

Elevator Safety Advisory Committee Agenda

May 20, 2014 - 9 to 11 a.m.

Tukwila Service Location

Time	Topic	Facilitator	Comments
9 – 9:30 a.m.	<ul style="list-style-type: none"> • Introductions/Purpose • Comments regarding Nov. minutes • By laws (Attachment A) • Elect a Vice-Chair • Elevator Advisory Analysis Form (Attachment B) 	<ul style="list-style-type: none"> • Scott Cleary • Scott Cleary • Jack Day/ Scott Cleary • Scott Cleary • Jack Day/ Scott Cleary 	
9:30 – 9:50 a.m.	<p><u>Chief's Report</u></p> <ul style="list-style-type: none"> • Scorecard/Accidents • Maintenance Control Program (MCP) • Legislative Activities (Attachment C) • Draft WAC 296-96 	<ul style="list-style-type: none"> • Jack Day • Jack Day • Jack Day • Jack Day 	
9:50 – 9:55 a.m. 9:55 – 10:05 a.m. 10:05 – 10:20 a.m. 10:20 – 10:30 a.m.	<p><u>Old Business:</u></p> <ul style="list-style-type: none"> • Testing FAID (Fire Alarm initiation Devices) • Existing machine room enclosure and access to the machine room (Attachment D) • Overview of progress on point of sale inspections of residential elevators. (17.1 & 18.1 Equipment) (Attachment E) • Purpose and scope on subcommittee for Part B Permits 	<ul style="list-style-type: none"> • Rob McNeil & David Gault • Keith Becker • Swen Larson • Brian Wheeler 	
10:30 – 11:00 a.m.	<p><u>New Business:</u></p> <ul style="list-style-type: none"> • Licensing Criteria • Code adoption sub-committee • Proposal for Comb Impact Device 	<ul style="list-style-type: none"> • Scott Cleary • Jack Day • Jack Day 	
11:00 a.m. – Noon	<p><u>Stakeholder meeting:</u> You are encouraged to stay for the meeting. It is an informal touch base with the stakeholders.</p>		
Future agenda	<p><u>Future Business:</u></p> <ul style="list-style-type: none"> • Residential Maintenance Licensing • Acceptable LULA applications (limits to install) • ANSi A10.4 Maintenance 		
1:00 – 2:30 p.m.	<p><u>Questions and answers:</u> Regarding maintenance of other types of equipment such as material lifts, incline elevators, temporary personnel lifts, etc.</p>		

The purpose of the Elevator Safety Advisory Committee is to advise the department on the adoption of regulations that apply to conveyances; methods of enforcing and administering the elevator law, chapter 70.87 RCW; and matters of concern to the conveyance industry and to the individual installers, owners and users of conveyances. If a member is unable to fulfill his or her obligations, a new member may be appointed. An advisory committee member may appoint an alternate to attend meetings in case of conflict or illness.

- 1) Limit meetings to no more than two hours.
- 2) Please choose an alternate and submit their names and contact information.
- 3) Nominees, merits of why, Vote for the chair position.
- 4) Each of you represent a unique part of the industry, therefore you must be available for concerns and discussion with your represented piers and if necessary bring items forward to the table to be discussed.
- 5) All items to be discussed at the advisory level shall be included within the agenda. You will ensure any item relevant to the committee, be sent to the chair for inclusion into the agenda. Items not on agenda may not be decided at the meeting. This is to ensure public participation of the forum.
- 6) Review RCW and WAC and adopted standards, if there happens to be matters of concern, it is your obligation to bring them forward. Within each and every case decisions must be based upon public, worker and building safety.
- 7) L&I may not be the entity changing Statutes; you may need to become involved with your legislative representative in order to affect change.
- 8) The department thanks you for stepping up and volunteering, with that said the department needs to be assured of your participation. Please keep the meeting dates updated within your calendars. Your input is very important, and the department is at a great loss without your attendance.

Stakeholder meeting: You are encouraged to stay for the meeting. It is an informal touch base with the stakeholders.

