

## VT TEC Manual—Appendix G: Vermiculite Policies

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### Vermiculite Policies & Procedures | Background

Vermont’s WAP has made substantial progress since 2011 to incorporate vermiculite remediation efforts into weatherization projects. As the program gained experience related to vermiculite, programmatic policies and procedures were continuously improved.

Overall, striving to continuously improve vermiculite policies and procedures as new information and funding opportunities came to light has been a good thing.

- ✚ WAP funding has successfully leveraged additional funding sources that have helped chip away at one of the biggest barriers to WAP projects.
- ✚ The presence of vermiculite is no longer cause for an automatic deferral of WAP services and fewer vulnerable Vermont families have been denied WAP services due to vermiculite.
- ✚ Many Vermont families have now received professional vermiculite remediation services and were then able to benefit from a comprehensive WAP project.

These accomplishments—and the continuously evolving nature of vermiculite policies—have come with some challenges. Among them, it has been difficult to keep up to date with Vermont WAP’s vermiculite policies & procedures as things changed over time.

The goal of this appendix is to provide one comprehensive set of vermiculite policies for Vermont’s WAP network to help guide future project work in homes with vermiculite.

### Vermiculite Policies & Procedures | Guidance Consolidation Overview

**The content included in this guidance supersedes and replaces any and all previously issued vermiculite guidance.**

Previously issued guidance on this topic that is hereby replaced includes, but is not limited to:

- ✚ Vermont Weatherization Program Notice 2014-1
- ✚ Vermont Weatherization Program Notice 2015-2
- ✚ Vermont Weatherization Program Notice 2017-1
- ✚ Vermont Weatherization Program Memorandum 2018-02



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### Working in Homes with Vermiculite | Qualified Asbestos Professionals

Throughout this guidance, the term qualified asbestos professional is used. This can have different meanings depending on the type of services being referenced. Any individual or entity performing asbestos-related services in Vermont must be certified/licensed to perform that specific service in accordance with the Vermont Regulations for Asbestos Control.

The four types of asbestos service designations most applicable to WAP projects are:

1. Asbestos Inspector
2. Asbestos Project Designer
3. Asbestos Abatement Contractor
4. Asbestos Project Monitor

Some individuals or entities are qualified to perform all four of these asbestos related services. Others are qualified to perform some, but not all, of these four services.

### Required Segregation of Duties | Avoiding Conflicts of Interest

- ✚ It is **never allowable** for the same company that performs the vermiculite/asbestos remediation services to also have one of their own employees serve as the asbestos project monitor.

The primary duties of the asbestos project monitor are to conduct the final visual and air clearance testing required for each project to determine if the area meets the state regulations for clearance. These duties cannot be performed by an employee of the company that performed the vermiculite/asbestos remediation services under any circumstance, even when the company is licensed to perform asbestos project monitoring services.

This regulation can make it seem like a WAP agency must procure the services of (1) a qualified asbestos abatement contractor and (2) an asbestos project monitor for every vermiculite remediation project. That is not necessarily the case.

It is acceptable for a WAP agency to procure the services of an asbestos abatement contractor and allow for the abatement contractor to subcontract out the asbestos project monitoring services to a qualified individual or entity. This is a common and acceptable industry practice. The only thing the asbestos abatement contractor performing the work cannot do is have one of their own employees serve as the project monitor.

### Asbestos Services Procurement by the WAP

**Required Services:** A WAP agency must procure the following services for each vermiculite remediation project:

- ✚ An Asbestos Abatement Contractor & An Asbestos Project Monitor
- or--
- ✚ An Asbestos Abatement Contractor (*who will be responsible for subcontracts with an Asbestos Project Monitor*)

**Additional Services:** A WAP agency can also procure the services of an asbestos inspector and/or an asbestos project designer to provide additional services. A common procurement example: A WAP agency can procure an asbestos professional that will serve the following roles: (1) Serve as the asbestos inspector, (2) serve as the asbestos project designer responsible for the design of the remediation project, (3) serve as the asbestos project monitor and (4) hire and manage an asbestos abatement contractor.

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### **Working in Homes with Vermiculite | Asbestos Project Regulations & Permitting**

Vermiculite is a Regulated Asbestos-Containing Material (RACM). All asbestos abatement projects involving RACMs must submit an Asbestos Abatement Project Permit Application Form (VDH Form A104). The form must be submitted at least 10 working days before an abatement project begins. This form must be completed and submitted by a qualified asbestos professional.

This permit application must be submitted with a diagram showing the location of the project activity within the building and payment for the permit, as specified in Section 7 of the Vermont Regulation for Asbestos Control.

For more information about the permitting process or the Vermont Regulations for Asbestos Control, please call (802) 863-7220 or (800) 439-8550 (toll-free in VT).

Small Scale Short Duration Activities (SSSD or 3SD) include any asbestos abatement activity that encompasses up to and including:

- ✓ 10 linear feet of asbestos-containing material (ACM) located on pipes
- or
- ✓ 10 square feet of ACM from any surface within the abatement area within a facility

All 3SD must be performed by a trained and certified Asbestos Worker or Supervisor. A completed 3SD notification must be sent to the Vermont Department of Health, using the 3SD Notification Form (VDH form L105). This form must be submitted within 48 hours of the activity.

### **Five WAP Project Approaches for Homes with Vermiculite**

There are five possible ways to proceed with a WAP project in homes with Vermiculite. Some of them disturb the existing vermiculite in the home and some of them do not. The project approaches are:

1. Small-Scale Short-Duration Activities (3SD)
2. Abatement
3. Hybrid Approach
4. Alternative Approach
5. Weatherize the Rest of the Home

Guidelines for each approach are outlined in the following tables.

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### Working in Homes with Vermiculite | Five Project Approaches

There are five possible ways to proceed with a WAP project in homes with Vermiculite. Guidelines for each approach are outlined in the tables below.

Approach	Abbreviated Guidelines
<b>When the Vermiculite Gets Removed</b>	
1. Small-Scale Short-Duration Activities (SSSD or 3SD)	<ul style="list-style-type: none"> <li>✓ Remove less than 10 total square feet of vermiculite/asbestos containing material</li> <li>✓ All 3SD must be performed by a qualified asbestos professional.</li> <li>✓ No permit is required per Vermont Dep. of Health (VDH)</li> <li>✓ A completed SSSD notification must be sent to the Vermont Department of Health, using the SSSD Notification Form (VDH form L105).</li> <li>✓ This form must be submitted within 48 hours of the activity.</li> <li>✓ Must notify VDH after work is completed</li> <li>✓ Potentially eligible for HWAP-Vermiculite &amp; VLite-Vermiculite Funding (<i>depends on DAACC results</i>)</li> <li>✓ Potentially eligible for regular HWAP job funding (<i>depends on project-level SIR and DAACC results</i>)</li> <li>✓ Potentially eligible for Zonolite Funding (<i>depends on vermiculite test results regarding barium</i>)</li> <li>✓ <b>Not Eligible for DOE funding</b></li> </ul>
2. Abatement	<ul style="list-style-type: none"> <li>✓ Remove more than 10 total square feet of vermiculite/asbestos containing material</li> <li>✓ Project must get permitted through VDH by a qualified asbestos professional using an Asbestos Abatement Project Permit Application Form (VDH Form A104).</li> <li>✓ The permit application form must be submitted at least 10 working days before an abatement project begins.</li> <li>✓ Must notify VDH after work is completed</li> <li>✓ Potentially eligible for HWAP-Vermiculite &amp; VLite-Vermiculite Funding (<i>depends on DAACC results</i>)</li> <li>✓ Potentially eligible for regular HWAP job funding (<i>depends on project-level SIR and DAACC results</i>)</li> <li>✓ Potentially eligible for Zonolite Funding (<i>depends on vermiculite test results for barium</i>)</li> <li>✓ <b>Not Eligible for DOE funding</b></li> </ul>

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**Working in Homes with Vermiculite | Five Project Approaches**

