

Define “limited” removal of pollutants		
“Limited” removal of pollutants is defined as only removing pollutants that are necessary to perform weatherization work (oil paint cans, oil in garages, etc.) and if the pollutants pose a risk to workers.		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
“Limited” removal of pollutants that pose a risk to the occupant or worker is allowable.		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Using DOE WAP funds for Lead, Asbestos, and Radon abatement.		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
Sensory inspection.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
Visual inspection to identify hazardous waste materials (e.g., refrigerant, asbestos, lead, mercury, CFL lighting bulb, ballasts, etc.).		
Prohibited Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Using DOE WAP funds for any testing for hazardous materials other than that specifically permitted in the asbestos, lead, and radon sections of this document.		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
<ul style="list-style-type: none"> • Inform occupant in writing of hazards associated with hazardous waste materials being generated/handled in the home. • Inform occupant in writing of observed hazardous condition and associated risks. • Provide occupant written materials on safety issues and proper disposal of household pollutants. 		

6.10 - Injury Prevention of Occupants		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
Workers must take all reasonable precautions against performing work on homes that will subject workers or occupants to health and safety risks. Minor repairs and installation may be conducted only when necessary to effectively weatherize the home. Otherwise, these measures are not allowed. WAP auditors/assessors will inform clients of dangerous and unsafe condition of the home, and will be referred to other local social service agencies if repair/replacement is beyond the project scope.		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Using DOE WAP funds for major repairs, as defined by Hawaii’s H&S Plan.		
Define “major” repairs		
“Major” repairs are defined as any repair exceeding the projected average cost per unit during the given program year. DOE funds will not be used to make general home repairs. Stairs, handrails, and other general repairs will not be made with DOE funds. Clients will be referred to other local social service agencies if repair/replacement is beyond the project scope. If worksite is not safe, weatherization work will be deferred until a safe work environment can be provided by the client.		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>

DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input type="checkbox"/>
Visually inspect for dangers that would prevent weatherization.	
Allowable Testing/Inspection	
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
Visually inspect for dangers that would prevent weatherization.	
Required Occupant Education	
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
If identified hazardous conditions will not be corrected during weatherization, inform occupant in writing of observed hazards and associated risks utilizing the "Hazard Identification Notification Form" required by WPN 22-7.	

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

Required Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
<p>DOE funds will be used for lead paint testing, site set-up, clean-up, and verification on all pre-1978 homes. Work that disturbs painted surfaces on pre-1978 housing must be in accordance with the EPA's Lead RRP requirements. All testing, job site set-up, and clean up must be supervised by a Certified Renovator and each crew member must be accompanied by a Certified Renovator. Typical work that may disturb lead paint in pre-1978 homes could include window or through wall room air conditioners. Only those costs directly associated with lead safe work practices for surfaces directly disturbed during weatherization activities are allowable H&S expenses. Solar or hybrid hot water system installed with through the wall penetrations will also follow LRRP and LSW. Refer to Hawaii's Field Guide for more information on LSW practices. It is doubtful that the disturbance of paint will be affected beyond the minimum levels for these measures, but if it will, the job will be deferred.</p> <p>Deferral is required when the extent and condition of lead-based paint in the house would potentially create further health and safety hazards. If it appears that extensive amounts of lead paint will be disturbed by weatherization creating further health and safety hazards, the client will be notified that the job will be deferred.</p>		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
Only those costs directly associated with lead safe work practices for surfaces directly disturbed during weatherization activities are allowable H&S expenses.		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Using DOE WAP funds for lead abatement. Using DOE WAP funds for purchase, resourcing, or maintenance of X-ray Fluorescence (XRF) devices.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
Testing to determine the presence of lead on surfaces that will be disturbed by WAP measure installation is allowed with EPA-approved testing methods. If EPA-approved testing is not conducted, the Subgrantee may assume lead is present and work in compliance with EPA RRP rules. Job site set-up and cleaning verification is required by a Certified Renovator.		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
Follow pre-renovation education requirements per EPA RRP rules. Where lead paint is present, clients must receive and acknowledge with signature, the most current EPA "Renovate Right" pamphlet. When deferral is necessary, WAP auditors/assessors will provide information in writing describing conditions that must be met in order for weatherization to commence.		

6.12 – Mold and Moisture

Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Hawaii will not be correcting any mold and moisture problems. If these problems are encountered during assessment, the home will be deferred until problems are resolved. Suspected mold or severe moisture problems will be identified, using sight and smell, during the early stages of an assessment and a determination made of the severity or extent of the problem. If the problem is too severe to weatherize the home, client will be notified, and job deferred until problem is resolved.