Chief's Report

Maintenance Control Program (MCP) – Jack Day

Please check out our website at:

<http://www.lni.wa.gov/TradesLicensing/Elevators/ConResp/MCP/> to view a list of Companies with Code Compliant MCP's and a list of Companies suspended from performing work regulated by A17.1 due to non-compliance with the MCP.

Legislative Activities – Jack Day

- Substitute HB 2146 - Reduce Appeal Bond
- Reduces appeal bond to 10% but no less than \$100. Effective 7/1/2015
- No language change to WAC 296-96 required
- Questions?

Draft WAC 296-96 – Jack Day

Located within the elevator advisory section is a copy of our rules in electronic form. Its intended use is to update these draft rules with changes as they are created. Also attachments defining the rationale will be captured and posted as well. Strategically the analysis document will more than likely become the attachment. You can find the 296.96 WAC copy by using the following link:

<http://www.lni.wa.gov/TradesLicensing/Elevators/CalNews/AgendaMeeting/Default.asp>.

Old Business Notes:

Testing FAID (Fire Alarm Initiation Devices) – Rob McNeil (I need documentation to support)

Discussion regarding the testing requirements for periodic smoke and heat detectors and the credentials required of the initiation device testers. Seattle certifies persons by confidence testing. Need to supply the NFPA 72 testing criteria. What is the rationale?

Concern: elevator inspectors only check FAID devices at acceptance. Who is qualified to perform the periodic tests?

- *Should we pursue confidence testing for smoke detectors?*
- *Should we pursue confidence testing for heat detectors and shunt trip devices?*
- *Should we pursue confidence testing for the pressurization of the hoistway?*
- *Should we document the alternate landing?*
- *Should documentation be provided on site regarding the specific design of the fire fighters emergency service?*
- *Who performs these tests: Licensed elevator mechanics and/or certified alarm technicians?*
- *Involvement of building and fire officials?*

Existing machine room access – Keith Becker to report

- See attachment D

Overview of progress on point of sale inspections of residential elevators – Swen Larson

Elevators, Platform lifts and Stairway Chairlifts located in a private residence, shall be inspected upon completion and at the transfer of title/deed to ensure code compliance.

- See attachment E for answers to questions submitted last meeting

Purpose and scope on subcommittee for Part B Permits – Brian Wheeler

Means to allow companies to participate in a program that allows block permits for minor alterations and selected new installation permits. L&I will work with stakeholders to draft language for the Directors consideration for possible Legislation. Please place your names and contact information on the sign up sheet provided before leaving today. First meeting will be afternoon of June 11th.

New Business Notes:

Licensing criteria – Scott Cleary

Combining categories:

- Categories 02, 06, 07 combined and remove commercial dumbwaiters (cat 1)
- Combine categories 03 and 04 under industrial
- Combine category 08 with 01
- Incorporate only NEIP, CAT, CET for all categories except material lift
- Remove wording in WAC 296-96-00906:

The applicant must provide acceptable proof to the department that shows the necessary combination of documented experience and education credits in the applicable license category (see WAC 296-96-00910) of not less than three years' work experience in the elevator industry performing conveyance work as verified by current and previous employers licensed to do business in this state or as an employee of a public agency;

Code adoption sub committees and discussion of processes formed around subcommittee activities – Robert McNeil or Bryan Wheeler

The Elevator Safety Advisory Committee (ESAC) is the statutorily-approved body used to advise the Department of Labor & Industries (L&I) on the adoption of rules, enforcement and administration of authorities and matters of concern to the manufacturers, installers, owners and users of the conveyances in Washington State. Unfortunately, the ESAC meets only 4 times each year and L&I's need for policy review and recommendation work is greater than what the ESAC is designed to provide.

For that reason, on the agenda for consideration at our May 20 ESAC meeting is a proposal to create an ESAC subcommittee (Subcommittee) that would review and advise on matters related to the national standards, Washington Codes, Washington Administrative Codes (WACs), Revised Code of Washington (RCWs) and other policies. For example, the Subcommittee could pick a WAC section to review, analyze and make recommendations about in order to clean up outdated, inconsistent and/or unnecessary rule language. All stakeholders will be encouraged to actively participate in the Subcommittee and it will include L&I involvement. The Subcommittee should meet monthly, work fast and present its first report to the ESAC at its fall meeting.

