

# South Carolina Weatherization Health and Safety Plan

## 1.0—GENERAL INFORMATION

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

Subgrantees are to spend no more than \$2,000 of DOE Formula Health and Safety funds on any one dwelling.

## 2.0—BUDGETING

Grantees are encouraged to budget H&S costs as a separate category and, thereby, exclude such costs from the Average Cost Per Unit (ACPU) cost limitation. This separate category also allows these costs to be isolated from energy efficiency costs in evaluations. H&S costs that are budgeted and reported under the Program Operations category rather than the H&S category, must be included in the calculation of the ACPU and cost-justified through the Grantee's Department of Energy (DOE) program-approved energy audit tool.

Select which option used below.

Separate H&S Budget ☒

Contained in Program Operations ☐

## 3.0—H&SEXPENDITURE LIMITS

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

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

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

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

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

DOE recommends reviewing recent budget requests and compare those to actual H&S expenditures to see if previous budget estimates have been accurate. The resulting Total Average H&S Cost per Unit multiplied by the Grantee's production estimate in the Annual File should correlate to the H&S budget amount listed in the Grantee's annual plan.

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

The budget request for Health and Safety for Program Year 2026 is \$335,160. This represents 18% of program operations \$1,835,722. This is slightly more than the percentage that was requested in Program Year 2025 (15%). The maximum amount of DOE funds that can be spent on Health and Safety measures is \$2,000 per dwelling (BIL Health and Safety maximum remains \$1,050).

The attached spreadsheet lists the spending for BIL/IJA Health and Safety, DOE Health and Safety, and LWAP Health and Safety spending between July 2024 (OEO's go-live date for LITT) and May 2026. BIL/IJA Health and Safety spending totals \$272,342.44 on 366 BIL/IJA completions (average spending of \$744 per dwelling). DOE Health and Safety spending totals \$233,490.50 on 269 completions (average spending of \$868 per dwelling). LWAP Health and Safety spending totals \$3,019,126.02 on 635 total completions (average spending of \$4,755 per dwelling). OEO requests this increase to DOE Health and Safety funds to allow subgrantees to conserve their LWAP Health and Safety funds. LWAP Health and Safety funds are typically spent on costly measures such as HVAC replacements that do not qualify as Energy Conservation Measures.

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

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

[HS Report.xlsx](#)

## **4.0—INCIDENTAL REPAIR MEASURES**

Any measures that could be identified as Health and Safety which the Grantee chooses to instead identify and treat as an Incidental Repair Measure (IRM), must be implemented consistently throughout the Grantee's weatherization program. The measure must fit the regulatory definition of an IRM and be cost justified along with the associated Energy Conservation Measure (ECM) and/or package of measures. [10 CFR 440.3](#) defines Incidental Repairs as, "those repairs necessary for the effective performance or preservation of weatherization materials."

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

Any measure installed in conjunction with an Energy Conservation Measure (ECM) will be considered an Incidental Repair Measure (IRM). ECMs are defined as measures applied to a dwelling that improve the energy efficiency of the dwelling. If an auditor deems a repair to be necessary and it is not associated with an ECM, it may be considered a Health and Safety Measure (provided it is allowed by the approved Health and Safety Plan).

Incidental Repairs are those repairs necessary for the effective performance or preservation of weatherization materials, but not part of a standard installation. Such repairs include but are not limited to the framing or repair of windows and/or doors that could not be caulked or weather-stripped and the provision of protective materials, such as paint, to seal installed materials. South Carolina will adhere to WPN 19-5 in determining when measures meet the criteria to be considered IRMs.

Repairing a small roof leak will be considered a Health and Safety measure when no attic insulation is installed, but will be considered an Incidental Repair Measure when attic insulation is installed.

Vapor barriers will always be installed as Health and Safety measures.

The maximum amount of DOE funds that can be spent for incidental repairs per dwelling is \$500. LWAP funds can be used to supplement DOE funds.

The total cost of all IRMs, not to exceed \$500 in DOE funding, is added to the cost of the package of weatherization measures to calculate the whole unit Savings to Investment Ratio (SIR).

There is no cap on LWAP funds that can be used for IRMs, but the cumulative SIR (which includes the IRMs) must be 1.0 or higher to spend DOE funds on the dwelling.

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

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

Required topics are:

➤ **Occupant Pre-existing or Potential Health Condition Screening**

- Provides documentation that allows occupant(s) to self-report known or suspected health concerns as part of initial application for weatherization, during the energy audit, or other part of the weatherization process as specified.

Must minimally contain the following:

- Any known risks associated with the measures and materials being installed
- Subgrantee point of contact information for occupant(s)
- Date of screening

➤ **Hazard Identification Notification**

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

➤ **Radon Informed Consent Form**

- Provides documentation that the occupant(s) (and landlord if applicable) have been informed of any potential hazards associated with radon in weatherized dwellings. The form must minimally contain the following:
  - An explanation on the potential small risk of increasing radon levels when building tightness is improved. This is based on the results of the [Buildings Assessment of Radon Reduction Interventions with Energy retrofits Expansion Study \(The BEX Study\)](#)
  - A list of precautionary measures WAP will install based on [EPA Healthy Indoor Environment Protocols](#).
  - Some of the benefits of Weatherization including energy savings, energy cost savings, improved home comfort, and increased safety.

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

During the intake process, subgrantees interview applicants regarding common health and safety issues in homes including moisture problems, mold and mildew, and lead-based paint. The subgrantee gives the applicant an opportunity to address any unique health and safety issues. All health and safety information is captured on Form 100 (Client Interview Form).

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

During the energy audit, subgrantees conduct a thorough examination of the dwelling for potential energy efficiency measures and health and safety issues. Once the audit is complete, subgrantees explain the measures that will be installed. In addition, the client receives three EPA documents at this point in the process:

- A Brief Guide to Mold, Moisture, and Your Home
- A Citizen's Guide to Radon
- The Lead-Safe Certified Guide to Renovate Right

The client is asked to complete three forms indicating they received and reviewed the EPA documents. The subgrantee then addresses any concerns or questions the client has with the EPA documents or weatherization measures.

