

New Jersey Health and Safety Plan

Health and Safety Expenditure Limits

For the Department of Energy (DOE) Weatherization Assistance Program (WAP), the New Jersey Department of Community Affairs (DCA) budgets health and safety (H&S) costs in a separate budget category from Program Operations, removing H&S costs from the SIR and the per unit expenditure limitation of \$6500. DCA has expended H&S costs of 4.5% for ARRA and 5.6% for DOE Annual 2009 (as a percentage of average-per unit costs). Historically 5% was requested in 2010 and 7.7% in 2011. DCA anticipates the new requirements of ASHRAE 62.2 will increase expenditures by at least 50%. In addition, this H&S Plan calls for more grantee intervention in addressing H&S issues; therefore DCA will set an average H&S expenditure limit of 14% of the per unit average for Program Operations. This percent will vary based on actual expenditures and will be averaged across all units. Sub grantee agencies will be required to maintain their budget limitation or face disallowed costs. DCA will require sub grantees to track H&S costs and related measures in order to support future budget requests.

Deferral & Referral Policy

Clients shall be notified in writing within 7 calendar days of the site visit wherein a determination was made to defer the project due to H&S issues and where partial weatherization (only as specifically allowed in the following Plan or approved by DCA on a case-by-case basis) is not an option. The notification shall include reason(s) for deferral, any testing results, and appeal rights. Agencies are expected to make reasonable efforts on behalf of their clients to find alternative assistance when DOE funds are unable to address conditions that lead to deferral. When possible, the notice shall include a list of potential agencies with funding designed to address the specific H&S issue which precludes a client from participating.

Agencies must postpone work when problems occur that cannot be remedied within the scope of allowable measures identified in this Plan or other available grantee and sub-grantee funds.

Building rehabilitation and hazard remediation work are beyond the scope of WAP. Only those H&S corrections necessary to effectively perform weatherization, or those needed to avoid worsening H&S conditions as a result of weatherization are allowed to be performed and must fall within reasonable costs as identified in this Plan and approved by DOE. Not all observed H&S conditions need to be corrected in order to proceed with weatherization; however, the client should still be notified of any observed conditions and if the condition is not corrected it should be clearly explained in the client file how the condition is not related to the planned weatherization work. No costly testing (such as for lead, asbestos, or radon) or H&S corrections are allowed unless energy conservation measures (ECMs) are planned based on the energy audit. No WAP funded H&S activity outside of assessment and/or testing should occur unless WAP funded ECMs are being performed. Blower door results can be estimated but must be updated once testing or hazard correction is concluded. This may alter ventilation requirements and potentially impact other components of the work scope, which must be updated to accurately reflect the actual assessment data. Units must be deferred if necessary corrective work is beyond the scope of this Plan.

In order to maintain the primary energy efficiency mission of the program, H&S budgets are limited to 14% of \$4650 (New Jersey's estimated per unit expenditure for the 2012 Program Year) or an estimated \$650 per unit adjusted based on actual Program Operation expenditures. Agencies must maintain this H&S expenditure limit of 14%, on average, across all units reported to DCA or face disallowed costs except that DCA may approve waivers on a case-by-case basis. Waivers must be submitted to DCA Monitors for approval when the total H&S cost is over \$650 up to \$1,300 for an individual unit. H&S estimates over \$1,300 for an individual unit must be approved by the DCA Program Supervisor. Agencies must receive DCA approval to perform work in a home with estimated H&S costs in excess of \$650 per unit. H&S practices must be performed within the guidance of this Plan but certain discretion is left to the auditor in estimating costs and making judgments for deferral. Those judgments must be within the limitations outlined herein and detailed justification provided in the client file.

Additional considerations that may lead to deferral shall include other good cause which includes any condition which may endanger the health and/or safety of the occupant, work crew, or subcontractor as determined by the NJ

Department of Community Affairs at its sole discretion (i.e., illegal activity, pets, animal waste, and hoarding).

Reasons for deferral must be tracked by sub grantees.

Procedure for Identifying Occupant Health Concerns:

At the time of application clients will identify any occupant health issues which may affect performance of weatherization work through the completion of a questionnaire and HIPAA authorization form. At the initial site visit this information will be confirmed and inquiry made to identify any additional occupant health concerns. Health conditions will not preclude clients from receiving weatherization if reasonable accommodations can eliminate the issue. Reasonable accommodations can include temporary relocation on a case-by-case basis with approval by DCA.

Training:

DCA shall provide training to or require completions by sub-grantees and their contracted workers where applicable on this H&S Plan including specific courses in H&S assessment, combustion safety testing, ASHRAE 62.2 compliance, Lead Safe Weatherization, OSHA 10 and 30 hours courses, and other trainings necessary to fully implement this Plan. All weatherization agencies and contractors will be EPA Certified Firms and utilize EPA Certified Renovators at each pre-1978 worksite. All individuals performing work on pre-1978 dwellings shall be trained in lead-safe weatherization practices. Units weatherized may include occupants receiving Section 8 Rental Assistance which requires compliance with 24 CFR 35. Agencies performing weatherization in multiple dwellings (buildings containing 3 or more units) will require compliance with N.J.A.C. 5:10 Lead Safe Building Maintenance Practices. Training in all applicable lead courses (EPA, HUD, Lead Safe Weatherization, DCA Lead Safe Building Maintenance Practices) will be completed by March 31, 2013.

Documentation Form(s) have been developed (Check Yes or No):

Yes

Clients will be notified in writing of any observed hazards as well as reasons for deferral. These notifications will contain the required content, including the client's name and address, dates of the audit/assessment and when the client was informed of a potential health and safety issue, a clear description of the problem, a statement indicating if, or when conditions under which weatherization could continue, the responsibility of all parties involved, and the client(s) signature(s) indicating that they understand and have been informed of their rights and options. A copy of the notification(s) must be signed by the client and maintained in the client file.

Air Conditioning and Heating Systems

Concurrence or Alteration:

Concur with WPN11-6

“Red tagged” or inoperable heating system replacement, repair, or installation is allowed given the climate conditions of our service area, unless prevented by other guidance herein. Air conditioning system replacement, repair, modification, and tune-up is allowed to facilitate the replacement or modification of a heating system or in homes of at-risk occupants. At-risk occupants include any household member with medical documentation requiring air conditioning.

Funding:

Primary funding source for heating and air-conditioning is LIHEAP WAP. If those funds are exhausted and it is not a recommended measure on the energy audit, then DOE H&S funds can be used.

Beyond Scope of DOE WAP:

If it is beyond the scope of LIHEAP WAP and DOE WAP then the client will be deferred.

Standards for Remedy:

Audit software protocol will be used first to determine if heating/cooling measure is allowed. If it is not recommended through the energy audit by having an SIR of 1 or better, the system can be addressed as an H&S issue. For both heating and air conditioning systems make sure systems are present, operable, and performing. Air conditioning will only be addressed when the repair or replacement is needed for the existing heating system unless occupant is at-risk, in which case it can be addressed as part of or independently of the heating system. For air conditioning clients, determine the presence of at-risk occupants. An at-risk occupant is a household member with a medical condition documented by a physician that requires air conditioning. No new installation of air conditioning

systems is permitted where an air conditioning unit did not previously exist. Medical documentation must be no older than 180 days. Air conditioning is to be repaired when practical and costs are less than replacement.
Standards for Deferral:
Deferral will take place when the mechanical, electrical, and/or plumbing systems are in such a state of disrepair that failure is imminent and will create a hazard to occupants, or where necessary correction is beyond the scope of this Plan and/or a code compliant heating system cannot be installed due to structural issues or other H&S issues as delineated in this Plan. The primary mechanism for determining deferral of a unit is based on costs associated with correcting the H&S condition necessary in order to perform audit recommended weatherization work as defined in the DCA Deferral & Referral Policy above.
Standards for Referral:
LIHEAP will be the primary funding source for this activity. Deferred cases will be referred to publicly funded programs i.e., CDBG.
Training Provision:
Auditors and Crew will be trained in the elements of the H&S Plan and combustion safety testing training by March 31, 2013.
Client Education:
Weatherization Bulletin #718 provides guidance to sub grantees on client education strategies for recipients of heating system/appliances.
Disposal Procedures:
Disposal procedures must comply with N.J.A.C. 5:23 Uniform Construction Code including applying for permits, appropriate sub code official inspections and proper disposal of appliances, tanks, etc. Refrigerant recovery and disposal will comply with EPA Section 608 as amended by 40 CFR82. Equipment replacement contracts must include provisions for proper disposal by the contractor. Additionally, contaminated or unusable heating oil shall be disposed of by the contractor. WAP workers will not be involved with disposal.
Air Conditioning Installation (as specific to installation as a health and safety measure):
According to US DOE consumption data from 2006, the average cooling degree days for New Jersey was 934 days. Temperatures can get high enough to create a dangerous situation for at-risk clients. For air conditioning clients, determine the presence of at-risk occupants. An at-risk occupant is a household member with a medical condition documented by a physician that requires air conditioning. The documentation must be no older than 180 days. Air conditioning treatments are limited to replacement, repair, modification, and tune-up. No new installations are permitted.
Heating System Installation (as specific to installation as a health and safety measure):
According to a climate study by Rutgers University during the period of 1981-2010 the average heating degree days were 6,262. In New Jersey and like climates, death from hypothermia is prevalent when heating is not present in the home.

