

**What's New?  
Crosswalk from WPN 11-6 to WPN 17-7**

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## General

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- Language about H&S Plan requirements was brought into the narrative portion of the guidance; previously it was after the table of tissues.
- Clarified H&S Plan requirements based on the H&S budget decision (i.e., whether to have a separate H&S budget or not).
- Removed language requiring a deferral/referral policy in the H&S Plan as redundant. The deferral/referral policy is a separate piece that covers a broader range of issues than just H&S issues, and is part of the master file. H&S Plan must still identify specific action levels related to certain issues that trigger deferral, but mustn't detail deferral and referral policies for each specific issue in the table.
- Added language requiring H&S Plans to include a policy for dealing with H&S issues identified that are life threatening and require an immediate response.
- Removed language about measure skipping. This issue is bigger than H&S and will be addressed in the FAQs.
- Draft guidance released had included specific measures that may only be charged as H&S, not as IRM (e.g., lead safe work, asbestos-related work). In many cases, those costs do not meet the definition of IRM ("necessary to preserve or protect installed ECMs"), but they may be included as part of the measure they are associated with. Additional FAQs will further clarify.
- Created a new "Attachment A" to more comprehensively address heating units and added special considerations related to various heating systems, including fireplaces, masonry chimneys, manufactured-housing specific issues and more.

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## Table of Issues

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### General

- Added deferral and other written notification requirements into Client Education.
- Removed "Appliances and Water Heaters" row, covered material in "Combustion Gases" and "Mold & Moisture" rows, as applicable.
- Added client notification requirement around testing results, if done, as in for asbestos or radon.
- Removed "Drainage" row and covered that material in "Mold & Moisture" row.
- Combined "Electrical – other than Knob & Tube" and "Electrical – Knob & Tube" into one row – "Electrical."
- Removed "Fire Hazards" row.
- Changed "OSHA & Crew Safety" row to "Worker Safety" row.
- Removed "Solid Fuel Heating," "Space Heaters, stand alone electric," "Space Heaters, unvented combustion," and "Space Heaters, vented combustion" rows. That material is covered in "Combustion Gases," and more detail provided in Attachment A.
- Removed "Spray Polyurethane Foam" row. This material is covered generally in "Worker Safety."
- Added requirement to client education to leave paperwork and manuals for any equipment installed.
- Added rows: "Gas Ovens/Stovetops/Ranges," "Fuel Leaks," and "Hazardous Materials Disposal."

## *Issue Specific*

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### **Air-Conditioning and Heating Systems/Units**

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- Clarified definition of “System.”
- Clarified sizing requirements.
- Added language from the removed space heating rows indicated above.
- Added visual inspection guidance for solid fuel appliances.
- Clarified that workers must have licenses or certifications required by the AHJ if installing heating/cooling systems.

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### **Asbestos – General**

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- Added requirement for H&S Plan to include the policy for blower door testing when suspected asbestos containing materials (ACM) are identified.
- Added requirement that client provide documentation that a certified professional performed the removal or remediation in cases where a home was deferred due to ACM and then later approached for weatherization. This is to discourage clients from trying to do this hazardous work themselves.
- Added definition of “friable.”
- Added clarification that sampling and testing is allowed only by an AHERA certified professional.

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### **Asbestos - in siding, walls, ceilings, etc.**

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- Removed recommendation to insulate from the interior, as this is redundant. Technicians know their options.

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### **Asbestos - in vermiculite**

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- Removed language recommending pressurization blower door testing, instead requiring Grantees to propose their own policy for blower door testing when suspected ACM are present. Pressurization is still an option.
- Added allowance for baseline environmental asbestos sampling, as long as Grantee has policy to inform the response to the testing results.

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### **Asbestos - on pipes, furnaces, other small covered surfaces**

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- Covered in Asbestos – General, above.

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### **Biologicals and Unsanitary Conditions**

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- N/A

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### **Building Structure and Roofing**

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- N/A

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## Code Compliance

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- Added a requirement to cite specific code reference if extra work is done due to code compliance being triggered by weatherization work.
- Removed language in “Testing” about local code enforcement inspections.