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

If any health concerns are identified, the subgrantee may need to defer the home until the concerns can be addressed. If a deferral is required, the subgrantee will complete the Deferral of Service Notification (Form 107). This form outlines the specific issues that must be addressed before weatherization work can begin and how to notify the subgrantee when they are addressed.

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

Separate attachment to SF424 ☒

Separate attachment to H&S Plan ☐

## 6.0—HEALTH AND SAFETY CATEGORIES

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

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

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

### Required Actions

Concur with DOE Guidance ☒

Alternative Guidance ☒

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☒

- Replace, repair, or install primary heating systems when existing primary heating systems are unsafe, inoperable, or nonexistent. No home may be left without a safe primary heating system after weatherization where climate conditions require heating (i.e., all climate zones except zone 1 as defined by ASHRAE). If unable to meet this requirement, deferral is required.
- No DOE-funded weatherization work is permitted if the completed dwelling unit will be heated with an unvented combustion space heater as the primary heat source. The primary heat source must be replaced with a vented unit prior to or by weatherization. The replacement unit must be sized to heat the entire dwelling unit.
- Unsafe secondary heating units, including space heaters, must be repaired, or removed and disposed of, or deferral is required. Secondary unvented space heaters are considered unsafe if they:
  - are not listed and labeled as meeting ANSI Z21.11.2;
  - have an input rating of more than 40,000 BTU/hour;
  - are in a bedroom and have an input rating of more than 10,000 BTU/hour;
  - are in a bathroom and have an input rating of more than 6,000 BTU/hour;
  - are operating in an unsafe manner (e.g., high carbon monoxide (CO) readings, too close to combustible materials, lack sufficient combustion air volume); or
  - are not permitted by the Authority Having Jurisdiction (AHJ).
- DOE WAP Grantees and Subgrantees must comply with the Manufactured Home Construction and Safety Standards which mandate 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, 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.
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- All HVAC replacements must first be modeled in LITT to determine if they can be completed as a cost-effective Energy Conservation Measure (ECM).
- HVAC clean and tunes must be completed with LWAP H&S or DES funds.
- Programmable or smart thermostats must be installed with LWAP H&S or DES funds.
- Use LWAP H&S or DES to funds to provide the client with a six-month supply of HVAC air filters for either a newly installed or existing system.

### Allowable Actions

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

  

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| <ul style="list-style-type: none"> <li>Subgrantees must use alternative funds (LWAP Health and Safety or DES) to pay for air conditioner, heat pump, or HVAC repair or replacement that cannot be completed as a cost justified ECM. This may also include duct and register repair or replacement.</li> <li>Prior to replacing an air conditioner, heat pump, or HVAC system, a Manual J calculation must be performed based on post-retrofit dwelling characteristics.</li> <li>HVAC refrigerant pipes can be insulated as a Health and Safety measure if deemed necessary by the energy auditor to prevent moisture or condensation.</li> <li>Ducts can be insulated to reduce moisture if the audit does not return duct insulation as an ECM.</li> </ul> |
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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Prohibited Actions</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Using DOE WAP H&S funds for replacement or installation of secondary heat sources is prohibited.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Required Testing/Inspection</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Concur with DOE Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <ul style="list-style-type: none"> <li>Verify that primary heating systems are present, operable, and performing correctly.</li> <li>Conduct combustion appliance testing and visual inspection of all combustion appliances and their related venting per ANSI/BPI-1200-S-2017 Standard Practice for Basic Analysis of Buildings.</li> <li>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).</li> <li>CO testing is required for all combustion appliances, regardless of venting type.</li> <li>Verify proper clearances for all combustion venting types.</li> <li>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.</li> <li>Conduct pre- and post- weatherization worst case CAZ depressurization testing in spaces that have 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 to be left operational, the home cannot be weatherized unless the vent meets national or local codes.</li> <li>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.</li> </ul> |

  

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| <b>Grantee Combustion Testing Action Levels</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Refer to the Retrofitting South Carolina Weatherization Field Guide, 2.0201.01 Combustion Appliance Zone (CAZ) Testing.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Grantee Woodstove &amp; Fireplace inspection/testing policy including actions/limits</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Concur with DOE Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Fireplace or woodstove venting that will be left operational after weatherization must meet current local or national standards or the home must be deferred.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Required Occupant Education</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Concur with DOE Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <ul style="list-style-type: none"> <li>Appropriate use and maintenance of units.</li> <li>Provide all paperwork and manuals for any equipment installed by weatherization.</li> <li>Discuss and provide information on proper disposal of bulk fuel tanks when not removed as part of the weatherization work.</li> <li>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.</li> <li>Discuss thermostat use and how higher settings for cooling and lower settings for heating can impact the</li> </ul> |

client's energy costs.