Appliances and Water Heaters	
Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	Replacement of water heaters is allowed on a case-by-case basis with approval from DCA. Repair and cleaning are allowed. Replacement and installation of other appliances for H&S purposes such as stoves are not allowable; however, repair and cleaning are permissible as H&S costs. The primary funding source is HIP or LIHEAP WAP. An attempt must be made to achieve a SIR and install as an ECM before H&S funds can be used. Also see Air Conditioning and Heating Systems and Combustion Gases.
Funding:	
Primary funding source is LIHEAP WAP or HIP. If those funds are exhausted and it is not a recommended measure on the energy audit then DOE H&S funds can be used.	
Beyond Scope of DOE WAP:	
If it is beyond the scope of LIHEAP WAP, HIP, and DOE WAP then the client will be deferred.	
Standards for Remedy:	
Determine whether the appliances/water heaters are operating safely. Issues related to leaking units, combustion safety, electrical concerns, and other conditions leading to water heater failure will be assessed. Combustion safety testing is required when combustion appliances are present. Audit software protocol will be used to determine if replacement or repair is recommended as an energy conservation measure. If not recommended, LIHEAP or HIP funding will be used unless exhausted.	

Standards for Deferral	
The mechanical, electrical, and/or plumbing systems are in such a state of disrepair that failure is imminent and will create a hazard to occupants, or where necessary correction is beyond the scope of this Plan. A code compliant water heater system cannot be installed due to structural issues or other H&S issues as delineated in this Plan. The primary mechanism for determining deferral of a unit is based on costs associated with correcting the H&S condition necessary in order to perform audit-recommended weatherization work as defined in the DCA Deferral & Referral Policy above.	
Standards for Referral:	
LIHEAP will be the primary funding source for this activity. Deferred cases will be referred to publicly funded programs i.e., CDBG.	
Training Provision: Discuss how training will be provided for the specific health and safety category. Note: Some health and safety categories, like OSHA, require training.	
Auditors and Crew will be trained in diagnosis, the elements of the H&S Plan and combustion safety testing training by March 31, 2013.	
Client Education:	
Weatherization Bulletin #718 provides guidance to sub grantees on the client education strategies for recipients of heating system/appliances.	
Disposal Procedures:	
The contractor shall provide for code compliant disposal in their contract with the sub grantee. All materials must be removed from the site and properly disposed of by the contractor.	

Asbestos - in siding, walls, ceilings, etc.	
Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	Temporary removal and replacement of 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. Recommended, where possible, to insulate through home interior when suspected asbestos siding is present.
Funding:	
DOE funding will be used.	
Beyond Scope of DOE WAP	
If it is beyond the scope of DOE, the unit will be deferred.	
Standards for Remedy:	
Inspect exterior wall surface and subsurface for asbestos siding prior to drilling or cutting. Remove asbestos or suspected asbestos shingles only as needed to perform the measure installation prior to drilling the sidewall and replace with removed shingles. Temporary removal of shingles is permissible under N.J.A.C. 12:120. Workers should make all attempts to create minimal breakage of shingles. Clients must be removed from the work area. Respirators and full body suits must be used by all workers while asbestos shingles are being removed and replaced.	
If it becomes necessary to remove the siding, it is recommended that it be removed with minimal breakage. To do this it should <u>not</u> be hammered, sawn, or dropped. Siding should be removed in whole pieces and then carried or lowered to the containment area (instead of letting it drop to the ground). Siding will most likely break where it is fastened to the building, these areas should be moistened with water before attempting to remove the fasteners. Often a type of pliers, called "lineman's pliers" can be used to cut off the heads of the nails. Fasteners may also be cut by inserting a reciprocating saw behind the shingle and carefully cutting it without damaging the shingle. The ground underneath the work area should be protected with heavy plastic (>= 6mil) in order to catch any debris that might inadvertently fall. Debris should be carefully removed from the plastic using a HEPA vacuum for small material at the end of every workday. In NJ it is not required that a NJ licensed asbestos contractor remove this type of material. The only exception is if the building is to be demolished. For more information on this subject, please refer to the Indoor Environments Contacts page for information on how to contact the DOH.	
Standards for Deferral:	
Clients will be deferred when asbestos or suspected asbestos shingles cannot be safely temporarily removed to allow dense pack insulation and/or clients refuse to allow insulating through the interior. Sidewall insulation cannot be skipped when called for in the energy audit but can be partially performed when the area that cannot be insulated is less than 25% of the total insulated wall area. The primary mechanism for determining deferral of a unit is based on costs associated with correcting the H&S condition necessary in order to perform audit-recommended weatherization work as defined in the DCA Deferral & Referral Policy above.	

Standards for Referral:
Deferred units will be referred to publicly funded rehabilitation programs (i.e., CDBG).
Training Provision:
Sub grantees will be trained in safe practices for siding removal and replacement and how to identify asbestos containing materials.
Client Education:
Clients must be informed that suspected asbestos siding is present and how precautions will be taken for containment and to ensure minimal breakage of siding.
Disposal Procedures:
No permanent removal of asbestos containing materials will be performed; however, some minimal breakage and fibers may be released requiring disposal. As a result, containment materials and broken shingles must be sealed in plastic and properly disposed. If the ACM being removed contains 1% or more of asbestos and is from a residential building or commercial facility and is a Category I non-friable asbestos material that is not in poor condition and is not friable, this waste may also be disposed of as ID 13C, construction and demolition debris. According to the USEPA, this is based on the fact that Category I non-friable asbestos materials, which are asbestos-containing resilient floor covering, shingles, asphalt roofing products, packing and gaskets rarely become friable if handled responsibly. Generally these materials do not release significant amounts of asbestos fibers, even when damaged. However, during the demolition activity, the waste must be handled in a responsible manner which will not cause the Category I non-friable material to become friable and become a regulated asbestos containing material (RACM).
ID 13C Construction and Demolition Solid Waste - means waste building material and rubble resulting from construction, remodeling, repair, and demolition operations on houses, commercial buildings, pavements and other structures, but not including other solid waste types.

Asbestos - in vermiculite	
Concurrence or Alteration:	
Alternative Guidance <input checked="" type="checkbox"/>	Testing is allowed with DOE funds. Encapsulation and removal are not allowed with DOE funds. Vermiculite must be assumed to contain asbestos and not disturbed other than testing performed by an AHERA certified tester. When vermiculite is present, a certified professional must be used by the client to remove it and provide documentation from the certified professional that it was removed prior to receiving WAP services. Blower door testing will not be performed unless testing shows no asbestos present.
Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.	
DOE funding will be used for testing; however, encapsulation and removal are not allowed with DOE funds.	
Beyond Scope of DOE WAP:	
If beyond the scope of DOE WAP unit will be deferred.	
Standards for Remedy:	
Assess whether suspected vermiculite is present. Do not disturb or reenter the area of the home where suspected asbestos is present unless certified to perform testing. Complete as much of the energy audit as practical without disturbing the vermiculite and estimate the blower door numbers. If ECMs are recommended from the energy audit, have the suspected vermiculite tested in accordance with the Asbestos Hazard Emergency Response Act of 1986 (AHERA) using certified prescriptive sampling performed by a certified tester. Blower door testing will not be done unless vermiculite testing has shown no asbestos is present. If asbestos is present in vermiculite, the unit must be deferred. If tests show that no asbestos is present, perform the blower door tests and complete the energy audit and update estimated numbers to determine the recommended measures.	
Standards for Deferral:	
Unit shall be deferred if client refuses testing or if asbestos containing vermiculite is confirmed via a certified tester. Partial weatherization is not an option when asbestos containing vermiculite is present. The primary mechanism for determining deferral of a unit is based on costs associated with correcting the H&S condition necessary in order to perform audit-recommended weatherization work as defined in the DCA Deferral & Referral Policy above.	
Standards for Referral:	
Deferred units shall be referred to publicly funded rehabilitation programs (i.e., CDBG).	