Approach	Abbreviated Guidelines
<p><b>When Vermiculite is Disturbed During the Weatherization Project but it is <u>Not Removed</u> from the Home</b></p>	
<p>3. Hybrid Approach</p>	<ul style="list-style-type: none"> <li>✓ The regulatory requirements and the permitting process is the same for a hybrid project as it is for an abatement project. For example, the work still occurs in a VDH regulated &amp; permitted asbestos abatement area and clearance testing is required.</li> <li>✓ This approach is called a “hybrid” because a qualified asbestos professional and a weatherization professional are together in the abatement area simultaneously.</li> <li>✓ The most common hybrid projects occur in attics or kneewall closets. The vermiculite is moved as needed so the attic can be effectively airsealed and then insulated. The vermiculite is not removed from the home.</li> <li>✓ Potentially eligible for HWAP-Vermiculite &amp; VLite-Vermiculite Funding (<i>depends on DAACC results</i>)</li> <li>✓ Potentially eligible for regular HWAP job funding (<i>depends on project-level SIR and DAACC results</i>)</li> <li>✓ <b>Not Eligible for Zonolite or DOE funding</b></li> </ul>

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**Working in Homes with Vermiculite | Five Project Approaches**

Approach	Abbreviated Guidelines
<p><b>When Vermiculite is <u>Not Disturbed</u> During the Weatherization Project and it is <u>Not Removed</u> from the Home</b></p>	
<p>4. Alternative Approach</p>	<p>This approach can be considered when the area(s) of the building that have vermiculite can be effectively airsealed and insulated without disturbing the vermiculite.</p> <ul style="list-style-type: none"> <li>✓ <b>Written OEO permission is required <u>prior to</u> using this approach</b></li> <li>✓ Alternative Approach requests &amp; approvals are to be recorded on the Atypical Project Approval form.</li> <li>✓ Asbestos contractors are not involved in the project</li> <li>✓ There is no permitting required per VDH</li> <li>✓ <b>Project is eligible for regular HWAP <u>or</u> DOE job funding</b> <i>(depends on project-level SIR)</i></li> <li>✓ Project is Not Eligible for HWAP-Vermiculite, VLite-Vermiculite, or Zonolite Funding</li> <li>✓ Some examples of this approach include:               <ul style="list-style-type: none"> <li>- Airseal &amp; insulate the slopes or attic from below using rigid foam sheet insulation &amp; caulking.</li> <li>- Airseal &amp; insulate over the attic floor-boards without disturbing the vermiculite located below the floor-boards.</li> </ul> </li> </ul>
<p>5. Weatherize the Rest of the Home</p>	<p>This approach can be considered when the area(s) of the building that have vermiculite do not present major airsealing opportunities and are already insulated. It can also be considered in cases where the vermiculite is located within an area that does not need to receive weatherization improvements.</p> <ul style="list-style-type: none"> <li>✓ <b>Written OEO permission is required <u>prior to</u> using this approach</b></li> <li>✓ When using this approach, project requests &amp; approvals are to be recorded on the Atypical Project Approval form.</li> <li>✓ Asbestos contractors are not involved in the project</li> <li>✓ There is no permitting required per VDH</li> <li>✓ <b>Project is eligible for regular HWAP <u>or</u> DOE job funding</b> <i>(depends on project-level SIR)</i></li> <li>✓ Project is Not Eligible for HWAP-Vermiculite, VLite-Vermiculite, or Zonolite Funding</li> <li>✓ Examples where this approach can be considered include:               <ul style="list-style-type: none"> <li>-The vermiculite is only located in the attic, it’s already covered by several inches of loose-fill cellulose insulation and there are no major air sealing improvement opportunities in the attic.</li> <li>-There is vermiculite in the exterior walls but there is no vermiculite identified anywhere else.</li> <li>-There is vermiculite at the base of the chimney in the basement but there is no vermiculite identified anywhere else.</li> </ul> </li> </ul>

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### Working in Homes with Vermiculite | Rental Properties

The presence of vermiculite shall be treated as cause for automatic deferral of services in rental properties only. It is the responsibility of the property owner to remediate vermiculite prior to the receipt of WAP services.

The following excerpt is taken from Form 617, v4.1 entitled, Apartment Building Standards. “The Vermont Home Weatherization Assistance Program (HWAP) requires that rental properties meet minimum standards to qualify for WAP funding. Building Owners who do not themselves qualify for WAP services must make any necessary upgrades prior to receiving WAP services, however WAP will assist in identifying problems and suggesting corrective action”.

Form 617 is provided to all property owners. In addition to the general information conveyed on this form, WAP staff must provide a brief written list of any corrective actions that need to be made by a property owner to prevent a project deferral from occurring after evaluating their building(s).

The written list is to be based on observable conditions found during a walk through or building assessment.

Taking photographic documentation of the observable conditions is recommended.

Uploading Form 617, the written list of observable conditions found during the building evaluation and any photographic documentation into the WAP documents area of HES is required.

### Determining When to Follow the Vermiculite Guidance<sup>1</sup> for Rental Properties

- ✚ **Rent-to-own agreements:** Follow the vermiculite policies for rental properties.
- ✚ **Life Leases:** Follow the vermiculite policies for owner-occupied property.
- ✚ **Income Eligible Property Owner:**
  - ✓ Follow the vermiculite policies for owner-occupied property if the income-eligible property owner lives in the building that contains the vermiculite.
  - ✓ Follow the vermiculite policies for rental properties if the income-eligible property owner does not live in the building that contains the vermiculite.

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<sup>1</sup> This breakdown of owner-occupied vs. rental-occupied properties does not extend to all WAP policies and procedures. This is specific to Vermiculite and Deferral Policies only.

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### Working in Homes with Vermiculite | Making Deferral Decisions in Owner Occupied Homes

In some cases, dwelling units that have vermiculite insulation may need to be deferred.

**However, as of July 01, 2014, it is not allowable to defer a project solely due to the presence of Vermiculite insulation in owner-occupied homes.**

There are standard operating procedures (SOPs) that must be followed prior to making a deferral decision for a dwelling unit that has vermiculite.

### Types of Vermiculite Deferrals | Category 1 vs. Category 2

There are two different types of vermiculite deferrals that will be covered in more detail throughout this guidance. The reasons for, and the timing of, a deferral decision impact the type of deferral. The programmatic requirements associated with each deferral category are outlined in this guidance.

- ✚ **A Category 1- Vermiculite Deferral** is a deferral that either occurs before the economic analysis of the project happens or that is made for reasons other than the economic analysis of the project and/or scope of work.
- ✚ **A Category 2- Vermiculite Deferral** is a deferral that is based on the economic analysis of the project and/or scope of work.

### The First Three Vermiculite Service Phases

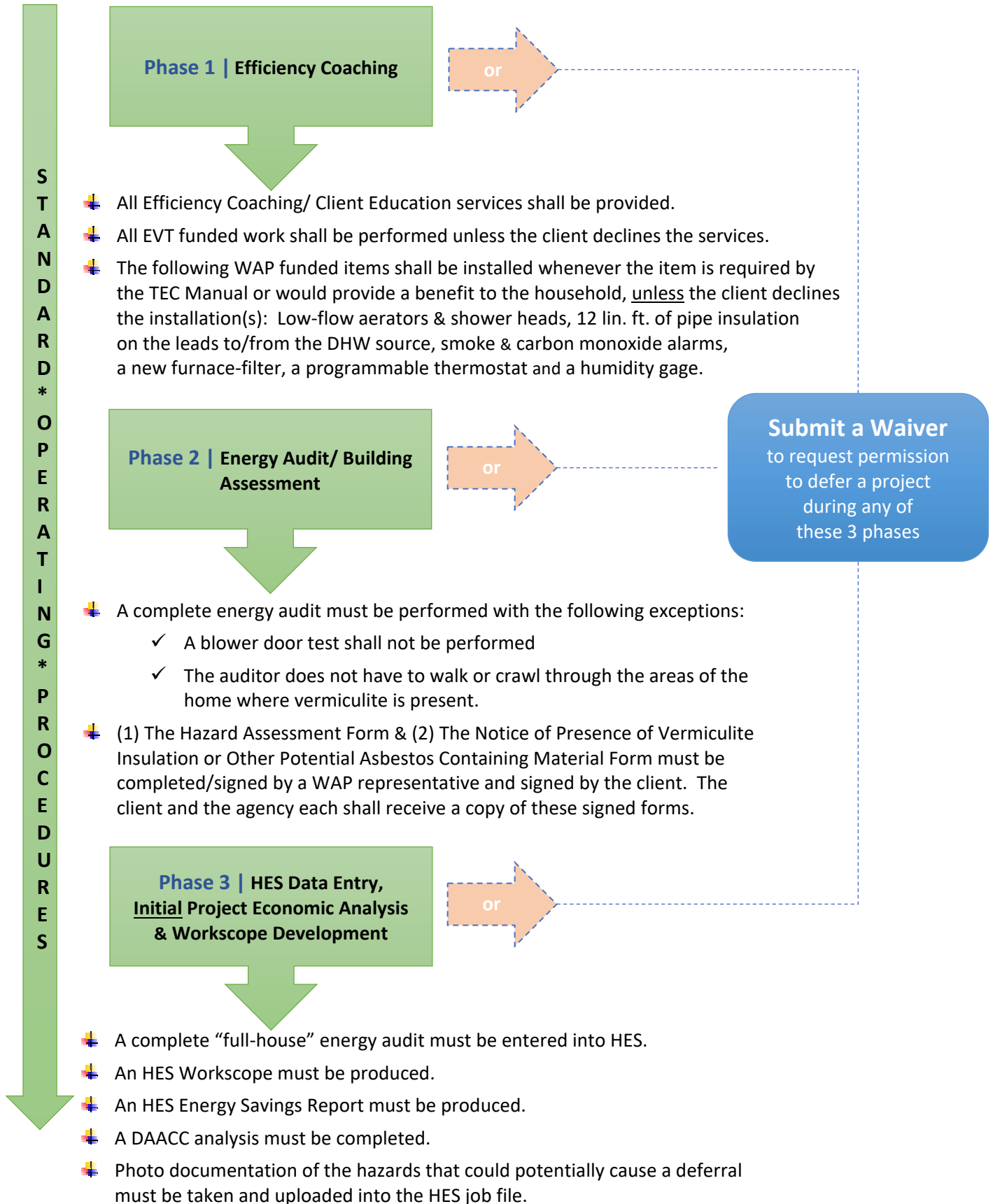
The first three vermiculite service phases and the standard operating procedures associated with each phase are established in this guidance.

