:

- Explain whether you concur with existing guidance from WPN 17-07 and how that guidance will be implemented in your Program, if you are proposing an alternative action/allowability, or if the identified category will not be addressed and will always result in deferral. Alternatives must be comprehensively explained and meet the intent of DOE guidance.
- Where an Action/Allowability or Testing is “required” or “not allowed” through WPN 17-07, Grantees must concur, or choose to defer all units where the specific category is encountered.
- “Allowable” items under WPN 17-07 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

<table>
<thead>
<tr>
<th>Concurrence with Guidance</th>
<th>Alternative Guidance</th>
<th>Results in Deferral</th>
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<tbody>
<tr>
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<tr>
<td>Air Conditioning Unallowable Measure</td>
<td>Heating Unallowable Measure</td>
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<tr>
<th>Funding</th>
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<td>State</td>
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<tr>
<td>Utility</td>
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<td>Other  ✓</td>
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</table>

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

- When combustion safety tests fail, weatherization tasks are deferred until corrective action is taken. Clients are informed of issues and deferral in writing. A state licensed technician evaluates the system. If repair or replacement is recommended, DOE or leveraged funds are pursued first and used whenever allowable or available. If DOE is used for replacement or repair and results in SIR > 1, it must be assigned as an ECM. If SIR is < 1, it must be assigned as H&S. If deemed outside the scope of weatherization, deferral is necessary.
- Due to some limitations on testing imposed by the Maine Fuel Board (see links in Testing Protocols below) it is MaineHousing policy that oil-fired combustion heating appliances in homes to be weatherized must have been professionally serviced within the previous 12 months; and gas-fired combustion heating appliances must have been serviced within the previous 24 months, of the audit date. Documentation of the service date must be provided. Any combustion heating appliances that do not meet this requirement must receive a Clean Tune and Evaluate (CTE) by a licensed heating technician.
- A CO alarm is the first measure installed in the home if there is none present.
- After the weatherization measures are completed, the home must be checked again to ascertain that all combustion appliances are operating safely.
### How do you address unsafe or non-functioning secondary heating systems, Including unvented secondary space heaters?

- Secondary systems are viewed as equal to primary systems where health and safety is concerned. They must undergo the same testing and protocol as primary systems. The exception being that DOE funds are not used to replace secondary heating systems. If repair is outside the scope of H&S, secondary systems must be removed or rendered inoperable, with the client’s permission, or deferral is required.
- Unvented fossil fuel heaters must be removed, except when ANSI approved and used as secondary heat only, with no exceptions.

### Indicate Documentation Required for At-Risk Occupants

Because of Maine's high heating degree day environment, cooling needs are considered to be insignificant for Maine dwellings. Therefore, Maine climate conditions do not warrant defining at-risk occupants or the repair or replacement of air conditioning systems under DOE WAP.

### Testing Protocols

- All WAP staff must follow Maine Weatherization Field Guide SWS-2018, 2.0201, 2.0202, 2.0203
- And Maine Fuel Board, Maine Statute


### Client Education

#### Training

- Energy auditors and QCIs receive training on combustion safety testing and protocol through BPI certification training, HPC conferences and ongoing training as needed.
- State Monitors provide training on allowable use of H&S funds on primary and secondary heating systems, ongoing as needed.

### 7.2 - Asbestos – All

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

Prior to performing an energy audit, weatherization work, or conducting tests, the energy auditor must conduct an inspection for materials suspected of containing asbestos if there is the possibility that they may be disturbed during the -audit testing or weatherization work. If suspected friable asbestos is present, then a blower door test will not be conducted (See: [Maine Weatherization Standards](http://www.mainehousing.org/docs/default-source/ehs-partners-library/maine-weatherization-programs/technical-tools/variances/sws-2018-variance-request-form-11-15-18.pdf?sfvrsn=50eb715_14), Section 4.13).

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

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<td>Utility ☐</td>
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<tr>
<td>Other ☑️</td>
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</table>

2020 DOE Health And Safety Plan Template COVID-19 076012020 (Redlined)
### How do you address suspected ACM’s in siding, walls, or ceilings that will be disturbed through the course of weatherization work?

Decisions on approaches to potential weatherization work where asbestos is present shall be based on the judgment of the most qualified individual at the agency or a MaineHousing representative. When major energy-saving measures might be sacrificed as a result of suspected asbestos-containing materials, the agency or contractor may have the suspected material tested for asbestos content.

