

2025 EDITION

THE BIG  
BOOK  
OF NYC LOCAL  
LAW COMPLIANCE

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A GUIDE FOR PROPERTY OWNERS AND MANAGERS  
Empower your team & prevent violations in the world's most complex environment

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# The biggest day (to date!) in compliance history is happening this year, in 2025.

From four different requirements falling on the same day to even larger penalties, this year is a huge year in local law compliance for NYC properties. That said, we've got you covered when it comes to understanding how these rules impact your portfolio, and how you can protect your buildings, occupants, and your business.

This year's edition of the Big Book of NYC Local Law Compliance gives you updates on the most complex regulations, plus critical how-to's for avoiding significant penalties and staying in compliance. We'll also cover easy ways you can track action items and take advantage of the latest tools available for your team.

The team at SiteCompli has been updating this Guide each year since 2016. And with the 10th anniversary of our Compliance Checklist (NYC's most-downloaded compliance resource) happening this year, we're not stopping anytime soon. Our team is always on standby to make sure yours has the latest industry news and updates, and knows how to respond to growing compliance challenges.

Read on to get all the details you need for your compliance strategy this year, and how you can plan ahead to stay on top of it all in the years to come.

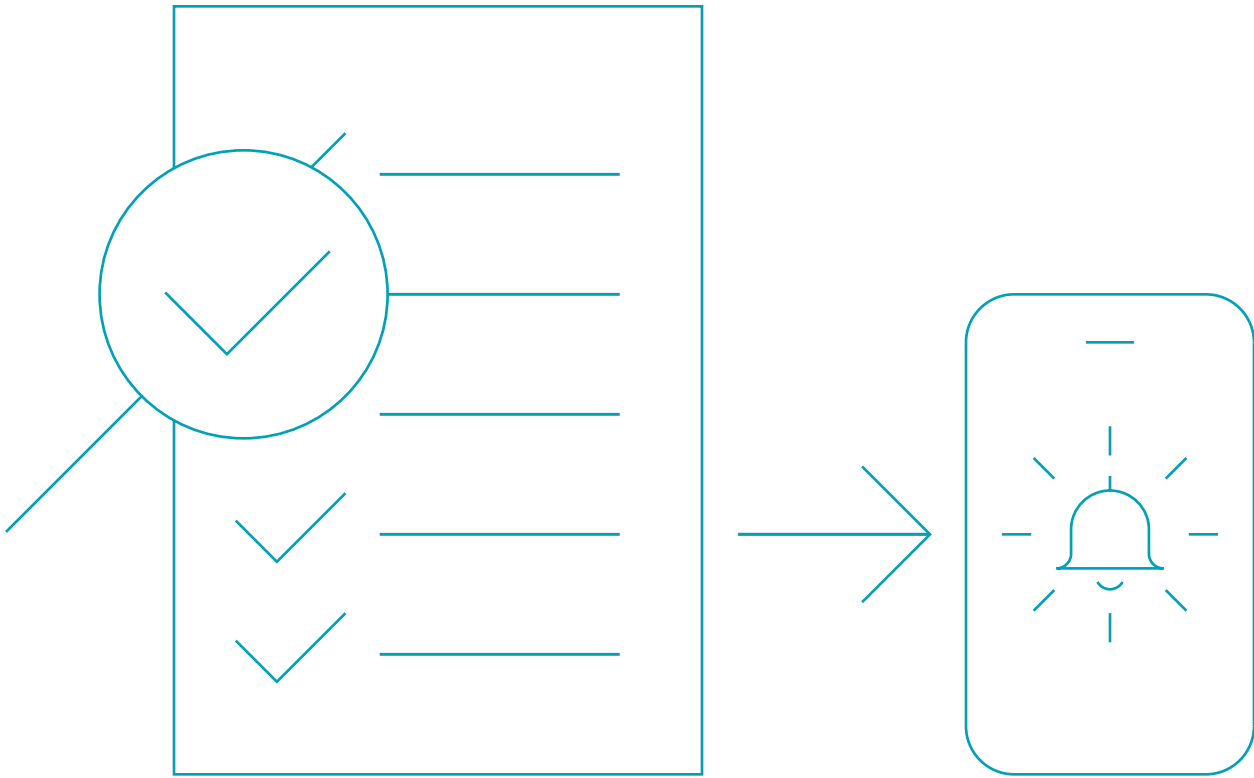
## WHAT'S NEW THIS YEAR?

- Retaining Wall must-do's and penalty increases
- FISP Cycle 10 – and what may come next
- New residential programs
- Critical Sanitation reminders

### COMPLIANCE CHANGES – WE'VE GOT YOU COVERED

Rules are changing constantly, so make sure you're informed. We'll keep you posted on the latest updates and best practices on the SiteCompli Blog. Subscribe to get weekly updates on new posts as they're released:

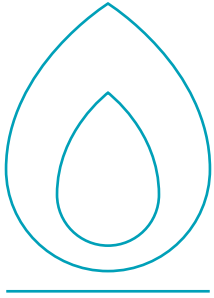
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MUST-DO'S:

REQUIRED  
INSPECTIONS,  
FILINGS,  
AND MORE



# GAS PIPING SYSTEMS

We're now over one year into the second cycle of required Local Law 152 filings. Here's a recap of what's required, and what's coming next.

## GENERAL DETAILS – INSPECTIONS AND CERTIFICATIONS

- Buildings are required to either perform gas piping inspections (if a system is in place) or submit certifications that no system exists once every four years
- That's right – **even if you don't have a gas piping system, you still need to comply with this law**
- That includes alternate requirements for buildings with a gas system that is currently not supplied with gas
- Filing dates are based on Community District:

LL 152 CYCLE 2 & 3 DEADLINES			
Subcycle	Community Districts (all boroughs)	Cycle 2	Cycle 3
A	1, 3, 10	1/1/24 - 12/31/24 (Done)	1/1/28 - 12/31/28
B	2, 5, 7, 13, 18	1/1/25 - 12/31/25	1/1/29 - 12/31/29
C	4, 6, 8, 9, 16	1/1/26 - 12/31/26	1/1/30 - 12/31/30
D	11, 12, 14, 15, 17	1/1/27 - 12/31/27	1/1/31 - 12/31/31

## KEY REMINDERS

- Inspections of gas piping systems must be conducted by a qualified inspector (LMP – Licensed Master Plumber, or a qualified individual working for one) and submitted to the building owner within 30 days of the inspection date. The same must be submitted to the DOB no later than 60 days from the inspection date.
- If there are any issues found and corrections are required, a Certification confirming that corrections were completed must be submitted within 120 days of the original inspection.
- Certifications for buildings without gas piping systems must also be done by a LMP or a Registered Design Professional (RDP). Properties with systems that are not currently supplied with gas/are not connected to any equipment must submit statements from the utility company and more to the DOB via their online portal.
- If you have any questions, reach out to [LL152of16@buildings.nyc.gov](mailto:LL152of16@buildings.nyc.gov)

## ENFORCEMENT

While we haven't seen violations for Cycle 1 filings, we are seeing Notices of Deficiency from the Department of Buildings. These NODs don't carry the promised \$5,000 penalty for failure to file, but they will stay open until an approved Cycle 2 filing is submitted. Additionally, the DOB states that "Failure to submit a GPS2 by the applicable deadline for Cycle 2 and future four-year cycles will result in a violation being issued and a civil penalty of \$1,500 for 3-family residential buildings and \$5,000 for all other buildings."

### LOCAL LAW 152 IN YOUR ACCOUNT

SiteCompli and InCheck users can view Local Law 152 due dates for each building in their portfolio (including community districts and building classifications) directly in their account:

<https://clients.sitecompli.com/dob/ll152>

### FILING INSTRUCTIONS

Get step-by-step details for inspections, certifications, and other scenarios directly from the DOB:

<https://www.nyc.gov/site/buildings/property-or-business-owner/gas-piping-inspections.page>



# ELEVATOR REQUIREMENTS

Here's a refresher on some of the most important elevator filing requirements – specifically periodic inspections, category 1 inspections, and category 5 inspections.

## PERIODIC INSPECTIONS

The periodic inspection requirement for devices has now been in effect for a few years. As a reminder, periodic inspections are no longer performed by private directors or inspectors on behalf of the DOB. Instead, building owners must hire an authorized agency to perform annual periodic inspections for their devices. This requirement is separate from and in addition to annual Category 1 inspections.

### REMINDERS:

- Periodic inspections must take place between January 1 and December 31 of each year, with a minimum of 90 days from the date of any Category 1 testing or past periodic inspection
- Initial periodic inspections on new installations must be performed in the calendar year following the final acceptance test
- Periodic inspections must be performed by an approved elevator agency and cannot be affiliated with the agency performing the maintenance
- Witnessing agencies are not required to witness the periodic inspections

PERIODIC ELEVATOR INSPECTION FILING DEADLINES	
Submit periodic inspection report to the DOB	Within 14 days of the inspection date
Correct defects identified in the periodic inspection report	Within 90 days of the inspection date
Submit Affirmation of Correction to DOB	Within 14 days of the date corrections were made

## KNOW THE DIFFERENCE: PERIODIC INSPECTIONS VS. CATEGORY 1 TESTING

Periodic inspections and Category 1 tests are different – and they’re both required for devices. Category 1 tests are performed by an approved elevator inspection agency and witnessed by an approved agency not affiliated with the agency performing the inspection.

Submission timelines are slightly different, as well:

UPDATED CATEGORY 1 INSPECTION FILING DEADLINES	
<b>Submit test report to the DOB</b>	Within 21 days of the inspection date
<b>Correct defects identified in the test report</b>	Within 90 days of the inspection date
<b>Submit Affirmation of Correction to DOB</b>	Within 14 days of the date corrections were made

## DON'T FORGET ABOUT CATEGORY 5 TESTS

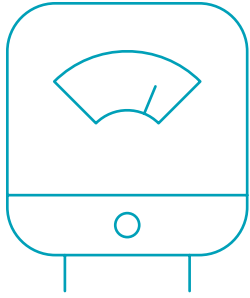
Category 5 tests are performed within 5 years from the month of the most recent test (e.g. June 2024 for a June 2019 test). Per the department, reports must be submitted within 21 days of the test date to avoid late fees. Filings not submitted by the 21st day of the month, following the five-year anniversary, will not be accepted and failure to file violations will be issued with a \$5,000 penalty.

## VIOLATIONS GOING FORWARD

After a 5-year pause and a mass-issuance in 2023, it looks like violations for failure to file and/or correct elevator inspections should be issued on an annual basis going forward.

As a reminder, the penalty – regardless of periodic or CAT 1, FTF (file) or FTC (correct) - is always the same: \$3,000 per noncompliant device.





# BOILERS – DOB & DEP

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## DOB REQUIREMENTS FOR BOILER INSPECTIONS

Inspection cycle: January 1 - December 31

Annual inspections must be performed in this timeframe and are required for both high and low pressure boilers. All inspection reports are due within 14 days from the date of performing the inspection.