- ✚ **Phase 1 | Efficiency Coaching**
- ✚ **Phase 2 | Energy Audit/ Building Assessment**
- ✚ **Phase 3 | HES Data Entry, Initial Project Economic Analysis & Workslope Development**



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### Working in Homes with Vermiculite | The First Three Vermiculite Service Phases



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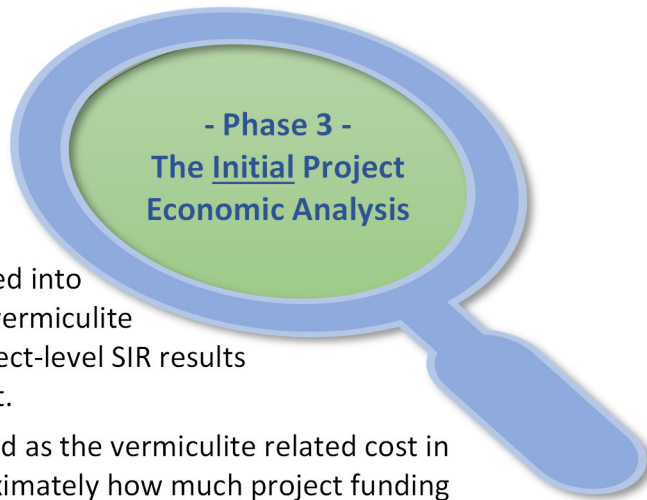
Working in Homes with Vermiculite | A Closer Look at the Third Vermiculite Service Phase

**Use Historical Bid Data**

for vermiculite remediation from similar situations when producing a preliminary estimate to address the vermiculite.



This preliminary cost estimate can be entered into HES as the estimated measure cost for the vermiculite remediation work. This will inform the project-level SIR results generated by the HES Energy Savings Report.

The preliminary estimate can also be entered as the vermiculite related cost in the DAACC. This will help determine approximately how much project funding could be available from a combination of programs/ funding sources given two possible scenarios that hinge on the results of the Zonolite vermiculite testing.

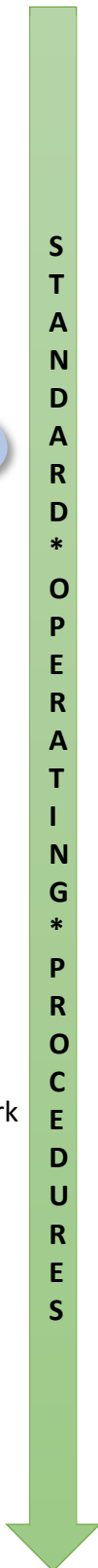
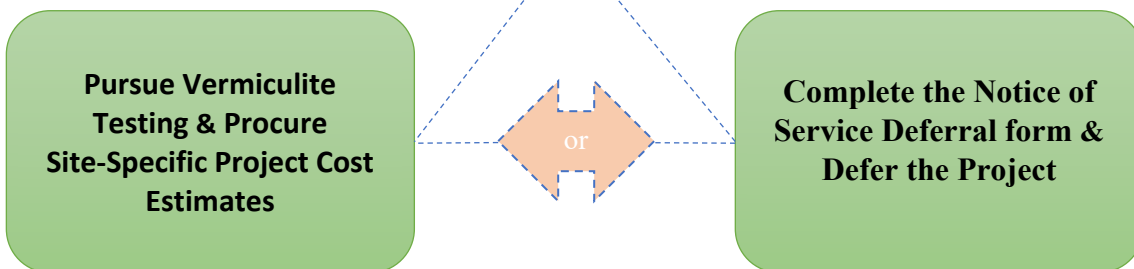


**Zonolite Vermiculite Testing**

**Does the Vermiculite Contain Barium?**

-  **Scenario 1** | A vermiculite test indicates that there is barium in the vermiculite. Based on this test result, Zonolite funding would likely be available to cover some of the vermiculite abatement costs.
-  **Scenario 2** | A vermiculite test indicates that there is no barium in the vermiculite. Based on this test result, Zonolite funding would not be available to cover any of the vermiculite abatement costs.

**Engage the Client** using the preliminary information from the DAACC and the HES Energy Savings Report as a starting point and funding scenarios for the project.  when presenting the likely scope of work and funding scenarios for the project. **Jointly determine** if there may be a manageable path forward for the project given all of the preliminary information.



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### Working in Homes with Vermiculite | Making Category 1- Vermiculite Deferral Decisions

In some cases, dwelling units that have vermiculite insulation may need to be deferred.

**However, as of July 01, 2014, it is not allowable to automatically defer a project solely due to the presence of Vermiculite insulation in owner-occupied homes.** There are standard operating procedures (SOPs) that must be followed prior to making a deferral decision for a dwelling unit that has vermiculite.

### Types of Vermiculite Deferrals | Category 1 vs. Category 2

There are two different types of Vermiculite deferrals that will be covered in detail in this guidance. The reasons for, and the timing of, a deferral decision impact the type of deferral. The programmatic requirements associated with each deferral category are outlined in this guidance.

- ✚ **A Category 1- Vermiculite Deferral** is a deferral that either occurs before the economic analysis of the project happens or that is made for reasons other than the economic analysis of the project and/or scope of work.
- ✚ **A Category 2- Vermiculite Deferral** is a deferral that is based on the economic analysis of the project and/or scope of work.

The following tables cover Category 1-Vermiculite Deferrals.