Training Provision:
Audit training will be provided to sub grantees on how to recognize vermiculite. Testers must be certified through the AHERA course for testing.
Client Education:
Clients should be instructed not to disturb suspected asbestos containing material. Provide asbestos safety information to the client. Notify the client of the potential observed hazard and inform them that testing will be necessary to verify the presence of asbestos. Formally notify the client if test results are positive for asbestos and have notification form signed by the client and a copy kept in the client file. If asbestos is determined to be present inform client that work can only continue if the asbestos is removed by a certified professional and appropriate documentation provided.
Disposal Procedures:
Not applicable. No asbestos containing vermiculite will be removed.

Asbestos - on pipes, furnaces, other small covered surfaces	
Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	Assume asbestos is present in unknown or common asbestos containing covering materials. Encapsulation of friable asbestos is allowed by an AHERA asbestos control professional and should be conducted prior to blower door testing. Removal may be allowed if performed by an AHERA asbestos control professional when no other remedy is possible and the treatment is necessary for the completion of the energy conservation measure. Blower door results can be estimated to complete the audit but must be updated once asbestos work is concluded.
Funding:	
DOE funds will be used, except to remove or encapsulate intact material necessary to accomplish furnace work being performed through LIHEAP or other funding source, in which case the non-DOE WAP funds should be used.	
Beyond Scope of DOE WAP:	
If beyond the scope of DOE WAP unit will be deferred.	
Standards for Remedy:	
Auditor will perform visual inspection to identify suspected asbestos containing covering materials. If suspected friable asbestos is present, minor asbestos encapsulation or removal may be performed by a certified asbestos contractor. Complete as much of the energy audit as practical without disturbing the material and estimate the blower door numbers. If the material is intact and will not be disturbed by recommended WAP activity, continue with weatherization work. Testing may be allowed where the material is suspected to contain asbestos and cost estimates for the necessary encapsulation or removal are high and could potentially be avoided. Once the friable material is encapsulated or removed or if tests show that no asbestos is present, perform the blower door tests and complete the energy audit and update estimated numbers to determine the recommended measures.	
Standards for Deferral:	
Deferral will take place when friable asbestos is unable to be corrected through this Plan. Asbestos that is intact but requiring removal for mechanical or other work must also be addressed within this Plan and cannot result in skipping audit-recommended measures or partial weatherization. The primary mechanism for determining deferral of a unit is based on costs associated with correcting the H&S condition necessary in order to perform audit-recommended weatherization work as defined in the DCA Deferral & Referral Policy above.	
Standards for Referral:	
Deferred units shall be referred to publicly funded rehabilitation programs (i.e., CDBG).	
Training Provision:	
Training will be provided to sub grantees to visually identify suspected asbestos and asbestos containing materials. Anyone disturbing suspected asbestos containing material must be a certified AHERA professional.	
Client Education:	
Inform client of any observed suspected asbestos containing material. Clients should be instructed not to disturb suspected asbestos containing material. Provide asbestos safety information to the client. If deferral is necessary, inform client that work can only continue if the asbestos is removed by a certified professional and appropriate documentation provided.	
Disposal Procedures:	
Disposal of asbestos containing materials shall be included in the contract with the AHERA certified contractor. All asbestos containing materials must be disposed of in accordance with federal and state regulations.	

Biological and Unsanitary Conditions - odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.

Concurrence or Alteration:

Concur with WPN11-6 <input checked="" type="checkbox"/>	Removal of conditions that may lead to or promote biological concerns and unsanitary conditions is allowed. Removal of condition is defined as repairing the condition that creates the biological contamination such as repairing leaking or broken waste lines. Addressing or testing for bacteria and viruses is not an allowable cost. Deferral may be necessary in cases where a known agent is present in the home that may create a serious risk to occupants or weatherization workers. Also see Mold and Moisture guidance below.
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Funding:

DOE funds can be used to address this particular H&S category.

Beyond Scope of DOE WAP:

If beyond the scope of DOE WAP then the unit will be deferred.

Standards for Remedy:

Sensory inspection will be used to identify the biological concerns. The inspection will be conducted by the agency representative provided that he/she is not exposed to hazardous biological contaminants (i.e., raw sewage, animal/human feces, decomposing garbage, and animal carcasses). Cleanup of contaminants such as decomposing garbage and animal/human feces due to the occupant's neglect are not eligible. Hazardous conditions must be corrected by a certified professional and signed clearance notification must be provided to the agency prior to weatherization continuing. Non-hazardous conditions can be corrected by the client, and if performed within 30 days, weatherization can continue.

Standards for Deferral:

Units with conditions which present a health risk to agency representatives shall be deferred if they cannot be corrected through this Plan. The primary mechanism for determining deferral of a unit is based on costs associated with correcting the H&S condition necessary in order to perform audit-recommended weatherization work as defined in the DCA Deferral & Referral Policy above.

Standards for Referral:

Deferred units shall be referred to local health departments and publicly funded rehabilitation programs.

Training Provision:

Sub grantees will be trained in how to recognize conditions and when to defer as well as worker safety when coming in contact with these conditions.

Client Education:

Inform client of observed conditions. Provide information on how to maintain a sanitary home and steps to correct deferral conditions. Inform client that hazardous conditions must be corrected by a certified professional and signed clearance notification must be provided to the agency prior to weatherization continuing. Non-hazardous conditions can be corrected by the client, and if performed within 30 days, weatherization can continue.

Disposal Procedures:

Disposal of contaminants must be performed in accordance with state and local codes.

Building Structure and Roofing

Concurrence or Alteration:

Concur with WPN11-6 <input checked="" type="checkbox"/>	Building rehabilitation and structural corrections are beyond the scope of the Weatherization Assistance Program. Homes with conditions that require more than incidental repair should be deferred. See Mold and Moisture guidance below.
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Funding:

DOE funds will be utilized to address incidental repairs, which are separate from the H&S funding category and must be included in the package SIR and the average cost per unit for Program Operations.

Beyond Scope of DOE WAP:

If the work is beyond an incidental repair then the client will be deferred.

Standards for Remedy:

Auditors will perform visual inspection. Ensure that access to areas necessary for weatherization is safe for entry and performance of assessment, work, and inspection. Only incidental repairs will be considered for funding and must be included in the package SIR and the average cost per unit for Program Operations. The package SIR must

be above 1.0 or greater to perform weatherization work. Incidental repairs are those which are performed because they are deemed necessary for the effective performance or preservation of one or more ECMs. In addition the incidental repair must be listed as ordinary maintenance or minor work as defined in N.J.A.C. 5:23.
Standards for Deferral:
Determine whether repair work is necessary and meets the definition of incidental repair. The unit must be deferred if the package SIR is below 1.0. If the work requires more than incidental repair then the client must be deferred.
Standards for Referral:
Deferred cases will be referred to publicly funded programs i.e., CDBG.
Training Provision:
Sub grantees will be trained on how to identify deficiencies and substandard conditions in housing and how to differentiate between incidental and major repair, and between incidental and H&S repairs.
Client Education:
Notify client of any housing deficiencies and/or substandard conditions or compromised areas.
Disposal Procedures:
Agencies will dispose of or include proper disposal of all construction debris as part of their contract with the contractor.