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

| Required Actions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                               |                                                                    |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|--------------------------------------------------------------------|
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Alternative Guidance <input type="checkbox"/> | Results in Deferral/Referral <input type="checkbox"/>              |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                               | Alternative Funds <input checked="" type="checkbox"/>              |
| <ul style="list-style-type: none"> <li>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).</li> <li>Grantees must have written policy included in their H&amp;S plan for: <ul style="list-style-type: none"> <li>Identifying and managing suspected ACM that provides for reasonable and necessary precautions to prevent asbestos contamination in the home.</li> <li>Addressing blower door testing where suspected friable ACM is present (as defined by EPA), including vermiculite.</li> </ul> </li> </ul> |                                               |                                                                    |
| Grantee ACM policy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                               |                                                                    |
| <ul style="list-style-type: none"> <li>Assume asbestos is present in suspect covering materials.</li> <li>When suspected friable ACM is present, defer the dwelling until testing determines otherwise.</li> <li>No blower door testing is allowed if there is suspected friable ACM present.</li> <li>The removal of ACM is not an allowable Health and Safety cost.</li> <li>When deferral is necessary due to suspected asbestos, occupant must provide documentation that a certified professional certifies the materials are free of asbestos or has performed remediation before work can continue.</li> </ul>                                                                                             |                                               |                                                                    |
| Grantee Blower Door Testing Policy When Suspected ACM Exists                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                               |                                                                    |
| When friable Asbestos Containing Material (ACM) is suspected, in the home, the blower door test will not be conducted. The house will be deferred until the customer can provide documentation that a certified professional validates the suspected material is either free of asbestos or has been properly remediated                                                                                                                                                                                                                                                                                                                                                                                          |                                               |                                                                    |
| Allowable Actions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                               |                                                                    |
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                               | Allowed with Alternative Funds <input checked="" type="checkbox"/> |
| <ul style="list-style-type: none"> <li>Temporary removal and reinstallation of ACM siding to perform an ECM (e.g., wall insulation).</li> <li>Removal of asbestos siding is allowed to perform energy conservation measures. All precautions must be taken not to damage siding. Asbestos siding should never be cut or drilled. Known asbestos containing building components shall not be handled during weatherization work in a way which could cause the transmission of asbestos dust into the air.</li> </ul>                                                                                                                                                                                              |                                               |                                                                    |
| Prohibited Actions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                               |                                                                    |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                               |                                                                    |
| Using DOE WAP H&S funds for general abatement/removal/or replacement of asbestos siding, thermal system insulation (TSI) or Transite, or vermiculite is prohibited.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                               |                                                                    |
| Required Testing/Inspection                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                               |                                                                    |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Alternative Guidance <input type="checkbox"/> | Results in Deferral/Referral <input type="checkbox"/>              |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                               | Alternative Funds <input checked="" type="checkbox"/>              |
| <ul style="list-style-type: none"> <li>Visually inspect all surfaces (i.e., walls, floors, ceilings, roofs) for suspected ACM prior to drilling or cutting.</li> <li>Assume asbestos is present in suspect materials unless testing reveals otherwise.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                               |                                                                    |

| Allowable Testing/Inspection                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Allowed with Alternative Funds <input checked="" type="checkbox"/> |
| <ul style="list-style-type: none"> <li>Sample collection and testing of suspected ACM conducted by an Asbestos Hazard Emergency Response Act of 1986 (AHERA) certified tester.</li> <li>Baseline indoor environmental asbestos sampling.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                  |                                                                    |
| Required Occupant Education                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                    |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Alternative Guidance <input type="checkbox"/>                      |
| <ul style="list-style-type: none"> <li>Formally notify the occupant, and landlord if applicable, in writing: <ul style="list-style-type: none"> <li>of suspected ACMs that are present and what precautions will be taken to ensure the occupants' and workers' safety during weatherization;</li> <li>of results if testing was performed;</li> <li>not to disturb suspected ACM; and</li> <li>when deferral is necessary due to asbestos, occupant, or landlord if applicable, must provide documentation that a certified professional performed the remediation before work can continue.</li> </ul> </li> </ul> |                                                                    |

| 6.3 – Biologicals and Unsanitary Conditions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                    |                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|------------------------------------------------------------------|
| Required Actions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                    |                                                                  |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Alternative Guidance <input type="checkbox"/>                      | Results in Deferral/Referral <input checked="" type="checkbox"/> |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Alternative Funds <input checked="" type="checkbox"/>              |                                                                  |
| Deferral where conditions (odors, bacteria, raw sewage, rotting wood, etc.) in the home pose a health risk to occupants and/or weatherization workers or may be worsened by weatherization activities (e.g., air sealing) and will not be resolved by weatherization.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                    |                                                                  |
| Allowed Actions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                    |                                                                  |
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Allowed with Alternative Funds <input checked="" type="checkbox"/> |                                                                  |
| <ul style="list-style-type: none"> <li>Limited remediation (not more than \$1,000) of conditions that may lead to or promote biological concerns and unsanitary conditions is allowed. This includes plumbing or sewage repair. Items totaling more than \$1,000 should be addressed with LWAP or Dominion Energy Settlement (DES) funds as Health and Safety measures if the subgrantee's budget permits. Weatherization Readiness Funds (WRF) can also be used provided the dwelling would otherwise be deferred.</li> <li>Addressing bacteria and viruses is not an allowable cost.</li> <li>Deferral may be necessary in cases where conditions in the home pose a health risk to occupants and/or those installing weatherization measures.</li> <li>See Mold and Moisture section for more information.</li> </ul> |                                                                    |                                                                  |
| Required Testing/Inspection                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                    |                                                                  |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Alternative Guidance <input type="checkbox"/>                      | Results in Deferral/Referral <input type="checkbox"/>            |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Alternative Funds <input checked="" type="checkbox"/>              |                                                                  |
| Sensory inspection of interior, exterior, attics, and subspaces of the dwelling.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                    |                                                                  |
| Prohibited Testing/Inspection                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                    |                                                                  |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                    |                                                                  |
| DOE WAP H&S funds may not be used for testing of materials for biological contaminants.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                    |                                                                  |
| Required Occupant Education                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                    |                                                                  |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Alternative Guidance <input type="checkbox"/>                      |                                                                  |
| <ul style="list-style-type: none"> <li>Inform client in writing of observed conditions.</li> <li>Provide information on how to maintain a sanitary home.</li> <li>When deferral is necessary, complete Deferral Form 107 with description of conditions that must be met for weatherization to commence.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                    |                                                                  |

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

### Allowable Actions

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☒

Incidental and minor repairs are permitted. If a dwelling requires repairs beyond this scope, the unit will be deferred until the work is completed by the homeowner or funded through alternative sources.

Incidental repairs are those necessary to ensure the effective performance and long-term preservation of an Energy Conservation Measure (ECM).

Minor repairs are those that do not meet the definition of a major repair.