On behalf of L&I, I believe the proposed Subcommittee will provide to the ESAC needed additional resources and expertise to assist the ESAC's work with the department. Please be prepared to discuss this important matter and opportunity at our May 20 meeting. I encourage you to support this effort.

Proposal for Comb Impact Device – Jack Day

- See Analysis (Attachment B)

Future Business Notes:

Residential Maintenance Licensing – Scott Cleary

Only properly licensed individuals can perform maintenance and testing on residential installations.

Acceptable LULA applications (limits to install) – Scott Cleary

Permit-able applications: need to define where they can be installed.

- WAC 296-96-02590: (1) LULAs may be permitted in churches, private clubs, and buildings listed on the historical register that are not required to comply with accessibility requirements. (2) Installation of LULAs in existing buildings that are not required to comply with accessibility requirements will be considered on a case-by-case basis by the department.
- The department is seeking advice and instruction of WAC 296-96-02590(2). We want to remove it, at the discretion of the department, and put in its place defined acceptable applications greater than those found in (1).
- Do we have any discussion regarding building occupancies, building type or use and rise limitations?

In the afternoon:

Questions and answers: Regarding maintenance of other types of equipment such as material lifts, incline elevators, etc.

The 1 to 2:30 p.m. timeslot is set to be a question and answer period in order to assist companies struggling to understand the maintenance requirements for conveyances whose design requirement's only reside in WAC 296-96. **Material lift MCP providers should attend.** It will be beneficial for **ANSI A10.4 Temporary Personnel lifts providers to attend** as well.



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Washington State Elevator Committee By-Laws

ARTICLE I: NAME

The name of this Committee shall be the “Washington State Elevator Safety Advisory Committee”.

ARTICLE II: PURPOSE

The Committee is organized to advise the Department of Labor and Industries, Elevator Inspection Department on the adoption of rules that apply to conveyances; methods of enforcing and administering this chapter; and matters of concern to the conveyance industry and to the individual installers, owners, and users of conveyances, without discrimination, and to maintain standards as established by the State of Washington.

ARTICLE III: MEMBERS

Membership of the Committee shall be as defined in RCW 70.87.220.

Committee Member responsibilities:

- a) Be present at a minimum of 75% of all regularly scheduled committee meetings in a 12 month period;
- b) Have a thorough knowledge of matters to be presented before the Committee where written correspondence was provided prior to the Committee meeting.

In the event a Committee Member fails to regularly attend Committee meetings or otherwise participate in Committee activities, the Committee may decide, after a majority vote at a regularly scheduled Committee meeting, to recommend to the Director of Labor and Industries that the member's position be considered for replacement and appointment of a new member.

ARTICLE IV: OFFICERS

The Committee shall elect (by written ballot or voice vote) one of its members by simple majority to serve as Chairperson, and one member to serve as Vice Chairperson.

The elected Chairperson and Vice Chairperson shall assume the office immediately upon election and shall serve until their membership on the Committee has expired.

The Chairperson and Vice Chairperson position may come up for a vote at a regularly scheduled Committee meeting by any member in good standing of the Committee. A vote to remove the Chairperson or Vice Chairperson shall be by written or voice ballot and a simple majority of Committee Members shall be required. If voted out of office he/she shall immediately relinquish their position, and a replacement shall be elected. The replacement shall immediately take the elected position and continue with the meeting if appropriate.

ARTICLE V: DUTIES OF OFFICERS

The Chairperson shall:

- a) Preside at all meetings, functions, and affairs of the Committee and act as Spokesperson for the Committee outside of meetings;
- b) Appoint all Standing and Special Committee members and designate the committee chairperson for same;
- c) Serve as Ex-officio member to all committees;
- d) Exercise supervision over all affairs of the Committee.

In the event the Chairperson cannot preside at a meeting, the Vice Chairperson of the Committee shall serve in that capacity.