### LOW PRESSURE BOILERS

Property owners must hire a licensed professional to conduct inspections. This can be a qualified installer licensed by the DOB or an authorized insurance company. Inspection reports for these inspections must be filed for H-stamped and E-stamped boilers (not HLW-stamped hot water heaters) located in the following property types:

- Residential buildings with six or more families
- Commercial and mixed-use buildings (1-5 residential units and commercial space), regardless of boiler BTU capacity
- Residential buildings classified as Single Room Occupancy dwellings

The following registered low-pressure boilers DO NOT require an annual inspection:

- Boilers in residential buildings with 5 families or fewer
- Single boiler located within a single dwelling unit and supplying heat only to that unit



**DON'T FORGET:** Low-pressure boilers with a heating input of 100,000 BTUs or less are subject to inspection when located anywhere outside a single apartment within a 6 or more residential occupancy, commercial or mixed-use property.

## HIGH PRESSURE BOILERS

High pressure boilers have slightly different requirements from low pressure boilers:

- Two inspections required: internal and external
- Inspections must be conducted in the same cycle (year), but should be performed approximately six months apart
- Inspections must be conducted by an authorized insurance company
- Inspectors must notify the DOB at least 10 days before performing the internal inspection

Electric high-pressure boilers must be annually inspected as high-pressure boilers in accordance with Article 303 of Title 28 of the NYC Administrative Code.

## FILING PROCESS & ENFORCEMENT

Annual boiler inspections are required to be submitted to DOB NOW: Safety 14 days after the inspection date. Late filings will result in a \$50 fee for every month past the initial due date, up to a maximum of \$600 per boiler.

Reports submitted after the late filing period (no later than January 14 of the calendar year immediately following the inspection cycle) will receive the full civil penalty of \$1,000 per boiler.

DEFECTS FOUND	DANGEROUS CONDITIONS
<p>A 90-day period from the initial inspection date is given to correct any defects, and another inspection report must follow 14 days after the defect is corrected.</p> <p>If the subsequent inspection report is filed after the correction due date, a failure-to-file Affirmation of Correction civil penalty of \$1,000 per boiler will be imposed.</p>	<p>The boiler must be immediately shut down if it is a threat to the life and safety of inhabitants of the building. The inspector who deemed the boiler dangerous has 24 hours to notify the DOB's Boiler Unit by email.</p>

## BOILER REMOVALS

An OP49 must be filed with the DOB in DOB NOW: Build as confirmation of a boiler removal or disconnection. This form must be submitted within 30 days of removal/disconnection, or it may be subject to late penalties.

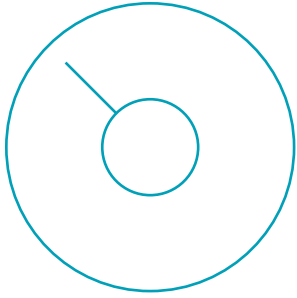
Filing an OP49 is critical - if you don't officially remove a boiler with the DOB, they may still issue annual administrative penalties for failure to file annual inspections - even if the building itself is demolished.

### BOILER FAQs AND GLOSSARY

Get more details on boiler ins and outs from the DOB:

<https://www.nyc.gov/site/buildings/safety/boiler-frequently-asked-questions.page>

<https://www.nyc.gov/site/buildings/safety/boiler-compliance.page>



# DEP BOILER TRIENNIALS

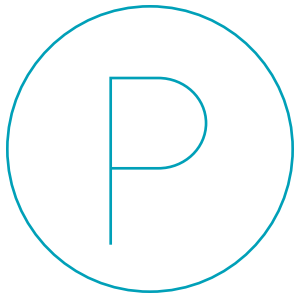
In addition to DOB regulations, certain boilers also must comply with requirements from the Department of Environmental Protection. DEP registrations for specific boilers are typically renewable every three years and can be accessed through the online Clean Air Tracking System (CATS).

#### GET THE DETAILS

See the full DEP requirement list here:

<https://www.nyc.gov/assets/dep/downloads/pdf/air/cats/cats-boiler-filing-applicability.pdf>

BOILER REGISTRATION I	BOILER REGISTRATION II	BOILER WORK PERMIT/ CERTIFICATE OF OPERATION
<p><b>350,000 BTU/hr to less than 2.8 million BTU/hr heat input</b></p> <p>The owner, owner's representative or any licensed professional could submit an application form. It must contain the boiler make/model, max heat input and gross output (BTU/hr), and fuel type.</p> <p>Registration will be issued for three years from the date of approval.</p> <p><b>IMPORTANT:</b> Boilers (owned by the same person in the same building) that are less than 350,000 BTU/hr each but combined have a heat input equal to 350,000 BTU/hr or greater must be registered in a single registration.</p>	<p><b>2.8 million BTU/hr to less than 4.2 million BTU/hr</b></p> <p>The owner, their representative, or any licensed professional could submit an application form. It must contain the boiler make/model, max heat input and gross output (Btu/hr), and fuel type of Boiler Room Plan.</p> <p>Professional Engineer Certification is required for boiler design and Boiler Room Plan.</p> <p>Licensed Oil Burner Installer (LOBI) and/or Licensed Master Plumber (LMP) must be identified before submitting the online form.</p> <p>Final Registration II will be issued for three years from the date of approval of initial Registration II.</p>	<p><b>4.2 million BTU/hr and above</b></p> <p>Only a Professional Engineer/ Registered Architect is allowed to file for a Work Permit.</p> <p>Drawings/Plans (in PDF format) with a Plot Plan, Boiler Room Layout and Boiler Plan, equipment compliance certification, draft calculations, heat load calculations for a new building, Workman's Compensation Insurance documents are all required.</p> <p>A work permit is issued for one year from the date of approval. Original Inspection request needs to be submitted by PE, LOBI/LMP along with performance test data and combustion test printouts.</p> <p>Certificate of Operation will be issued for three years from the date of the original inspection.</p>



# PARKING STRUCTURES

As a reminder, teams must hire a NYS licensed Professional Engineer who is designated by the Department as a Qualified Parking Structure Inspector (QPSI). They will inspect the structure and file a report with the Department of Buildings. Parking Structure Inspections filed with the DOB are also referred to as Conditional Assessments.

## WHAT'S CHANGING?

After kicking off the first inspection cycle and requiring an additional one-time filing for structures in specific neighborhoods, there's even more change on the horizon for parking structure requirements.

The City Council has already passed a law increasing the frequency of required inspections from once every 6 years to once every 4 years. This will go into effect after the first cycle ends in 2027.

We still don't know how filing dates will be changed from the existing subcycles, so now more than ever is a critical time to stay in touch with your QPSI and stay informed.

CYCLE 1 REMINDERS			
<b>Subcycle A</b>	Manhattan Community Districts 1 - 7	1/1/22 - 12/31/23 (DONE)	This subcycle will have to file again during Cycle 2 – due dates not confirmed yet.
<b>Subcycle B</b>	Manhattan Community Districts 8+ and Brooklyn	1/1/24 - 12/31/25	A full inspection is due before the end of this year. This is in addition to the initial observation that was due in August 2024.
<b>Subcycle C</b>	Bronx, Queens, and Staten Island	1/1/26 - 12/31/27	A full inspection is due during the designated subcycle timeframe. This is in addition to the initial observation that was due in August 2024.

## ONE-TIME INITIAL OBSERVATIONS VERSUS ANNUAL OBSERVATIONS

In addition to the above cyclical conditional assessments, many parking structures had to comply with a one-time filing. All structures also have to comply with annual recorded observations.

ONE-TIME INITIAL OBSERVATIONS	ANNUAL OBSERVATIONS
<p>A one-time report required for parking structures in Subcycles B and C, due on August 1, 2024.</p> <p>Owners in Subcycle B may have chosen to submit their inspection before August 1, 2024, fulfilling both the one-time observation and regular inspection requirements. If you did not submit a full inspection before 8/1/24, it is still due before the end of this year. We recommend confirming with your QPSI.</p> <p>Owners in Subcycle C were required to submit an initial observation before 8/1/24, and will be required to perform and submit an inspection during their designated timeframe (2026 – 2027).</p>	<p>An observation required every year (except when an inspection is performed and submitted to the DOB).</p> <p>Annual observations are not required to be submitted/filed with the DOB.</p> <p>Completed reports must be kept onsite and made available to the DOB &amp; QPSI upon request.</p> <p>The annual observation can be performed by a super, garage attendant, or other individual assigned by the owner.</p> <p>Per the DOB, “A PIPS annual checklist should contain conditions/findings of all parking structure elements and appurtenances and method for locating and recording observed conditions.”</p>

In any case (cyclical inspections or annual observations), the DOB must be notified immediately of any unsafe conditions. Anyone can call 311 at any time whenever they see or suspect an unsafe condition in any building. Only a Professional Engineer, Registered Architect, or a QPSI may submit an UNSAFE Notification of Parking Structure (UNPS) in DOB NOW.

### ENFORCEMENT

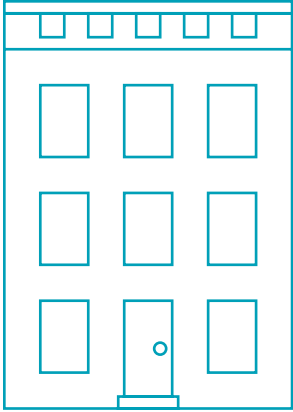
Violations for failure to file parking structure inspections were issued to structures in Subcycle 1A in late November 2024. Violations for unsafe structures followed soon after.

Penalties are \$1,000 per month for late filings, and \$5,000 per year for failure to file. These penalties may be combined, resulting in significant fine amounts.

#### KNOW YOUR STRUCTURES

Parking Structure filings are available in your account – access them here:

<https://clients.sitecompli.com/dob/parkingstructure/inspections>



# FACADE INSPECTIONS & PARAPETS

To keep properties and New Yorkers safe, owners of buildings seven stories and higher must have exterior walls and appurtenances inspected every five years under Local Law 11. Facade Inspection Reports must be submitted to DOB NOW: Safety.

## WHAT'S CHANGING?

The city is actively researching the current FISP structure, and has commissioned an external firm to help them perform a study on feasible changes that maintain safety and reduce potential burdens.

It's likely that any changes recommended by the city will be made at the end of this Cycle (2030) or closer to it.

Facade inspections are still critically important, and carry high penalties for failure to file or maintain/repair unsafe facades. Make sure you know your plan for Cycle 10.

SUBCYCLE	LAST DIGIT OF BLOCK #	CYCLE 9 DATES	CYCLE 10 DATES
A	4, 5, 6, 9	2/21/20 - 2/21/22	2/21/25 - 2/21/27
B	0, 7, 8	2/21/21 - 2/21/23	2/21/26 - 2/21/28
C	1, 2, 3	2/21/22 - 2/21/24	2/21/27 - 2/21/29

## PENALTIES AND FINES

FILING FEES	PENALTIES
<ul style="list-style-type: none"> <li>▪ Initial report filing fee - \$425</li> <li>▪ Amended/subsequent report - \$425</li> <li>▪ Extension report - \$305</li> </ul>	<ul style="list-style-type: none"> <li>▪ Late filing (initial report) - \$1,000/month</li> <li>▪ Failure to file (initial report) - \$5,000/year</li> <li>▪ Failure to correct SWARMP conditions - \$2,000</li> <li>▪ Failure to correct unsafe conditions – varies, see link below*</li> </ul>

## NEW – PARAPET OBSERVATIONS

Parapet observations are now required annually for all buildings (with some exceptions).

