

Comments on NYC Department of Buildings Proposed Rules to Implement NYC Local Law 157

Detailed below are two specific comments on the proposed DOB rules to implement LL 157. The first is a technical comment concerning a conflict in how the applicable industry device manufacturing and installation standards are referenced. The second is allowing for an exception from device installation guidance in NFPA 715-23 and the proposed rule itself, to accommodate physical room size space limitations.

1 – Referencing of Industry Standards

The appropriate manufacturing standard to reference in the rules is UL 1484 - *Standard for Safety Residential Gas Detectors* and the appropriate installation standard to reference is NFPA 715-2023 *Standard for the Installation of Fuel Gases Detection and Warning Equipment*. Section 908-02 (f)(1) inappropriately references the installation standard, NFPA 715-2023 as a manufacturing standard, instead of UL 1484, which could create conflicts and confusion for device manufacturers and suppliers.

Background:

UL 1484 - *Standard for Safety Residential Gas Detectors*, is the long standing manufacturing standard which establishes the requirements residential gas detector (gas alarm) manufacturers must meet to be listed to this standard. Residential gas detectors listed to UL 1484 must undergo a series of comprehensive tests to confirm performance attributes. Detection threshold, resistance to false alarms, and ignition testing to prove the device cannot be the source of ignition in a maximum flammability gas environment are a few examples of the performance testing mandated by UL 1484. UL 1484 also prescribes how devices are labeled and what information is included in manufacturing instructions. UL 1484 is the performance standard all residential gas detector (gas alarm) manufacturers seek to adhere to and comply with.

By way of comparison, NFPA 715 *Standard for the Installation of Fuel Gases Detection and Warning Equipment*, went into effect in April 2022, and as the title implies, is primarily an installation standard that prescribes how fuel gas detectors (gas alarms) are installed in dwellings. Notably, NFPA 715 by its title and intended application is not a manufacturing standard.

Comment:

My specific comment applies to Section 908-02 - *Standards for Installation and Location of Natural Gas Alarms*, paragraph (f)(1), which states: "The alarm must be manufactured, in accordance with NFPA 715-2023, Standard for the Installation of Fuel Gases Detection and Warning Equipment;"

As written, this requirement creates a conflict for any residential gas detector (gas alarm) manufacturer as it references the NFPA 715 installation standard as a manufacturing standard, instead of UL 1484.

Therefore, I recommend the existing Section 908-02 (f)(1) be changed to reference UL 1484 instead of NFPA 715 as follows (changes bolded):

*(1) The alarm must be manufactured. in accordance with **UL-1484, Standard for Safety Residential Gas Detectors**;*

Or, alternatively, if the intent of Section 908-02(f)(1) is to provide guidance on installation versus manufacturing, it could be changed to read:

*(1) The alarm must be **installed** in accordance with NFPA 715-2023, Standard for the Installation of Fuel Gases Detection and Warning Equipment;*

2 – Recommended Modification to Proposed Rule Minimum Horizontal Distance Requirement

Background:

Building and private home owners will encounter situations where it will not be physically possible to install a gas alarm in the same room as a fuel burning appliance that is a minimum of 3 feet horizontally away from that appliance. This situation would most commonly arise with gas hot water heaters and gas clothes dryers installed in small utility closets.

Comment:

I recommend Section 908-02(f)(2) be modified to allow for the installation of a gas alarm closer than 3 feet horizontally away from a fuel gas burning appliance in enclosed spaces where it is impractical to meet the 3-foot minimum requirement. This would meet the intent of NFPA 715 but recognize that utility closets commonly used to house gas hot water heaters, gas clothes dryers and in some cases gas boilers and furnaces may not accommodate installation of a gas alarm at least 3 feet away horizontally.

Recommended changes to Section 908-02(f)(2) bolded below:

*(2) Where a fuel-gas-burning appliance is installed within a dwelling, the gas alarm must be installed in the same room as the appliance. The alarm must be located at least 3 feet, **or as far 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, **other than variations from NFPA 715 minimum horizontal distance requirements necessary to accommodate installation of gas alarms in enclosed spaces.***