Code Compliance	
Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	Correction of preexisting code compliance issues is not an allowable cost other than where weatherization measures are being conducted or when necessary to perform weatherization work. State and local (or jurisdiction having authority) codes must be followed while installing weatherization measures. Condemned properties and properties where “red tagged” H&S conditions exist that cannot be corrected under this guidance should be deferred.
Funding:	
DOE funds will be utilized to address code compliance issues where weatherization measures are being conducted or when necessary to perform weatherization work. The cost of complying with code requirements tied to installation of a specific measure will be charged as part of the measure such as following local code to install a furnace. When not a direct component of the measure but still necessary to perform weatherization work, the costs must be charged to the H&S budget category.	
Beyond Scope of DOE WAP:	
If beyond the scope of DOE WAP then the unit must be deferred.	
Standards for Remedy:	
The auditor will perform visual inspection. Repair code violations directly connected to a weatherization measure or when necessary to perform audit-recommended weatherization work.	
Standards for Deferral:	
Code violations that are necessary to safety perform weatherization must be corrected or the unit deferred. Some preexisting code conditions may not require correction in order to continue weatherization. The primary mechanism for determining deferral of a unit is based on costs associated with correcting the H&S condition necessary in order to perform audit-recommended weatherization work as defined in the DCA Deferral & Referral Policy above.	
Standards for Referral:	
When severe structural conditions exist that place occupants at risk the agency should report to the local code officials. Deferred cases will also be referred to publicly funded programs i.e., CDBG.	
Training Provision:	
Sub grantees will be trained on how to determine what code compliance may be required.	
Client Education:	
Inform client of observed code compliance issues.	
Disposal Procedures:	
Proper disposal of construction debris is required related to repair of eligible code violations.	

Combustion Gases	
Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	Proper venting to the outside for combustion appliances, including gas dryers is required. Correction of venting is allowed when testing indicates a problem.

Funding:
DOE funds will be utilized.
Beyond Scope of DOE WAP
If beyond the scope of DOE WAP, LIHEAP funds may be used if available. If not, the unit will be deferred.
Standards for Remedy
Combustion safety testing is required when combustion appliances are present. Inspect venting of combustion appliances and confirm adequate clearances. Test naturally drafting appliances for draft and spillage under worst case conditions before and after air tightening. Inspect cooking burners for operability and flame quality.
Standards for Deferral:
Deferral will occur when correction is beyond the scope of this Plan. The primary mechanism for determining deferral of a unit is based on costs associated with correcting the H&S condition necessary in order to perform audit-recommended weatherization work as defined in the DCA Deferral & Referral Policy above. LIHEAP funds may be used if available if beyond the scope of WAP.
Standards for Referral:
LIHEAP funds may be used if available and beyond the scope of WAP. Deferred units shall be referred to the appropriate utility company and publicly funded rehabilitation programs.
Training Provision:
Sub grantees will be trained on how to perform appropriate testing, determine when a building is excessively depressurized, and the difference between air free and as-measured.
Client Education:
Provide client with combustion safety and hazards information, including the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO. Clients receive appliance-health in system evaluation forms that summarize the carbon monoxide test results of their dryers, gas ranges, heaters, and water heater. Also, information on new heating systems is provided including advice on regular maintenance.
Disposal Procedures:
Any materials removed as a result of correcting hazardous conditions must be properly disposed of.
Combustion Gas Problem Discovery:
The auditor/crew will keep records maintained in the client file of calls for service to the utility company. The auditor/crew is to contact and notify the utility immediately.

Electrical, other than Knob-and-Tube Wiring	
Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	Minor electrical repairs are allowed where health or safety of the occupant is at risk. Upgrades and repairs are allowed when necessary to perform specific weatherization measures.
Funding:	
DOE WAP or LIHEAP	
Beyond Scope of DOE WAP:	
If it is beyond the scope of DOE WAP or LIHEAP WAP then the client will be deferred.	
Standards for Remedy:	
Auditors will perform visual inspection. Voltage drop and voltage detection testing should be performed as necessary. Electrical issues should be determined if correction is necessary to safely perform weatherization activity. Electrical upgrades necessary for a specific ECM can be included in the cost of the measure.	
Agencies will seek the approval of the state when electrical overloads are likely to result from installing new appliances through the weatherization program. Weatherization Bulletin #715 provides guidance on overloads.	
Standards for Deferral:	
Deferral will occur when corrections are beyond the scope of this Plan. The primary mechanism for determining deferral of a unit is based on costs associated with correcting the H&S condition necessary in order to perform audit-recommended weatherization work as defined in the DCA Deferral & Referral Policy above. LIHEAP funds may be used if available if beyond the scope of WAP.	
Standards for Referral:	
Will be referred to publically funded programs.	

Training Provision:
Sub grantees will be trained in how to identify electrical hazards and local code compliance.
Client Education:
Provide information on overloading circuits, electrical safety/risks. Observed hazards including any existing overloads discovered at the time of the audit will be discussed with the owner and noted in the client folder.
Disposal Procedures:
Follow manufacturer's specifications and local codes & standards when disposing of any electrical equipment.

Electrical, Knob-and-Tube Wiring

Concurrence or Alteration:	
Alternative Guidance <input checked="" type="checkbox"/>	Minor upgrades and repairs necessary for weatherization measures and where the health or safety of the occupant is at risk are allowed. Must provide sufficient over-current protection where necessary. The state prohibits insulating where knob and tube wiring is live. Weatherization Bulletin # 402 states the policy guidance on knob and tube wiring.
Funding:	
DOE WAP or LIHEAP	
Beyond Scope of DOE WAP:	
If it is beyond the scope of DOE WAP or LIHEAP WAP then the client will be deferred.	
Standards for Remedy:	
Inspect for presence and condition of knob-and-tube wiring. Check for alterations that may create an electrical hazard. Voltage drop and voltage detection testing are allowed. Knob and tube wiring can be removed in order to perform weatherization measures if within the cost limitation identified in this Plan. Damming around the wire with proper clearance or skipping wall cavities where knob-and-tube is present can also be performed unless the area not being insulated is greater than 25% of the total attic/floor area or wall area respectively as called for in the energy audit.	
Standards for Deferral:	
Deferral will occur when the correction is beyond the scope of this Plan. The primary mechanism for determining deferral of a unit is based on costs associated with correcting the H&S condition necessary in order to perform audit-recommended weatherization work as defined in the DCA Deferral & Referral Policy above. LIHEAP funds may be used if available if beyond the scope of WAP.	
Standards for Referral:	
Cases will be deferred to publicly funded programs.	
Training Provision:	
Sub grantees will be trained on how to identify electrical hazards and local code compliance.	
Client Education:	
Provide information to client on over-current protection, overloading circuits, basic electrical safety/risks. Observed hazards including any existing overloads discovered at the time of the audit will be discussed with the owner and noted in the client folder.	
Disposal Procedures:	
Follow manufacturer's specifications and local codes & standards when disposing of any electrical equipment.	

Fire Hazards

Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	Correction of fire hazards is allowed when necessary to safely perform weatherization.
Funding:	
DOE WAP	
Beyond Scope of DOE WAP:	
If beyond the scope of this Plan, the unit will be deferred.	
Standards for Remedy:	
Check for fire hazards in the home during the audit and while performing weatherization.	

The state will require that heating contractors comply with industry standards, manufacturer instructions, and the Weatherization Installation Standards Manual, along with applicable codes to prevent hazardous situations where combustible materials are located dangerously close to combustion appliances. Agency crew and contractors must refer to NFPA, CABO, and BOCA codes to identify proper clearances between combustion appliances and combustible materials.

Procedures to identify potentially dangerous creosote build-up in chimneys and wood stove flues include client interview regarding wood stove use and visual inspection of the chimney. If additional examination of the chimney or wood stove flue needs to be conducted by a CSIA Certified Chimney Sweep. The procedure defined by the NFPA (National Fire Protection Association) should be followed. Weatherization Bulletin #714 and 715 also provide guidance when considering fire hazards.

Agencies will also inspect chimneys at the audit stage and inquire of clients about when chimneys and wood stove flues were last cleaned. Chimney sweeps will be allowed as an H&S measure.