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## Combustion Gases

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- Changed language stating correction of unsafe venting was “allowed” to stating you will correct unsafe venting when testing indicates a problem.
- Added requirement to cost-test repair versus replacement and keep documentation in the client file.
- Clarified that replacement units must meet safety guidelines in Grantee’s Plan or Field Guide.
- Removed language related to gas stoves/ovens, created a separate row for that.
- Added “CO action levels” to training requirements.

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## Electrical

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- Clarified that client education about over-current protection, etc., is only *required* when electrical issues are the cause for deferral.

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

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- N/A

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## Fuel Leaks

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- All new. Added this row.

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## Gas ovens /Stovetops/Ranges

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- Added this row. Took language from “Combustion Gases” row that previously included gas stoves/ovens/ranges.
- Updated testing requirements to match current BPI standard and SWS (removed requirement for burner CO testing, is still allowed).

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## Hazardous Materials Disposal

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- Added this row, took some applicable language from previous “Appliances and Water Heaters” and “Refrigerant” rows.
- Added the requirement to document disposal requirements in contract language with the responsible party.

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## **Injury Prevention of Occupants and Weatherization Workers**

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- Added that Grantees should define what counts as “minor” repairs.

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## **Lead Based Paint**

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- Removed requirement for Lead Safe Weatherization training. This is still allowed, but minimum requirement is the EPA RRP.
- Added clarification of documentation that is required in the client file.
- Clarified that only the testing and lead safe work practices should be charged to the H&S budget.
- Added language to testing requirement related to the economic feasibility of the chosen testing method.
- Added requirement for Grantee to verify lead safe work practices.

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## **Mold and Moisture**

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- Added language from previous “Drainage” row, which has been deleted in this version of the guidance.
- Clarified that source control is allowed.
- Clarified that surface preparation costs, if any, should be charged as part of the ECM they’re associated with.

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## **Occupant Pre-existing or Potential Health Conditions**

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- Removed language around temporary relocation of occupants if they have health issues that may be exacerbated by weatherization work. This was deemed unnecessary by the network during review.
- Changed client health screening from being required at intake AND audit to being required only at one or the other. Screening at both times is still allowed.

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## **Pests**

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- Clarified that pest exclusion techniques may be included in air sealing practices.

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## **Radon**

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- Clarified that radon mitigation is not an allowable H&S expense.
- Added specifications to vapor barrier installations requirement.
- Added that WAP should consider installing radon-related precautionary measures (sealing foundation penetrations, covering open sump pits, etc.) where radon may be present.
- Added an informed consent requirement for clients. Requirements of the consent form are outlined in the guidance.
- Added proper vapor barrier installation to training requirements for workers.

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

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- Separated smoke and CO alarms requirements – smoke alarms are allowed, CO alarms are required to comply with ASHRAE 62.2.
- Added to testing: Verify operation of installed alarms.

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## **Ventilation and Indoor Air Quality**

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- Added “and Indoor Air Quality” to the title. ASHRAE 62.2 covers more than ventilation.
- Updated policy – DOE WAP no longer requires adopting most current version within one year of publication. Grantees must adopt and implement 62.2 version 2016, but after that, adoption of future versions will be voluntary.
- Added language from the standard about avoiding pressure differences greater than 3 Pascals across closed doors.
- Clarified that in Climate Zone 1 where homes are designed to have free air movement between indoors and outdoors, the ventilation requirements of ASHRAE 62.2 are not required, but other requirements of the standard apply.
- Added to client education portion “including location of service switch and cleaning instructions.”
- Removed reference to ASHRAE 62.2 FAQs, will include these in overall H&S FAQs.

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## **Window and Door Replacement, Window Guards**

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- N/A

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## **Worker Safety**

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- This was previously OSHA row.
- Added reference to OSHA Hazard Communication Standard and updated reference to MSDS (now SDS).
- Removed OSHA 10 as a requirement, although safety training is still required.
- Removed OSHA 30 requirement for crew leaders (this had already been waived, but was still in the WPN table until now).