The Vice Chairperson of the Committee shall:

- a) Be present at all meetings
- b) Have a working knowledge of all responsibilities of the Chairperson
- c) In the event of the Chairpersons' sudden departure, be able to assume all responsibilities and functions of the Chair, until the Committee is able to convene and appoint a new Chairperson.

The Chief Elevator Inspector from the Department of Labor and Industry shall serve as Secretary to the Committee per RCW70.87.220.

The Secretary shall:

- a) Keep a record of the minutes of all meetings;
- b) Submit all information to the Committee Members fourteen (14) days prior to the regular Committee meeting for all business to be reviewed

or acted on by the Committee. Business information received after the prescribed fourteen (14) day period may be considered if time permits or scheduled for the next regular Committee meeting.

ARTICLE VI: MEETINGS

Committee meetings shall be held on the third Tuesday of February, May, August and November. Special meetings may be called from time to time as the situation warrants.

In accordance with the Open Public Meetings Act as stated in RCW 42.30.020 and RCW 30.030, all meetings of the Committee regarding policies affecting the public shall be open to the public.

ARTICLE VII: QUORUM

A quorum for a regular or special meeting of the Committee shall be a simple majority of the Committee Members.

ARTICLE VIII: PARLIAMENTARY AUTHORITY

Legal Counsel to the Committee may include representation by the Office of the Attorney General. The members participate within the boundaries of RCW 70.87 and WAC 296.96.

ARTICLE IX: AMENDMENTS

The Bylaws may be amended by a simple majority of the Committee provided the amendment has been read at the previous meeting or mailed to the Committee Members fourteen (14) days prior to the meeting at which the voting will occur.

ARTICLE X: CONFLICT OF LAWS

In the event of any conflict between these Bylaws and the Committee's governing statute, Title 70.87 RCW, or the laws of the State of Washington, the law shall prevail.

ARTICLE XI: ADOPTION AND EFFECTIVE DATE

These Bylaws have been duly adopted by the Washington State Elevator Safety Advisory Committee.

Dated this _____ day of _____, 2014

Chairperson

Vice Chairperson

Secretary

Elevator Advisory Analysis Form – 2014

PROPOSAL NUMBER		DATE:	May 20, 2014
TITLE OF PROPOSAL:	Retroactive requirement to install Comb Impact devices		
PREPARED BY:	Jack Day		
PHONE #: & e mail	360 902-6128 / day1235@lni.wa.gov		
Brief summary of what this proposal does and its purpose:	Escalator and moving walks installed prior to 1993 were not equipped with comb impact devices. The intent would be to follow New York in requiring these devices which will reduce the severity of injuries to the public that become entrapped between the comb plate and the moving step.		
Does the proposal promote Public, Building or Worker Safety?			
<input checked="" type="checkbox"/> Public <input type="checkbox"/> Building <input type="checkbox"/> Worker			
1. The effect of this proposal would be:			
<input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> None			
If there is no effect or impact, should we continue to propose this change?			
<input type="checkbox"/> Yes <input type="checkbox"/> No			
2. If the proposal has an effect on the program, (major, minor, uncertain) briefly describe (effects) below.			
Of the 509 total counts (not counting Seattle and Spokane) there may be as many as 226 escalators and moving walks without the device. None of the 509 devices are calibrated to 65 PSI vertical. Some of the 226 may have been upgraded with the safety device; it is unknown at this time? Permitting and inspection impact will be high so we may propose to phase this in over time.			
3. If enacted, what type of fiscal impact would this proposal have on the owners, elevator companies or agency?			
Agency: communication with requirements and inspection staff to accommodate. Owner: upfront costs and reoccurring maintenance and testing Elevator companies: ?			
4. If the proposal has fiscal impact, how much?			
<input type="checkbox"/> Less than \$50,000 <input type="checkbox"/> More than \$50,000 <input type="checkbox"/> None			
Unknown at this time, we need proposal estimates from the elevator companies			
5. What other stakeholders would be impacted by this proposal? List, if any, and briefly summarize the impact for each affected group and their positions:			
6. If enacted, would this proposal require a new rule or revise an existing rule?			
<input checked="" type="checkbox"/> New rule <input type="checkbox"/> Revise existing rule <input type="checkbox"/> No rule change			
If this proposal has an effect on rules, identify the section of the proposal and cite the affected rules: This would go into the existing section of WAC part "D" Subpart IV section 3. Propose it			

reads as follows: For all existing and newly installed escalators a device shall be provided that will cause the opening of the power circuit to the escalator driving machine motor and brake where a resilient vertical force not greater than 268 N (60) LBS) in the upward direction is applied at the center of the front of the comb-plate.