Standards for Deferral

Deferral will occur when correction is beyond the scope of this Plan. The primary mechanism for determining deferral of a unit is based on costs associated with correcting the H&S condition necessary in order to perform audit-recommended weatherization work as defined in the DCA Deferral & Referral Policy above.

Standards for Referral:

Referrals will be made to publicly funded programs.

Training Provision:

Sub grantees will be trained on how to identify fire hazards.

Client Education:

Inform client of observed hazards and necessary corrections.

Disposal Procedures:

Any material waste created as a result of correcting fire hazards must be properly disposed of.

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

Concurrence or Alteration:

Concur with WPN11-6 <input checked="" type="checkbox"/>	Removal of pollutants is allowed and is required if they pose a risk to workers. If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client, the unit must be deferred.
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Funding:

DOE

Beyond Scope of DOE WAP:

If beyond the scope the unit will be deferred.

Standards for Remedy:

Auditors will perform sensory inspection. Suspected pollutants beyond small amounts of normal household cleaners must be removed from the envelope prior to weatherization and the client informed of risks associated with keeping pollutants indoors, even when ventilation is present. Permanent location of suspected pollutants should be considered in defining the envelope.

Formaldehyde vapors are emitted by pressed wood products, hardwood, plywood, wall paneling, particleboard, wafer board, environmental tobacco smoke, durable press drapes, glues, some new carpets, urea-formaldehyde foam insulation, etc. VOCs are emitted by some household cleaning products like cleansers and disinfectants; paints, paint strippers, and other solvents; preservatives; stored fuels, and automotive products; moth repellents and air fresheners; etc.

ASHRAE 62.2 addresses normal household conditions and does not account for high polluting sources. The sub grantee agencies will consider additional ventilation in homes with suspected VOC problems that are not easily removed. Client education will be provided to make clients aware of any products used in weatherization containing

formaldehyde and volatile organic compounds. Also, sub grantees will inform clients of household hazardous waste collection day programs in their county.
Standards for Deferral:
Deferral will occur when clients refuse removal of suspected pollutants or when correction is beyond the scope of this Plan. The primary mechanism for determining deferral of a unit is based on costs associated with correcting the H&S condition necessary in order to perform audit-recommended weatherization work as defined in the DCA Deferral & Referral Policy above.
Standards for Referral:
Referrals will be made to publicly funded programs.
Training Provision:
Sub grantees will be trained on how to recognize potential hazards and when removal is necessary.
Client Education:
Inform client of observed condition and associated risks. Provide client written materials on safety and proper disposal of household pollutants.
Disposal Procedures:
Any pollutants permanently removed by weatherization agencies must be properly disposed of.

Injury Prevention of Occupants and Weatherization Workers – Measures such as repairing stairs and replacing handrails.	
Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	Workers must take all reasonable precautions against performing work on homes that will subject workers or occupants to H&S risks. Minor repairs and installation may be conducted only when necessary to effectively weatherize the home; otherwise these measures are not allowed.
Funding:	
DOE funds shall be used to address this particular H&S category.	
Beyond Scope of DOE WAP:	
If beyond the scope of DOE WAP the unit shall be deferred	
Standards for Remedy:	
Observe if dangers are present that would prevent weatherization. If weatherization cannot be safely performed, the hazards must be correct by WAP if within reasonable costs or by the client prior to weatherization or the unit deferred.	
Standards for Deferral	
Deferral will occur when correction is beyond the scope of this Plan. The primary mechanism for determining deferral of a unit is based on costs associated with correcting the H&S condition necessary in order to perform audit-recommended weatherization work as defined in the DCA Deferral & Referral Policy above. LIHEAP funds may be used if available if beyond the scope of WAP.	
Standards for Referral:	
Referrals will be made to publicly funded programs.	
Training Provision:	
Awareness of potential hazards.	
Client Education:	
Inform client of observed hazards and associated risks.	
Disposal Procedures:	
Any material wastes created by weatherization agencies must be properly disposed of.	

Lead Based Paint	
Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	Follow EPA's Lead; Renovation, Repair and Painting Program (RRP). In addition to RRP, Weatherization requires all weatherization crews working in pre-1978 housing to be trained in Lead Safe Weatherization (LSW). Testing is allowed. Lead-based paint should be assumed in pre-1978 housing unless testing negative.

Funding:
DOE funds shall be used to insure proper containment, occupant protections, and cleanup are implemented as required in EPA regulations and lead-safe weatherization practices.
Beyond Scope of DOE WAP:
If treatments are beyond the scope of DOE WAP the unit shall be deferred.
Standards for Remedy:
Testing as directed under the EPA RRP Rule is allowed and recommended where estimated costs for containment are high and could potentially be avoided. Job site set up and cleaning verification is required and must be performed by an EPA Certified Renovator. Weatherization Bulletin # 608 requires that all sub grantees have Pollution Occurrence Insurance coverage and that all crew and contracted workers be certified in Lead Safe Weatherization. All firms must be EPA Certified. Certified renovator training is required of all contractors and agency crews to ensure that the state meets EPA standards for safe weatherization. Weatherization activities occurring in multiple dwellings must be performed in accordance with NJAC 5:10 Lead Safe Maintenance Requirements. All individuals performing work in multiple dwellings must be trained in NJ's lead safe maintenance requirements.
New Jersey is one of the few states in the nation that has a law ordering all children to be tested to find out how much lead is in their bodies. Since this valuable information is available, at the intake stage, agencies should request the child (ren)'s blood lead levels if known. Units occupied by a child under 6 with a blood lead level of 10ug/dL or higher shall be deferred when lead is to be disturbed by weatherization work.
Standards for Deferral:
Deferral is required when the extent and condition of lead-based paint in the house would potentially create further H&S hazards. Units occupied by known lead poisoned children (blood lead level of 10ug/dL or higher) shall be deferred when lead is to be disturbed by weatherization work. If the lead spot test is positive for lead-based paint and containment cannot be achieved and there is a risk of traffic through the work area the unit shall be deferred. The primary mechanism for determining deferral of a unit is based on costs associated with necessary containment work as defined in the DCA Deferral & Referral Policy above.
Standards for Referral:
Deferred units shall be referred to local health departments and publicly assisted housing rehabilitation programs.
Training Provision:
All weatherization crews working on pre-1978 homes must receive Lead Safe Weatherization training and be accompanied by an EPA Certified Renovator. Grantee Monitors/Inspectors must be Certified Renovators and receive LSW training.
Client Education:
Follow RRP requirements.
Disposal Procedures:
Construction and lead waste shall be disposed in accordance with state and local policies.
Lead Based Paint Compliance:
A determination must be made for all units including the year built of the home, suspected presence of lead, and any necessary actions taken and signed and kept in the client file. All testing result and post weatherization cleaning Verification Records shall be maintained in the client file such as photographs of pre and post LSW practices and photographs of LSW setup, a certified renovator acknowledgement that lead-based paint is not present. Training records for all individuals working on weatherization projects will be maintained at the agency level and shall be verified by State Monitors on a bi-annual basis. Testing certification forms for each unit must be completed by the Certified Renovator and maintained with the client file. Testing certification forms must include the specific location of the test by room and component and result. A minimum of 3 inspections per agency per year shall be conducted by the State Monitor during the performance of weatherization activities to insure that proper containment is established, occupants and their belongings are being protected, and egress routes which avoid the work area are established. The State Monitor shall stop work if the crew has failed to implement the RRP and LSW practices.

Mold and Moisture

Concurrence or Alteration:

Concur with WPN11-6



Limited water damage repairs that can be addressed by weatherization workers and correction of moisture and mold creating conditions are allowed when necessary in order to weatherize the home and to ensure the long term stability and durability of the measures. Where moderate to severe moisture or suspected mold issues cannot be addressed, deferral is required. Minor suspected mold or moisture conditions will be addressed through providing adequate ventilation at the minimum meeting ASHRAE 62.2 standards. Mold testing and cleaning are not allowable H&S costs.

Funding:

DOE funds will be used for minor repairs and moisture corrections. Mold testing and cleanup are not allowed with DOE funds.

Beyond Scope of DOE WAP:

If treatments are beyond the scope of DOE WAP the unit shall be deferred.