#### Testing Protocols
Assess potential asbestos hazard; if unsure whether material contains asbestos, contact a qualified asbestos professional to assess the material and to sample and test as needed.

#### Client Education
- Inform the client in writing that suspected ACMs are present and what precautions will be taken to ensure the occupants’ and workers’ safety during weatherization.
- Formally notify client in writing of results if testing was performed.
- If deferral is necessary, the client will be informed in writing of the nature and extent of the problem, how the problem results in deferral and corrective action needed for weatherization to proceed.

#### Training and Certification Requirements
Energy auditors and QCIs receive training on ACM through BPI certification training, HPC conferences and ongoing training as needed:
- Safe practices for siding removal and replacement.
- How to identify suspected ACM.
- Determine if licensing/certification for removal and reinstallation of asbestos siding is required by AHJ.

### 7.2b – Asbestos - in vermiculite

#### Concurrence, Alternative, or Deferral

<table>
<thead>
<tr>
<th>Concurrence with Guidance</th>
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#### Funding

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<tr>
<th>DOE ✓</th>
<th>LIHEAP ✓</th>
<th>State [ ]</th>
<th>Utility [ ]</th>
<th>Other ✓</th>
</tr>
</thead>
</table>

#### How do you address suspected ACM’s in vermiculite that will be disturbed through the course of weatherization work?

When vermiculite insulation is found in an attic, unless testing proves otherwise, take precautionary measures as if the vermiculite contains asbestos. Encapsulation by an appropriately trained asbestos control professional is allowed. Removal is not allowed.

#### Testing Protocols
- Blower door testing should be done with pressurization rather than depressurization.
- If the energy auditor deems it unsafe to conduct blower door testing, an Infiltration SIR Waiver must be submitted and will be subject to approval by MaineHousing.

#### Client Education
• Inform the client in writing that suspected ACMs are present and what precautions will be taken to ensure the occupants’ and workers’ safety during weatherization.
• Formally notify client in writing of results if testing was performed.
• If deferral is necessary, the client will be informed in writing of the nature and extent of the problem, how the problem results in deferral and corrective action needed for weatherization to proceed.

<table>
<thead>
<tr>
<th>Training and Certification Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>AHERA sample collection and testing must be conducted by a certified tester.</td>
</tr>
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</table>

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

<table>
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<tbody>
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<th>Funding</th>
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</thead>
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<tr>
<td>DOE ☑</td>
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</table>

**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 Maine Weatherization Standards 4.13 for specific audit protocols, procedural restrictions and worker PPE, Maine Weatherization Standards.

**Testing Protocols**

• Assess whether suspected ACMs are present.
• Sample collection and testing is allowed and must be conducted by an AHERA certified tester.

**Client Education**

• Instruct clients in writing not to disturb suspected ACM.
• Provide asbestos safety information to the client.
• Formally notify client in writing of results if testing was performed.
• If deferral is necessary, the client will be informed in writing of the nature and extent of the problem, how the problem results in deferral and corrective action needed for weatherization to proceed.

<table>
<thead>
<tr>
<th>Training and Certification Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sample collection and testing must be conducted by an AHERA certified tester.</td>
</tr>
</tbody>
</table>

### 7.5 – Biologicals and Unsanitary Conditions

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

<table>
<thead>
<tr>
<th>Concurrence, Alternative, or Deferral</th>
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<tbody>
<tr>
<td>Concurrence with Guidance ☐</td>
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**Unallowable Measure ☐**

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<tbody>
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<td>DOE ☑</td>
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</table>

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

Maine Weatherization Standards, Section 4.9

**Testing Protocols**

2020 DOE Health And Safety Plan Template COVID-19 076012020 (Redlined)
- Remediation of a condition that may lead to or promote biological concerns or unsanitary conditions is allowed, however, addressing bacteria and viruses is not an allowable cost.
- Remediation of viruses is not an allowable cost. However, in the unprecedented environment of COVID 19, PPE, cleaning and disinfecting materials and supplies, and reasonable allowance for extra time needed to meet safe work practice protocols specific to COVID 19 will be allowable H&S costs. See 7.24, COVID 19

### Client Education

- Deferral may be required in cases where a known biological agent is present in a dwelling that may create a serious risk to weatherization workers. If deferral is necessary, the client will be informed in writing of the nature and extent of the problem, how the problem results in deferral and corrective action needed for weatherization to proceed.
- Inform client in writing of observed conditions.
- Provide information on how to maintain a sanitary home.