<b>Making Category 1- Vermiculite Deferral Decisions</b>		
<b><u>Prior to the Completion of the First Three Vermiculite Service Phases</u></b>		
<p><b>Program Standard:</b> A WAP agency must submit a waiver request—Form 539—to the OEO <u>prior to</u> deferring a project in a dwelling unit with vermiculite when the SOPs associated with the first three vermiculite service phases <u>have not</u> been completed in full.</p> <p><b>Exceptions to the Program Standard:</b> Allowable exceptions to the above program standard are outlined in the table below. These are examples where Form 539 does not apply.</p>		
<b>Potential Issues</b> <b>The building has vermiculite and...</b>	<b>Allowable Actions</b>	<b>Required Actions</b>
<b>for a WAP provider to take re: Project Deferral</b>		
<p><b>Exception 1</b> The client(s) is uncooperative, abusive or threatening to those who must engage with the client or perform work at the home during the project.</p>	<p>In these situations, a WAP provider can defer the project without performing vermiculite service phases 1, 2, and/or 3 as outlined in this guidance. The decision to defer any further service provisions can be made <u>without</u> submitting a waiver to OEO.</p>	<p><b>Action 1   Inform client in writing</b> --The reason that services are being deferred. --Terms &amp; conditions that would need to be upheld in order to resume service provision.</p> <p><b>Action 2   Inform OEO</b> --That a deferral has been made and the cause.</p>
<p><b>Exception 2</b> Illegal activities are being conducted in the dwelling unit.</p>		<p><b>Action 3   Record Keeping</b> --Upload all the information provided to the client into the HES job file. --Indicate in HES that the job has been deferred along with the reasons for the deferral and the deferral date (<i>on the audit information screen</i>).</p>

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### Working in Homes with Vermiculite | Making Category 1- Vermiculite Deferral Decisions

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<b>Potential Issues</b>	<b>Allowable Actions</b>	<b>Required Actions</b>
<b>The building has vermiculite and...</b>	<b>for a WAP provider to take re: Project Deferral</b>	
<p><b>Exception 3</b> The dwelling unit has sewage or other sanitary problems (e.g., fleas or other pest infestation) that would endanger workers and that could potentially be worsened by proceeding with weatherization work.</p>	<p>In these situations, a WAP provider can defer the project without performing vermiculite service phases 1, 2, and/or 3 as outlined in this guidance.</p> <p>The decision to defer any further service provisions can be made <u>without</u> submitting a waiver to OEO.</p>	<p><b>Action 1   Inform client in writing</b> --The reason that services are being deferred. --The building and/or the site condition(s) that would need to be provided in order to resume service provision. --Provide referrals to other programs that may be able to help the client.</p> <p><b>Action 2   Inform OEO</b> --That a deferral has been made and the cause.</p> <p><b>Action 3   Record Keeping</b> --Upload all the information provided to the client into the HES job file. --Indicate in HES that the job has been deferred along with the reasons for the deferral and the deferral date (<i>on the audit information screen</i>). --Whenever possible take photographic documentation of the conditions that caused the deferral and then store the photos in HES.</p>

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### Working in Homes with Vermiculite | Making Category 1- Vermiculite Deferral Decisions

#### Making Category 1- Vermiculite Deferral Decisions

#### Prior to the Completion of the First Three Vermiculite Service Phases

**Program Standard:** A WAP agency must submit a waiver request—Form 539—to the OEO prior to deferring a project in a dwelling unit with vermiculite when the SOPs associated with the first three vermiculite service phases have not been completed in full.

Some example scenarios of when/how to apply this program standard are included in the table below:

<b>Potential Issues</b> <b>The building has vermiculite and...</b>	<b>Allowable Actions</b>	<b>Required Actions</b>
<b>for a WAP provider to take re: Project Deferral</b>		
<p><b>Form 539 Applies -- Example # 1</b> The client has known health conditions or allergies that would prohibit the safe installation of insulation and/or other weatherization materials.</p>	<p>In these situations, a WAP provider can defer the project without fully performing vermiculite service phases 1, 2, and/or 3 as outlined in this guidance.</p>	<p><b>Action 1   Submit to OEO</b> --A Vermiculite Deferral Process Waiver (Form 539). --Photographic documentation of the building and site conditions.</p> <p><b>Action 2   Inform client in writing (<u>after waiver approval from OEO</u>)</b> --The Notice of Service Deferral must be completed in full (Form 537). --General information about what the likely WAP scope of work would include <u>if</u> the client were to bring the building or site conditions up to the needed standard must be provided (on form 537). A site-specific work scope <u>does not</u> have to be provided to the client.</p>
<p><b>Form 539 Applies -- Example # 2</b> The client has known health conditions that prohibit the disturbance or removal of existing materials in the home that would need to be disturbed or removed to complete the weatherization project.</p>	<p><b>However, in this case, the decision to defer the project prior to completing the first 3 vermiculite service phases <u>requires an approved waiver from OEO before communicating the deferral decision to the client.</u></b></p>	<p>--General information about the likely benefits that would result from a weatherization project must be provided (on form 537). A site-specific benefit analysis <u>does not</u> have to be provided to the client. --Provide referrals to other programs that may be able to help the client (on this form).</p> <p><b>Action 3   Record Keeping</b> --Upload all the information provided to the client, including the Notice of Service Deferral into the HES job file (form 537). --Upload the OEO approved Vermiculite Deferral Process Waiver Form into the HES job file (form 539). --Upload photographic documentation of the building and site conditions to the HES job file. --Indicate in HES that the job has been deferred along with the reasons for the deferral and the deferral date (<i>on the audit information screen</i>).</p>

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**Working in Homes with Vermiculite | Making Category 1- Vermiculite Deferral Decisions**

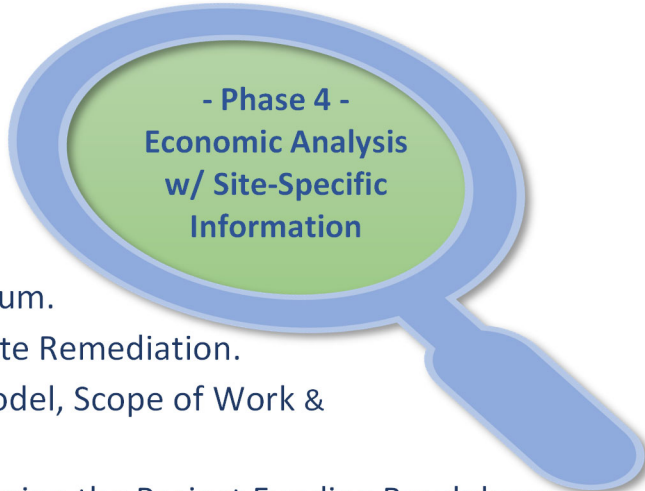
<b>Making Category 1- Vermiculite Deferral Decisions</b>		
<b>Prior to the Completion of the First Three Vermiculite Program Service Phases</b>		
<p><b>Program Standard:</b> A WAP agency must submit a waiver request—Form 539—to the OEO prior to deferring a project in a dwelling unit with vermiculite when the SOPs associated with the first three vermiculite service phases <u>have not</u> been completed in full.</p> <p>An example situation of when/how to apply this program standard is included in the table below:</p>		
<b>Potential Issues</b>	<b>Allowable Actions</b>	<b>Required Actions</b>
<b>The building has vermiculite and...</b>	<b>for a WAP provider to take re: Project Deferral</b>	
<p><b>Form 539 Applies -- Example # 3</b></p> <p>The building structure and/or the primary mechanical systems—electrical and plumbing—are in an observable state of disrepair that would require extensive corrective action before the home could be safely and effectively weatherized <u>and</u> it is likely that the repairs to the building structure, and/or the primary mechanical systems, would exceed \$5,000. This \$5,000 cost threshold refers to onsite costs only and it excludes any estimated costs associated with work to remedy vermiculite issues, fix or repair the heating system(s) or to perform a standard weatherization project.</p>	<p>In this situation, a WAP provider can defer the project without fully performing phases 1, 2, and/or 3 as outlined in this guidance.</p> <p><b>In this case, the decision to defer the project prior to completing the first 3 vermiculite service phases requires an <u>approved waiver from OEO before communicating the deferral decision to the client.</u></b></p> <p>Photographic documentation of the building and site conditions <u>must</u> be provided to OEO along with the request for waiver.</p>	<p><b>Action 1   Submit to OEO</b></p> <p>--A Vermiculite Deferral Process Waiver (Form 539).</p> <p>--Photographic documentation of the building and site conditions.</p> <p><b>Action 2   Inform client in writing (<u>after waiver approval from OEO</u>)</b></p> <p>--The Notice of Service Deferral must be completed in full (Form 538).</p> <p>--General information about what a likely WAP scope of work would include <u>if</u> the client were to bring the building or site conditions up to the needed standard must be provided (on form 538). A site-specific work scope <u>does not</u> have to be provided to the client.</p> <p>--General information about the likely benefits that would result from a weatherization project must be provided (on form 538). A site-specific benefit analysis <u>does not</u> have to be provided to the client.</p> <p>--Provide referrals to other programs that may be able to help the client (on this form).</p> <p><b>Action 3   Record Keeping</b></p> <p>--Upload all the information provided to the client, including the Notice of Service Deferral into the HES job file (form 538).</p> <p>--Upload the Vermiculite Deferral Process Waiver Form to the HES job file.</p> <p>--Upload photographic documentation of the building and site conditions to the HES job file.</p> <p>--Indicate in HES that the job has been deferred along with the reasons for the deferral and the deferral date (<i>on the audit information screen</i>).</p>