Owners must have an observation for all buildings with parapets fronting the public right-of-way, regardless of height. Detached 1-2 family homes or buildings with a fence or other barrier preventing access to the exterior wall are exempt.

Observations must be performed by a competent person, follow guidelines provided in the new law, and be done within each calendar year. While they don't have to be submitted to the DOB, they do need to be saved and provided upon request.

## HOW DOES THIS INTERACT WITH FACADES?

Per the DOB, if the FISP report performed in a given year includes all information required to satisfy rule 1 RCNY 103-15, no separate parapet observation is required for that year. The owner must have a copy of the FISP report available upon request. Of course, parapet observations still have to be performed and kept during off-years in between FISP filings.

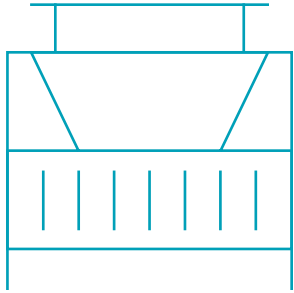
### GET THE DETAILS

See the list of what parapet observations should include in our post:

<https://sitecompli.com/blog/reminder-dob-parapet-observation-requirement-begins-in-2024/>

\*View specific fees for failure to correct unsafe conditions in the full text of the rule:

[https://www.nyc.gov/assets/buildings/rules/1\\_RCNY\\_103-04.pdf](https://www.nyc.gov/assets/buildings/rules/1_RCNY_103-04.pdf)



# COOLING TOWERS

## WHAT TO KNOW

**INITIAL REGISTRATION:** All cooling towers must be registered with the DOB prior to operation.

**ANNUAL CERTIFICATION:** All owners/managers of properties with cooling towers are required to submit annual certification with the DOB, verifying that the cooling tower has been inspected, tested, cleaned, and disinfected. The annual due date is November 1st.

**MAINTENANCE PLAN:** Mandatory regular inspections, testing, cleaning, and disinfection of cooling towers is required in accordance with Local Law 77.

**DISCONTINUED USE:** Owners/managers must notify the DOB within 30 days after removing or permanently discontinuing use of a cooling tower. The tower must be drained and sanitized according to current DOHMH requirements.

**EXTENDED SHUT-DOWN:** Cooling towers shut down for more than five days must be cleaned and disinfected. Cleaning must occur within 15 days before resumed use.

**SUMMERTIME HYPERHALOGENATION:** Maintenance requirement implemented to mitigate the risk of Legionella growth in cooling tower systems throughout the summer – specifically required between July 1 and August 31 of every year.

### MPP EXPLAINED

Review Maintenance Program & Plan requirements here:

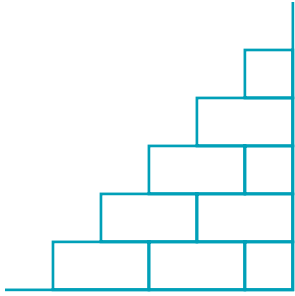
<https://www.nyc.gov/site/doh/business/permits-and-licenses/cooling-towers-mpp.page>

### HYPERHALOGENATION HOW-TO

Here's what the DOB requires every summer:

<https://www1.nyc.gov/assets/doh/downloads/pdf/cd/summertime-disinfectant-faq.pdf>





# RETAINING WALLS

Per Local Law 37/08, effective January 2014, owners of properties with “a retaining wall or part of a retaining wall which is at least ten feet high and faces a public right of way such as a sidewalk or entrance must have a condition assessment of this wall conducted every five years.”

While the city has required retaining wall inspections for several years (and two cycles), they’ve promised to issue violations for the first time in Cycle 3.

DUE DATES – CYCLE 3	
Bronx	1/1/24 - 12/31/24 (DONE)
Manhattan	1/1/25 - 12/31/25
Staten Island	1/1/26 - 12/31/26
Queens	1/1/27 - 12/31/27
Brooklyn	1/1/28 - 12/31/28

## REMEMBER

- Retaining wall inspections must be performed by a QRWI – a Qualified Retaining Wall Inspector. QRWIs are responsible for performing the inspection, submitting the condition assessment report, and notifying the DOB of any unsafe conditions.
- QRWIs must submit condition assessment reports and fees within 60 days after completing the assessment.
- QRWIs and owners must take immediate steps in the case of unsafe conditions, including calling 311 to report the condition and completing the RWIP3 form within 24 hours.

## ENFORCEMENT

In addition to forthcoming first-time violations, the city recently approved substantial increases to penalties for retaining wall inspections.

Here are the new penalties:

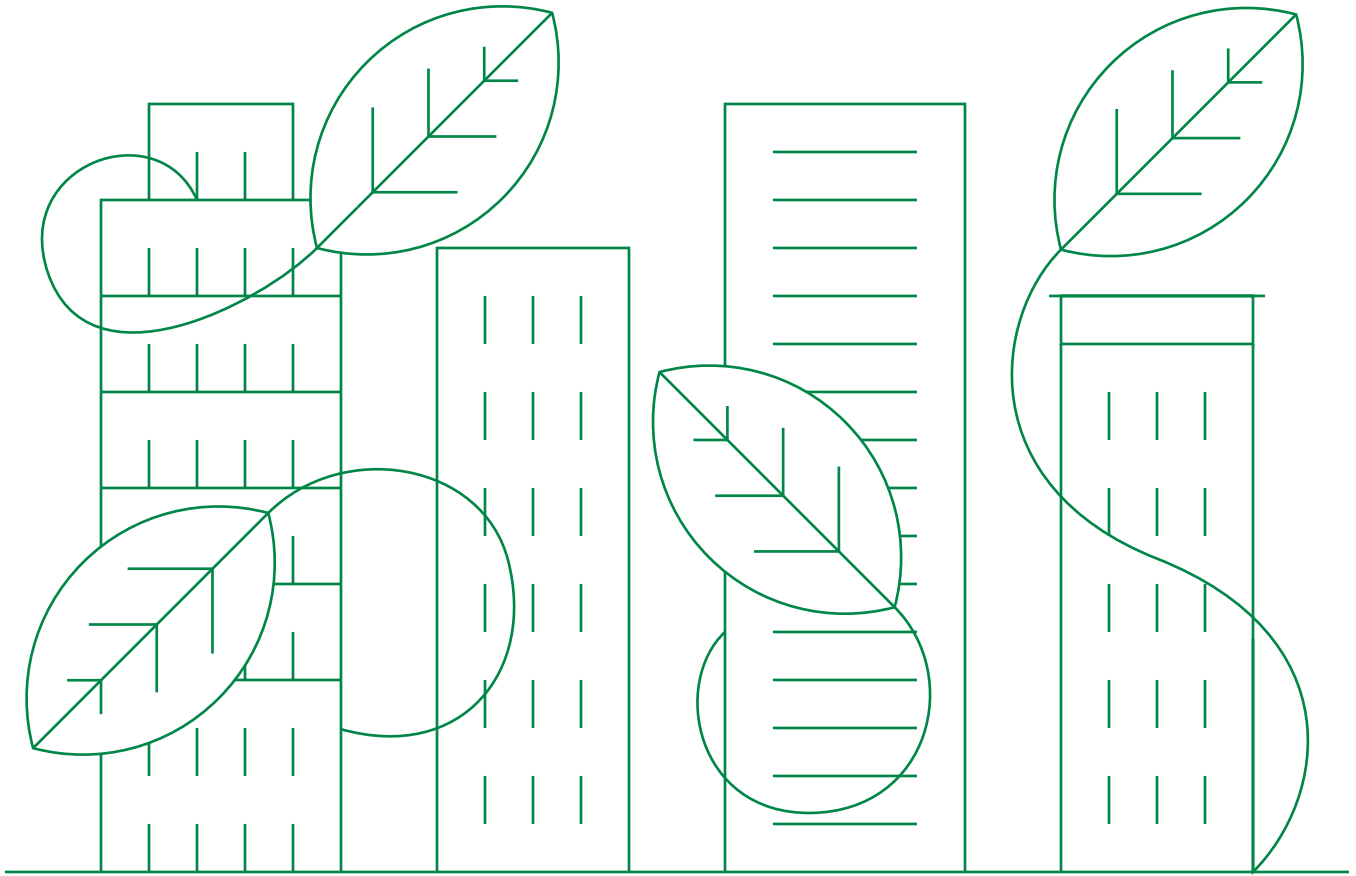
- Failure to file: \$5,000 per year starting on January 1 following the deadline, and ending on the filing date of an acceptable report
- Late filing: In addition to the penalty for failure to file, \$1,000/month beginning on February 1 following the deadline and ending on the filing date of an acceptable report

Given that late filing fees are added to initial FTF fees, potential penalties could be exponential - in line with parking structures and similar filing requirements.

### INSPECTION FAQs

Review frequently asked questions about requirements and wall specifics:

<https://www.nyc.gov/site/buildings/safety/retaining-wall-faqs.page>



# SUSTAINABILITY REQUIREMENTS

May 1, 2025 is the biggest day in compliance history for sustainability-related requirements.

In addition to annual Benchmarking requirements, many covered buildings will have to submit information on one-time Local Law 88 requirements and the very first filings for Local Law 97.

In this section, you'll learn what each of these requirements (plus Local Law 87) means for your buildings.

## LOCAL LAW 84

# BENCHMARKING

Owners of buildings 25,000 square feet and up are required to file information about energy usage annually through the online Energy Star Portfolio Manager tool. Reports are due by May 1st for the previous year (e.g. file 2024 in 2025), with additional quarterly deadlines for those who missed the initial due date.

### QUARTERLY DEADLINES:

- 1st deadline: May 1
- 2nd deadline: August 1
- 3rd deadline: November 1
- 4th and final deadline: February 1 of the following year

Each deadline carries a violation and a \$500 penalty, which can total \$2,000 for failing to file by all four deadlines. These violations are typically seen as BENCH- BENCHMARKING infractions issued by the DOB.

#### LL 84 IN YOUR ACCOUNT

See if your properties are required to Benchmark in your SiteCompli or InCheck account:

<https://clients.sitecompli.com/dob/benchmarking>



**DON'T FORGET:** Properties that are required to Benchmark must post Energy Grades at building entrances each year. Updated Grades are available in DOB NOW on October 1st, and must be posted by October 31st to avoid a \$1,250 penalty per building.

## LOCAL LAW 87

# ENERGY AUDITS AND RETRO COMMISSIONING

Local Law 87 mandates that buildings over 50,000 gross square feet undergo a periodic energy audit and retro-commissioning measures. They must submit an Energy Efficiency Report (EER) once every 10 years.