7. General comments on this proposal: (Please include any additional background that would be helpful or comments on any similar proposals that you are aware of)

121 escalator accidents or the last four years, approximately 17 affected by entrapments at the comb teeth with one death.

Mr. Franklin from New Your reports:

The comb-stop switch has decreased the amount of lost toes and fingers being ripped off due to escalators continuing to run while person is entrapped. Comb-entrapment of digits, sneakers and all forms of footwear on devices equipped with a comb-stop switch will cause the escalator to shut down instead of running continuously and pulling the entrapped item and the person further into the escalator landing plate area. The comb-stop switch is also instrumental in serious preventing injury and strangulation due to clothing being pulled into the comb area. Once again this layer of safety is accomplished by the Comb-Stop switch shutting the escalator down instead of allowing the device to run continually. All types of escalators in NYC have been retrofit with the comb-plate stop switches including the wooden 1919 vintage units at Macy's flagship store at Herald Square. These units are Otis L and ML units. At present all escalators in New York City have been retrofitted with the comb-stop switch.

Donald J Franklin

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SUBSTITUTE HOUSE BILL 2146

AS AMENDED BY THE SENATE

Passed Legislature - 2014 Regular Session

State of Washington 63rd Legislature 2014 Regular Session

By House Labor & Workforce Development (originally sponsored by Representative Condotta)

READ FIRST TIME 02/05/14.

Sec. 5. RCW 70.87.170 and 2003 c 143 s 18 are each amended to read as follows:

(1) Any person aggrieved by an order or action of the department denying, suspending, revoking, or refusing to renew a permit or license; assessing a penalty for a violation of this chapter; or ordering the operation of a conveyance to be discontinued, may request a hearing within fifteen days after notice of the department's order or action is received. The date the hearing was requested shall be the date the request for hearing was postmarked.

(2) The party requesting the hearing must accompany the request with a certified or cashier's check for two hundred dollars payable to the department, except that if a penalty assessment is the issue for the hearing, the check amount shall be ten percent of the penalty amount or two hundred dollars, whichever is less, but in no event less than one hundred dollars. The department shall refund the ((two hundred dollars)) amount of the check if the party requesting the hearing prevails at the hearing; otherwise, the department shall retain the ((two hundred dollars)) amount of the check.

(3) If the department does not receive a timely request for hearing, the department's order or action is final and may not be appealed.

~~((2))~~ (4) If the aggrieved party requests a hearing, the department shall ask an administrative law judge to preside over the hearing. The hearing shall be conducted in accordance with chapter 34.05 RCW.

NEW SECTION. **Sec. 6.** This act takes effect July 1, 2015.

--- END ---

5-1-2014

Means of Access Sub Committee on (Machine room/control room access)

Sub-committee members; Keith Becker, Jack Day, David Spafford, Terry Rozell, Scott Cleary, Robert McNeill, Joseph McCann, Amber Quann.

What are we attempting to do?

REASONING: It is felt that there does not exist, adequate regulations regarding the safe means of access to the Machine Room or Machine Space for existing elevators.

SCOPE: If possible, develop safe machine room/ control room access requirements for existing buildings or structures. Provide instruction and guidelines for proper installation and maintenance of this access. Access should be considered fixed and permanent and non-combustible. Determine if the WAC's fall into existing or new requirements.