VT TEC Manual—Appendix G: Vermiculite Policies

Working in Homes with Vermiculite | Phase 4 – Site-Specific Economic Analysis of the Project

**Use Site-Specific Information**

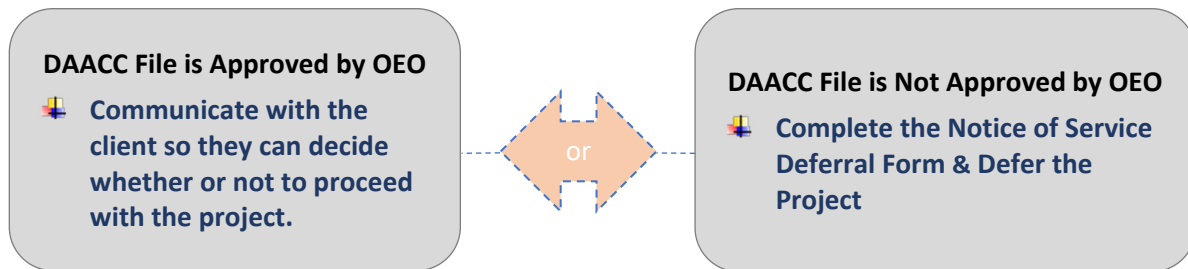
to perform an accurate economic analysis of the project during the fourth vermiculite service phase. Key requirements are below:



-  Perform Zonolite’s Testing for Barium.
-  Get Site-Specific Bids for Vermiculite Remediation.
-  Generate a Site-Specific Energy Model, Scope of Work & WAP Project Cost Estimate.
-  Create a DAACC File to Help Determine the Project Funding Breakdown & Submit to OEO for Final Approval.

STANDARD \* OPERATING \* PROCEDURES

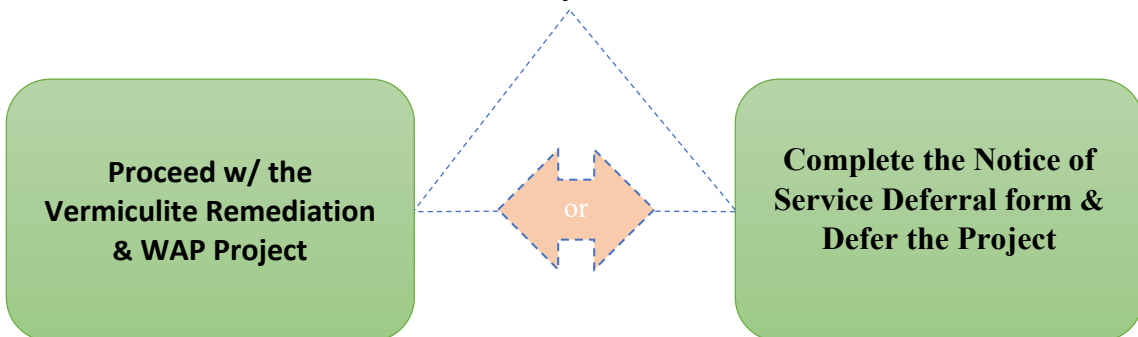
**Results of the Economic Analysis Are Used to Determine Next Steps\***



\*Note that it is not allowable to defer a project simply because it is expensive when the project level SIR is 1.0 or greater and the Non-Energy Savings investment for the regular WAP funded job is less than the established threshold for the project.

**Engaging the Client |** Present the client with the proposed scope of work and the OEO approved funding breakdown for the project proposal. The sources for the approved funding breakdown are (1) the DAACC  and (2) the HES Energy Savings Report. The client then decides if they want to proceed with the project.

**The Next Course of Action Depends on the Client’s Decision**



## VT TEC Manual—Appendix G: Vermiculite Policies

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### Working in Homes with Vermiculite | Performing the Economic Analysis for the Project

#### Deferrals and Additional Contributions Calculator (DAACC) -

##### An Investment Calculation Aid for WAP Projects in Homes that Contain Vermiculite

The investment calculation aid, “DAACC Template\_V.8.\_08-01-2020” or a newer DAACC file version shall be used to provide enhanced project investment analysis for all prospective weatherization projects that will include some form of vermiculite remediation unless a qualifying Category 1- Vermiculite Deferral is made. It is no longer allowable to use versions of the DAACC older than the “DAACC Template\_V.8.\_08-01-2020” file version.

##### DAACC Usage Requirements in Homes that Contain Vermiculite

- ✚ The DAACC shall be used prior to committing or using any funding from the following funding sources/budgets for vermiculite remediation work:
  - a. The HWAP-Vermiculite Budget
  - b. The VLITE-Vermiculite Budget
- ✚ The DAACC shall be used prior to making any Category 2- vermiculite project deferral decision and prior to communicating any Category 2- vermiculite project deferral decision to a weatherization client.<sup>2</sup>
- ✚ In most cases it is a requirement to use the DAACC prior to proceeding with a WAP project that will include some form of vermiculite remediation. However, there is one allowable way to proceed with a project that includes some form of vermiculite remediation without using the DAACC. It is likely this would only occur in projects with very minor vermiculite remediation needs because all conditions listed below shall be met:
  - a. The project will not be deferred and a comprehensive WAP project will be completed.
  - b. No HWAP-Vermiculite or VLITE-Vermiculite funding will be used for the project.
  - c. The total contribution toward Vermiculite remediation efforts charged to the regular weatherization job/funding as an incidental repair measure does not exceed \$1,500.
  - d. The project-level SIR remains at 1.0 or greater when including all of the incidental repair measure costs for vermiculite remediation work that will be charged to the regular weatherization job/funding.
  - e. The client is not being asked to contribute any funding toward the WAP project or any of the vermiculite remediation work.

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<sup>2</sup> Unless written approval from OEO to communicate the deferral decision to the client is attained.



## VT TEC Manual—Appendix G: Vermiculite Policies

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### Working in Homes with Vermiculite | Performing the Economic Analysis of the Project

#### When in the Process is the DAACC Used?

The number of times—and when—the DAACC is used largely depends on each WAP provider’s preferences when trying to decide if a WAP project that needs some form of vermiculite remediation can proceed or not.

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#### **A WAP provider can, at their discretion, skip over phase 3 entirely and proceed directly from the 2<sup>nd</sup> to the 4<sup>th</sup> vermiculite service phase prior to completing the DAACC for the first time.**

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#### **A Scenario Where it May be Beneficial to Skip Over Phase 3**

- ✚ A WAP provider is confident that they will be able to proceed with a WAP project that needs some form of Vermiculite remediation—at little to no cost to the client—given the likely scope of work and the funding sources available.

#### **Using the DAACC During Vermiculite Service Phase 3:**

Historical bid data from similar vermiculite remediation projects is used to perform a rough economic analysis of the project during the 3<sup>rd</sup> vermiculite service phase. The historical bid data is entered into HES and the DAACC file to roughly estimate the project level SIR and the funding breakdown for the project. For vermiculite abatement projects, two project versions are evaluated. One version with a Zonolite funding contribution and one version without a Zonolite funding contribution. The results of the two roughly estimated funding breakdowns are shared and discussed with the client along with the proposed scope of work. Then, the WAP agency and client jointly determine if there may be a manageable path forward for the project.

If the joint decision is that the project seems viable, the WAP provider will then proceed to the 4<sup>th</sup> vermiculite service phase where they will coordinate Zonolite vermiculite testing for barium and procure a site-specific bid for the vermiculite remediation.

Note that OEO approval of the roughly estimated versions of the DAACC file is not required before engaging the client.

#### **Using the DAACC During Vermiculite Service Phase 4:**

Site-specific bid information for the vermiculite remediation work and the known results from Zonolite’s barium testing are used to perform an accurate economic analysis of the project during the fourth vermiculite service phase. The site-specific bid information is entered into both HES and the DAACC file to accurately estimate the project-level SIR and the funding breakdown for the project.

After the agency has updated the HES & DAACC files, the DAACC file is submitted to OEO for approval. Once approved, the updated project proposal and the project funding breakdown are shared and discussed with the client. The client then decides whether or not to proceed with the project based on the information provided. If the client decides to defer the project, complete the Notice of Service Deferral form (form 538). Otherwise, proceed with the project.

Note that it is not allowable practice to defer a project simply because it is expensive when the project level SIR is 1.0 or greater and the Non-Energy Savings investment for the regular WAP funded job is less than the established threshold for the project.<sup>3</sup>

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<sup>3</sup> Without written approval from OEO for the individual project.