Standards for Remedy:

Visual assessment is required and diagnostics such as moisture meters are recommended pre-weatherization and prior to final inspection. Suspected mold of individual areas less than or equal to 10 square feet are considered minor and weatherization can continue as long as adequate ventilation or dehumidification can be provided and the homeowner instructed in cleaning the area. For moderate to severe mold conditions, if the home has more 10 square feet in any one area (conditioned or unconditioned) or more than 20 square feet in total of all areas of the home (either conditioned or unconditioned) of suspected mold it must be deferred. Identifiable moisture creating conditions must be corrected prior to weatherization or the unit deferred. High humidity, general mustiness, or sensory observed moisture where a source cannot be pinpointed must be addressed with adequate ventilation or dehumidification prior to weatherization or the unit deferred. Agency field technicians must have a relative humidity gauge because most biological containments and moisture problems can be controlled by identifying humidity levels in the attic, basement, and crawlspace. Normal household moisture can be addressed with ASHRAE 62.2 compliance but this does not account for high moisture sources. The presence of moisture in attics and basements should be considered when defining the envelope.

Standards for Deferral:

Moderate to severe moisture conditions must be corrected before weatherization can continue or the unit deferred. Units with moderate to severe suspected mold must always be deferred, since correction cannot be performed by WAP. Minor moisture or suspected mold should not normally lead to deferral except in those cases where ventilation or dehumidification is unable to be installed or not expected to correct the condition. The primary mechanism for determining deferral of a unit is based on costs associated with correcting the H&S condition necessary in order to perform audit-recommended weatherization work as defined in the DCA Deferral & Referral Policy above. NJ will also provide sub grantees with a standardized form to be used in the event that Weatherization must be deferred due to serious mold and moisture problems.

Standards for Referral:

Referrals will be made to publicly funded programs.

Training Provision:

Sub grantees will be trained using the national curriculum on mold and moisture or equivalent.

New Jersey will provide training to State Monitors and sub grantee field staff on identifying mold and moisture problems including drainage issues. The training will ensure that staff can identify suspected mold and provide the client with information on remediation.

Client Education:

Provide client notification and disclaimer on mold and moisture awareness and discuss importance of cleaning and maintaining drainage systems and proper landscape design. Instruct client in cleanup of small suspected mold covered surfaces and that large covered surfaces should be remediated by a professional.

Disposal Procedures:

Any material wastes created by weatherization agencies must be properly disposed of.

Mold Protocols:

A mold/moisture assessment must be performed in all homes and signed by the auditor and kept in the client file. Photographs of preexisting moisture damage and/or suspected mold should be dated and included in the client file

with notes regarding if the moisture condition has been or will be corrected. Post weatherization photographs should also be included. Most homes have mold spores and many have conditions that can lead to mold growth. Minor moisture and suspected mold conditions will be addressed through adequate ventilation. Suspected mold cleaning is not allowed with WAP H&S funds; however, small areas of surface preparation can be included in the costs of the measure as ancillary costs for the direct installation of a material, such as cleaning a window sill in preparation of caulking. Moisture damaged areas can be corrected as an incidental repair or H&S repair depending on their purpose and how they are justified in the client file. See Ventilation policy below.

Occupant Preexisting or Potential Health Conditions	
Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	When 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. Temporary relocation of at-risk occupants may be allowed on a case by case basis as approved by DCA. Failure or the inability to take appropriate actions must result in deferral or partial weatherization where approved by DCA on a case-by-case basis.
Funding:	
DOE	
Beyond Scope of DOE WAP:	
If beyond the scope of this Plan the unit will be deferred.	
Standards for Remedy:	
<p>Require occupant to reveal known or suspected health concerns as part of initial application for weatherization. Screen occupants again during audit to verify earlier concerns and/or to determine if addition concerns exist that may not have been included at the time of application.</p> <p>Agency staff as early as the intake stage should be alert to situations that could negatively affect the H&S of clients. Question clients about allergies or diseases that are traceable to materials used in weatherization. The client will complete an Indoor Air Quality checklist, a Building Related Illness checklist, and a Residential Moisture Problem Assessment form/checklist. Later, a decision can be made about proceeding with weatherization work or postponing work because of a major problem or installing partial weatherization with approval by DCA on a case-by-case basis.</p> <p>Agencies will become aware of clients' health problems that could be exacerbated by weatherization activities at the intake stage. Clients applying for assistance will complete a building related illness checklist to identify preexisting conditions and warn agency staff what routines will need to be modified to protect the health of clients.</p> <p>Weatherization Bulletin #406 provides directions when client health is a consideration. See Lead Based Paint guidance above.</p>	
Standards for Deferral:	
Deferral will occur when precautions cannot be practically taken to avoid harm to the client, such as relocation or timing specific work for consideration of the client's health.	
Standards for Referral:	
Referrals will be made to publicly funded programs.	
Training Provision:	
<p>Sub grantees will be trained on how to assess occupant preexisting conditions and determining what action to take if the home is not deferred. Sub grantees will be made aware of potential hazards and weatherization activity that could affect occupant health.</p> <p>The Rutgers Cooperative Extension will be requested to provide training of its Indoor Air Quality Leader program. Also, NJ WAP plans to provide Red Cross first aid & CPR class training.</p>	
Client Education:	
Provide client information of any known risks. Provide worker contact information so client can inform of any issues.	
Disposal Procedures:	
n/a	

**Occupational Safety and Health
Administration (OSHA) and Crew Safety**

Concurrence or Alteration:

Concur with WPN11-6



Workers must follow OSHA standards and Material Safety Data Sheets (MSDS) and take precautions to ensure the H&S of themselves and other workers. MSDS must be posted wherever workers may be exposed to hazardous materials.

Funding:

DOE

Beyond Scope of DOE WAP:

If beyond the scope of this Plan the unit will be deferred.

Standards for Remedy:

The state staff visiting client units will be provided protection against unreasonable conditions that could endanger their H&S before weatherization measures have been installed, during work in progress, and upon final inspection. State staff is covered under the standards of the Public Employees OSHA and any other applicable statutes, regulations, or guidelines published in the New Jersey Register which pertains to H&S matters. The expected costs for the grantee in H&S include at a minimum, safety goggles, respirators, protective suits, and gas leak detectors.

Local government staff is covered by the Public Employees OSHA for H&S protection. The private, nonprofit agency crew and private sector contractors are covered by the federal OSHA standards Title 29, Code of Federal Regulations (CFR) Part 1926. Crew/Contractors should be aware that Material Safety Data Sheets are available to learn about a potentially hazardous material's effect on the health of individuals and how to safely apply the material in a client's home. Agencies must have a binder containing MSDS for materials used by its crew or contractors.

Standards for Deferral:

Deferral will occur when OSHA required work activity is beyond the scope of this Plan. The primary mechanism for determining deferral of a unit is based on costs associated with meeting OSHA requirement in order to perform audit-recommended weatherization work as defined in the DCA Deferral & Referral Policy above.

Standards for Referral

Referrals will be made to publically funded programs.

Training Provision:

Sub grantees will be trained in use and importance of personal protection equipment. OSHA 10 hour training is required for all workers. OSHA 30 hour training is required for crew leaders.

Training will be provided for state field monitors, agency field technicians, and contractors from among these topics offered by the New Jersey Department of Labor's Occupational Safety & Health Training Unit:--Electrical Safe Work Practices

- Ergonomics for the Office
- First Aid for Bystanders
- Hand and Portable Power Tool Safety
- Hand Injury Prevention
- Hazard Awareness
- Hazard Communication
- Heat and Cold Stress and Carbon Monoxide Poisoning
- Hearing Conservation
- Ladder Safety
- Material Handling, Back Safety & Lifting Techniques
- OSHA Record Keeping
- Personal Protective Equipment
- Respiratory Protection
- Safety Audit
- Safety Program Development
- Safety Scanning

- The Supervisor and Safety
- Walking and Working Surfaces

NJ WAP plans to provide Red Cross first aid & CPR class training. Agency staff and contractors must meet drug-free workplace requirements in Weatherization Bulletin #807.

In addition, agencies must comply with Weatherization Bulletin #806, dealing with control of equipment and Weatherization Bulletin # 506, dealing with the list of disbarred contractors.