Proposal as of 5-5-2014

Document being utilized to determine minimum access to all existing elevators is outlined in ASME A17.1-2010, Part 2, Section 2.7.3.1 through 2.7.3.4

2.7.3 Access to Machinery Spaces, Machine Rooms, Control Spaces, and Control Rooms

2.7.3.1 General Requirements

2.7.3.1.1 A permanent and unobstructed means of access shall be provided to

- (a) machine rooms and control rooms
- (b) machinery spaces and control spaces outside the hoistway
- (c) machinery spaces and control spaces inside the hoistway that do not have a means of access to the space as specified in 2.7.3.1.2.

2.7.3.1.2 Access to machinery spaces and control spaces inside the hoistway

2.7.3.1.2(b) from the car top shall comply with **2.12.6 and 2.12.7**

2.12.6 Hoistway Door Unlocking Devices

2.12.6.1 General. Except in jurisdictions that limit the use of hoistway door unlocking devices, they shall be provided for use by elevator and emergency personnel for each elevator at every landing where there is an entrance.

2.12.6.2 Location and Design. Hoistway door unlocking devices shall conform to 2.12.6.2.1 through

2.12.6.2.5.

2.12.6.2.1 The device shall unlock and permit the opening of a hoistway door from a landing irrespective of the position of the car.

2.12.6.2.2 The device shall be designed to prevent unlocking the door with common tools.

2.12.6.2.3 Where a hoistway unlocking device consists of an arrangement whereby a releasing chain, permanently attached to a door locking mechanism, is kept under a locked panel adjacent to the landing door, such a panel shall be self-closing and self-locking and shall not have identifying markings on its face.

2.12.6.2.4 The hoistway door unlocking device shall be Group 1 Security (see 8.1). The operating means shall also be made available to emergency personnel during an emergency.

2.12.6.2.5 The unlocking device keyway and locked panel (see 2.12.6.2.3), if provided, shall be located at a height not greater than 2 100 mm (83 in.) above the landing.

2.7.3.2 Passage Across Roofs. The requirements of 2.7.3.2.1 and 2.7.3.2.2 shall be conformed to where passage over roofs is necessary to reach the means of access to machinery spaces, machine rooms, control spaces, and control rooms.

2.7.3.2.1 A stairway with a swinging door and platform at the top level, conforming to 2.7.3.3, shall be provided from the top floor of the building to the roof level. Hatch covers, as a means of access to roofs, shall not be permitted.

2.7.3.2.2 Where the passage is over a roof having a slope exceeding 15 deg from the horizontal, or over a roof where there is no parapet or guardrail at least 1 070 mm (42 in.) high around the roof or passageway, a permanent, unobstructed and substantial walkway not less than 600 mm (24 in.) wide, equipped on the side sloping away from the walk with a railing conforming to 2.10.2.1, 2.10.2.2, and 2.10.2.3,

2.10.2 Standard Railing

2.10.2.1 Top Rail. The top rail shall have a smooth surface, and the upper surface shall be located at a vertical height of 1 070 mm (42 in.) from the working surface.

2.10.2.2 Intermediate Rail, Member, or Panel.

The intermediate rail or equivalent structural member or solid panel shall be located approximately centered between the top rail and the working surface.

2.10.2.3 Toe-Board.

The toe-board shall be securely fastened and have a height not less than 100 mm (4 in.) above the working surface.

shall be provided from the building exit door at the roof level to the means of access.

2.7.3.3 Means of Access. The means of access to the following shall conform to 2.7.3.3.1 through 2.7.3.3.6:

(a) machine rooms, control rooms, and machinery spaces and control spaces outside the hoistway, and machinery spaces and control spaces inside the hoistway that do not have a means of access to the space as specified in 2.7.3.1.2

(b) between different floor levels in machine rooms, in control rooms, and in machinery spaces or control spaces outside the hoistway

(c) from within machine rooms or control rooms to machinery spaces and control spaces

2.7.3.3.1 A permanent, fixed, noncombustible ladder or stair shall be provided where the floor of the room or the space above or below the floor or roof from which the means of access leads, or where the distance between floor levels in the room or space, is more than 200 mm (8 in.).