This law's intent is to inform building owners of their energy consumption through energy audits, which are surveys and analyses of energy use, and retro-commissioning, ensuring correct equipment installation and performance.

EERs are due on December 31st of their designated year:

DUE DATES CORRESPOND WITH THE LAST DIGIT OF YOUR TAX BLOCK NUMBER:									
4	5	6	7	8	9	0	1	2	3
2024	2025	2026	2027	2028	2029	2030	2031	2032	2033

As of January 1, 2022, EERs must be submitted to the DOB by Registered Design Professionals.

### ENFORCEMENT & PENALTIES

- \$3,000 for failure to file in the first year
- \$5,000 for each additional year until the EER is submitted

**NEW FOR THIS YEAR** – buildings are now allowed to submit EERs even if they have outstanding fines for missing or late filings. The intent here is to help teams be in compliance with the law going forward – even though fines may not be forgiven by the Department.

**LL 87 IN YOUR ACCOUNT**  
See if your properties are required to submit EERs in your SiteCompli or InCheck account:  
<https://clients.sitecompli.com/dob/audit>

## LOCAL LAW 97

# EMISSIONS LIMITS

Local Law 97 is an initiative to reduce greenhouse gas emissions in New York City. Under the new rules, most buildings over 25,000 square feet must meet new energy efficiency standards and comply with greenhouse gas emission limits by 2024, with stricter enforcements coming by 2030. The purpose of the new rules is to push towards a 40% decrease in city emissions by 2030 and 80% by 2050.

Final rules for emissions limits and compliance paths were released by the DOB starting in late 2023, with new rules on filing requirements introduced in late 2024.

There are four groups of covered buildings with distinct compliance paths:

### LL 97 IN YOUR ACCOUNT

See if your properties fall on a specific covered buildings list:

<https://clients.sitecompli.com/dob/ll97>

<b>Article 320 - General Covered Buildings Subject To LL 97</b>	Many buildings subject to Local Law 97 will have to submit their first LL 97 report by May 1, 2025 for emissions tracked during the 2024 calendar year.
<b>Rent Regulated Properties</b>	Properties on this list need to submit their first LL 97 report by May 1, 2027 for emissions tracked during the 2026 calendar year.
<b>Income Restricted Properties</b>	Properties on this list need to submit their first LL 97 report by May 1, 2036 for emissions tracked during the 2035 calendar year.
<b>Article 321 - Certain Affordable Housing &amp; Houses of Worship</b>	Properties on this list can comply by completing required items on a prescriptive list and submitting a one-time report due May 1, 2025.

## ENFORCEMENT & VIOLATIONS

There are extension requests and other programs owners can take advantage of. That said, there will be two main types of Local Law 97 violations: failure to meet emission limits, and failure to file required reports.

For Article 320 buildings:

- Failing to submit the required report: (Floor area x \$0.50) per month
- Failing to meet the emissions limit: ((Actual emissions – limit) x \$268) per year

For Article 321 buildings:

- Failing to submit the required report on time : \$10,000
- Failing to demonstrate compliance with one of two compliance pathways: \$10,000

Per the city, “There is an annual grace period through June 30th where the report may be submitted without penalty, but reports submitted after June 30th will incur a \$0.50/sf penalty for each month that has passed since May 1st.”

### GET MORE DETAILS

For updated filing guides and the latest rules, visit the city's site:

<https://www.nyc.gov/site/buildings/codes/1197-greenhouse-gas-emissions-reductions.page>

## LOCAL LAW 88

# LIGHTING & SUBMETERING

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Local Law 88 of 2009 requires certain building owners to upgrade lighting systems and install electrical sub-meters in tenant spaces. Residential buildings may be covered under the law, with the exception of garden-style apartments, 1-3 family homes, and some others.

Generally, covered buildings for Local Law 88 overlap with covered buildings for Local Laws 84 and 97. There are exceptions – if you have questions, reach out to [support@sitecompli.com](mailto:support@sitecompli.com).

## WHAT ARE COVERED TENANT SPACES?

A covered tenant space is:

- a tenant space larger than 5,000 gross square feet (465 m<sup>2</sup>) on one or more floors of a covered building let or sublet to the same person; or
- a floor, of a covered building, larger than 5,000 gross square feet (465 m<sup>2</sup>) consisting of tenant spaces let or sublet to two or more different persons.

This applies to both commercial and residential buildings. Exceptions are dwelling units in apartment buildings or 1-2 family homes with no more than 2 apartments. Additionally, exclusions for submetering include "a covered tenant space for which the electrical consumption within such space is already measured by a meter dedicated exclusively to that space."

## ENFORCEMENT & VIOLATIONS

While Local Law 88 work was due on January 1, 2025, filings aren't due until May 1, 2025. Some industry experts have said that so long as work is completed before May and reports are filed, teams can avoid penalties. The city's penalty definitions seem to support that:

- Failing to complete lighting upgrades: \$1,500 per year until compliance report is filed
- Failing to report sub-metering of tenant spaces: \$1,500 per year until a report is filed
  - If a report is filed, but submeters have not been installed in all covered spaces: \$500 per noncompliant space per year until resolved

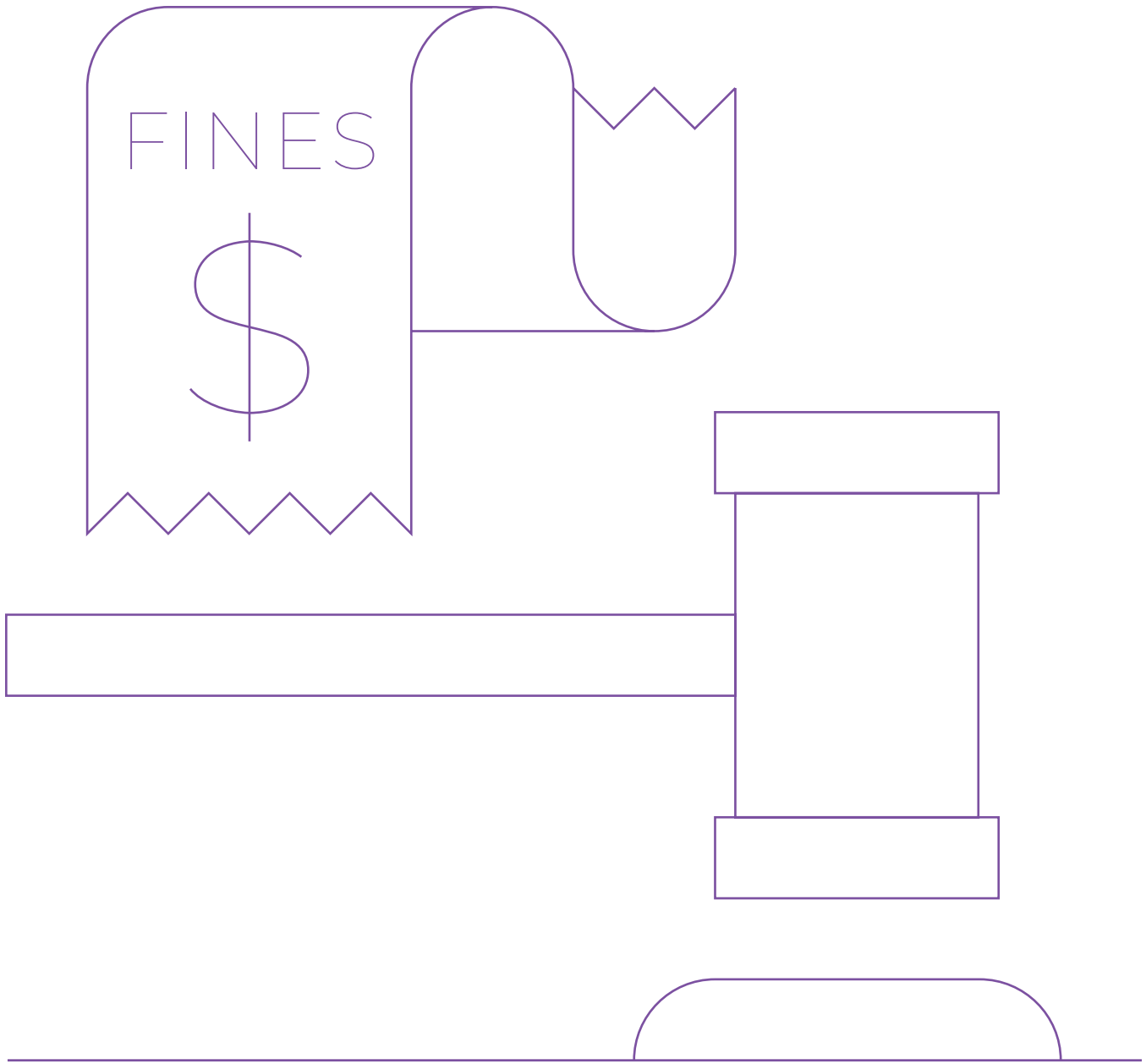
The DOB notes that while they're not required to conduct inspections here, they do have the authority to perform them "should it be deemed appropriate."

### GET MORE DETAILS

The city's FAQ page has key details on Local Law 88:

<https://www.nyc.gov/site/buildings/codes/ll88-faqs.page>





# OATH FINES & HEARINGS

# OFFICE OF ADMINISTRATIVE TRIALS & HEARINGS

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In addition to adjudicating city matters, OATH also hosts hearings for summonses issued by several different agencies. These summonses are what property owners, managers, and even tenants frequently deal with (FDNY, DOB, Sanitation, Health, and more). The ECB (Environmental Control Board) was the sole former host for these hearings and is still frequently referenced when referring to various agency summonses.

KEY OATH TERMS	
<b>Named Respondent</b>	The party (person, company, or entity) responsible for attending the hearing, making corrections, and paying fines. May be a building owner, manager, tenant, vendor, or other related party.
<b>Issuing Agency</b>	Over 13 agencies issue violations through OATH. The issuing agency will determine if compliance is required beyond the standard fine and hearing.
<b>Hearing Date</b>	The day when the hearing is scheduled. If the summons is not resolved by then (via a cure, alternate hearing, or stipulation), you must attend or submit a request to reschedule.
<b>Cure Date</b>	For certain DOB and FDNY violations, a cure date will be offered. If a Certificate of Correction is submitted and accepted by the issuing agency before this date, you won't need to attend the hearing/pay any fines.
<b>Stipulation</b>	Admission of guilt in exchange for 75 additional days to correct the violation and a reduced penalty (usually half of the standard amount). Will be mailed if offered and must be accepted pre-hearing.
<b>Mitigation</b>	Admission of guilt coupled with proof of correction at the hearing may result in a mitigated (reduced) penalty.
<b>Judgment</b>	Judgment results post-hearing can include Dismissal (no penalties, though the issuing agency can appeal) or In Violation (standard penalty imposed, though you may appeal).
<b>Default Judgment</b>	Failing to attend the hearing will result in a significantly increased penalty and an automatic admission of guilt. Default judgments can be vacated (reopened) within 75 days of the hearing date.