### Training

Energy auditors and QCIs receive training on biological hazards through BPI certification training, Maine Indoor Air Quality Council conferences, HPC conferences and ongoing training as needed. WAP workers will receive training specific to COVID 19 workplace safety.

### 7.6 – Building Structure and Roofing

<table>
<thead>
<tr>
<th>Concurrence, Alternative, or Deferral</th>
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<td>Concurrence with Guidance ☑</td>
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<td>DOE ☑</td>
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</table>

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

- Whole roof replacements are not allowed and must be deferred until addressed with other funding.
- Use testing equipment such as IR camera and moisture meter as well as visual inspection to determine the extent of issues.
- Structural issues that may pose any risk to clients or weatherization workers must be addressed prior to weatherization and in some cases, deferral is necessary.
- Minor repairs are allowed when they meet the definition below.

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

Minor allowable structural or roofing repairs are those which include no more than 15% of the total roof or structural area. In addition, minor allowable roof/structural repairs are those that don’t result in exceeding the per contract H&S per unit average of $1,200.00 Repairs exceeding the definition are unallowable major repairs.

**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
• Notify client in writing of structurally compromised areas.
• If deferral is necessary, the client will be informed in writing of the nature and extent of the problem, how the problem results in deferral and corrective action needed for weatherization to proceed.

**Training**

• Energy auditors and QCIs receive training in how to identify structural and roofing issues through BPI certification training and ongoing training as needed.
• State Monitors provide training on the definition of “minor” repairs and other allowability guidelines.

## 7.7 – Code Compliance

<table>
<thead>
<tr>
<th>Concurrence with Guidance</th>
<th>Alternative Guidance</th>
<th>Results in Deferral</th>
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**Funding**

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

• Corrections of preexisting code compliance issues is not allowable, unless associated with specific weatherization measures being installed in the home.
• All repair and installation work on the weatherization work order shall conform to the local building codes when applicable, including, but not limited to, 2015IRC, the Maine Plumbing Code; the NFPA 70 National Electric Code; NFPA 101 Life Safety Code; NFPA 31 Standard for the Installation of Oil-Burning Equipment; NFPA 54 National Fuel Gas Code; NFPA 211 Standard for Chimneys, Fireplaces, Vents, and Solid Fuel-Burning Appliances; and ASHRAE 62.2-2016 Ventilation and Indoor Air Quality in Low-Rise Residential Buildings.

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

Examples of code compliance issues:

• Ventilation and Indoor Air Quality
• Combustion appliance operation and venting
• Electrical work related to installing building ventilation
• Electrical work related to health and safety items affecting worker safety found in the home.

Grantee and Subgrantee personnel are trained to identify these issues before, during and after work has been completed. DOE/WAP funding is used to remediate these issues when allowable. If remediation is outside the scope of weatherization, and there is potential risk to workers or occupants, deferral and referral to other funding is required.

**Client Education**

• Clients are notified of code issues that require deferral in writing.
• If deferral is necessary, the client will be informed in writing of the nature and extent of the problem, how the problem results in deferral and corrective action needed for weatherization to proceed.

**Training**
- Energy auditors and QCIs receive training on code compliance through BPI certification training, HPC conferences, state Building Technical Committee meetings and ongoing training as needed.
- MaineHousing ensures that Subgrantees are informed when new codes are adopted by the state, and provides current code books to every Subgrantee.
- State Monitors provide training on conditions when code compliance applies to weatherization, when deferral is necessary, and other allowability guidelines.

### 7.8 – Combustion Gases

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<th>Concurrency with Guidance</th>
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#### Testing Protocols


**How are crews instructed to handle problems discovered during testing, and what are the specific protocols for addressing hazards that require an immediate response?**
Assuming testing has been done or is in progress:

### Failure of Spillage test:
- Shut down the appliance, inspect for chimney blockage, provide outside air to the CAZ to check if the issue is depressurization.
- Inform client of the issue and educate on potential hazards.
- Order a CT&E to be performed by a Maine licensed burner technician as soon as possible.