Agency crew and contractors must have the Weatherization Installation Standards Manual in their possession on the job site when issues involving the proper methods to install a material are raised.

Special attention will be given to job site accidents and injuries. OSHA's Forms for Recording Work-Related Injuries and Illnesses must be completed and kept on file at all agencies.

If they qualify, sub grantees and contractors are encouraged to use the New Jersey Department of Labor free Occupational Safety & Health On-Site Consultation program to find out about potential hazards at their worksites, and improve their occupational safety and health management systems. For enforcement activity or to register a complaint regarding a workplace safety or health hazard, contact one of the area offices of the U.S. Department of Labor's Occupational Safety and Health Administration that serve the county where the workplace is located.

Client Education:

MSDS and OSHA cards should be available to clients upon request.

Disposal Procedures:

Sub grantees and contractors must dispose of office and field equipment when obsolete in a responsible manner. Seek out county and local government programs that recycle computer and electronic equipment containing hazardous components. Also, any debris removed from a client's house, especially materials used to weatherize and which contain hazardous chemicals must be disposed of properly, in accordance with state and federal EPA rules.

OSHA and MSDS Compliance:

DCA will perform random onsite assessments to determine if crews are utilizing safe work practices. State Monitors may stop work for observed unsafe work practices.

Pests

Concurrence or Alteration:

Concur with WPN11-6 <input checked="" type="checkbox"/>	Pest removal is allowed only where infestation would prevent weatherization. Infestation of pests may be cause for deferral where it cannot be reasonably removed or poses H&S concern for workers. Screening of windows and points of access is allowed to prevent intrusion.
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Funding:

DOE WAP

Beyond Scope of DOE WAP:

If beyond the scope of DOE WAP the unit will be deferred.

Standards for Remedy:

Auditors will assess the presence and degree of infestation and risk to worker. Pest infestation that may prevent weatherization activity or potentially lead to the degradation of weatherization materials must be corrected prior to weatherization or the unit deferred. Care should be taken that installed materials are protected from pest intrusion.

Standards for Deferral.

The primary mechanism for determining deferral of a unit is based on costs associated with correcting the H&S condition necessary in order to perform audit-recommended weatherization work as defined in the DCA Deferral & Referral Policy above.

Standards for Referral:

Will be referred to local health department.

Training Provision:

Sub grantees will be trained in how to assess presence and degree of infestation, associated risks, removal, pest management, and need for deferral. Training for agencies at www.epa.gov/pesticides/factsheets/ipm.htm

Client Education:
Inform client of observed condition and associated risks as well as methods for pest management and removal.
Disposal Procedures:
All removed pests, nesting, or debris must be properly disposed of.

Radon	
Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	Whenever site conditions permit, exposed dirt must be covered with a sealed vapor barrier except for mobile homes. In homes where radon may be present, precautions should be taken to reduce the likeliness of making radon issues worse. Pre-weatherization radon testing is allowed and required in some cases as outlined below. Radon mitigation is not allowed with DOE funds.
Funding:	
DOE	
Beyond Scope of DOE WAP:	
If beyond the scope of this Plan the unit will be deferred.	
Standards for Remedy:	
<p>Over six million New Jersey residents live in moderate to high risk communities per the NJ Department of Environmental Protection (DEP). DEP categorizes risk as high, moderate, or low. A map listing the risk levels for each NJ municipality can be viewed at: http://njradon.org/ctytiera.htm#04. Weatherization agencies providing services in Tier 1 municipalities <u>must</u> test for radon unless the property owner has tested for radon in the previous 5 years and has written evidence that radon levels are below 4 pico-Curies per liter (pC/l). Testing is recommended in Tier 2 municipalities. EPA testing protocols will be used.</p> <p>Precautions should be taken to reduce the likeliness of making radon issues worse in untested properties and properties with radon levels below 4 pC/l. AHSRAE 62.2 compliance must be met with continuous exhaust ventilation. Properties with radon levels of 4 pC/l and above or where testing is refused in Tier 1 units will be deferred.</p>	
Standards for Deferral:	
Deferral will occur when correction is beyond the scope of this Plan. The primary mechanism for determining deferral of a unit is based on costs associated with taking necessary precautions in order to perform audit-recommended weatherization work as defined in the DCA Deferral & Referral Policy above.	
Standards for Referral:	
Referrals will be made to publically funded programs.	
Training Provision:	
Sub grantees will be trained on what radon is, how it occurs, what factors may make radon worse, weatherization measures that may be helpful, and vapor barrier installation.	
Client Education:	
Provide client with EPA consumer's guide to radon and inform them of any testing results.	
Disposal Procedures:	
Any materials associated with testing or waste from taking radon precautions must be properly disposed of.	

Refrigerant	
Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	Reclaim refrigerant per Clean Air Act 1990, section 608, as amended by 40 CFR82, 5/14/93.
Funding:	
DOE	
Beyond Scope of DOE WAP:	
If beyond the scope of this Plan the unit will be deferred.	

Standards for Remedy:
Contracted appliance providers that provide replacement refrigerators are required to dispose of the old refrigerator in accordance with the Clean Air Act 1990, section 608, as amended by 40 CFR 82, 5/14/93. Weatherization Bulletin #418 provides protocols that comply with EPA standards for disposal of the existing refrigerator. The state requires that weatherization-related work conform with applicable codes in jurisdictions where the work is being performed. The contract with sub grantees, the contract between shell contractor and sub grantees, and the contractor assurances form for heating systems ensure that applicable work will be reviewed by local code inspectors for permits taken. Weatherization Bulletins #405, 410, 716, 719, and 724 provide directives that require crews/contractors to comply with local code requirements.
Standards for Deferral:
Deferral will occur when correction is beyond the scope of this Plan.
Standards for Referral:
Referrals to publically funded programs.
Training Provision:
EPA-approved section 608 type I or universal certification is required for those working with refrigerant.
Client Education:
Instruct clients not to disturb refrigerant.
Disposal Procedures:
Dispose of in accordance with Clean Air Act 1990, section 608, as amended by 40 CFR82, 5/14/93.

Smoke, Carbon Monoxide Detectors, and Fire Extinguishers	
Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	Installation of smoke/CO detectors is allowed where detectors are not present or are inoperable. Replacement of operable smoke/CO detectors is not an allowable cost. Providing fire extinguishers is allowed only when solid fuel is present. Installation is not allowed unless audit-approved weatherization measures are installed.
Funding:	
DOE	
Beyond Scope of DOE WAP:	
Installation is not allowed if it is the only WAP measure installed.	
Standards for Remedy:	
Check for operation of existing smoke/CO detectors. Install smoke and/or CO detectors per local code or manufacturers specification where ones are not present, functioning, or within their useful life. Provide fire extinguishers where weatherization work is performed that may have an impact on solid fuel heating.	
Standards for Deferral:	
Deferral will occur when correction is beyond the scope of this Plan.	
Standards for Referral:	
Referrals will be made to publically funded programs such as local fire department.	
Training Provision:	
Sub grantees will be trained on where to install detectors and local code compliance.	
Client Education:	
Provide client with verbal and written information on use of smoke/CO detectors and fire extinguishers where allowed.	
Disposal Procedures:	
Replaced nonfunctioning or outdated smoke/CO detectors must be removed and properly disposed of following local code compliance.	
Smoke/CO Detector Installation:	
Smoke detectors will be allowed as a H&S cost. At least one smoke detector must be located on every floor of the home. Every bedroom must be within the sound of a smoke detector.	

Solid Fuel Heating (Wood Stoves, etc.)	
Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	Maintenance, repair, and replacement of primary indoor heating units are allowed where occupant H&S is a concern. Maintenance and repair of secondary heating units is allowed.
Funding:	
Primary funding source for heating and air-conditioning is LIHEAP WAP. If those funds are exhausted and it is not a recommended measure on the energy audit, then DOE H&S funds can be used.	
Beyond Scope of DOE WAP:	
If it is beyond the scope of LIHEAP WAP and DOE WAP then the client will be deferred.	
Standards for Remedy:	
Required inspection of chimney and flue and combustion appliance zone depressurization.	
Standards for Deferral:	
Deferral will occur when correction is beyond the scope of this Plan. The primary mechanism for determining deferral of a unit is based on costs associated with correcting the H&S condition necessary in order to perform audit-recommended weatherization work as defined in the DCA Deferral & Referral Policy above.	
Standards for Referral:	
Referrals will be made to publically funded programs.	
Training Provision:	
Sub grantees will be trained in how to perform CAZ depressurization test and proper inspection.	
Client Education:	
Provide safety information including recognize depressurization.	
Disposal Procedures:	
All removed systems or waste materials must be properly disposed of.	