## RESPONDING TO AN OATH HEARING

All hearings must be requested and prescheduled before the scheduled hearing date:

- **HEARING BY PHONE:** Most hearings are being conducted by phone. You must request your phone hearing three (3) business days before your hearing date.
- **HEARING IN PERSON:** You can request an in-person hearing. The request must be emailed to [livehearings@oath.nyc.gov](mailto:livehearings@oath.nyc.gov) at least five (5) business days before the hearing date. You will then receive an email with date, time and location information for your hearing. Please note that enforcement agencies that send representatives to hearings will continue to appear by phone for all hearings. No enforcement agency personnel will be present at in-person hearings.
- **ONLINE HEARING (ONE-CLICK HEARING):** You can fight your summons by sending OATH Hearings Division a defense using a simple online form. You must make sure your case is eligible and the form must be submitted on or before the scheduled hearing date: [www.nyc.gov/oath](http://www.nyc.gov/oath)
- **HEARING BY MAIL:** You can fight your summons by sending the OATH Hearings Division a defense in writing by regular mail. You must make sure your case is eligible and the defense must be received by OATH before the scheduled hearing date: 66 John St., 10th Floor.

### TAKE ACTION

Respond to hearings & get more details here:

<https://www.nyc.gov/site/oath/hearings/hearings-and-defaults.page>



**DON'T FORGET:** There are relatively new requirements for having third party representation at OATH. Make sure you've got your paperwork taken care of – review requirements in our post: <https://sitecompli.com/blog/oath-hearing-process-clarified-by-new-adopted-rules/>

## OATH & COMPLIANCE

For DOB and FDNY summonses issued via OATH, it's not enough to just attend the hearing or pay fines. Compliance is required to fully close violations and avoid future issues and penalties.

**CORRECTIONS:** A Certificate of Correction must be submitted to the issuing agency, otherwise the violation will remain open. Failure to submit a Certificate of Correction can result in additional fines, trouble obtaining new work permits or a Certificate of Occupancy, or issues during a transaction/refinance.

DOB Certificates of Correction are submitted online via DOB NOW, and FDNY Certificates of Correction.

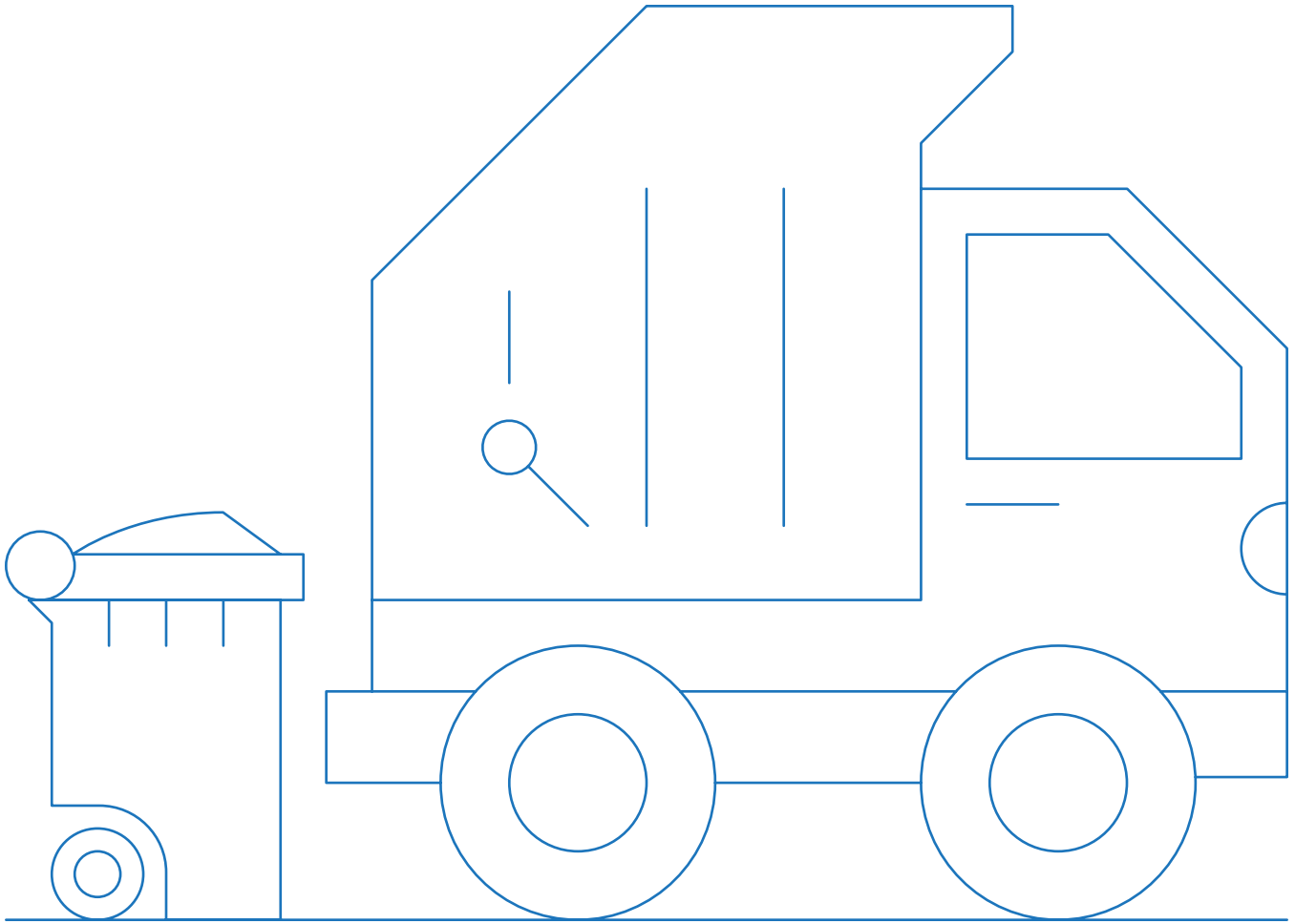
On the DOB's side, uncorrected Class 1 violations will result in a \$5000 fine (AEUHAZ1) issued directly to the building - not the named respondent. This means owners may be ultimately responsible for onsite violations initially incurred by tenants or vendors. Please note that AEUHAZ1 fines have increased significantly in recent years. It's a stark reminder that correcting underlying conditions are critical to resolving open violations.

**SHOULD I PAY THE FINE TO AVOID A HEARING?** For violations where submitted compliance isn't required (e.g. Sanitation), it's possible to avoid the hearings process by paying the fine. That said, paying an OATH/ECB fine is an admission of guilt. Having a few guilty violations at a single property can impact future violations through increased fines and decreased chances of getting a dismissal. While it seems like a timesaving fix, paying the fine can oftentimes lead to bigger headaches going forward.

**UNDERGOING CONSTRUCTION? BEWARE:** The DOB is now monitoring unpaid arrears (including OATH/ECB fines) when issuing permits. They will issue twice the amount of standard civil penalties if your construction site has an "excessive violation" ratio compared to the rest of NYC.

You can always review the compliance status of a violation in your SiteCompli or InCheck account. If you have questions, you can also reach out to each agency directly:

- DOB - (212) 393-2405 (Administrative Enforcement Unit)
- FDNY - [CureLetterVerification@fdny.nyc.gov](mailto:CureLetterVerification@fdny.nyc.gov) (Subject Line: Cure Verification Unit)



# SANITATION REQUIREMENTS & PROGRAMS

A number of DSNY regulations have been introduced over the past few years. Here's a refresher on the most important ones, and what you need to know going forward.

# TRASH SETOUT TIMES

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Below are timeframe requirements for trash setout:

## RESIDENTIAL BUILDINGS WITH 1-9 UNITS

- Set out trash after 6:00 PM in bins, 55 gallons or less, with secure lids

## RESIDENTIAL BUILDINGS WITH 10+ UNITS

- Set out waste after 6:00 PM in bins, 55 gallons or less, with a secure lid; OR
- Set out waste after 8:00 PM, if putting bags directly on the curb

All waste should be set out by midnight, unless specified otherwise.

If you set your waste out incorrectly, at the wrong time, or on the wrong day, you may be fined.

## ENFORCEMENT

- \$50 for the first offense
- \$100 for the second offense
- \$200 for the third and subsequent offenses

# CONTAINERIZATION & BINS

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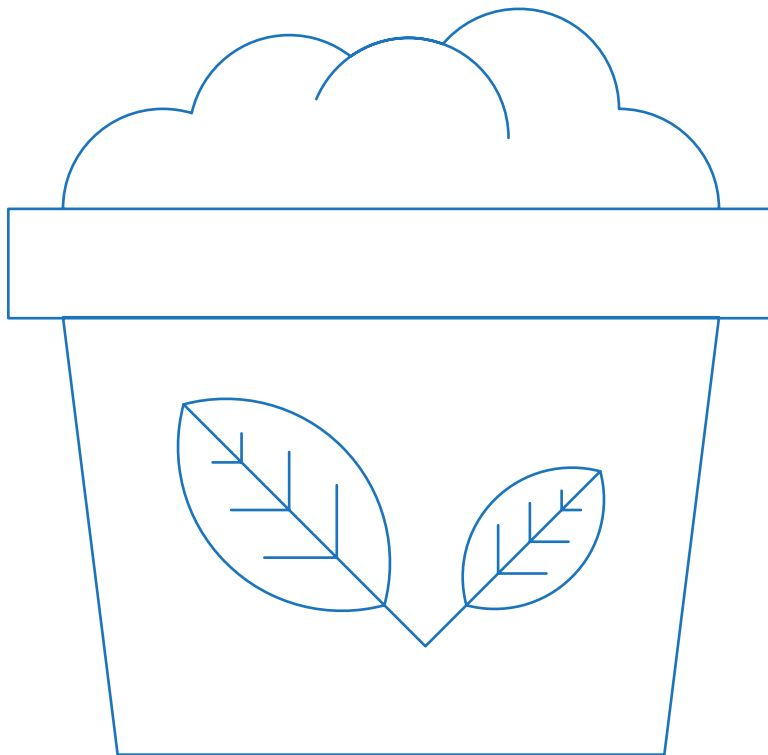
As of November 12, 2024, 1 – 2 family homes and buildings with up to 9 units must use bins (55 gallons or less) with secure lids for trash setout.

Starting in June 2025, and for a year following, the city will engage in a containerization pilot program in Manhattan Community District 9 (West Harlem, Hamilton Heights, Manhattanville, and Morningside Heights) for larger residential buildings. The pilot program will include SOSCs – Stationary On-Street Containers – and will likely influence the full citywide containerization rollout.

## PILOT PROGRAM DETAILS

If you have properties in Manhattan CD 9, make sure you've taken action before April 1. Learn more in our post:

<https://sitecompli.com/blog/deep-dive-dsny-containerization-pilot-program-final-rules/>



# COMPOSTING & SEPARATION

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Buildings that don't sort recyclables and composting from trash (or set them out properly) may be fined:

- Metal, glass jars and bottles, rigid plastics, and cartons must be separated from household trash and set out together in labeled bins with secure lids or in clear plastic bag.
- Mixed paper and cardboard must be separated from household trash and set out together in labeled bins with secure lids or in clear plastic bags. Cardboard can also be bundled (flattened and tied with twine) and set out next to bins or bags. Do not use cardboard boxes as bins.

