Comments submitted in support of Chapter 900 of Title 1 of the Rules of the City of New York as amended by adding a new Section 908-02 with the following revisions:

Comments submitted by: Robert Torbin: Omega Flex, Inc., and member of the NFPA 715 Technical Committee, and Eric Crosson: Sparrow Detect, Inc.

**§908-02 Standards for Installation and Location of Natural Gas Alarms.**

**(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.

**(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.

**(c) *Private dwellings.*** One or more natural gas alarms must be installed in each dwelling in accordance with this section on or before May 1, 2025.

**(d) *Class A multiple dwellings.*** One or more natural gas alarms must be installed in each dwelling in accordance with this section on or before May 1, 2025.

**(e) *Class B multiple dwellings.*** On or before May 1, 2025, class B multiple dwellings must be protected by either:

(1) One or more natural gas alarms installed in each dwelling in accordance with this section; or

(2) A line-operated zoned natural gas detecting system, designed in accordance with NFPA 715-2023 by a registered design professional, and installed in all public corridors and public spaces.

**(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 NFPA 715-2023, Standard for the Installation of Fuel Gases Detection and Warning Equipment;

(2) Where ~~a~~ one or more permanent fuel-gas-burning appliance(s) is/are installed within a dwelling, ~~the~~ one or more gas alarms must be installed ~~in~~ on the same ~~room~~ floor as the appliance(s). The alarm must be located ~~at least~~ more than 3 feet~~, but~~ ~~not more than 10 feet~~ from the appliance(s), ~~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.

(3) One alarm must be installed in the basement of any building served by fuel gas service where the point of entry of the gas piping is below grade.

(~~3~~4) The alarm must be labeled with the name of the manufacturer;

(~~4~~5) The alarm must be listed and labeled with either UL 1484 or UL 2075, as applicable; and

(~~5~~6) The alarm must be kept in good working order.

**(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, or by the dwelling unit occupant.

***(h) LP Gas Service***. For dwelling units served by LP gas, the requirements for fuel gas detectors remain the same except the gas alarm must be installed on a wall and must be located within 18 inches of the floor.

**Substantiation:**

The New York City Rules are revised to reflect the market entry of new fuel gas detectors based on a different sensor and methane detection technology that permits the detection of methane at extremely low concentrations (< 1%). The primary benefits of this technology include:

* a significant improvement in life-safety features that permits earlier detection of a natural gas leak which provides the occupants more time to react and evacuate the property.
* A more reliable measurement approach and improvement in the accuracy of the alarm which reduces the number of false positive indications and minimizes negative consumer outcomes, and
* a much lower cost to the consumer/building owner which should encourage faster adoption and implementation within existing housing and buildings.

NFPA 715, which was first issued in April 2022, is now open for public comments and pending re-publication in April of 2025. To date, proposals have been received by the Technical Committee to revise sections 9.4.1 and 5.8.5.3.1 regarding the number of required detectors and the recommended mounting locations. The This issue will not be resolved before the NYC Rules are adopted by the Department of Buildings. Therefore, it is recommended that the NYC Rules reflect the quickly evolving technologies for methane detection and accommodate all currently available fuel gas detection alarms and sensors. NYC housing stock is unique in many ways including age, floor plans, building materials and appliance installations, and represents a major challenge to installers regarding the retrofitting of methane detectors. The proposed revisions will not reduce the level of prescribed safety presently built into the NFPA 715 requirements, but will allow the maximum flexibility for homeowners, building owners and renters to install and operate these devices in their homes with minimum cost and disruption, and as quickly as possible. The proposed revisions will not interfere with the efforts of Consolidated Edison regarding the methane detectors that they have installed in proximity to their indoor gas meters and any fuel gas sensors added by the building owners and occupants.