Limited water damage repairs that can be addressed by weatherization workers are allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. Source control (i.e., correction of moisture and mold creating conditions) is allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. Source control is independent of latent damage and related repairs. Correction of minor drainage, gutters or down spouts to direct rainwater away from the building is allowable if within the cost limitations. Installation of gutters, down spouts, extensions, flashing, sump pumps, and landscape is not an allowable cost. Surface preparation where weatherization measures are being installed (i.e., cleaning mold off window trim in order to apply caulk) must be charged as part of the ECM, not to the H&S budget category. Disposal of any material removed from the structure will be done in an environmentally acceptable manner.

Prohibited Actions

Concur with DOE Guidance

Using DOE WAP funds for mold cleanup.

Using DOE WAP funds for window and door replacements.

Required Testing/Inspection

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

Visual assessment for moisture or mold damage including exterior drainage.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Diagnostics such as material moisture content, or relative humidity measurements at the audit and/or final inspection.

Prohibited Testing/Inspection

Concur with DOE Guidance

Using DOE WAP funds for mold testing of any type.

Required Occupant Education

Concur with DOE Guidance

Alternative Guidance

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

6.13 - Occupant Pre-existing or Potential Health Conditions

Required Actions

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

During application intake or home assessment/audit, subgrantees will determine if a person’s health may be at-risk and/or the work activities could constitute a health or safety hazard. The occupant at-risk will be required to take appropriate action based on severity of risk. Failure or the inability to take appropriate actions must result in a deferral. Failure or the inability to take appropriate actions must result in a deferral.

At the time of application or during the home assessment/audit, the occupant must complete a “Client Health Survey,” identifying potential health issues of the applicant and all occupants of the dwelling. This survey will be inserted into the client file for future reference. The information collected during this process will be used to aid in determining the best material and course of action for the weatherization process. When an occupant’s health is fragile and/or work activities would constitute a health or safety hazard, the occupant(s) at-risk will be required to leave the home during work activities. If the occupant is unable to leave the home and the intended work may exacerbate an occupant’s health condition, the home may need to be deferred.

Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Occupants at-risk will be asked to leave home during weatherization work to make sure weatherization work does not make health condition worse. If at-risk occupants cannot be relocated during weatherization work, then the home will be deferred. Training will be provided on how to assess occupant pre-existing conditions and determining course of action is required.

Required Testing/Inspection

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

Screen occupants for known or suspected health concerns during the home assessment/audit by utilizing the “Client Health Survey” that identifies any known risks associated with the measures and materials being installed, Subgrantee point of contact information for occupants, and date of screening.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

If at-risk occupants cannot be relocated during weatherization, the home shall be deferred.

Required Occupant Education

Concur with DOE Guidance

Alternative Guidance

- 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

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

Deferral of homes where infestation of pests cannot be reasonably removed or poses H&S concern for workers.

Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Pest removal is allowed only where infestation would prevent weatherization. If the presence of pests interferes with weatherization, job will be deferred until pests are removed.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Assessment of presence and degree of infestation and risk to workers.

Required Occupant Education

Concur with DOE Guidance

Alternative Guidance

Inform occupant in writing of observed conditions and associated risks.

6.15 – Radon

Required Actions

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

Since homes will not be sealed due to natural ventilation, there will be no testing for radon. Only baseload measures will be installed which should not affect infiltration or concentration of radon in homes.

Allowable Actions

Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
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Clients will be referred to EPA and EPA consumer’s guide to radon if they have concerns about radon.

Prohibited Actions

Concur with DOE Guidance <input checked="" type="checkbox"/>
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Using DOE WAP funds for radon mitigation.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
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No DOE funding will be used for radon testing.

Required Occupant Education

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
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- Provide all occupants EPA’s A Citizen’s Guide to Radon and inform them of radon related risks.
- Occupants must sign an informed consent form prior to receiving weatherization services.

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

Required Actions

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

Install CO alarms in every home where alarms are not present or are inoperable in compliance with ASHRAE 62.2-2016 which references NFPA 720 (note: NFPA 720 has been incorporated into NFPA 72).

Allowable Actions

Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
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Install smoke alarms is allowed where detectors are not present or are inoperable. Replace functional smoke alarms and carbon monoxide alarms if they are beyond the manufacturer’s stated lifetime (usually 10 years). Replace functional smoke or carbon monoxide alarm batteries if designed to be replaceable.

Prohibited Actions

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

Using DOE WAP funds for replacement of functional smoke or carbon monoxide alarms that are not beyond the manufacturer’s stated lifetime.

Required Testing/Inspection

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

WAP auditors/assessors will test existing smoke alarms and carbon monoxide detectors for operation and age of installed safety devices.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
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WAP auditors/assessors will test existing smoke alarms and carbon monoxide detectors for operation and age of installed safety devices.