### Failure of vent CO ppm in heating appliance or gas oven:
- Ensure ambient CO is at acceptable level.
- Ensure CO alarms are installed.
- Inform client of the issue and educate on potential hazards.
- Order a CT&E to be performed by a Maine licensed technician as soon as possible.

### Ambient CO levels from 9-35ppm:
- Inform client of condition and hazards.
- Inspect for the source of CO.
- If source is identified as a permanently installed appliance, order a CT&E to be performed by a Maine licensed technician as soon as possible.

### Hazards that require immediate response:

### Ambient CO levels from 36-69ppm:
- Inform client of condition and hazards.
- Open windows and doors and turn off any potential sources of CO.
- If source is identified as a permanently installed appliance, inform client to discontinue use until it can be serviced.
- Order a CT&E to be performed by a Maine licensed technician as soon as possible.

### Ambient CO levels 70ppm or greater:
- Terminate testing.
- Notify client of the need to evacuate the building.
- Ensure emergency services are contacted.
- If source is identified as a permanently installed appliance, inform client to discontinue use until it can be serviced.
- Order a CT&E to be performed by a Maine licensed technician as soon as possible.

### Client Education

- Client education on combustion appliance operation, maintenance and CO hazards is provided at the energy audit and throughout the weatherization process as needed.
- Operation manuals for newly installed heating systems are provided to the client.
- Operation instructions and manuals for CO and smoke alarms are provided.
- If deferral is necessary, the client will be informed in writing of the nature and extent of the problem, how the problem results in deferral and corrective action needed for weatherization to proceed.

### Training

- Energy auditors and QCIs receive training on combustion safety testing and protocol through BPI certification training, HPC conference sessions and other state-approved trainings. Training is reinforced by State Monitors in the field, ongoing as needed.
- Training on allowable use of H&S funds on primary and secondary heating systems is provided at approved training conferences and is reinforced by State Monitors ongoing as needed.

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

Electrical Labor and Materials used to address K&T shall be categorized as Incidental Repair. Other electrical labor or materials used to address worker/client safety shall be categorized as H&S.

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

Minor allowable electrical repairs are those that don’t result in exceeding the per contract H&S per unit average of $1,200.00. Repairs exceeding the definition are unallowable major repairs.

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

- Clients are notified in writing if there are electrical concerns or issues that require a deferral of services.
- If deferral is necessary, the client will be informed in writing of the nature and extent of the problem, how the problem results in deferral and corrective action needed for weatherization to proceed.

### Training

- Grantee and Subgrantee personnel are trained to identify electrical hazards in the required BPI Building Analyst course.
- Licensed electricians will be used to further identify and remediate hazards using program funds.

### 7.10 – Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, and other Air Pollutants

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

Removal of pollutants is required if they pose a risk to weatherization workers. DOE H&S funds may be used. If removal cannot be performed or is not allowed by the client, deferral is necessary and the deferral policy will be followed.

### Testing Protocols

Sensory inspection will be performed.

### Client Education
• The client will be informed in writing of the potential hazards and associated risks.
• Client education materials include information on hazardous materials and Indoor Air Quality.
• If deferral is necessary, the client will be informed in writing of the nature and extent of the problem, how the problem results in deferral and corrective action needed for weatherization to proceed.

Training
Energy auditors and QCIs receive Training on Air Pollutants through BPI certification training, HPC conference sessions, Maine Indoor Air Quality Council conferences and other state-approved trainings.

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

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Remediation Protocols

**Maine Weatherization Field Guide**, Section 2.0201.1b
- Inspect and test for gas or oil leakage at connections of natural gas, propane piping, or oil systems
- If leaks are found, immediate action will be taken to notify occupant to help ensure leaks are repaired
- The report will specify repair for leaks and replacement for hazardous or damaged gas or oil connectors and pipes.

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

Allowable fuel leak repairs are those that don’t exceed the per contract H&S per unit average of $1,200.00

Client Education

- Clients are notified in writing if there are fuel leak concerns or issues that require a deferral of services.
- If deferral is necessary, the client will be informed in writing of the nature and extent of the problem, how the problem results in deferral and corrective action needed for weatherization to proceed.