## VT TEC Manual—Appendix G: Vermiculite Policies

### Working in Homes with Vermiculite | Performing the Economic Analysis for the Project

#### Minimum Project-Level SIR Requirement

- ✚ A weatherization project must have a project-level SIR of 1.0 or greater. If this minimum SIR cannot be achieved the project may need to be deferred.

#### Additional Project Investment Policies that are Supported by the DAACC:

- ✚ An investment threshold for Non-Energy Saving Measures (Non-ESMs) is established for each job. The investment threshold is set as a fixed percentage of the Total Net Job Cost Estimate. Currently, the Non-ESM threshold is set at 35 percent of the total net job cost estimate.
  - ✓ **This is an investment threshold. It is not an investment limit.** It is allowable to invest more than 35% of the total net job cost into Non-ESMs on a regular weatherization job without seeking approval.<sup>4</sup> However, investing more than 35% of the total net job cost into Non-ESMs on a regular weatherization job is not required.
  - ✓ **This is an investment threshold that impacts deferral decisions.** It is not allowable practice to defer a project simply because it is expensive when the Non-Energy Savings investment for the regular WAP funded job will be less than 35% of the total net job cost estimate.
  - ✓ **This is an investment threshold that impacts the accessibility of supplemental funding sources administered by OEO.** Only when the cost for the Non-ESMs exceeds 35% of the total net job cost does the job become eligible to use other supplemental funding sources administered by OEO. On eligible projects, the supplemental funding sources can be used to buy down the Non-ESM costs so that less of those costs get charged to the regular weatherization job.
- ✚ When the Non-ESM costs exceed the established threshold for a job that needs some form of vermiculite remediation, the job becomes eligible to use (1) HWAP-Vermiculite and (2) VLITE-Vermiculite funding. The amounts that can be invested toward vermiculite remediation from these budgets are calculated by the DAACC based on the workscope composition and job costs.
- ✚ Each of these supplemental budgets have per-job caps for vermiculite remediation activity.
  - ✓ The allowable per-job caps from each of the HWAP-Vermiculite and VLITE-Vermiculite budgets is set at \$3,700 for a combined total of \$7,400 per job.
- ✚ Approval forms are built directly into the calculation aid. “Section 1” of each approval form provides for a standardized and expedited project approval process. An optional “Section 2” on each of the approval forms is also available for use. This section can be used by a WAP agency that wants to request permission to adjust the standard funding breakdowns that were provided by the calculation aid for the job. OEO will review the DAACC files and make project approval decisions.
- ✚ Note these submissions can also serve as transmittal requests when the costs submitted for approval exceed the transmittal threshold.

<sup>4</sup> Unless the minimum Project-Level SIR requirement of 1.0 is not met.

## VT TEC Manual—Appendix G: Vermiculite Policies

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### Pre-Vermiculite Remediation vs. Vermiculite Remediation | Definitions & Differences

Vermiculite remediation projects require a lot of planning and project management effort. Sometimes there are multiple parties involved before, during, and after the actual vermiculite remediation takes place. Plus, the work is paid for using a combination of different funding sources that all have their own rules about allowable expenses. To effectively manage the project funding, it is essential to understand what is meant by “Pre-Vermiculite Remediation Services” versus “Vermiculite Remediation Services”.

#### Definitions:

- ✚ **Pre-Vermiculite Remediation Services** include everything that happens (and still needs to be paid for) even if the actual vermiculite remediation project never ends up happening. Some examples include asbestos project design and vermiculite sampling/Zonolite barium testing services.
- ✚ **Vermiculite Remediation Services** include everything that happens during, or as a result of, the actual vermiculite remediation project happening. Some examples include the vermiculite abatement project, post abatement inspection services and post abatement clearance testing services.

#### Important Differences:

- ✚ There are different rules about allowable expenditure types for each of these two vermiculite related services that are outlined in detail on the following pages.
- ✚ Another important difference relates to the per-job investment caps for the HWAP-Vermiculite budget and the VLITE-Vermiculite grant.
  - ✓ Pre-Vermiculite Remediation Service costs do not count against the per-job investment caps.
  - ✓ Vermiculite Remediation Service costs do count against the per-job investment caps.
- ✚ The third important difference relates to the impact that these costs have on project-level SIR calculations.
  - ✓ Pre-Vermiculite Remediation Service costs do not count in project-level SIR calculations.
  - ✓ Vermiculite Remediation Service costs do count in project-level SIR calculations.

## VT TEC Manual—Appendix G: Vermiculite Policies

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### Allowable Uses of Primary Weatherization Funding | DOE vs. HWAP

✚ **DOE Funding:** It is never allowable to use any DOE funding for vermiculite remediation services (or for pre-vermiculite remediation services). However, the regular weatherization job can proceed as a DOE funded job when there is enough supplemental funding to cover the full cost of all vermiculite related work and DOE funds will not be used for any vermiculite related work.

✚ **HWAP Funding:** It is allowable practice to use HWAP funding for vermiculite related work.

**Any costs for vermiculite remediation services** that will be invoiced to the traditional HWAP grant (not to the separate HWAP-Vermiculite budget line) shall be handled as follows:

- ✓ **For the Economic Analysis of the Project:** Subcontractor costs only shall be entered into the HES project. These costs need to be entered as incidental repair measures that are included in the project-level SIR calculation. This is automatically accomplished when using the HES Measure titled, “VML\_Vermiculite Remediation Services”.
- ✓ **For Invoicing:** All costs shall be included on the HWAP monthly expenditure report in accordance with an agency’s standard accounting practices for cost-reimbursement weatherization grants.

**Any costs for pre-vermiculite remediation services** that will be invoiced to the traditional HWAP grant (not to the separate HWAP-Vermiculite budget line) shall be handled as follows:

- ✓ **For the Economic Analysis of the Project:** Subcontractor costs only shall be entered into the HES project. These costs need to be entered as Non-SIR measures so that the costs do not impact the project-level SIR calculation. This is automatically accomplished when using the HES Measure titled, “VML\_Pre-Vermiculite Remediation Services”.
- ✓ **For Invoicing:** All costs shall be included on the HWAP monthly expenditure report in accordance with an agency’s standard accounting practices for cost-reimbursement weatherization grants.

### Additional Financial Considerations for OEO Administered Funding

- ✚ It is not allowable practice to have the client pay an asbestos subcontractor and then to reimburse the client for the expense. **The WAP shall pay the asbestos contractor directly.**
- ✚ When using the DAACC, it is not allowable practice to have the client pay for the portion of the vermiculite remediation costs that are prescribed to the regular weatherization project. **The WAP provider shall pay for these costs.**

## VT TEC Manual—Appendix G: Vermiculite Policies

### Working in Homes with Vermiculite | Supplemental Funding for Vermiculite Remediation Funding Administered by OEO

- ✚ **An HWAP-Vermiculite budget line** has been added into the traditional HWAP grant agreements to support vermiculite remediation efforts.
- ✚ **The VLITE-Vermiculite grants** are also issued to support vermiculite remediation efforts.

#### Additional Funding

- ✚ **Zonolite Funding** is now available to support vermiculite remediation efforts.  
**- only for abatement projects -**

The Zonolite Attic Insulation (ZAI) Trust was set up as part of a settlement with the W.R. Grace company to educate the public about the dangers of asbestos containing vermiculite mined by W.R. Grace under the product name Zonolite between 1963 and 1990 from a mine in Libby, Montana. The trust also provides partial reimbursement to home-owners for vermiculite abatement. The ZAI Trust Board of Directors agreed to work with Vermont’s WAP to enable active weatherization clients to have access to ZAI trust funds without having to pay up front for abatement themselves and then—only after the abatement project was complete—be able to request a partial cost reimbursement from the ZAI Trust. This has eliminated a substantial cash-flow barrier for low-income Vermonters. Under this new agreement, Vermont’s WAP coordinates payments to the asbestos contractor for the cost of the abatement services minus the amount that the ZAI Trust will contribute. After the project is finished and the payments to the abatement contractor can be verified, a claim is submitted by WAP to the ZAI Trust. Payments for the remaining balance of the abatement project are then made by the ZAI Trust directly to the abatement contractor.

#### Allowable Uses of Supplemental Vermiculite Funding

The allowable uses for this supplemental funding are outlined in the tables below.