Any dwelling conditions requiring repairs beyond incidental or minor work must be deferred or resolved using alternative funding sources.

‘Major’ repairs can be completed with LWAP or DES funds as Health and Safety measures if the subgrantee’s budget permits.

Weatherization Readiness Funds (WRF) can also be used provided the dwelling would otherwise be deferred.

### Prohibited Actions

Concur with DOE Guidance ☒

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

Using DOE WAP H&S funds for building rehabilitation is prohibited.

### Define “major” repairs

Major repairs are any improvements or renovations that exceed \$1,000.

### Required Testing/Inspection

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☒

Visual inspection of building structure and roofing for damages that compromise building durability and to verify that portions of the home where weatherization will occur are safe for entry and performance of assessments, work, and inspections.

### Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☐

Allowed with Alternative Funds ☐

N/A

### Prohibited Testing/Inspection

Concur with DOE Guidance ☒

Using DOE WAP H&S funds for any testing/evaluation of structural materials by a third-party is prohibited.

### Required Occupant Education

Concur with DOE Guidance ☒

Alternative Guidance ☐

Notify occupant in writing of structurally compromised areas.

## 6.5 – Code Compliance

### Allowable Actions

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☒

Correction of preexisting building code compliance issues is not an allowable cost with DOE WAP H&S funds except when triggered by weatherization measures being installed in a specific room or area of the home. When correction of preexisting code compliance issue(s) is related to an installed weatherization measure(s), cite specific code requirements with reference to the weatherization measure(s) that are related to the code compliance issue. Include this information in the client file. LWAP or DES funds can be utilized to address preexisting building code issues if the subgrantee's budget permits.

#### Prohibited Actions

Concur with DOE Guidance ☒

- 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 H&S funds for work on condemned properties and properties where H&S conditions exist that cannot be corrected under this guidance is prohibited.

#### Required Testing/Inspection

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☐

Alternative Funds ☐

Visual inspection.

#### Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☐

Allowed with Alternative Funds ☐

N/A

#### Required Occupant Education

Concur with DOE Guidance ☒

Alternative Guidance ☐

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

## 6.6 – Electrical

#### Required Actions

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☒

Provide sufficient over-current protection and damming prior to insulating building components containing knob and tube wiring, as required by the AHJ. If standard insulation practices are followed around knob and tube wiring, there must be documented photo evidence that the circuit is dead. Insulation should never be blown in walls if active knob and tube wiring exists in the dwelling.

#### Allowable Actions

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☒

Electrical repairs will be addressed as IRMs if related ECMs are installed (for example repairing wiring in an attic after insulation is blown). Otherwise, Health and Safety funds may be used to address minor electrical issues/repairs. Minor electrical repairs include installing junction boxes in attics and in crawlspaces, repairing wall receptacles, repairing switches and defective lighting fixtures, securing loose wiring, replacing a malfunctioning breaker, and replacing unsafe electrical panels as determined by a licensed electrician.

#### Prohibited Actions

Concur with DOE Guidance ☒

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

#### Define "major" repairs

A major repair is something other than those listed above in the minor repairs section that exceeds \$1,000. For example, a major repair would include rewiring an entire dwelling. LWAP or DES funds may be used to complete a 'major' repair if the subgrantee's budget

permits.

#### Required Testing/Inspection

Concur with DOE Guidance ☒ Alternative Guidance ☐ Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒ Alternative Funds ☒

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

#### Allowable Testing/Inspection

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

Voltage drop and voltage detection testing are allowed.

#### Required Occupant Education

Concur with DOE Guidance ☒ Alternative Guidance ☐

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

## 6.7 – Fuel Leaks

#### Required Actions

Concur with DOE Guidance ☒ Alternative Guidance ☐ Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒ Alternative Funds ☒

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

#### Allowable Actions

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

- Replacement or repair of leaking bulk fuel tanks and/or lines if connected systems will remain after weatherization.
- Replacement of flexible appliance gas connectors that are not compliant with current fuel gas codes.

#### Prohibited Actions

Concur with DOE Guidance ☒

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

#### Required Testing/Inspection

Concur with DOE Guidance ☒ Alternative Guidance ☐ Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒ Alternative Funds ☒

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

#### Allowable Testing/Inspection

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

|                                                                                                                   |                                               |
|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|
| Testing of exposed gas lines for fuel leaks from utility coupling into, and throughout, the home.                 |                                               |
| <b>Prohibited Testing/Inspection</b>                                                                              |                                               |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                      |                                               |
| Using DOE WAP H&S funds for environmental testing of soil or water is prohibited.                                 |                                               |
| <b>Required Occupant Education</b>                                                                                |                                               |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                      | Alternative Guidance <input type="checkbox"/> |
| Inform occupants in writing of fuel leak testing results, including specific location if fuel leaks are detected. |                                               |