Training

- Energy auditors and QCIs receive training on fuel leaks through BPI certification training, HPC conferences and ongoing training as needed.
- Auditors are required to hold a valid Limited Energy Auditor Technician license from the Maine Fuel Board

7.12 – Gas Ovens / Stovetops / Ranges

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

- Unsafe gas cooking appliances must be repaired if cost effective. DOE funds may be used for repair only, not replacement.
- Unsafe gas cooking appliances may be replaced using HEAP Weatherization funds when that funding is available.
- Follow BPI safety protocols for any actionable levels of CO.

Testing Protocols

- Use a gas leak detector to test for leakage on fuel supply lines. Verify leaks with bubble solution.
- Visually inspect oven for carbon build-up and flame impingement.
- Visually inspect burner flames for size and color of flame. If flames are excessively high and orange, it may be set up for the wrong fuel. Discontinue testing and inform client to order a Service Call.
- Monitor ambient CO when testing oven and flames.
- Measure CO in the appliance vent and compare to acceptable levels per SWS. Follow protocol for actionable levels of CO and other issues. See section 7.8 Combustion Gases.

Client Education

- Inform clients of signs of potential problems such as flame impingement and CO emissions and stress the importance of maintenance.
- Stress the importance of using exhaust ventilation when operating the stove.
- Ensure client understands CO alarm operation and signals.

Training

- Energy auditors and QCIs receive training on testing equipment, testing procedures and safety protocols through BPI certification training, HPC conferences, and other approved trainings.
- State Monitors reinforce training ongoing as needed.
- State Monitors provide training on allowable use of funds ongoing as needed.

7.13 – Hazardous Materials Disposal

[Lead, Refrigerant, Asbestos, Mercury (including CFLs/fluorescents), etc.]

(please indicate material where policy differs by material)

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Client Education

Each agency must give notification to the occupants of homes to be weatherized regarding the potential hazards of lead paint and lead paint dust if the home was built prior to 1978. EPA’s publication The Lead-Safe Certified Guide to Renovate Right must be given to an adult occupant of the affected home. For occupied homes, the agency or their representative must have an adult tenant or homeowner sign an acknowledgement after receiving the pamphlet. The pamphlet can also be sent by certified mail with receipt to be placed in the customer file.

Training
• Energy auditors and QCIs receive training on hazardous materials through BPI certification training, HPC conferences, Maine Indoor Air Quality Council conferences and ongoing training as needed. **WAP workers will receive training specific to COVID 19 workplace safety and proper disposal of used PPE and surface coverings.**

• Appropriate Personal Protective Equipment (PPE) for working with hazardous waste materials will be provided to all agency staff. Workers will be trained how to successfully use PPE by certified individuals.

Disposal Procedures and Documentation Requirements

• Agencies and contractors may not use abatement contractors to remove or dispose of asbestos-containing materials without prior authorization from MaineHousing. Asbestos abatement can be performed using non-DOE funds if authorization to do so is granted by MaineHousing.

• Maine Weatherization will adhere to EPA lead safe rules as written in the “Lead; Renovation, Repair, and Painting Program” Final Rule (LRRPP Final Rule), as directed by DOE.

• Grantee and Subgrantees will comply with all subsections of [Maine Title 38, Chapter 13: Waste Management](http://example.com).

### 7.14 – Injury Prevention of Occupants and Weatherization Workers
(Measures such as repairing stairs and replacing handrails)

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

- The energy audit must include an assessment of any potential hazards to weatherization workers and occupants.
- DOE H&S funds are strictly for safety issues related to weatherization activities. Issues of accessibility or home repair must be referred to other programs.

**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 allowable injury prevention measures are those that don’t result in exceeding the per contract H&S per unit average of $1,200.00. Repairs exceeding the definition are unallowable major repairs.

**Training**

Energy auditors and QCIs are directed to WPN 17-7 for guidance on when injury prevention measures are warranted and allowed. State Monitors reinforce guidance ongoing as needed.

### 7.15 – Lead Based Paint

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2020 DOE Health And Safety Plan Template COVID-19 076012020 (Redlined)
### Safe Work Protocols

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

### Testing Protocols

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

### Client Education

Each agency must give notification to the occupants of homes to be weatherized regarding the potential hazards of lead paint and lead paint dust if the home was built prior to 1978. EPA’s publication The Lead-Safe Certified Guide to Renovate Right must be given to an adult occupant of the affected home. For occupied homes, the agency or their representative must have an adult tenant or homeowner sign an acknowledgement after receiving the pamphlet. The pamphlet can also be sent by certified mail with receipt to be placed in the customer file.