<b>Allowable Expenditure Types by Funding Source for Vermiculite Remediation Services</b>			
<b>Type of Expenditure</b>	<b>Supplemental Funding Type</b>		
	<b>HWAP- Vermiculite Budget</b>	<b>VLITE-Vermiculite Grant</b>	<b>Zonolite</b>
Subcontractor Material	Yes	Yes	Yes
Subcontractor Labor	Yes	Yes	Yes
WAP Agency Material*	No	No	No
WAP Agency Staff Labor*	No	No	No

\*No WAP agency costs related to vermiculite remediation services can be charged to the HWAP-Vermiculite budget, the VLITE-Vermiculite grant or to Zonolite. Only Subcontractor costs can be charged to these supplemental funding types.

**VT TEC Manual—Appendix G: Vermiculite Policies**

**Working in Homes with Vermiculite | Allowable Uses of Supplemental Vermiculite Funding**

Allowable uses for this supplemental funding are outlined in the table below.

<b>Allowable Expenditure Types by Funding Source for <u>Pre</u>-Vermiculite Remediation Services</b>			
<b>Type of Expenditure</b>	<b>Supplemental Funding Type</b>		
	<b>HWAP- Vermiculite</b>	<b>VLITE- Vermiculite*</b>	<b>Zonolite*</b>
<u>Pre</u> -Vermiculite Remediation Services <b>Performed by Qualified Asbestos Subcontractors</b> Examples Include: Professional Consultation, Site Evaluations & Testing Fees, i.e., Vermiculite Sampling/ Zonolite Barium Testing.	<b>Yes**</b>	No	No
<u>Pre</u> -Vermiculite Remediation Services <b>Performed by WAP Agency Staff</b> Examples Include: Professional Consultation, Site Evaluations & Testing Fees, i.e., Vermiculite Sampling/ Zonolite Barium Testing.	No	No	No

\* No costs for any pre-vermiculite remediation activities can be charged to VLITE or Zonolite

\*\* It is only allowable to charge the costs for pre-vermiculite remediation activities to the HWAP-Vermiculite budget when the costs are from qualified asbestos subcontractors. No other costs associated with pre-vermiculite remediation activities can be charged to this budget.

## VT TEC Manual—Appendix G: Vermiculite Policies

### Working in Homes with Vermiculite | Funding Breakdown for a Sample Abatement Project

A sample funding breakdown for a vermiculite abatement project with a project-level SIR greater than 1.0 is shown in the table below.<sup>5</sup>

<b>Total Vermiculite Abatement Cost</b>	<b>\$12,500.00</b>
Zonolite Funding Contribution	\$4,270.62
HWAP-Vermiculite Funding Contribution	\$3,700.00
VLITE-Vermiculite Funding Contribution	\$3,700.00
Regular HWAP Job Funding Contribution (incidental repair measure)	\$500.00
<b>Remaining Balance of Funding Needed</b>	<b>\$329.38</b>

#### Allowable Actions:

In this scenario any of the following actions could be taken.

- ✚ Request OEO permission to increase the amount of funding that would be charged to the regular HWAP Job by another \$329.38 (only allowed if the project-level SIR would still be 1.0 or greater with this extra incidental repair measure cost added to the project).
  - ✓ This results in a fully funded vermiculite abatement project at no cost to the low-income client.
- ✚ Use leveraged income to pay for the remaining balance of \$329.38
  - ✓ This results in a fully funded vermiculite abatement project at no cost to the low-income client.
- ✚ Use Non-OEO administered grant funding (e.g., USDA, Argosy) to pay for the remaining balance of \$329.38
  - ✓ This results in a fully funded vermiculite abatement project at no cost to the low-income client.
- ✚ Use leveraged income to pay for (a) the remaining balance of \$329.38 and for (b) the \$500.00 that would have been charged to the regular HWAP Job as an incidental repair.
  - ✓ This results in a fully funded vermiculite abatement project at no cost to the low-income client and none of the abatement charges impact the HWAP job cost average.
- ✚ Use Non-OEO administered grant funding (e.g., USDA, Argosy) to pay for (a) the remaining balance of \$329.38 and (b) for the \$500.00 that would have been charged to the regular HWAP Job as an incidental repair.
  - ✓ This results in a fully funded vermiculite abatement project at no cost to the low-income client and none of the abatement charges impact the HWAP job cost average.
- ✚ Require the client to pay the \$329.38 remaining balance of the abatement costs. Provide the client with the proposed scope of work, funding breakdown & referrals to other programs that may be able to help them secure the funds to cover the remaining balance of the abatement costs. Either proceed with or defer the WAP project depending on the client decision about contributing the remaining balance of the abatement costs.

<sup>5</sup> All funding amounts shown in this table would be determined by the DAACC.

**VT TEC Manual—Appendix G: Vermiculite Policies**

**Working in Homes with Vermiculite | Funding Breakdown for a Sample Abatement Project**

A sample funding breakdown for a vermiculite abatement project with a project-level SIR greater than 1.0 is shown in the table below.

<b>Total Vermiculite Abatement Cost</b>	<b>\$12,500.00</b>
Zonolite Funding Contribution	\$4,270.62
HWAP-Vermiculite Funding Contribution	\$3,700.00
VLITE-Vermiculite Funding Contribution	\$3,700.00
Regular HWAP Job Funding Contribution (incidental repair measure)	\$500.00
<b>Remaining Balance of Funding Needed</b>	<b>\$329.38</b>

**Non-Allowable Actions:**

In this scenario none of the following actions could be taken.


- ✚ Defer the WAP project because it is expensive.
- ✚ Exceed the maximum per-job funding limit for HWAP-Vermiculite or VLITE-Vermiculite funding.
- ✚ Ask the client to contribute any amount greater than the Remaining Balance of Funding Needed as calculated by the DAACC. In this example, \$329.38.





## VT TEC Manual—Appendix G: Vermiculite Policies

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### Working in Homes with Vermiculite | Making Category 2- Vermiculite Deferral Decisions

 **A Category 2- Vermiculite Deferral** is a deferral that is based on the economic analysis of the project and/or the scope of work.


 This type of deferral is made when a project does not have a project-level SIR of 1.0 or greater.


 This type of deferral is made when there is not enough funding to cover the full cost of vermiculite remediation services and the client—after being presented with all of the information about the project—has decided to defer the project because of the funding gap.


### Finalizing Category 2- Vermiculite Deferral Decisions | Requirements

1 | Record the deferral decision and the information that was communicated to the client prior to the deferral decision being made on the Notice of Service Deferral (Form 538). This form must be completed in full. A completed copy must be provided to the client and a copy must be retained for the file.


2 | Upload the following to the HES job file:


 All information provided to the client, including the Notice of Service Deferral (Form 538)

 The completed version of the DAACC file that was used to inform the deferral decision

 Photographic documentation of the building and site conditions

3 | Record the following information into the HES file on the audit information screen

 That the job has been deferred

 The reason(s) for the deferral

 The date of the deferral decision

4 | Assign the appropriate Job Type on the HES audit information screen

Assign the appropriate “No Unit” Funding Source for the job on the HES selected measures screen

Add the job to the correct HES invoice

## VT TEC Manual—Appendix G: Vermiculite Policies

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### Working in Homes with Vermiculite | Reactivating Deferrals

#### Eligibility Reverification Requirements When Reopening Deferred Projects

**For Owner-Occupied Dwelling Units:** When **all** of the following conditions are met, the household is automatically eligible for weatherization to proceed after the issues that caused the deferral have been addressed.

1. Prior to the deferral decision being made, the household was eligible for WAP services *when they transitioned off the client wait list and onto the open jobs/WIP list.*
2. There has been no change in ownership for the dwelling unit.
3. **Not more than two years** have elapsed between the date the client was informed in writing of the deferral decision and the date the weatherization agency was informed by client that weatherization work would be able to proceed. This duration of time shall be defined as the **eligibility grace period.**

Whenever a deferral is reactivated during the eligibility grace period there is no need for reapplication or a program eligibility reverification to occur.

If the eligibility grace period has elapsed, the household will need to provide an updated application packet to enable the agency to reverify their programmatic eligibility.

The original application date, efficiency coaching date and energy audit date shall be retained in the HES software program.

**All reactivated deferrals shall be expedited to the front of the production que.** This applies to all reactivated deferrals, even those where eligibility reverification is necessary due to the expiration of the eligibility grace period.