| 6.8 – Gas Ovens/Stovetops/Ranges                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                    |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
| Allowable Actions                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                    |
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                            | Allowed with Alternative Funds <input checked="" type="checkbox"/> |
| <ul style="list-style-type: none"> <li>When testing indicates a problem, standard maintenance on gas cooktops and ovens is allowed.</li> <li>Gas ranges will be visually inspected for operability and flame quality. Clients will be notified that a clean and tune or repair is recommended if the flame has any discoloration, flame impingement, an irregular pattern, or if the burners are visibly dirty, corroded, or bent.</li> </ul> |                                                                    |
| Prohibited Actions                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                    |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                  |                                                                    |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                    |                                                       |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|-------------------------------------------------------|
| Using DOE H&S funds for replacement of gas ovens/ranges/stovetops is prohibited. DOE H&S funds can be used for repair of gas ovens/ranges/stovetops. Replacement of gas ovens/ranges/stovetops with LWAP or DES funds (including switching the fuel source) is allowed.                                                                                                                                                                                                                                                |                                                                    |                                                       |
| Required Testing/Inspection                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                    |                                                       |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Alternative Guidance <input type="checkbox"/>                      | Results in Deferral/Referral <input type="checkbox"/> |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Alternative Funds <input checked="" type="checkbox"/>              |                                                       |
| <ul style="list-style-type: none"><li>• Test gas ovens for CO.</li><li>• Grantee H&amp;S plan must define action levels and resulting actions.</li><li>• Visually inspect cooking burners and ovens for operability and flame quality.</li></ul>                                                                                                                                                                                                                                                                       |                                                                    |                                                       |
| Define action levels for oven CO testing and resulting actions                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                    |                                                       |
| <ul style="list-style-type: none"><li>• If the CO exceeds the threshold limit of 225 Parts per Million (PPM) as measured, the appliance will be cleaned.</li><li>• If the CO exceeds the threshold limit of 225 PPM as measured after cleaning , the appliance will be serviced.</li><li>• If the CO exceeds the threshold limit of 225 PPM as measured after servicing, the dwelling may be deferred or the appliance may be replaced with alternative (LWAP, DES, or other approved braided source) funds.</li></ul> |                                                                    |                                                       |
| Allowable Testing/Inspection                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                    |                                                       |
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Allowed with Alternative Funds <input checked="" type="checkbox"/> |                                                       |
| Testing for CO is allowed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                    |                                                       |
| Required Occupant Education                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                    |                                                       |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Alternative Guidance <input type="checkbox"/>                      |                                                       |
| Inform occupants of the importance of using exhaust ventilation when cooking and the importance of keeping burners and broilers clean to limit the production of CO.                                                                                                                                                                                                                                                                                                                                                   |                                                                    |                                                       |

| 6.9 – Hazardous Materials |
|---------------------------|
| Required Actions          |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                    |                                                       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|-------------------------------------------------------|
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Alternative Guidance <input type="checkbox"/>                      | Results in Deferral/Referral <input type="checkbox"/> |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Alternative Funds <input checked="" type="checkbox"/>              |                                                       |
| <ul style="list-style-type: none"> <li>Hazardous Waste Materials generated by weatherization work (e.g., refrigerant, asbestos, lead, mercury, CFL lighting bulb/ballasts, etc.) must be disposed of according to all local and federal laws, regulations, and guidelines, as applicable. Costs specifically related to disposal may be charged as an H&amp;S expense.</li> <li>Subgrantees must document disposal requirements in contract language with the responsible party.</li> <li><b>Limited</b> removal of pollutants that pose a risk to workers is required (e.g., flammable liquids, hazardous chemicals, and other air pollutants) as defined the Grantee's H&amp;S Plan.</li> <li>If removal cannot be performed or is not allowed by the occupant, the unit must be deferred.</li> </ul> |                                                                    |                                                       |
| <b>Define "limited" removal of pollutants</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                    |                                                       |
| Limited removal of pollutants is any action below the previously defined major repair limit of \$1,000.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                    |                                                       |
| <b>Allowable Actions</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                    |                                                       |
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Allowed with Alternative Funds <input checked="" type="checkbox"/> |                                                       |
| Any pollutant that poses a direct risk to weatherization workers or occupants may be removed with DOE H&S funds provided the cost to remove the pollutants is \$1,000 or less. LWAP or DES funds may be used for to remove pollutants where the cost exceeds \$1,000.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                    |                                                       |
| <b>Prohibited Actions</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                    |                                                       |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                    |                                                       |
| Using DOE WAP H&S funds for Lead, Asbestos, and Radon abatement is prohibited.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                    |                                                       |
| <b>Required Testing/Inspection</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                    |                                                       |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Alternative Guidance <input type="checkbox"/>                      | Results in Deferral/Referral <input type="checkbox"/> |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Alternative Funds <input checked="" type="checkbox"/>              |                                                       |
| Sensory inspection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                    |                                                       |
| <b>Allowable Testing/Inspection</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                    |                                                       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                    |                                                       |
| Allowed with DOE WAP H&S Funds <input type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Allowed with Alternative Funds <input type="checkbox"/>            |                                                       |
| N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                    |                                                       |
| <b>Prohibited Testing/Inspection</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                    |                                                       |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                    |                                                       |
| Using DOE WAP H&S funds for any testing for hazardous materials is prohibited other than that specifically permitted in the asbestos, lead, and radon sections of this document.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                    |                                                       |
| <b>Required Occupant Education</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                    |                                                       |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Alternative Guidance <input type="checkbox"/>                      |                                                       |
| <ul style="list-style-type: none"> <li>Inform occupant in writing of hazards associated with hazardous waste materials being generated/handled in the home.</li> <li>Inform occupant in writing of observed hazardous condition and associated risks.</li> <li>Provide occupant written materials on safety issues and proper disposal of household pollutants.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                    |                                                       |

## 6.10 - Injury Prevention of Occupants

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                    |  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|--|
| <b>Allowable Actions</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                    |  |
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Allowed with Alternative Funds <input checked="" type="checkbox"/> |  |
| <ul style="list-style-type: none"> <li>Repairs or replacement of stairs, including attic, basement, banister, or outdoor, and installation of handrails may be completed with DOE H&amp;S funds when necessary to effectively weatherize the home so long as such actions do not meet the definition of a 'Major' repair.</li> <li>Additional non-'Major' repairs to floors, walls, and ceilings are also allowed with DOE H&amp;S funds when necessary to effectively weatherize the home.</li> <li>To reduce risk of fires, vent dryers to the outside or replace vinyl flexible dryer vent with metal flexible dryer vent.</li> <li>To reduce fall risks and improve client mobility, LWAP or DES funds can be used to construct and install wheelchair ramps.</li> </ul> |                                                                    |  |

Installation of wheelchair ramps must receive prior approval from OEO.

#### Prohibited Actions

Concur with DOE Guidance ☒

Using DOE WAP H&S funds for **major** repairs, as defined by the Grantee's H&S Plan, is prohibited. LWAP or DES funds can be used to complete 'major' repairs if the subgrantee's budget permits.