As of October 6, 2024, all boroughs in NYC now have curbside composting services available. As a result, leaf and yard waste, food waste, and food-soiled paper separation from trash is now mandatory citywide.

Failure to separate the above from trash may get you a warning, and after April 1, 2025, a penalty.

## LEAF & YARD WASTE

- Leaf and yard waste, food scraps, and food-soiled paper should be set out inside labeled bins (55 gallons or less) with secure lids or in your DSNY brown compost bins. You can line your bins with clear plastic, paper, or compostable bags to help keep them clean.
- Extra leaf and yard waste can be put in paper lawn and leaf bags or clear plastic bags. Twigs and branches can be bundled with twine and placed next to bins and bags.

## ENFORCEMENT

### BUILDINGS WITH 1 – 8 UNITS:

- \$25 for the first offense
- \$50 for the second offense
- \$100 for the third and subsequent offenses

### BUILDINGS WITH 9+ UNITS:

- \$100 for the first offense
- \$200 for the second offense
- \$300 for the third and subsequent offenses



# COMMERCIAL REQUIREMENTS

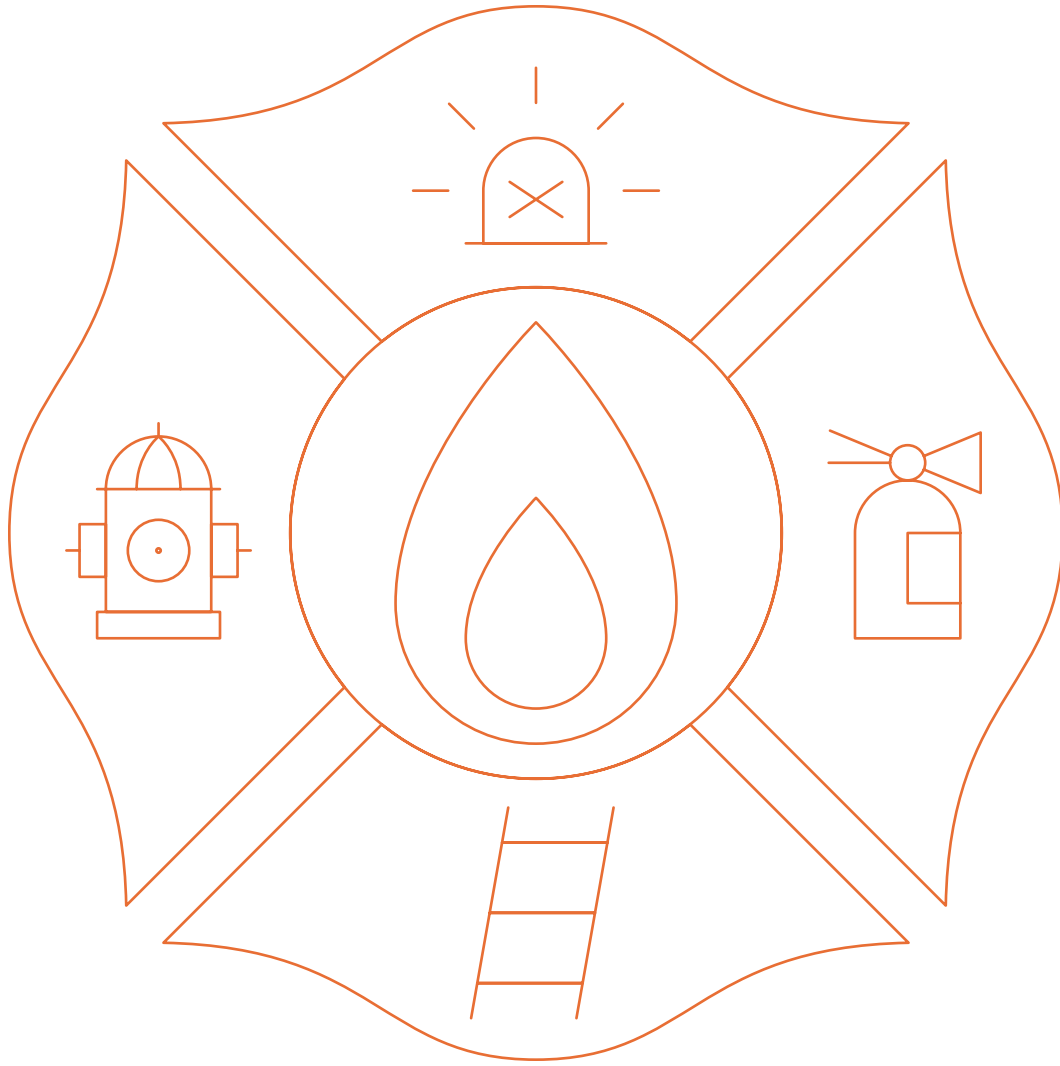
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- As of March 1, 2024, all businesses in NYC must use bins with secure lids when setting out trash for collection, either 1 hour before closing or after 8:00 PM.
- This applies to all businesses that set out waste on the curb. This does not apply to businesses that have waste collected from a loading dock.
- Businesses may also use bins for recycling, but it is not required. Recycling in bags or bundles can be set out after 8:00 PM.
- Bins must be removed from the curb by the time your business reopens.

## RULES FOR BUSINESSES

Learn more about Commercial Waste Zones and requirements at the city's site:

<https://www.nyc.gov/site/dsny/businesses/businesses.page>



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# FDNY VIOLATIONS & REGULATIONS

# VIOLETIONS

<b>NOTICES OF VIOLATION (NOVs)</b> NOVs are associated with a fine and hearing through OATH and are sometimes labeled as "Summons," but should not be confused with Criminal Summons.	<b>VIOLETION ORDERS (VOs)</b> VOs require correction via FDNY reinspection/ document submission.
<b>Commonly Issued For:</b> <ul style="list-style-type: none"> <li>▪ Expired permits</li> <li>▪ Markings and lack of signage</li> <li>▪ Expired/lack of Certificate of Fitness</li> <li>▪ Missed inspections</li> </ul>	<b>Commonly Issued For:</b> <ul style="list-style-type: none"> <li>▪ Blocked egress</li> <li>▪ Occupancy over limit</li> <li>▪ Fire safety plan issues</li> <li>▪ Emergency action plan issues</li> </ul>
<b>How to Correct:</b> If a cure date is offered (first offense), submit a Certificate of Correction to the FDNY in advance of the cure date <ul style="list-style-type: none"> <li>▪ If accepted, you can avoid a hearing and any potential fines (unless the hearing is required, as noted on the violation)</li> <li>▪ If there is no cure date, you will need to attend the OATH hearing, pay any subsequent fines, and still submit the Certificate of Correction to the FDNY</li> </ul>	<b>How to Correct:</b> Comply with the Order within the given timeframe (forthwith/immediately - 90 days) <ul style="list-style-type: none"> <li>▪ File required paperwork or contact issuing inspector for reinspection</li> <li>▪ If the infractions are corrected, the inspector will dismiss the VO</li> </ul>
<b>Penalties:</b> OATH-related fines for FDNY infractions can range from \$300 for mitigated penalties to \$5,000 for default penalties (and aggravated penalties are even higher). Note that there can be multiple infractions on a single NOV.	<b>Penalties:</b> While there are no immediate financial penalties or hearings scheduled, failure to comply with a VO in the given timeframe will result in a Criminal Summons, requiring an appearance in criminal court, plus initial fines of \$5,000 - \$10,000.
<b>Additional Info:</b> It's a common misconception that showing proof at an OATH hearing will satisfy the compliance portion of an NOV - it will not. In order to fully close a NOV, a Certificate of Correction must be on file with the FDNY.	<b>Additional Info:</b> VOs are not associated with OATH whatsoever. As a result, VO information is provided only by the FDNY, and can be complex, cumbersome, and time consuming to obtain.

# PROACTIVE FDNY INFORMATION

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In order to prevent violations, it's important to know details about the kinds of equipment and certifications associated with your property.

## PERMIT ACCOUNTS

The FDNY issues and monitors permit accounts (sometimes known as equipment use permits) for the use, operation, and maintenance of equipment and space, as well as regulated fire safety and prevention systems.

<b>Permit Account Number</b>	Main identifying component of a permit account – necessary when contacting the FDNY about a report.
<b>Account Owner</b>	Entity responsible for maintaining the account with the FDNY. May be building owner or tenant.
<b>Expiration Date</b>	May denote required inspection or annual payment date.

## COMMON PERMIT ACCOUNT TYPES

- Sprinkler/Standpipe systems
- Fuel oil
- A/C refrigeration units
- Fire alarms
- Range hoods
- Place of Assembly permits

## CERTIFICATES OF FITNESS

FDNY Certificates of Fitness (COFs, for short) are issued to individuals who have been tested to perform specific, safety-related tasks or manage specific pieces of FDNY-related equipment.

Certificates of Fitness can be building-specific (example: Fire and Life Safety Director), or citywide (example: Fire Guard for Impairment). Most COFs must be renewed periodically, and Notices of Violation can be issued for failure to have a valid COF or COF holder onsite.

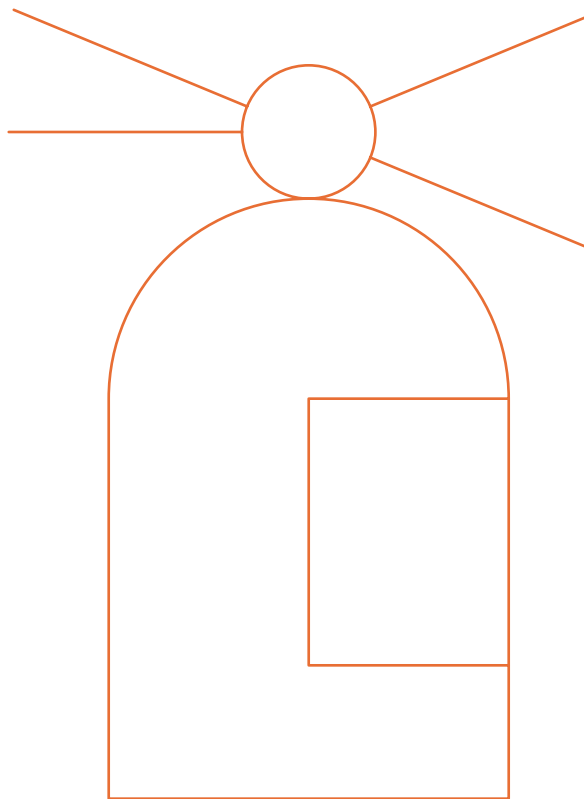
# FDNY DATA IN YOUR ACCOUNT

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FDNY information can be some of the hardest to track and uncover. That said, there are a number of resources you can access right from your account:

- Building-specific Certificates of Fitness
- Key permit account details
- Available copies and supplemental pages for NOVs
- Available documentation for VOs

Ask your Customer Success Manager or [support@sitecompli.com](mailto:support@sitecompli.com) for assistance if you have any questions.