### Training and Certification Requirements

- All participants working in the Weatherization Assistance Program shall follow EPA’s Lead, Renovation, Repair and Painting Program (RRP). All weatherization workers must comply with EPA’s Renovation, Repair and Painting Rule (RRP) and at least one person on each weatherization crew (includes both subcontractor crews and Subgrantee direct hires) must be trained in lead-safe weatherization.
- RRP training and refresher training are offered in-state on a regular basis.
- Subgrantees require EPA Firm certificates and weatherization crew RRP certificates from all contractors working in their WAP program.

### Documentation Requirements

There must be adequate documentation in the client file to demonstrate that lead-safe weatherization measures were performed when necessary. Documentation should include photos of the site and containment set up, as well as a listing of materials used and measures taken. Post-work inspector must also certify that Lead Safe Weatherization procedures were used and properly implemented.

### 7.16 – Mold and Moisture

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

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**Limited water damage**

**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?**
• Limited water damage repairs are allowed, using DOE funds, when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures.
• Source control is allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. Source control is independent of latent damage and related repairs. Extensive issues with grade and water table that require excavation may be deemed outside the scope of weatherization. See definition of “Minor” below.
• Where severe Mold and Moisture issues cannot be addressed, deferral is required.
• Mold cleanup is not an allowable H&S cost.
• Surface preparation where weatherization measures are being installed (e.g., cleaning mold off window trim in order to apply caulk) must be charged as part of the ECM, not to the H&S budget category.

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

Extensive issues with grade and water table that require excavation with costs in excess of $1,200.00 per job are considered outside the scope. Other allowable moisture related measures are those that don’t result in exceeding the per contract H&S per unit average of $1,200.00. Repairs exceeding the definition are unallowable major repairs.

Client Education
• Clients receive written notification and disclaimer on mold and moisture awareness.
• Client education is provided at the energy audit on importance of cleaning and maintaining drainage systems, routing gutters and sumps away from the home, impacts of landscape and plantings on site drainage, use of home humidifiers and other client behavior that impacts moisture control.
• If deferral is necessary, the client will be informed in writing of the nature and extent of the problem, how the problem results in deferral and corrective action needed for weatherization to proceed.

Training
• Energy Auditors and QCs are trained to assess the home and site for moisture issues through BPI certification training, HPC conferences, Maine Indoor Air Quality Council conferences, IR Thermography training, and ongoing training as needed.
• State Monitors provide guidance on definition of “Minor” and funding allowability ongoing as needed.

7.17 – Pests
Concurrence, Alternative, or Deferral

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

A deferral of services must be issued if there are rats, bats, roaches, reptiles, insects, or other animals or vermin that are inadequately or not properly contained on the premises.

Define Pest Infestation Thresholds, Beyond Which Weatherization Is Deferred

Testing Protocols
- Visual assessment of the dwelling
- Infrared scan of the dwelling to determine if there are pests that cannot be seen during the visual inspection.

### Client Education
The client is informed in writing of any pest issue that would result in a deferral of services.

### Training
Energy Auditors and QCIs are trained to assess the presence and degree of infestation, associated risks, and deferral policy. Training is provided through HPC conferences, Maine Indoor Air Quality Council conferences, IR Thermography training, and ongoing training as needed.

### 7.18 – Radon

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What guidance do you provide Subgrantees around radon?

- Radon mitigation is not an allowable H&S cost.
- Clients must sign an informed consent form prior to receiving weatherization services. This form must be kept in the client file.
- In homes where radon may be present, work scope should include precautionary measures based on EPA Healthy Indoor Environment Protocols for Home Energy Upgrades, to reduce the possibility of making radon issues worse. Whenever site conditions permit:
  - Cover exposed dirt floors within the pressure/thermal boundary with 6 mil (or greater) polyethylene sheeting, lapped at least 12” and sealed with appropriate sealant at all seams, walls and penetrations.
  - Other precautions may include, but are not limited to, sealing any observed floor and/or foundation penetrations, including open sump pits, isolating the basement from the conditioned space.
  - Maine climate rules out passive ventilation of basements. When CAZ issues are not a concern, mechanical exhaust may be installed in the basement as a H&S measure.

#### Testing Protocols

Maine WAP has no requirement for conducting radon tests, as radon testing and mitigation are not allowable per DOE guidelines. Energy auditors educate clients on testing options and direct them to “A Citizens Guide to Radon” during the client education portion of the audit.