#### Define "major" repairs

A major repair is any measure that is intended to mend or restore a deficient area of the dwelling with costs exceeding \$1,000.

- 

#### Required Testing/Inspection

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☒

Visually inspect for dangers that would prevent weatherization.

#### Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☐

Allowed with Alternative Funds ☐

N/A

#### Required Occupant Education

Concur with DOE Guidance ☒

Alternative Guidance ☐

If identified hazardous conditions will not be corrected during weatherization, inform occupant in writing of observed hazards and associated risks utilizing Form 111 Weatherization Hazard identification Form required by WPN 22-7.

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

#### Required Actions

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☒

- Subgrantees must comply with EPA's Lead; Renovation, Repair and Painting Program (RRP) rules when working in pre-1978 housing unless testing confirms the work area to be lead free. This includes, but is not limited to:
  - Client file documentation including the Certified Renovator's certification; any training provided on-site; description of specific actions taken; lead testing and assessment documentation; and photos of site and containment set up. Include the location of photos referenced if not in file. During annual monitoring, OEO verifies all contractors, energy auditors, and quality control inspectors have an active Lead Certified Renovator certification. In addition, for any pre-1978 homes that are monitored, OEO confirms Form 103 (Certified Renovator Compliance Form) is completed and verifies via photos that proper testing and abatement procedures were followed.
  - Certification and training requirements of the RRP rule.
  - Job site set up and cleaning verification by a Certified Renovator.
- Only those costs directly associated with lead safe work practices for surfaces directly disturbed during weatherization activities are allowable WAP H&S expenses.

#### Allowable Actions

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☒

Health and Safety funds can only be expended for lead safe work on surfaces that are directly disturbed during weatherization.

#### Prohibited Actions

Concur with DOE Guidance ☒

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                    |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>Using DOE WAP H&amp;S funds for lead abatement is prohibited.</li> <li>Using DOE WAP H&amp;S funds for purchase, resourcing, or maintenance of X-ray Fluorescence (XRF) devices is prohibited.</li> </ul>                                                                                                                                                                                                                                                              |                                                                    |
| <b>Allowable Testing/Inspection</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                    |
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                            | Allowed with Alternative Funds <input checked="" type="checkbox"/> |
| <ul style="list-style-type: none"> <li>Testing to determine the presence of lead in paint that will be disturbed by weatherization measures is allowed with EPA-approved testing methods.</li> <li>Testing methods must be economically feasible and justified.</li> <li>Job site set up and cleaning verification must be performed by a Lead Safe Certified Renovator.</li> <li>During annual monitoring, the grantee will verify that contractors and crews are using lead safe work practices.</li> </ul> |                                                                    |
| <b>Required Occupant Education</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                    |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Alternative Guidance <input type="checkbox"/>                      |
| Follow pre-renovation education requirements per EPA RRP rules (Form 103 Lead Certified Renovator and 103 A Lead Education Pamphlet).                                                                                                                                                                                                                                                                                                                                                                         |                                                                    |

| 6.12 – Mold and Moisture                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                    |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
| Allowable Actions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                    |
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Allowed with Alternative Funds <input checked="" type="checkbox"/> |
| <ul style="list-style-type: none"> <li>Limited water damage repairs (floors, ceilings, crawlspaces) are allowed when necessary to ensure the long-term stability of weatherization measures.</li> <li>Source control (i.e., correction of moisture and mold creating conditions) to weatherize the home and to ensure the long-term stability and durability of the measures. Source control is independent of damage and related repairs. Source control includes but is not limited to, site drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, vapor retarders, moisture barriers, ground covers, etc.</li> <li>Vapor barriers will be installed in accordance with the South Carolina Weatherization Field Guide in the crawlspace of all site-built homes and any manufactured home additions with site-built characteristics (no belly to act as the vapor barrier). Refer to the South Carolina WAP Policy and Procedures Manual for questions on accessibility issues related to the crawlspace.</li> <li>Vapor barriers are not required for a manufactured home if the belly is intact or can be repaired to a suitable condition.</li> <li>Ground covers can be installed under manufactured homes. See The Vapor Barrier section in the South Carolina WAP Policy and Procedures Manual for specifics on the differences between vapor barriers and ground covers and the funding limits for ground covers. Ground covers must be paid for with LWAP or DES funds.</li> <li>Window and door repairs are allowed with LWAP or DES funds to resolve a bulk water intrusion issue that is the cause of visible biological growth and in compliance with the most current program notice (WPN 19-5 at the time of this guidance).</li> </ul> |                                                                    |

| <ul style="list-style-type: none"> <li>Repair or replacement of crawl space doors and belly repair for manufactured homes are allowable measures to combat mold and moisture.</li> <li>To prevent outdoor spigots from freezing, spigot covers may be installed with alternative funds during the fall or winter months (September, October, November, December, January, or February).</li> </ul> |  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Prohibited Actions                                                                                                                                                                                                                                                                                                                                                                                 |  |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                       |  |
| <ul style="list-style-type: none"> <li>Using DOE WAP H&amp;S funds for mold cleanup is prohibited.</li> <li>Window and door replacement is only allowed with LWAP or DES funds. All window and door replacements must first be</li> </ul>                                                                                                                                                          |  |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                               |                                                                    |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|--------------------------------------------------------------------|
| modeled in LITT to determine if they can be completed as a cost-effective Energy Conservation Measure (ECM).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                               |                                                                    |
| <b>Required Testing/Inspection</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                               |                                                                    |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Alternative Guidance <input type="checkbox"/> | Results in Deferral/Referral <input type="checkbox"/>              |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                               | Alternative Funds <input checked="" type="checkbox"/>              |
| Visual assessment for moisture or mold damage including exterior drainage.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                               |                                                                    |
| <b>Allowable Testing/Inspection</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                               |                                                                    |
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                               | Allowed with Alternative Funds <input checked="" type="checkbox"/> |
| Diagnostic tools such as moisture meters or relative humidity measurements are allowable at the initial energy audit and final inspection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                               |                                                                    |
| <b>Prohibited Testing/Inspection</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                               |                                                                    |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                               |                                                                    |
| Using DOE WAP H&S funds for mold testing of any type is prohibited.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                               |                                                                    |
| <b>Required Occupant Education</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                               |                                                                    |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                               | Alternative Guidance <input type="checkbox"/>                      |
| <ul style="list-style-type: none"> <li>• Provide client written notification and disclaimer on mold and moisture awareness utilizing Mold and Moisture Form 102 and 'A Brief Guide to Mold, Moisture, and Your Home' pamphlet.</li> <li>• Provide information on importance of cleaning and maintaining drainage systems.</li> <li>• Provide information on proper landscape design and how this impacts site drainage and moisture control.</li> <li>• When deferral is necessary, complete Deferral Form 107 with description of conditions that must be met for weatherization to commence.</li> </ul> |                                               |                                                                    |