# BACK-OF-DOOR FIRE SAFETY NOTICES

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The Fire Safety Notice is a small (no larger than 6" x 9") sign that outlines safety instructions in case of a fire emergency. There are two city-approved versions – one for combustible buildings, and one for noncombustible buildings. These must be posted on the back of the front door of every unit in your properties.

## WHY IS THIS IMPORTANT?

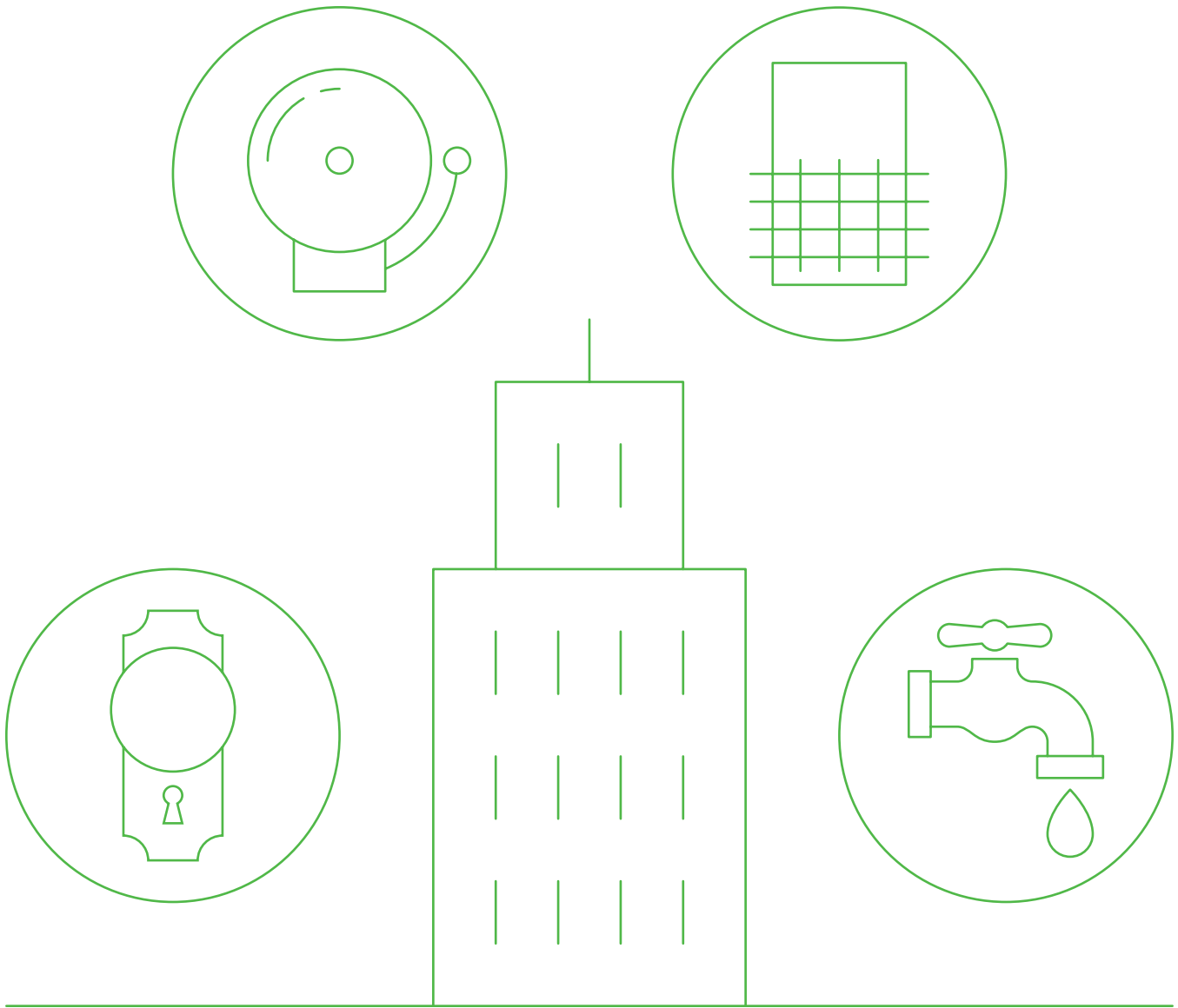
Fire Safety Notices have always been required, but the FDNY has now begun to require confirmation that the Notice is where it's supposed to be - whether by certification from a resident or by an inspection program from maintenance staff.

- The certification option allows you to mail a notice to residents that asks them to indicate if the Fire Safety Notice is present.
  - Many teams choose to do this as part of their annual safety notice mailing each January.
- An inspection program establishes a unit check from your staff every three years to confirm that the Fire Safety Notice is present.
- Either way you choose to comply is acceptable, but you must have some program in place to prevent violations or worse.

### NEED BOD STICKERS?

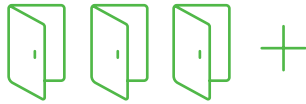
If your property needs BOD stickers, we've got you covered – order compliant stickers on-demand here:

<https://shop.sitecompli.com>



# RESIDENTIAL REQUIREMENTS

# HPD REGISTRATION



## 3+ Residential Units

rentals, condos, and co-ops included

OR



## 1 or 2 Residential Units

and neither the owner nor a family member occupies one of the units

OR



## Hotels

which are considered transient multifamily dwellings

# FAILURE TO REGISTER

Failure to register correctly or on time can lead to a number of issues. As of December 2023, properties may be issued penalties from \$500 - \$5,000, depending on their size. False registration documents can also lead to penalties between \$750 - \$5,000.

Additionally, properties may be subject to the following:

- Properties may be issued Orders or specific violations
- Properties will be ineligible to certify violations
- Properties will be unable to request a Code Violation Dismissal
- Properties will be unable to initiate a court action to recover possession of the premises for nonpayment of rent

## ISSUES WITH REGISTRATION?

Sign up for an appointment to speak with HPD's Registration Unit directly:

<https://hpdrau.timetap.com/#/>



**DON'T FORGET:** Failure to register will result in infractions, fines, and the inability to correct open HPD violations.



## TOP THINGS HPD INSPECTORS LOOK FOR

- ① Non-functioning or missing smoke detectors
- ② Non-functioning or missing carbon monoxide detectors
- ③ AS OF 5/1/25 - Non-functioning or missing natural gas detectors
- ④ No electricity
- ⑤ No gas
- ⑥ Double cylinder locks on exit doors
- ⑦ Illegal gates or bars on the windows
- ⑧ Debris blocking exit doors or fire escapes
- ⑨ Kitchen grease that constitutes a fire hazard
- ⑩ Window guards in a unit with a child under the age of 11
- ⑪ Lead paint signs in a unit with a child under the age of 6
- ⑫ Properly posted and maintained unit and common area signage

## HEAT SEASON

From October 1 - May 31 of each year, HPD's Heat Season rules are in effect:

- Between 6 AM and 10 PM, if the outside temperature falls below 55 degrees, the inside temperature must be at least 68 degrees.
- Between 10 PM and 6 AM, the inside temperature must be at least 62 degrees regardless of the temperature outside.

**DON'T FORGET:** Failure to meet temperature rules can result in Class C HPD Violations and substantial penalties: \$350 - \$1,250 per day AND \$500 - \$1,500 per day for subsequent violations – an increase from previous years.

There's also a "three strikes" rule from the department:

HPD may impose an Inspection Fee of \$200 "if a third or subsequent inspection within a heat season results in a third or subsequent heat violation and if a third or subsequent inspection within a calendar year results in a third or subsequent hot water violation."

## HPD PENALTIES

HPD introduced penalty increases in December 2023. Here's a look at the previous penalties, and the current penalties that may be imposed in Housing Court:

Category	Previous Penalties (before December 8, 2023)	Current Penalties (Violations issued on/after December 8, 2023)
<b>Class A Violations</b>	\$10 - \$50	\$50 - \$150, plus \$25/day
<b>Class B Violations</b>	\$25 - \$100, plus \$10/day	\$75 - \$500 plus \$25 - \$125/day
<b>Class C, buildings with 5 or fewer units (except for the below detailed class C violations)</b>	\$50 per day	\$150 - \$750 plus \$50 - \$150/day
<b>Class C, buildings with more than 5 units (except for the below detailed class C violations)</b>	\$50/150 days plus \$125 per day	\$150 - \$1,200 plus \$150 - \$1,200 per day
<b>Class C, Lead-based paint hazard</b>	\$250 per day, up to \$10,000	\$250 per day, up to \$10,000 (NO CHANGE)
<b>Class C Heat and hot water</b>	\$250 - \$500 per day AND \$500 - \$1000 per day for subsequent violations	\$350 - \$1,250 per day AND \$500 - \$1,500 per day for subsequent violations
<b>Class C Heat and hot water - illegal device</b>	\$25 per day or \$1,000, whichever is more	\$50 per day or \$2,000, whichever is more
<b>Class C, self-closing doors</b>	\$250 - \$500, plus \$250 per day for each day from date set for correction until correction	\$250-\$500, plus \$250 per day for each day from date set for correction until correction (NO CHANGE)

Lead-based paint recordkeeping violations also can result in civil penalties:

- Order 614, 616, or 617: \$250 per day per violation, up to a maximum of \$10,000
- Order 618: \$1,000 maximum
- Order 619: \$1,500 maximum per violation
  - CRIMINAL PENALTY: Misdemeanor punishable by a fine of up to \$500 or imprisonment for up to six months or both
- Order 620: \$1,000 minimum and \$5,000 maximum per violation

## ALLERGEN HAZARD INSPECTIONS AND REMEDIATION

- Local Law 55 requires owners to check for indoor allergen hazards (mice, cockroaches, rats, and mold) annually.
- Owners must provide a notice and DOHMH brochure informing tenants of this inspection requirement.
- Owners must remediate found conditions using integrated pest management procedures and specific processes to treat underlying defects (in the case of mold).
- Certifications for any violations issued for these conditions must include affidavits stating that work practices were appropriately followed.

### EASY LL 55 INSPECTIONS & FOLLOW-UPS

Capture required Local Law 55 data onsite & automatically trigger follow-up work with your InCheck app – it's that simple:

<https://sitecompli.com/solutions/local-law-55>

## ANNUAL BEDBUG REPORTING

Residential owners are required to submit bedbug infestation and treatment records to HPD annually.

**Failure to file bed bug reports is the fastest-growing HPD violation citywide.**

Here's what needs to be documented and shared for each property:

- The number of dwelling units.
- The number of dwelling units, as reported or otherwise known to the owner, that had a bedbug infestation during the previous year.
- The number of dwelling units, as reported or otherwise known to the owner, in which eradication measures were employed during the previous year for a bedbug infestation.
- The number of dwelling units reported in number 3 that had a bedbug infestation after such eradication measures were employed in such units.