HWAP funding must be used to complete all reactivated deferral projects. DOE funding cannot be used.

**For Rental Properties:** When **all** of the following conditions are met, the project is automatically eligible for weatherization to proceed after the issues that caused the deferral have been addressed.

1. Prior to the deferral decision being made, the project was eligible for WAP services *when they transitioned off the project wait list and onto the open jobs/WIP list.*
2. There has been no change in ownership for the property.
3. **Not more than 12 months** have elapsed between the date the client was informed in writing of the deferral decision and the date the weatherization agency was informed by client that weatherization work could proceed. This duration of time shall be defined as the **eligibility grace period.**

Note that if the eligibility grace period has elapsed, the client will need to provide an updated application packet to enable the agency to reverify the project's programmatic eligibility.

Reactivated deferrals are not expedited to the front of the production que for rental properties. These projects are placed within the production que based on the date of the original efficiency coach visit relative to the coaching dates for other projects in the production que.

HWAP funding must be used to complete all reactivated deferral projects. DOE funding cannot be used.

## VT TEC Manual—Appendix G: Vermiculite Policies

### Vermiculite Policies & Procedures | Documentation & Forms

This section provides a summary of the required vermiculite documentation and forms for Vermont’s WAP.

Document Number	Document Name	Use Requirements	Required Recipients of Documentation & Signature Requirements
Vermiculite Form 532	Notice of Presence of Vermiculite or other Potential Asbestos Containing Materials (ACM)	This form must be used at every home with potential asbestos containing material. The client shall be informed about current policies and procedures related to vermiculite and/or other potential ACMs.	Is a Client Signature Required? --- <b>Yes</b>
			Is a WAP Agency Representative Signature Required? --- <b>Yes</b>
			Who Receives a Copy? --- <b>1   Client</b> <b>2   WAP Agency</b>
Vermiculite Form 533	United States Environmental Protection Agency’s Fact Sheet “Protect Your Family from Asbestos-Contaminated Vermiculite Insulation”	This informational fact sheet must be provided to all clients with vermiculite insulation.	Is a Client Signature Required? --- <b>No</b>
			Is a WAP Agency Representative Signature Required? --- <b>No</b>
			Who Receives a Copy? --- <b>1   Client</b>
Vermiculite Form 534	Vermont Department of Health’s, “Planning for Renovations and Demolitions: Asbestos and What You Need to Know”	This informational handout must be provided to any client / household with vermiculite insulation or other potential asbestos containing material.	Is a Client Signature Required? --- <b>No</b>
			Is a WAP Agency Representative Signature Required? --- <b>No</b>
			Who Receives a Copy? --- <b>1   Client</b>

## VT TEC Manual—Appendix G: Vermiculite Policies

### Vermiculite Policies & Procedures | Documentation & Forms

Document Number	Document Name	Use Requirements	Required Recipients of Documentation & Signature Requirements
Vermiculite Form 535	Vermont Weatherization Agency's Vermiculite Waiver	Each individual WAP agency is required to develop, maintain and use their own Vermiculite Waiver. Any update to the Waiver must be approved in writing by the OEO <u>prior to use</u> . The waiver must be used at each home with vermiculite insulation <u>before</u> proceeding with any weatherization construction/renovation services.	Is a Client Signature Required? --- <b>Yes</b>
			Is a WAP Agency Representative Signature Required? --- <b>Yes</b>
			Who Receives a Copy? --- <b>1   Client</b> <b>2   WAP Agency</b>
Form 536	Hazard Assessment Notification	This form must be used at every home that will receive weatherization services.	Is a Client Signature Required? --- <b>Yes</b>
			Is a WAP Agency Representative Signature Required? --- <b>Yes</b>
			Who Receives a Copy? --- <b>1   Client</b> <b>2   WAP Agency</b>

**VT TEC Manual—Appendix G: Vermiculite Policies**

**Vermiculite Policies & Procedures | Documentation & Forms**

Document Number	Document Name	Use Requirements	Required Recipients of Documentation & Signature Requirements
Form 537	Notice of Service Deferral – Category 1	<p>This form must be used when a deferral decision is made for the following reasons.</p> <p><b>1  </b> The client(s) is uncooperative, abusive or threatening to those who must engage with the client(s) or perform work at the home during the project.</p> <p><b>2  </b> Illegal activities are being conducted in the dwelling unit.</p> <p><b>3  </b> The dwelling unit has sewage or other sanitary problems (i.e., fleas or other pest infestation) that would endanger workers and that could potentially be worsened by proceeding with weatherization work.</p> <p><b>4  </b> The client has known health conditions that prohibit the installation of insulation and/or other weatherization materials.</p> <p><b>5  </b> The client has known health conditions that prohibit the disturbance or removal of existing materials in the home that would need to be disturbed or removed to complete the weatherization project.</p>	<p>Is a Client Signature Required?</p> <p>---</p> <p><b>No</b></p>
			<p>Is a WAP Agency Representative Signature Required?</p> <p>---</p> <p><b>No</b></p>
			<p>Who Receives a Copy?</p> <p>---</p> <p><b>1   Client</b> <b>2   WAP Agency</b></p>
Form 538	Notice of Service Deferral – Category 2	<p>This form must be used when a deferral decision is made for any reason other than the reasons that are listed above or the reasons that are outlined on pages 11-14 of this appendix.</p>	<p>Is a Client Signature Required?</p> <p>---</p> <p><b>No</b></p>
			<p>Is a WAP Agency Representative Signature Required?</p> <p>---</p> <p><b>No</b></p>
			<p>Who Receives a Copy?</p> <p>---</p> <p><b>1   Client</b> <b>2   WAP Agency</b></p>

## VT TEC Manual—Appendix G: Vermiculite Policies

### Vermiculite Policies & Procedures | Documentation & Forms

Document Number	Document Name	Use Requirements
Form 539	Vermiculite Process Waiver Request	<p>This waiver form must be submitted to OEO to request permission to defer a project where the “First 3 Vermiculite Service Phases” have not been fully competed <u>unless</u> one of the allowable exceptions outlined on pages 11 and 12 of this appendix is the reason for the deferral.</p> <p>If one of the allowable exceptions outlined on pages 11 and 12 of this appendix is the reason for the deferral, then the project can be deferred without submitting this form to OEO.</p> <p><i>Note that this form is only used in homes that contain vermiculite. Use form 540 in homes that do not contain vermiculite.</i></p>

#### Preparing & Submitting Documentation to the Zonolite Attic Insulation (ZAI) Trust

It is not allowable for a WAP Agency to ask the client to do anything more than sign and mail in any completed paperwork to the ZAI Trust. Preparation of all documentation required by the ZAI Trust shall be the responsibility of a WAP Agency and/or their designated qualified asbestos contractor.

## VT TEC Manual—Appendix G: Vermiculite Policies

### **What to Do When Vermiculite is Not Identified Until the Weatherization Construction Phase**

If a WAP installer, e.g. a crew worker, is the first to identify vermiculite insulation at a home, the on-site installation team must immediately stop working in the area where the vermiculite exists and call their supervisor to inform them.

It is imperative that before any work resumes, the WAP agency informs the client about the presence of vermiculite, provides all the required forms, including Forms 532, 533, 544 & 545 and gets all the required vermiculite related consent forms signed.

This applies regardless of where the vermiculite is found or how much is found. The crew must stop working in that area and the agency must follow all applicable vermiculite guidance before work can resume.

### **What to Do When a WAP Installer is Attempting to Denspack the Exterior Walls of a Home and Finds Vermiculite Insulation**

Please note that everything outlined above—informing the client, providing informational forms, getting consent forms signed—needs to be done prior to performing any of the steps below that outline where & how to drill additional holes in exterior walls after vermiculite is found in an exterior wall bay.

On the exterior of the building, drill a one-inch test hole 12-18 inches above the sill plate in the first wall bay closest to the corner of that wall. If no vermiculite is found, proceed to drill and insulate the wall.

- ✚ **If vermiculite is found** | Stop and do investigative drilling at the furthest point from where the vermiculite was found. If that bay has vermiculite as well, assume the entire wall has vermiculite and stop drilling and insulating that wall section.
- ✚ **If vermiculite is not found** | Continue to drill and insulate back toward the initial wall bay where the vermiculite was found. Stop drilling and insulating one wall bay before the point where vermiculite was initially found.

All individual wall sections shall be attempted to be insulated following the procedures listed above.