

Greetings,

After my review of the proposed Rule amending LL 126 of 2021 for the amends section 908-01 I would like to make the following recommendations for consideration before this rule is officially accepted:

1. In the beginning of section on page # 3 bullet point two, a change was made it applied prior to R2 buildings that negates the requirement for carbon monoxide system detectors. I believe that it should be modified and not eliminated for certain conditions and areas such as laundry rooms that have gas fired dryers as well as boiler rooms. In both cases there are greater capabilities of exposure, especially in laundry room that have a higher occupancy level. These areas should be included for this occupancy in this rule. Take note of the code section below that does not always seem to be applied in R2 occupancies as being broken out with such spaces as to a separate occupancy rating, therefore it is included as an R2 as opposed to a B occupancy. But if so, it would then require carbon monoxide detection that is if there was a fire alarm system present, maybe?

### **303.1.2 Buildings and Nonaccessory Tenant Spaces**

A building or nonaccessory tenant space used for assembly purposes with an occupant load of fewer than 75 persons shall be classified as a Group B occupancy, except that the number of plumbing fixtures for such a building or space is permitted to be calculated in accordance with the requirements for assembly occupancies.

2. In the proposed 908-01/915-01 (F) shut down of carbon monoxide producing appliances, I would like to suggest that it is done the same way as required with HVAC shut down is done in a fire alarm system. There should be the requirement for a two-step reset process (interlock) as opposed to just a reset of the fire alarm control to ensure the investigation of that event. This suggestion is very important as it applies to appliances that have pilot lights that is so that gas is not released upon reset of the fuel shut done as opposed to one action. In commercial kitchen hood fire suppression systems where the appliance use gas, and it is shut down with an electrical gas valve, it is required that a reset locking relay be there so that it must be reset before the gas is restored to prevent an accident. So, may be believed that appliances with pilot lights are no longer in service but why take the chance?
3. In section 4.4.1.1 it states who is authorized to inspect and test carbon monoxide detectors but it does not limit it to FDNY approved firms and inspectors that hold the required COF. As stated, any NYS licensed alarm firm can do this. Additional wording should be added as to limit it to approved firms and persons to make this even clearer. It does state that it includes rules and relations propagated by the Fire Commissioner but that is very broad.
4. In section 6.4.1.1 it states that in an ambient sound level over 105 dba visual notification appliances are required. Additional audible appliances should also be required too, but with an alternative as stated in the NFPA 72 that allows you to reduce the sound level in that area with an equipment shut down method, as done with music in night clubs. This would be alternate means if it can be accomplished to bring it below the threshold stated above in that area.

5. As for the requirement for carbon monoxide detection in existing building/occupancies without fire alarm systems, I would also like to suggest that this be reconsidered as well as be retroactively required in building occupancy classifications list for compliance that do not have fire alarm systems since they pose the same hazard. A stand-alone system should be required to be installed. In such cases the set level requirements (to be determined) for them could be based upon the BTU ratings of the gas fired unit or multiple units that pose the possible risk. That may able to be determined from the boiler inspection report as an example method to determine this. Consumer Affairs Licenses may possibly be used to identify businesses that may be subject to compliance too. A free pass should not be given for compliance to this rule to existing occupancies when there no fire alarm system even though the same hazards exist. An example of this would be a self-service laundromat that is open to the public with an M or B occupancies and have multiple gas dryers. The same exposure hazard exists here to the occupants but this requirement would only apply if there is a fire alarm system and not if there was none, why? I know that there may be some objections here to include this, but if the intent is for life safety as it applies to carbon monoxide then this should not come into play.
6. Items that are not fully addressed and should be in this rule revisions, are the setting of the visual appliance levels (intensity), sequence of operation for the carbon monoxide detector(s) with the fire alarm system, and the allowance for additional audible appliances with the installation requirements for them.