| 6.13 - Occupant Pre-existing or Potential Health Conditions                                                                                                                                                                                                                                                                                                                                                                                |                                               |                                                         |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|---------------------------------------------------------|
| <b>Required Actions</b>                                                                                                                                                                                                                                                                                                                                                                                                                    |                                               |                                                         |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                               | Alternative Guidance <input type="checkbox"/> | Results in Deferral/Referral <input type="checkbox"/>   |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                      |                                               | Alternative Funds <input checked="" type="checkbox"/>   |
| <ul style="list-style-type: none"> <li>• When a person's health may be at risk and/or WAP work activities could constitute an H&amp;S hazard, the occupant is required to take appropriate action based on severity of risk.</li> <li>• Deferral, if occupant risk cannot be mitigated.</li> </ul>                                                                                                                                         |                                               |                                                         |
| <b>Allowable Actions</b>                                                                                                                                                                                                                                                                                                                                                                                                                   |                                               |                                                         |
| Allowed with DOE WAP H&S Funds <input type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                    |                                               | Allowed with Alternative Funds <input type="checkbox"/> |
| N/A                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                               |                                                         |
| <b>Required Testing/Inspection</b>                                                                                                                                                                                                                                                                                                                                                                                                         |                                               |                                                         |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                               | Alternative Guidance <input type="checkbox"/> | Results in Deferral/Referral <input type="checkbox"/>   |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                      |                                               | Alternative Funds <input checked="" type="checkbox"/>   |
| <ul style="list-style-type: none"> <li>• Screen occupants for known or suspected health concerns either as part of initial application for weatherization, during the audit, or both.</li> <li>• Form 100 (Client Interview) is used by subgrantees to identify health concerns. Should deferral be necessary due to pre-existing or potential health conditions, complete Deferral Form 107 detailing the reason for deferral.</li> </ul> |                                               |                                                         |
| <b>Allowable Testing/Inspection</b>                                                                                                                                                                                                                                                                                                                                                                                                        |                                               |                                                         |
| Allowed with DOE WAP H&S Funds <input type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                    |                                               | Allowed with Alternative Funds <input type="checkbox"/> |
| N/A                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                               |                                                         |
| <b>Required Occupant Education</b>                                                                                                                                                                                                                                                                                                                                                                                                         |                                               |                                                         |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                               |                                               | Alternative Guidance <input type="checkbox"/>           |

- Inform occupant in writing of any known risks and provide pre-weatherization screening form.
- Provide occupant with Subgrantee point of contact information in writing.

## 6.14 – Pests

### Required Actions

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

Homes should be deferred where infestation of pests cannot be reasonably removed or where the infestation poses health and safety concerns for workers.

### Allowable Actions

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

- Pest removal is allowed only where infestation would prevent weatherization. Pest removal limited to \$1,000 of DOE H&S funds.
- Screening of windows and other points of access including belly repair of a manufactured home to prevent intrusion is allowed.
- Replacement of broken or inoperable windows and doors are allowed to prevent pest entry. These measures must be completed with LWAP Health and Safety or DES funds.
- Repair or replacement of mobile home skirting can be completed with LWAP H&S or DES funds.

### Allowable Testing/Inspection

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

Visual assessment of presence and degree of infestation and risk to workers.

### Required Occupant Education

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

- Inform client in writing of observed conditions and associated risks.
- When deferral is necessary, complete Deferral Form 107 with description of conditions that must be met for weatherization to commence.

## 6.15 – Radon

### Required Actions

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

- Cover exposed dirt floors within the pressure/thermal boundary with a sealed soil gas retarder.
- Cover sump well/pits with airtight covers.
- Implement ventilation as required by ASHRAE 62.2-2016.

### Allowable Actions

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

- In homes where radon may be present, work scope may include additional precautionary measures based on EPA Healthy Indoor Environment Protocols for Home Energy Upgrades.
- Other precautions may include, but are not limited to, sealing any observed floor and/or foundation penetrations, isolating the basement from the conditioned space, and ensuring crawl space venting is installed and operable.

### Prohibited Actions

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

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

### Allowable Testing/Inspection

|                                                                                                                                                                                                                             |                                                                    |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                          | Allowed with Alternative Funds <input checked="" type="checkbox"/> |
| Free testing is made available to all weatherization clients through the South Carolina Department of Health and Environment Control.                                                                                       |                                                                    |
| <b>Required Occupant Education</b>                                                                                                                                                                                          |                                                                    |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                | Alternative Guidance <input type="checkbox"/>                      |
| <ul style="list-style-type: none"> <li>• Clients must sign the Radon Informed Consent Form 108 before weatherization services can begin.</li> <li>• Clients must receive the EPA's 'A Citizen's Guide to Radon'.</li> </ul> |                                                                    |