Reports are due December 31st each year for the time period covering November of the previous year through October of the current year (e.g. November 2024 - October 2025).

In addition to submitting reports, owners are also responsible for distributing a copy of the electronic report form to each tenant during lease renewal/new lease commencement OR posting the report form in a prominent location in the building within 60 days of filing.

Finally, owners must distribute or post a notice providing information about the prevention, detection, and removal of bedbugs.

### REPORT DATA IN YOUR ACCOUNT

View historical bedbug report filings across your portfolio in your SiteCompli or InCheck account:

<https://clients.sitecompli.com/hpd/bedbugs>

## LEAD PAINT – RECENT UPDATES & REMINDERS

Key requirements for lead paint-related compliance have deadlines this year, with more coming due in the future:

- Starting in September 2024, owners will have to provide annual notice and investigation records whenever lead-based paint hazard or turnover violations are issued.
- August 9, 2025 is when all XRF tests have to be completed across all relevant units per Local Law 31.
  - Per Local Law 111, this now includes common areas.
- If a child under 6 is known to reside in a relevant unit as of January 2025, friction surfaces in the unit must be abated by July 2027.
- If a child under 6 comes to reside in a relevant unit after January 1, 2025, friction surfaces in the unit must be abated within 3 years of the date that the child came to reside.

### GET THE DETAILS

Read the full text of each law & get more information on our blog:

<https://sitecompli.com/blog/roundup-of-new-lead-based-paint-laws-hpd-resources/>

## NATURAL GAS DETECTORS – DUE THIS YEAR

Per Local Law 157, natural gas detectors are now required for every dwelling (private, Class A, and Class B), and must be installed on or before May 1, 2025.

- This requirement doesn't apply to buildings that don't have gas piping or gas service.
- In private/Class A dwellings, one or more alarms must be installed before May 1, 2025.
- In Class B dwellings, one of the following must happen before May 1, 2025:
  - One or more natural gas alarms must be installed in each dwelling.
  - A line-operated zoned natural gas detecting system, designed in accordance with NFPA 715-2023 by a registered design professional, must be installed in all public corridors and public spaces.

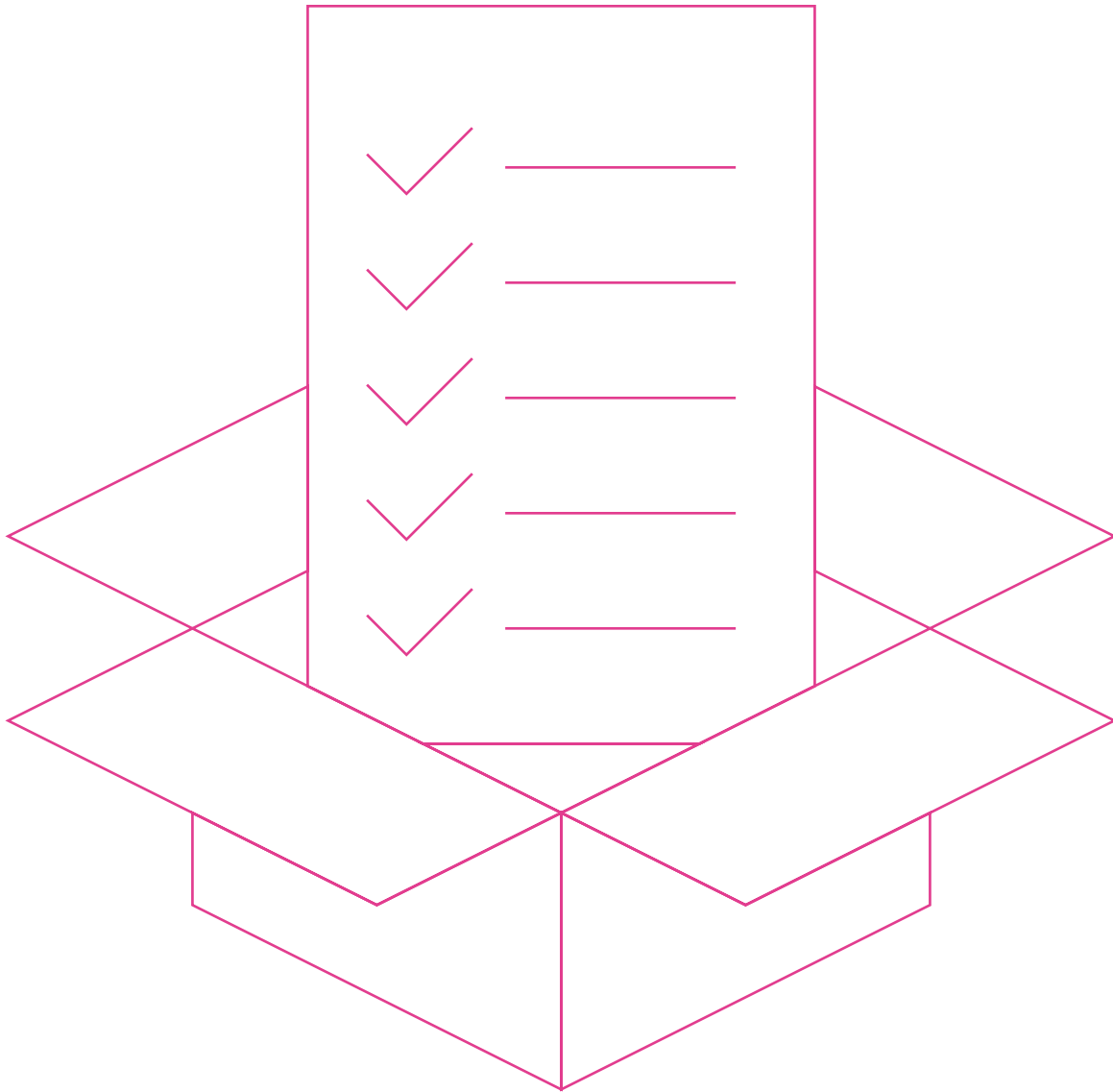
While sample details haven't been provided yet, notices must also be provided to dwelling occupants explaining key details about the detectors in each dwelling.

It's worth noting that while we're covering this requirement in the Residential section since it's applicable to dwellings, material and FAQs for the law have been managed by the Department of Buildings. That said, we expect, and the DOB mentions, that enforcement will be managed by HPD. Stay tuned for additional details here.

### RECOMMENDATIONS & INSTALLATION

We asked the experts – get their installation advice & device tips here:

<https://sitecompli.com/blog/ask-the-expert-ll-157-compliant-devices-with-ff-supply/>



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TAKING ACTION:

# COMPLIANCE RESOURCES

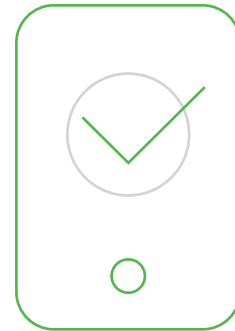
With new rules, longtime requirements, and everything in between, you need the right tools to keep track of it all – and make sure your team is on the right track to avoid harsh penalties.

Here’s just a few features teams are using to help take action & prevent fines:



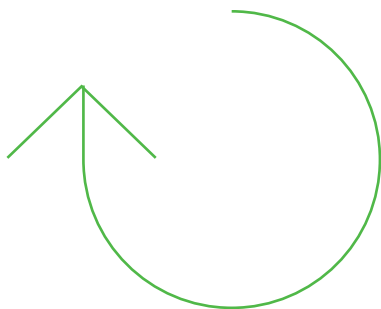
#### COMPLIANCE MANAGER

Track key proactive requirements with automated due dates, customizable statuses, easy document upload, and critical reminders via alerts and your synced calendar. Manage your Local Law 152 work, Local Law 31 tracking, inspections and observations, and more, all in one place.



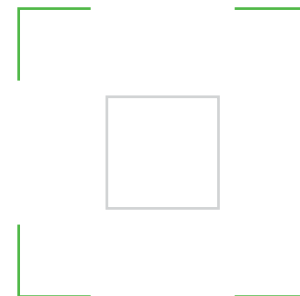
#### INCHECK MOBILE APP

Easy, swipe-through screens with even more input types to help your team get context on the go & capture more details, even faster.



#### AUTOMATED FOLLOW-UP TASKS

Don’t waste time texting, emailing, or calling in work that gets lost. InCheck assigns the right followups to the right people depending on what’s found onsite during inspections – automatically.



#### SMART STICKERS

Assign and start work just by scanning a smart sticker – for any location, asset, or unit across your portfolio.

Questions about any of the above features? Reach out to your Customer Success Manager or [support@sitecompli.com](mailto:support@sitecompli.com) - we’re happy to help your team get started.

## WHERE CAN I SUBMIT?

Below are helpful links to ensure your team can access DOB NOW, and other critical agency portals and correcting violations.

### DOB NOW: SAFETY

For elevator, boiler, energy compliance, façade, and parking structure filings, and select DOB:

- <https://www.nyc.gov/site/buildings/industry/dob-now-safety.page>

### SUSTAINABILITY COMPLIANCE INSTRUCTIONS

For Local Law 84 Benchmarking, Local Law 87 EERs, and Local Law 97 Reports

- <https://www.nyc.gov/site/buildings/codes/compliance-instructions.page>
- [https://www.nyc.gov/assets/buildings/pdf/how\\_to\\_file\\_energy\\_efficiency\\_report.pdf](https://www.nyc.gov/assets/buildings/pdf/how_to_file_energy_efficiency_report.pdf)
- <https://www.nyc.gov/assets/buildings/pdf/1197-compliance-report-process.pdf>

### HPD ECERTIFICATION

For correcting HPD violations and HQS failures

<https://webapps.hpdnyc.org/eSignature/Login.aspx>

HPD REGISTRATION PROS (partially online, partially via mail)

<https://a806-pros.nyc.gov/PROS/mdRInternet.html>

### NYC CITYPAY

To pay fines on OATH-related violations

<https://a836-citypay.nyc.gov/citypay/ecb>

Don't forget - for DOB and FDNY violations issued via OATH, you'll need to submit a Certificate of Corrections via the following:

- DOB NOW for DOB-OATH violations:  
[https://www.nyc.gov/assets/buildings/pdf/cofc\\_user\\_guide.pdf](https://www.nyc.gov/assets/buildings/pdf/cofc_user_guide.pdf)
- FDNY Business for FDNY-OATH violations:  
<https://www.nyc.gov/assets/fdny/downloads/pdf/business/submit-ccr.pdf>







# The best tools to take action

## The #1 source of compliance education information



STAY INFORMED



GET INSIGHTS



TAKE ACTION

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#### THE SITECOMPLI KNOWLEDGE CENTER:

<https://sitecompli.com/knowledge-center/>

### NEED HELP? WE'RE A CLICK AWAY.

@ [support@sitecompli.com](mailto:support@sitecompli.com)

☎ 800-564-1152

🔗 [support.sitecompli.com](https://support.sitecompli.com)

💬 In-app live chat available 9 - 5, M - F



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