



November 20, 2023

New York City Department of Buildings
Office of the General Counsel,
280 Broadway, 7th Floor
New York, NY 10007

**Re: Notice of Public Hearing and Opportunity to Comment
§908-02 – Standards for Installation and Location of Natural Gas Alarms,
Comments of the Northeast Gas Association.**

Via Email

Dear Sir or Madam:

The Northeast Gas Association¹ (“NGA”) respectfully submits the following comments and request for revision on behalf of our natural gas Local Distribution Company Members and Associate Members operating within The City of New York in response to the above referenced Notice.

NGA appreciates the focused efforts and commitment to enhancing gas safety within New York City (“NYC”) over the past several years, working collaboratively with a broad spectrum of stakeholders with a common goal of maximizing public safety. The introduction of several local laws including Local Law 152 (“LL 152”) and Local Law 157 (“LL 157”) codifies industry leading practices to maximize safety within buildings. Local Law 157 and the proposed rules will provide an additional layer-of-protection to alert consumers of a potential gas leak within a building. This will build on existing industry protective measures such as gas odorants.

¹ NGA is a regional trade association that focuses on pipeline safety and safety culture, education and training, technology research and development, operations, planning, and increasing public awareness of natural gas in the Northeast U.S. NGA supports a culture of pipeline safety and environmentally responsible energy delivery practices. NGA represents natural gas distribution companies, transmission companies, liquefied natural gas suppliers and associate member companies. Its member companies provide natural gas service to 14 million customers in 9 states (CT, MA, ME, NH, NJ, NY, PA, RI, VT).

For more than a decade, NGA has supported our members as they have developed residential gas alarm technology, tested these technologies, and promoted their awareness. In addition, NGA continues to play an active role with Underwriters Laboratory (“UL”) and the National Fire Protection Association (“NFPA”) Technical Committees responsible for both gas alarm product performance standards and device installation requirements referenced in NYC proposed rules (UL 1484 & 2075, NFPA 715). As such, NGA is in a unique position to provide comments to help support fit-for-purpose application of these important safety devices parallel with the intent of the abovementioned standards.

General Comments:

1. Adoption of National Standard

NGA recommends that the NYC Department of Buildings (“DOB”) considers including identification of UL 1484 and UL 2075 as appropriate *device performance / manufacturing standards* in addition to the NFPA 715 as the appropriate *installation standard* reference. While UL 1484 and UL 2075 are referenced in NFPA 715, for clarity and as described below, both installation and performance standards should be clearly referenced in §908.02 Standards for the Installation and Location of Natural Gas Alarms. This logic is consistent with carbon monoxide (“CO”) detector device performance specifications and installation requirements. The NGA proposes the following revised standard language:

(a) Adoption of National Standard. In accordance with Local Law 157 of 2016, the Department of Buildings adopts the 2023 edition of National Fire Protection Association (“NFPA”) 715 Standard for the Installation of Fuel Gases Detection and Warning Equipment as it pertains to the installation and location of natural gas alarms. Furthermore, the Department of Buildings adopts Underwriter Laboratories UL 2075-2023 Gas and Vapor Detectors and Sensors and UL 1484-2022 Standard for Safety Residential Gas Detectors.

2. References to Device Performance Standards (UL 1484) vs Device Installation Standard NFPA 715

NGA recommends clarification that references to alarm manufacturing standards refer to UL 1484, 5th edition, October 7, 2022 - *Standard for Safety Residential Gas Detectors*. While UL standards are referenced in NFPA 715-2023, it may lead to confusion to rely on an installation standard as a surrogate manufacturing / performance standard and as such the UL 1484 standard should be referenced directly in Section 908-02 (f)(1) as proposed below:

(f) Requirements. Each single- or multiple-station alarm, as defined in NFPA 715, must meet all of the following requirements:

*(1) The alarm must be manufactured, in accordance with **UL 1484-2022 Standard for Safety Residential Gas Detectors NFPA 715-2023, Standard for the Installation of Fuel Gases Detection and Warning Equipment**;*

3. Installation Requirements and Proximity to Fuel Burning Equipment

NGA understands the intent of Section 908-02(f)(2), as with NFPA 715, is to have alarms in relative proximity to end-use equipment. However, there may be situations, particularly in NYC, where the fuel burning equipment is installed in a utility closet within a larger room (a water heater for example). In this case, the alarm, for all practical purposes, would be installed within the utility closet and in some cases, within 3 feet of the appliance.

As a result, NGA recommends the following clarification to Section 908-02(f)(2) that meets the intent of NFPA 715:

*(2) Where a fuel-gas-burning appliance is installed within a dwelling, the gas alarm must be installed **as close as practicable to the same room as the appliance**. The alarm must be located at least 3 feet or as practicable, but not more than 10 feet from the appliance, measured horizontally. The gas alarm must be installed on either the ceiling, or a wall. Where installed on a wall, the alarm must be located not more than 12 inches from the ceiling.*

Exception: When the manufacturer's instructions or NFPA 715-2023 require installation in a different location, alarm installations must be placed in accordance with the manufacturer's or the NFPA 715 location requirements.

Finally, NGA agrees with the abovementioned Exception as it provides flexibility in adopting future advanced technologies, provided they meet UL 1484 requirements and manufacturers installation instructions.

4. Installer Qualifications

NGA recommends clarification to the Exception language in Section 908-02(g) that would permit a Licensed Master Plumber (LMP) to install, either a battery operated or plug-in AC alarm, on behalf of the building owner. Since the LMP is conducting gas safety inspections under LL 152, this may be an opportunity to leverage these inspections and assist building owners in conformance with LL 157. In addition, NYC DOB should consider including inspection for the presence of a gas alarm in spaces with fuel burning equipment that are required to be inspected in accordance with LL 152. This approach will provide NYC DOB with conformance data with LL 157 while addressing LL 152 requirements. As a result, NGA recommends the following clarification to Section 908-02(g):

(g) Installer qualifications. *Natural gas alarms must be installed by a New York City Licensed electrical contractor, who obtains all required permits.*

*Exception. Natural gas alarms that are powered either by battery or by plug-in AC receptacle may be installed by the building owner, building maintenance personnel, by the dwelling unit occupant or by a **Licensed Master Plumber Personnel acting on behalf of the building owner.***

5. Utility Installed Monitoring Equipment Exception

In some cases, Utility Operators have installed gas monitoring equipment within buildings to remotely monitor jurisdictional piping and appurtenances as defined in New York State Department of Public Service (NYSDPS) rules in (§16 NYCRR 255) for indications of a gas release. This equipment is exclusively used for Utility equipment monitoring purposes and does not meet the definition of Fuel Gas Alarm or Fuel Gas Detector in NFPA 715. This equipment is not intended to meet the requirements of LL 157 and as a result, for clarity, Utility monitoring equipment should be exempt from §908.02 as proposed below:

(b) Installation required. *Natural gas alarms must be installed in private dwellings, class A multiple dwellings, and class B multiple dwellings as defined in the Housing Maintenance Code, in accordance with the requirements of this section and local law 157 of 2016.*

*Exception: The requirements of this section do not apply to buildings that do not have gas piping or gas service or to **gas monitoring equipment installed by the Utility solely for the purpose of monitoring utility equipment.***

6. Retroactivity

In some cases, consumers may have installed gas alarms in advance of §908.02 and as a result, if the devices were listed to UL 1484 at the time of installation and installed in accordance with manufacturers requirements, should be considered retroactively in conformance. NGA recommends the NYC DOB consider clarification of retroactivity consistent with requirements in NFPA 715.

NGA appreciates the opportunity to provide comments in this matter.

Respectfully submitted,



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