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

| Required Actions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                    |                                                       |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|-------------------------------------------------------|
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Alternative Guidance <input type="checkbox"/>                      | Results in Deferral/Referral <input type="checkbox"/> |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Alternative Funds <input checked="" type="checkbox"/>              |                                                       |
| <ul style="list-style-type: none"><li>Smoke Alarms: Where alarms are not present or are inoperable, one UL-217 listed smoke alarm will be installed outside sleeping areas and on each habitable floor within every weatherized home. Alarms shall have non-removable, non-replaceable 10-year lithium batteries.</li><li>Carbon Monoxide Alarms: Where alarms are not present or are inoperable, one CO alarm will be installed outside the sleeping area and on each habitable floor within every weatherized home. Alarms shall be sealed lithium battery unit.</li><li>Mark the installation date on each smoke and CO alarm installed.</li></ul> |                                                                    |                                                       |
| Allowable Actions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                    |                                                       |
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Allowed with Alternative Funds <input checked="" type="checkbox"/> |                                                       |
| <ul style="list-style-type: none"><li>Replace functional smoke or CO alarm batteries if designed to be replaceable.</li><li>Provide fire extinguishers where solid fuel burning equipment is present.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                    |                                                       |

| Prohibited Actions                                                                                                                             |                                                         |                                                       |
|------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|-------------------------------------------------------|
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                   |                                                         |                                                       |
| Using DOE WAP H&S funds for replacement of functional smoke or CO alarms that are not beyond the manufacturer’s stated lifetime is prohibited. |                                                         |                                                       |
| Required Testing/Inspection                                                                                                                    |                                                         |                                                       |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                   | Alternative Guidance <input type="checkbox"/>           | Results in Deferral/Referral <input type="checkbox"/> |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                          | Alternative Funds <input checked="" type="checkbox"/>   |                                                       |
| Verify operation and age of installed alarms.                                                                                                  |                                                         |                                                       |
| Allowable Testing/Inspection                                                                                                                   |                                                         |                                                       |
| Allowed with DOE WAP H&S Funds <input type="checkbox"/>                                                                                        | Allowed with Alternative Funds <input type="checkbox"/> |                                                       |
| N/A                                                                                                                                            |                                                         |                                                       |

|                                                                                                                                                           |                                               |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|
| <b>Required Occupant Education</b>                                                                                                                        |                                               |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                              | Alternative Guidance <input type="checkbox"/> |
| Provide occupant with verbal and written information on use of newly installed devices and the potential risks of not properly maintaining these devices. |                                               |

## 6.17 – Ventilation and Indoor Air Quality

| Required Actions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                               |                                                                    |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|--------------------------------------------------------------------|
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Alternative Guidance <input type="checkbox"/> | Results in Deferral/Referral <input type="checkbox"/>              |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                               | Alternative Funds <input checked="" type="checkbox"/>              |
| Install ventilation as required by ASHRAE 62.2 - 2016. If occupant refuses ventilation as required by ASHRAE 62.2, the home must be deferred.                                                                                                                                                                                                                                                                                                                                                                     |                                               |                                                                    |
| Allowable Actions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                               |                                                                    |
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                               | Allowed with Alternative Funds <input checked="" type="checkbox"/> |
| Required Testing/Inspection                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                               |                                                                    |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Alternative Guidance <input type="checkbox"/> | Results in Deferral/Referral <input type="checkbox"/>              |
| DOE WAP H&S Funds <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                               | Alternative Funds <input checked="" type="checkbox"/>              |
| <ul style="list-style-type: none"> <li>ASHRAE 62.2 evaluation to determine required post-weatherization ventilation.</li> <li>Measure fan flow of existing fans and of installed equipment to verify performance.</li> <li>Attic baffles can be added as a Health and Safety measure to improve ventilation even if no insulation is installed as an ECM. The baffles must be paid for with LWAP H&amp;S or DES funds.</li> <li>Attic hatches/coffins can be installed with LWAP H&amp;S or DES funds.</li> </ul> |                                               |                                                                    |
| Allowable Testing/Inspection                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                               |                                                                    |
| Allowed with DOE WAP H&S Funds <input type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                               | Allowed with Alternative Funds <input type="checkbox"/>            |
| N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                               |                                                                    |
| Required Occupant Education                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                               |                                                                    |
| Concur with DOE Guidance <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                               | Alternative Guidance <input type="checkbox"/>                      |
| <ul style="list-style-type: none"> <li>Provide occupant with information on function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation system and components.</li> <li>Provide occupant with equipment manuals for installed equipment.</li> <li>Include disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality.</li> </ul>                                                                                  |                                               |                                                                    |

## 6.18 – Water Heaters

*(See Combustion Appliances for combustion related requirements)*

### Allowable Actions

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☒

- Minor safety repairs of water heaters are allowed (temperature and pressure-relief) valve piping, backflow prevention devices, expansion tanks) provided they do not exceed the major repair limit of \$1,000.
- Replace, repair, or install primary water heater when existing primary water heater is unsafe, inoperable, or nonexistent.
- Water heater timers can be installed with LWAP HS or DES funds. Make sure to educate the client on proper use.

### Required Testing/Inspection

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☒

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

### Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☒

Combustion Appliance Zone (CAZ) testing is allowed.

### Required Occupant Education

Concur with DOE Guidance ☒

Alternative Guidance ☐

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

## 6.19 – Worker Safety

### Required Actions

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☒

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

### Allowable Actions

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☒

- Removal of clutter and miscellaneous items to clear work zones for contractors or crews is allowable. Cost must not exceed \$350 (of any funding source).
- Equipment purchases to protect the health and safety of workers including Personal Protective Equipment (PPE) and jobsite cleaning supplies.

### Prohibited Actions

Concur with DOE Guidance ☒

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

### Define "major" repairs

A major repair is any measure:

- other than repairing stairs or installing or repairing handrails, or
- exceeds the previously defined major repair limit of \$1,000.

| Allowable Testing                                                   |                                                                    |
|---------------------------------------------------------------------|--------------------------------------------------------------------|
| Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>  | Allowed with Alternative Funds <input checked="" type="checkbox"/> |
| Environmental and surveillance testing required by OSHA regulation. |                                                                    |