

A G E N D A

CON EDISON

1. TEMP Gas Authorization

Usually issued for equipment/system test purposes. Who is responsible to follow up to ensure that the gas meter is locked after the temporary authorization period is over? The DOB? Plumber? Utility?

The responsibility should be on the plumber to follow up with the utility company after they have had a successful equipment/system test.

2. Utility Meter Relocation

When utility relocates gas meters from indoors to outdoors, what is the limit of the Utility scope of work? Is an LAA (permit) required and is a Licensed Master Plumber required to be part of this work?

To relocate a gas meter, additional gas piping must be installed. This alteration to the existing system requires a gas test and the necessary inspections from the DOB, which must include testing from the meter to the gas-end appliances. The work must be installed by an LMP and the necessary permit must be obtained. A LAA will be sufficient, because there is already an existing setting and system in place for the appliances.

MECHANICAL CONTRACTORS ASSOCIATION

1. Fire Pump Testing

The general procedure for pump acceptance testing in relation to standpipe flow testing needs to be clarified. Currently both of these tests are combined and really are more of a standpipe flow test than a pump acceptance test. Could we resurrect the bulletin that was supposed to go out a few years back?

The previously drafted Service Notice on acceptance testing will be re-evaluated and revised.

2. Design Drawings that Designate the LMFSC to Engage the Special Inspector

Special Inspector Issues:

- A.** Special Inspector and the Engineer of Record issue: Because of the conflict of interest the DOB does not allow the contractor to hire the SI or file the project as the EOR. We have been seeing quite often in our contracts line items requesting us to procure the SI or take over the duty of the EOR. Although we exclude this it eventually will rear its ugly head

sometime along the way. There is no clear language in the Code that we can forward to the owner stating this. A bulletin to clarify the responsibilities of the owner to hire both the SI and EOR would help us to go back at the owner and avoid taking on these responsibilities.

Concerning Special Inspections, BC 1704.1 makes clear that the SI must be retained by the owner. See below:

1704.1 General. *Where application is made for construction as described in this section, one or more special inspection agencies meeting the requirements of Sections 28-114.1 and 28-115.1 of the Administrative Code shall be retained by the owner to provide inspections during construction on the types of work listed under Section 1704 and elsewhere in this code.*

Concerning the EOR, BC 1704.1.2 does allow the EOR to serve as the Special Inspector. See below:

1704.1.2 Responsibilities of the special inspection agency. *The special inspection agency shall have the following duties and responsibilities:*

1. *Independence. The special inspection agency shall be independent of the contractors responsible for the work being inspected. The registered design professional of record is permitted to act as the approved special inspection agency and such agency's personnel are permitted to act as special inspectors for the work designed by the registered design professional of record, provided those personnel meet the qualification requirements of this section to the satisfaction of the department.*

- B.** Although Fire Suppression Contractors are allowed to be independent 3rd party Inspectors, I am being told that DOB Now will not accept a LMFSC to sign up for *special inspector responsibilities and is only accepting a PE.*

DOB is working to resolve.

PLUMBING FOUNDATION

1. Gas piping to temporary boilers and also to permanent boilers – NYCHA project in the Bronx. As you can see, there is a tee after the meter rig that has a valve for the permanent boilers and also a valve for the temporary boilers. In this picture, gas is already on so after the permanent boilers are complete, their plan is to close the valve supplying the temp boilers, install a blank and leave it as a future. The same NYCHA rep wants the contractor to do this at another NYCHA Brooklyn site.

On this contractor's NYCHA boiler projects, he always tells them you cannot do this either temporarily or permanently. As much as it would be helpful, he doesn't know of any way to acceptably apply the Code to the above approach.

The Code allows blanking off the gas line to the temp boilers provided the utility company can lock it off.