#### Client Education

- Energy auditors provide all clients with EPA’s *A Citizen’s Guide to Radon* and inform them of radon related risks. They inform clients that many counties in Maine have high probability of radon.

#### Training and Certification Requirements
• Energy auditors and QCIs are trained to understand the nature of, sources, and potential health effects of radon.
• Energy auditors, QCIs and weatherization installers are trained in proper materials and installation of vapor barriers and other precautionary measures.
• Training is provided through HPC conferences, Maine Indoor Air Quality Council conferences, Radon-specific training provided in-state, and ongoing training as needed.
• State Monitors rely on effective content and pictures in the Maine Weatherization Field Guide (SWS) to reinforce precautionary measure installation requirements.
• Radon testing and mitigation are not allowable per DOE guidelines, so Maine WAP has no certification requirements.

**Documentation Requirements**
The client must sign the Maine WAP Consent and Radon Informed Consent forms to verify they received educational materials and client education. A copy of the signed consents must be kept in the client file.

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

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

**Smoke Alarms:** Installation of smoke alarms is allowed where smoke alarms are not present or are inoperable.

**Carbon Monoxide Alarms:**
- When a dwelling has any combustion appliances and no operable CO alarms are present, at least one carbon monoxide (CO) alarm must be installed in the dwelling prior to weatherization measures being installed.
- CO alarms must be installed in all homes where none currently exist or existing alarms do not function, whether there are combustion appliances in the home or not.
- All CO alarms installed shall be the equivalent to the latest Underwriters Laboratory standard, ANSI/UL 2034, and comply with NFPA 720. Installed CO alarms may be used that sound alarm at a lower concentration of CO than 9ppm.

**Fire Extinguishers:** Not installed under the Maine Weatherization Program.

**Testing Protocols**

Existing alarms are tested for correct operation and checked for adequate location to conform with NFPA 720.

**Client Education**

All owner’s manuals for installed detectors are given to clients. The energy auditor instructs clients how to operate and maintain the equipment and how to respond to an alarm.

**Training**

Installers are directed to NFPA 720 for installation requirements.

**7.20 – Occupant Health and Safety Concerns and Conditions**

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What guidance do you provide Subgrantees for soliciting the occupants’ health and safety concerns related to components of their homes?
- When a person’s health may be at risk and/or WAP work activities could constitute an H&S hazard, the occupant will be required to take appropriate action based on severity of risk.
- Failure or the inability to take appropriate actions must result in deferral.

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?
Screen occupants to reveal known or suspected health concerns either as part of initial application for weatherization, during the audit, or both. When clients volunteer information, use follow up questions to determine the extent of issues. WAP staff will develop and ask screening questions specific to COVID 19.

What guidance do you provide Subgrantees for dealing with potential health concerns when they are identified?
- Energy auditors must inform the client of any known risks related to specific weatherization measures and explain any precautionary measures or actions they should take.
- WAP staff must provide clients with SDS for any materials being installed in the home.
- If clients determine that a measure will put them at risk, the energy auditor must consider an alternative that achieves the objective. For example, substitute vinyl backed fiberglass if spray foam is an issue.
- If screening questions indicate symptoms of COVID 19 in occupants or workers, work will be deferred. Subgrantees must establish policies and follow up accordingly if an occupant or worker is symptomatic or tests positive for COVID 19.

Client Education
- Inform client in writing of any known risks.
- Provide client with Subgrantee point of contact information in writing so client can inform of any issues.
- If deferral is necessary, the client will be informed in writing of the nature and extent of the problem, how the problem results in deferral and what is needed for weatherization to proceed.

7.21 – Ventilation and Indoor Air Quality

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Funding
DOE ☑ LIHEAP ☑ State ☐ Utility ☐ Other ☐

Identify the Most Recent Version of ASHRAE 62.2 Implemented (optional: identify Addenda used)
ASHRAE 62.2 2016

Testing and Final Verification Protocols
To pass a final inspection, the QCI must include a calculation demonstrating compliance with ASHRAE 62.2-2016. QCIs use the REDCalc tool designed by Residential Energy Dynamics: http://www.residentialenergydynamics.com/REDCalcFree/Tools/ASHRAE6222016

When internet service is unavailable, QCI may use the Maine WAP ASHRAE spreadsheet: http://www.mainehousing.org/partners/partner-type/community-agencies/maine-weatherization-programs

They must also obtain a client signature and upload the Final Ventilation Checklist

### Client Education

- The auditor will interview clients regarding health conditions of occupants with the intent of determining if air quality might be adversely affecting them.
- The client is required to sign the Final Ventilation Form which states, “The process of ventilation has been explained to me and I understand that altering the settings/disconnecting the ventilation equipment may result in unhealthy indoor air quality.” This is explained during the audit and inspection.