Space Heaters, Stand Alone Electric	
Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	Repair, replacement, or installation is not allowed. Removal is recommended and should be performed by WAP along with proper disposal.
Funding:	
No DOE funds will be utilized except for cost associated with removal and disposal.	
Beyond Scope of DOE WAP:	
n/a	
Standards for Remedy:	
Check circuitry to ensure adequate power supply for existing space heaters.	
Standards for Deferral:	
Deferral will occur when conditions are determined to be unsafe by the auditor and the client refuses to make corrections or allow removal.	
Standards for Referral:	
Referrals will be made to publically funded programs.	
Training Provision:	
Sub grantees will be trained in awareness of guidance and recognition of unsafe conditions.	
Client Education:	
Inform client of hazards and collect a signed waiver if removal is not allowed.	
Disposal Procedures:	
Contractor(s) will be responsible for proper disposal for all removed space heaters.	

Space Heaters, Unvented Combustion	
Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	Removal is required, except as secondary heat where the unit conforms to ANSI Z21.11.2 as reflected on the ANSI label or product specifications. Units that do not meet ANSI Z21.11.2 must be removed prior to weatherization but may remain until a replacement heating system is in place.

Funding:	
Primary funding source for heating and air-conditioning is LIHEAP WAP. If those funds are exhausted and it is not a recommended measure on the energy audit, then DOE H&S funds can be used. DOE funds can be used for costs associated with removal and disposal unless LIHEAP or other funds are paying for replacement, in which case those funds must also be used for removal and disposal.	
Beyond Scope of DOE WAP:	
n/a	
Standards for Remedy	
Testing for air-free carbon monoxide (CO) should be performed by the auditor. All primary unvented combustion space heaters must be removed, but may remain in place if functioning safely until an acceptable heating source is provided. Temporary heating can be provided until a permanent system is installed. Check secondary units for ANSI Z21.11.2 label or product specifications identifying the unit as ANSI Z21.11.2 compliant. Secondary units that cannot be shown to meet the ANSI Z21.11.2 standard must be removed. Damaged and hazardous secondary units must also be removed regardless of meeting the ANSI standard.	
Standards for Deferral:	
Deferral will occur when correction is beyond the scope of this Plan and/or client does not give consent to remove. The primary mechanism for determining deferral of a unit is based on costs associated with correcting the H&S condition necessary in order to perform audit-recommended weatherization work as defined in the DCA Deferral & Referral Policy above.	
Standards for Referral:	
Referrals will be made to publically funded programs.	
Training Provision:	
Sub grantees will be trained in how to perform air-free CO testing and identifying and understanding the dangers of unvented space heaters.	
Client Education:	
Inform client of dangers of unvented space heaters - CO, moisture, NO2, CO can be dangerous even if CO alarm does not sound.	
Disposal Procedures:	
All removed units must be disposed of. Contractor(s) will be responsible for proper disposal.	

Space Heaters, Vented Combustion	
Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	Should be treated as furnaces. See Air Conditioning & Heating System guidance above.

Spray Polyurethane Foam (SPF)	
Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	Use EPA recommendations (available online at http://www.epa.gov/dfe/pubs/projects/spf/spray_polyurethane_foam.html) when working within the conditioned space or when SPF fumes become evident within the conditioned space. When working outside the building envelope, isolate the area where foam will be applied, take precautions so that fumes will not transfer to inside conditioned space, and exhaust fumes outside the home.
Funding:	
DOE funds will be utilized.	
Beyond Scope of DOE WAP:	
n/a	
Standards for Remedy:	
Check for penetrations in the building envelope. Crews should use sensory inspection inside the home for fumes during foam application. If the application of spray polyurethane foam cannot be used safely in accordance with EPA regulations, an alternative insulating/air sealing product shall be installed.	
Standards for Deferral:	
Deferral will occur when precautions cannot be taken to assure the safety of clients.	
Standards for Referral:	
n/a	

Training Provision:	
Training on the use of various foam products including MSDS sheets and required PPE (Personal Protective Equipment), shall be provided to program field staff by March 31, 2013.	
Client Education:	
Provide notification to the client of plans to use two-part foam and the precautions that may be necessary.	
Disposal Procedures:	
Disposal of spray foam containers shall be in accordance with manufacturer's instructions.	

Ventilation & Air Quality	
Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	2010 (or most current) ASHRAE 62.2 is required to be met to the fullest extent possible, when performing weatherization activity. Existing fans and blower systems should be updated if not adequate.
Funding:	
DOE funds will be utilized to address this particular H&S category.	
Beyond Scope of DOE WAP:	
If beyond the scope of DOE WAP, the unit will be deferred.	
Standards for Remedy:	
Conduct ASHRAE 62.2 evaluation, measure fan flows, estimate costs needed to meet compliance and determine if deferral is necessary, install ventilation as necessary to meet the ASHRAE 62.2 calculated CFM requirements, and perform follow up testing to ensure compliance and make adjustments as needed to meet the standard. Post weatherization blower door numbers can be assumed to calculate required CFM but ventilation must be adjusted once final blower door numbers are performed. ASHRAE 62.2 is a minimum standard and additional ventilation may be necessary and is allowed to address higher concentrations of humidity or pollutants.	
Standards for Deferral:	
Weatherization will be deferred if indoor air quality/ventilation requirements (ASHRAE 62.2) cannot be met due to design constraints or excessive costs. The primary mechanism for determining deferral of a unit is based on costs associated with correcting the H&S condition necessary in order to perform audit-recommended weatherization work as defined in the DCA Deferral & Referral Policy above.	
Standards for Referral:	
Client will be notified in writing of deferral within 7 days of determination and referred to publicly funded rehabilitation programs (i.e., Community Development Block Grants, etc.) and local health department.	
Training Provision:	
ASHRAE 62.2 training will be provided by DCA to DCA State Monitors and appropriate agency staff in January 2013 including proper sizing, evaluation of existing and new systems, depressurization tightness limits, critical air zones, etc.	
Client Education:	
Provide client with information on function, use, and maintenance of ventilation system and components. Include disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality.	
Disposal Procedures:	
Construction waste shall be disposed of in accordance with state and local codes.	
ASHRAE 62.2 Compliance:	
Implementation of ASHRAE 62.2 will begin following training scheduled for January 2013. Implementation will begin prior to approval of the 2012 H&S Plan by DOE. No changes to the standards are proposed.	

Window and Door Replacement, Window Guards	
Concurrence or Alteration:	
Concur with WPN11-6 <input checked="" type="checkbox"/>	Replacement, repair, or installation is not an allowable H&S cost but may be allowed as an efficiency measure if cost justified.
Funding:	
DOE funds under the weatherization portion of the program will be utilized to replace, repair, or install windows and doors provided the measure is recommended on the energy audit software. Specific treatments not recommended on the energy audit are not allowed H&S costs.	

Beyond Scope of DOE WAP:
If beyond the scope of DOE WAP, partial weatherization as approved by DCA on a case-by-case basis may be considered or else the unit will be deferred.
Standards for Remedy:
Windows and door replacement and window guards cannot be installed with H&S funds unless necessary for correcting moisture conditions or a code requirement is triggered by weatherization activity, in which case they would be corrected under their respective allowable costs above. All other replacement, repair, and installation must meet SIR guidelines.
Standards for Deferral:
Deferral will occur when the corrections are beyond the scope of this Plan.
Standards for Referral:
Referrals will be made to publically funded programs.
Training Provision:
Sub grantees will be trained on awareness of this guidance.
Client Education:
Provide information on the generation of leaded household dust by friction and impact surfaces such as windows and doors.
Disposal Procedures:
Windows and doors are treated as standard construction waste and shall be disposed of in accordance with state and local codes.