MASTER PLUMBERS COUNCIL

1. What is the specific NYC FGC section that prohibits the use of appliance connectors on non-residential gas dryers?

According to FGC 411.1 both hard pipe and connectors are permissible. For space heaters and water heaters in dwellings there is an explicit requirement for hard-piped connections. Please note that appliances must be installed in accordance with the manufacturer's instructions. See below:

411.1 Connecting appliances. Except as required by Section 411.1.1, appliances shall be connected to the piping system by one of the following:

1. Rigid metallic pipe and fittings. Space heaters and water heaters within dwelling units shall be connected using rigid piping and fittings only. Use of semirigid (flexible) metallic tubing, fittings, appliance connectors or quick-disconnect devices is not permitted for this application.
 2. Listed and labeled appliance connectors in compliance with ANSI Z21.24 and installed in accordance with the manufacturer's installation instructions and located entirely in the same room as the appliance.
 3. Listed and labeled quick-disconnect devices used in conjunction with listed and labeled appliance connectors.
 4. Listed and labeled convenience outlets used in conjunction with listed and labeled appliance connectors.
 5. Listed and labeled outdoor appliance connectors complying with ANSI Z21.75/CSA 6.27 and installed in accordance with the manufacturer's installation instructions.
2. Development Inspectors have been requiring LMPs to file a PAA and prove the legality of an existing gas appliance. Recently the Department voided hundreds of ECB violations issued for Ordinary Plumbing Work related to this exact issue.
 - A. Under the Code, we believe that it is the Department's responsibility to research the legality of an installation and if appropriate issue a violation to the owner of the building?

It is the obligation of the owner to maintain their building in a safe and Code compliant manner. See below:

102.3 Maintenance. Installations, both existing and new, and parts thereof shall be maintained in proper operating condition in accordance with the original design and in a safe and sanitary condition. Devices or safeguards that are required by this code shall be maintained in compliance with the applicable provisions under which they were installed.

102.3.1 Owner responsibility. The owner or the owner's designated agent shall be responsible for maintenance of plumbing systems. To determine compliance with this provision, the commissioner shall have the authority to require any plumbing system to be inspected.

§28-301.1 Owner's responsibilities. All buildings and all parts thereof and all other structures shall be maintained in a safe condition. All service equipment, means of egress, materials, devices, and safeguards that are required in a building by the provisions of this code, the 1968 building code or other applicable laws or rules, or that were required by law when the building was erected, altered, or repaired, shall be maintained in good working condition. Whenever persons engaged in building operations have reason to believe in the course of such operations that any building or other structure is dangerous or unsafe, such person shall forthwith report such belief in writing to the department. The owner shall be responsible at all times to maintain the building and its facilities and all other structures regulated by this code in a safe and code-compliant manner and shall comply with the inspection and maintenance requirements of this chapter.

- B. What happens if no records can be found?

If there are no records the installations need to be legalized.

3. There has been a change in an existing procedure allowing stamped **as-built** plans and letters obtained for the design professional to be used to conduct an inspection and/or request gas authorization.

- A. Why has Development, without notice, prohibited the standardized practice of permitting a licensee to continue with jobs with changes providing they have stamped plans and a letter? They have declined to conduct inspections and require a PAA be obtained.

For Development inspections, sign and sealed plans with corrections bubbled by the design professional along with providing a letter stating what the corrections will be are acceptable in lieu of PAA. However, this is not applicable to finish inspections. Finish inspections require the plans to be correct at the time of inspections.

- B. If a job has a PAA in progress, a request for Gas Authorization will not be granted. Assuming the LMP is in possession of stamped plans; a letter and provides the proper comments: Why should a PAA in progress have to hold up an inspection?

The inspection will not be performed if there is an open PAA given that the open PAA might conflict with the work that is requested to be inspected.

- C. Why should a PAA in progress have to hold up gas authorization?

Gas Authorization will not be granted if there is an open PAA given that the open PAA might conflict with the work that is requested to be inspected.

- D. This situation does not preclude obtaining an Advanced Notice inspection.

Advance Notice Inspections should not be allowed if there is an open PAA. We will investigate further and resolve as needed.