### Training

Energy auditors and QCIs regularly attend trainings and conferences that specify changes to ASHRAE guidance. WAP staff will be trained on ASHRAE version changes in-state via webinar and Building Technical Committee meetings prior to implementation.

#### 7.22 – Window and Door Replacement, Window Guards

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

Window and door replacements are not allowable as H&S measures. Maine WAP does not install window guards.

**Testing Protocols**

N/A

**Client Education**

Client education packets include information on lead paint risk related to door and window replacement.

**Training**

State Monitors reinforce WPN 17-7 guidance ongoing as needed.

#### 7.23 – Worker Safety (OSHA, etc.)

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

2020 DOE Health And Safety Plan Template COVID-19 076012020 (Redlined)
• State Monitors conduct in progress inspections of all Subgrantee weatherization crews and contractors. State Monitors are certified through OSHA’s 30 hour General Industry training and are certified RRP Lead Renovators.
• In progress inspections assess whether contractors and crew are following OSHA standards, safety protocols specific to COVID 19, and RRP rules, where required, and take precautions to ensure the H&S of themselves and other workers.
• Applicable on-site standards are assessed, including but not limited to:
  • RRP lead safe practice, safety protocols specific to COVID 19, trip and fall hazards, machine guarding, proper labeling and use of ladders inside and outside, proper use of and appropriate PPE, extension cord condition and use, equipment maintenance, safe storage of materials, dust containment, proper precautions for spray foam installation, first aid on site, worker concerns, client concerns, compliance with the current OSHA Hazard Communication Standard, including on-site organized Safety Data Sheets.
• State Monitors will perform onsite inspections of completed and in-progress units statewide on a monthly basis.
• State Monitors may conduct on-site training by informing the crew leader of concerns. Within 30 days of the site inspection, the State Monitor submits a Unit Inspection Report to the Subgrantee. Reports include findings and any required corrective actions, communications with the client/owner and contractor, observations and an assessment of the contractor’s performance.
• If significant issues are identified, State Monitors will increase in progress monitoring, work with the Subgrantee and contractor where needed, identify training needs and provide training where needed.

Training and Certification Requirements

• It is the responsibility of the agency and/or the entity performing the weatherization work to initiate and maintain programs that comply with applicable Occupational Health and Safety Act Regulations (29 CFR 1910 and 1926) and any other applicable federal or state laws enacted to protect worker safety.
• MaineHousing supports weatherization contractors’ attendance of HPC conferences and in-state trainings on safe work practice topics using DOE T&TA funds as allowable.
• Free OSHA 10 and OSHA 30 trainings are offered in-state on a regular basis by the Maine Bureau of Labor. MaineHousing supports attendance using DOE T&TA funds as allowable.

7.24 – COVID 19

Concurrence, Alternative, or Deferral

WAP activities are affected by the COVID 19 pandemic. In accordance with Federal and State guidance, WAP activities may be modified, i.e. suspended, operated at lower capacity, units deferred, or other appropriate actions, as conditions change and knowledge of the virus evolves.

Funding

| DOE | LIHEAP | State | Utility | Other |

Remediation Protocols

Remediation of viruses is not an allowable cost. However, in the unprecedented environment of COVID 19, PPE, cleaning and disinfecting materials and supplies, and reasonable allowance for extra time needed to
meet safe work practice protocols specific to COVID 19 will be allowable H&S costs. See 7.5-Biologicals and Unsanitary Conditions.

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Clients will be informed of Grantee and Subgrantees’ protocols for working safely during assessments, weatherization, and inspections. Clients will be informed of policies and actions to be taken if an occupant or worker is symptomatic or tests positive for COVID 19.

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WAP workers will receive training specific to COVID 19 workplace safety and communicating with clients.

### 7.24 – <Add in Topic>

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