Required Occupant Education

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

Whole house ventilation and local exhaust provisions of ASHRAE 62.2 – 2016 will not be performed in Hawaii. Deferral is required for homes where both mechanical cooling is present, and the building has an established pressure boundary. Other components of ASHRAE 62.2 – 2016 such as separating air movement from attached garages and properly venting dryers will be enforced.

Deferral is required for homes where both mechanical cooling is present, and the building has an established pressure boundary. Homes must also be deferred where guidance within this plan cannot address high polluting sources, mold and moisture concerns, or the presence of unacceptable air quality as identified through sensory inspection. Homes that require work beyond the scope of this guidance will be deferred and referred to service organizations that can potentially address the identified hazard or health and safety concern. If the occupant refuses ventilation as required by ASHRAE 62.6, the home must be deferred.

Allowable Actions

Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
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Hawaii homes are in Climate Zone I, are designed to have free movement of air between the indoors and outdoors, and no effort is being made through weatherization to establish an air barrier. Therefore, Hawaii’s Weatherization Assistance Program is not required to meet the ventilation requirements outlined in ASHRAE 62.2 – 2016, except in any room that may be enclosed and contain a source of water or combustion.

Required Testing/Inspection

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

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

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
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All homes will be assessed to determine if mechanical cooling is present, and the building has an established pressure boundary. If both are present, the home must be deferred. If neither or only one of the two conditions is present, then weatherization work may continue. All homes must also be assessed for attached garages, clothes dryers, combustion appliances (proper ventilation), high polluting sources, mold and moisture concerns, or the presence of unacceptable air through sensory moisture inspection. Where attached garages are present, they must be sealed to separate air flow from the interior of the home. Where clothes dryers are present, they must be properly vented to the outdoors. Refer to ASHRAE 62.2 – 2016 standard for full implementation requirements. Also see Combustion Gases and Mold and Moisture sections above.

Excess materials used in meeting this ventilation standard will be retained by the agency. Items requiring removal from the home will be properly disposed by WAP crews and must not be left with the client.

Required Occupant Education

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
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Client will be provided with information on location of service switch and cleaning instructions, function, use, and maintenance of ventilation system and components where present or installed. WAP crews will provide occupant with equipment manuals for installed equipment. Include disclaimer that ASHRAE 62.2 – 2016 does not account for high polluting sources or guarantee indoor air quality.

6.18 – Water Heaters

(see Combustion Appliances for combustion related requirements)

Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Replacement of water heaters for health and safety is allowed on a case-by-case basis. Replacement of water heaters with solar or hybrid heat pump water heaters will first be attempted through the priority list. Replacement and installation of other not related appliances are not allowed.

Hot water tanks that are leaking water, producing high carbon monoxide, or drafting poorly will be assessed for repair or replacement. Combustion safety testing will be performed on all gas-fired water tanks. If repair is not possible, hot water tank can be replaced. All plumbing work is performed by license contractors and must comply with local codes. Local agency staff will confirm installation and that unit is working properly.

Water heater repair/replacement will be performed by a licensed plumber. WAP auditor/assessor will be trained to determine if installation is adequate (hooked up, producing hot water, etc.). Disposal of appliances shall be according to the environmental standards in the Clean Air Act 1990, Section 608, as implemented by 40 CFR 82 (7/1/2006). Disposal shall be by contractor/vendor. Disposed units will be recycled when possible.

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

If serious electrical hazards, gross overloads, or electrical wiring exposure are present, the energy auditor shall notify the owner and document in the client's file. If such condition is present, the client's home shall be deferred to resolve such major problems prior to any weatherization work.

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

Since Hawaii’s Weatherization Assistance Program mainly installs baseloads, subgrantees’ auditors/assessors perform initial assessment, install baseloads, and perform final inspections. Installation of solar hot water systems and hybrid heat pump water heaters will be done by contractors. Room air conditioners and refrigerators are delivered and installed by vendors. Old units are disposed of by vendors per EPA guidelines. Workers must follow OSHA standards where required and take precautions to ensure the H&S of themselves and other workers. OSHA Confined Space requirements will be followed as applicable.

Equipment purchases to protect the health and safety of the worker (e.g., Personal Protective Equipment (PPE), jobsite cleaning supplies).

Prohibited Actions

Concur with DOE Guidance

Using DOE funds for major repairs as defined by Hawaii’s H&S Plan.

Define “major” repairs

“Major” repairs are defined as any repair exceeding the projected average cost per unit during the given program year.

Allowable Testing

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Environmental and surveillance testing required by OSHA regulation.

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

Required Actions

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

Insert required item text

Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

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

Prohibited Actions

Concur with DOE Guidance

What is prohibited

Required Testing/Inspection

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

Insert required item text

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

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

Prohibited Testing/Inspection

Concur with DOE Guidance

What is prohibited

Required Occupant Education

Concur with DOE Guidance

Alternative Guidance

Insert required item text