4. Allowance for the continued use of ½” gas piping supplying a gas stove. The Codes maintain that while, for the most part, all new or replacement piping must comply with the current Codes (Fuel Gas Plumbing Fire), the existing system may stay in place under certain conditions. Why is the Department seeking to impose additional requirements to an owner?

½” gas piping supplying a stove was never permissible under the 1938 and 1968 Codes. We have allowed in-kind replacements (i.e. replacing a gas range with a range that has the same number of BTUs) at the original location with no work to the gas line to remain on the existing ½” pipe.

5. Permits are issued with an expiration date that is the next **possible** expiration date of their insurance or license. The expiration date will automatically be updated after the licensee renews their insurance or license. If the appointment would occur after a **possible** expiration date, Development is declining to grant an Actual Inspection. Advanced Notice Inspections can be successfully submitted and conducted.

- A. Why should an inspection be denied on the possibility that an event can occur?

The Department will work to have permits get extended automatically when insurance is updated rather than waiting to the date of expiration

- B. Do inspectors check their route sheet prior to inspections to verify the inspection can be legally conducted (not expired, no stop work order, no vacate)?

Yes.

6. Please find below a few scenarios that we request clarification on:

- A licensed Master Plumber (LMP) obtains an EWN and conducts work.
- The LMP submits a LAA application and the application will not go through due to open violations.
- The LMP submits **L2** forms but they are rejected.
- The owner refuses to do anymore work.

- A. What actions must the LMP take?

The LMP should notify the LAA Unit. Enforcement will then perform an inspection. Following the inspection the EWN will be revoked and a Work Without a Permit violation will be issued to the owner.

- An LMP obtains an EWN and conducts work.
- The LMP submits a LAA application and the application is **audited**.
- The Department requires remedial actions to be taken.
- The owner refuses to do anymore work

- B. What actions must the LMP take?

Same as 6 (a) above.

7. The inability for registered design professionals to file PAA's or make changes to plans. Design professionals cannot change information in the Record and complete the PAA. In some cases, the Boiler Division is requiring another filing.

The Department is reviewing examples provided and will follow-up the next meeting.

8. Their filings are not complete due to the lack of Schedule C or Schedule B. In BIS, the Schedule B & Schedule C had mandatory boxes that had to be completed by the registered design professional. In DOB NOW: *Build*, there are **pages** that are similar to both of these documents. However, the completion of these boxes is not mandatory. In addition, not all of the boxes carried over into *Build*. As an example:

- Design professional fails to include all required gas information in the application.
- Design professional does not find the appropriate **box** to check off the specific gas usage.
- Inspector requests PAA to make a change to the record.

The Department is reviewing examples provided and will follow-up the next meeting.

9. Please find below issues that our members are experiencing with DOB NOW: *Build* LAA:

- A. The inability to upload documents.

There are unfortunately occasions when this happens. We are working to resolve. If you encounter this problem use the Help Form at www.nyc.gov/dobhelp to report.

- B. Their permits are not migrating.

There are unfortunately occasions where there are problems with the migration between Build and Inspections. We are working to resolve. If you encounter this problem use the Help Form at www.nyc.gov/dobhelp to report.

- C. Is there another process that members can follow for help with DOB issues, as the current process takes a long time?

We post our service level on our Dashboard on our website. It's currently 2.6 days.

10. DOB Boiler Unit

- A. Boiler Inspection Checklist

See the following Boiler Project Requirements:

- ***[Boiler Design Professional Requirements](#)***
- ***[Allowable Work Without a Registered Design Professional Submitting Construction Documents for Department Approval](#)***
- ***[Work and Inspections](#)***
- ***[Work and Site Requirements](#)***

- B.** The inspection process with DOB NOW: *Build* plans and forms.
Outreach needs to be to engineers to inform them that if the filings are done wrong from the onset, the process will take so much longer.

The Department will stress to design professionals the importance of listing all the information on the initial filing.

- C.** Violations being issued for failed boiler inspections

There is a history of licensees not being ready for inspections. Licensees affirm in inspection request that the work is in compliance with the Code and ready for inspection.