



## **THE MPC GUIDE TO LOCAL LAW 152 COMPLIANCE**

The MPC is a non-profit organization consisting of small and large licensed plumbing contractor companies, whose mission is to protect the public health and safety of New York City through the enactment and enforcement of safe and effective plumbing Codes. Our committees have reviewed the Local Law 152 ([click here](#)) and the proposed rules ([click here](#)). We have been flooded with questions about persons offering to conduct LL152 inspections and there have been articles published about this topic that are not accurate. This document was created to provide the general public with up to date information, so that they can stay compliant with the requirements of LL152.

**IMPORTANT: As of March 06, 2019, the rule that will determine the qualification, inspection process and frequency of the inspections has not been finalized.**

### **At the time of this publishing:**

- NO** one is qualified to conduct the LL152 interior gas piping inspection.
- NO** official inspection process has been established.
- NO** official reporting procedure has been established.
- NO** start date or Borough has been finalized.
- NO** gas monitoring instrument specifications have been approved.

Until the rule is **finalized** and goes into effect, **no one** can state exactly what will be required for compliance.

## **FREQUENTLY ASKED QUESTIONS**

### **1. What is the reason for the delay in starting the inspections?**

There are still many details to work out and we do not anticipate inspections to start for at least a few months. The DOB is taking the time to develop an inspection process that provides the best level of safety for all NYC residents. There are approximately 330,000 buildings that will require inspection under LL 152. The intent was that an equal percentage of buildings from each borough would be inspected annually.

### **2. Should I have my plumber perform a pre-inspection?**

There is **NO SUCH THING** as a "*pre-inspection*" for an active gas piping system. If a licensed master plumber, or their employee, encounters any condition that can pose a hazard, they are obligated to take the required actions. If your plumber ignores a potentially hazardous condition, they are subject to both disciplinary actions against their license and criminal charges in the event there is a gas related incident related to their actions or inactions.

### **3. If I can't pre-inspect, what steps can I take to make my building pass an inspection?**

If your building has any leaks or dangerous abnormal conditions, the sooner they are identified and corrected the safer it will be for everyone. Many of our members have undertaken specialized training for these inspections and have advanced knowledge that they can share with you. They can provide you with recommended suggestions on how to best maintain your gas piping systems. Our members have access to the most up to date technical information to help you avoid an unnecessary gas shutdown and restore the gas in the event gas flow is interrupted.

### **4. How can I estimate what it might cost me if leaks are found and my building is shut down?**

We recommend that you have a discussion with your plumber. They can provide you with guidelines and budget pricing for repairs or replacement. They have information on how long a repair or replacement project may take and what steps could be taken to work with the Utility to prevent the gas from being shut off in the first place. A qualified plumber can discuss the permitting process. Any interruption to gas service is a major event for a building, so the plumber you chose can make all the difference in how fast gas service is restored. Our members are provided with the most up to date information through weekly updates and representation at all Utility and DOB Committee meetings.



**5. If there are NO approved inspectors or inspection process, how did my plumber provide me with a proposal?**

Without reviewing your proposal, we cannot comment on it specifically. As we have stated above, none of the LL152 inspector or inspection processes have been finalized at this time. There are very few licensed plumbers that possess enough information at this time to prepare an accurate estimate. As soon as the Rule and procedures are finalized all MPC members and other licensed plumbers will be provided with the information they need to provide you with a detailed estimate.

**6. Can anyone besides a licensed plumbing firm conduct a LL152 inspection?**

The law and the proposed Rules only permit a NYC licensed plumbing firm to conduct these inspections. As soon as the Rule is finalized, the exact qualifications of the inspectors will be determined. Engineers, Architects and special inspection agencies are **NOT** qualified to conduct these inspections and are prohibited from advertising plumbing services without a license.

**7. How long could it take to do a LL152 inspection?**

The time required to complete an inspection will be determined by several factors. The size of the building may not even be the determining factor. All exposed gas piping throughout the building must be both visually inspected and subjected to a leak detection inspection. There may be changes to the proposed rule that adds to the amount of pipe that may have to be inspected. Besides the actual field inspection, the inspector has pre-inspection work to complete and they must also process the DOB report.

**8. What do you think a LL152 inspection will cost?**

At this time, it is only possible to determine an approximate cost for an inspection. Some of the inspections may only require a few hours of field time. You can help your plumber determine how long it may take by surveying your existing system to identify where there is exposed gas piping. That would save the inspector some field time. At this time, there are some technical details relating to the inspection that must be finalized. We are recommending that our members wait to develop their inspection pricing. Owners should be comfortable with the firm they chose to do the inspection, ensure that they fully understand the process and explain what steps they will take to respond to leaks or other immediately hazardous conditions if they are encountered.

**9. If I am inspecting my piping and smell gas, or think I found a leak, what should I do?**

If you think you smell gas, you should leave the area and call 911. **DO NOT** use your cell phone, flashlight or any other electronic devices in an area where you think there may be a gas leak. Do not turn on any lights or operate any electrical appliances in that area. Leave the building and make your call outside. The fire department will respond and call in the Utility. These first responders are specially trained to look for possible gas leaks. It is important to know that they make every effort **NOT** to shut the gas off unless there is truly a need to do so. If you think you smell gas you should follow all of the information listed on your tenant safety plan. This plan was required under Local Law 153 of 2016 ([click here](#)).

**DO NOT** call your plumber until **AFTER** you have taken the above actions. If you call your plumber first, their professional response should be for you to immediately hang up and **call 911**.

This **abridged** LL152 guide was prepared by MPC Committee Members who are participants in the NYC Gas Working Group. Our Committee Members have actively participated in developing a federally approved gas interior piping qualification program. This guide has been published to provide the plumbing industry and the residents of NYC with the most up to date information about the new LL152 periodic inspections. It is subject to change without notice by the NYC Department of Buildings. It is for informational purposes only and the reader is responsible to ensure its accuracy.

We will be posting a full document to the website shortly. Please be sure to check our website to stay up to date.

The MPC has provided LL152 comments ([click here](#)) to the NYC Department of Buildings that are currently under consideration.