2.7.3.3.2 A permanent, noncombustible stair shall be provided where the floor of the room or the space above or below the floor or roof from which the means of access leads, or where the distance between floor levels in the room or space, is 900 mm (35 in.) or more. Vertical ladders with handgrips shall be permitted to be used in lieu of stairs for access to overhead machinery spaces, except those containing controllers and motor generators.

2.7.3.3.3 Permanent, fixed, noncombustible ladders shall conform to ANSI A14.3.

2.7.3.3.4 Permanent, noncombustible stairs shall have a maximum angle of 60 deg from the horizontal, and shall be equipped with a noncombustible railing conforming to 2.10.2.1, 2.10.2.2, and 2.10.2.3.

2.10.2 Standard Railing

2.10.2.1 Top Rail. The top rail shall have a smooth surface, and the upper surface shall be located at a vertical height of 1 070 mm (42 in.) from the working surface.

2.10.2.2 Intermediate Rail, Member, or Panel.

The intermediate rail or equivalent structural member or solid panel shall be located approximately centered between the top rail and the working surface.

2.10.2.3 Toe-Board.

The toe-board shall be securely fastened and have a height not less than 100 mm (4 in.) above the working surface.

2.7.3.3.5 A permanent, noncombustible platform or floor shall be provided at the top of the stairs conforming with the following:

- (a) Railings conforming to 2.10.2 shall be provided on each open side.
- (b) The floor of the platform shall be at the level of not more than 200 mm (8 in.) below the level of the access-door sill.
- (c) The depth of the platform shall be not less than 750 mm (29.5 in.), and the width not less than the width of the door.
- (d) The size of the platform shall be sufficient to permit the full swing of the door plus 600 mm (24 in.) from the top riser to the swing line of the door.

2.7.3.3.6 Where a ladder is provided, a permanent, noncombustible platform or floor shall be provided at the top of the ladder, conforming with the following:

- (a) Railings conforming to 2.10.2 shall be provided on each open side.
- (b) The floor of the platform shall be located below the level of the access-door sill by a vertical distance of not more than 200 mm (8 in.) where full bodily entry is required, and by a vertical distance of not more than 900 mm (35 in.) where full bodily entry is not required.
- (c) The depth of the platform shall be not less than 915 mm (36 in.) and the width not less than the width of the door or a minimum of 915 mm (36 in.), whichever is greater.
- (d) The size of the platform shall be sufficient to permit the full swing of the door plus 600 mm (24 in.) from the standard railing to the swing line of the door.
- (e) The ladder or handgrips shall extend a minimum of 1 220 mm (48 in.) above the platform floor level and shall be located on the access door/panel strike jamb side of the platform.
- (f) The railing on the access side shall be provided with a hinged section not less than 600 mm (24 in.) wide with a latchable end adjacent to the ladder.

NOTE: Any like-for-like repairs will be allowed to combustible ladders, stairs or platforms. If replacement is required due to inadequate structural integrity, then 2.7.3.3 must be followed in its entirety.

Comment [kb1]: New language added.

2.7.3.4 Access Doors and Openings. If provided.

2.7.3.4.1 Access doors shall be

- (a) self-closing and self-locking
- (b) kept closed and locked

NOTE: 2.7.3.4.2 through 2.7.3.4.7 are not required to be followed unless existing doors are replaced, openings modified or new doors or openings added.

Comment [kb2]: New language added.

2.7.3.4.2 Access doors to machine rooms and control rooms shall be provided. They shall be of a minimum width of 750 mm (29.5 in.) and a minimum height of 2 030 mm (80 in.). Keys to unlock the access doors shall be Group 2 Security (see 8.1).

2.7.3.4.3 Access doors for spaces specified in 2.7.4.2, 2.7.4.3, and 2.7.4.4 other than those for machine rooms or control rooms shall be a minimum width and height of 750 mm (29.5 in.). Keys to unlock the access doors shall be Group 2 Security (see 8.1).

2.7.3.4.4 Access doors for control spaces outside the hoistway shall be a minimum width

and height of 750 mm (29.5 in.). Keys to unlock the access doors shall be Group 2 Security (see 8.1).

2.7.3.4.5 Doors are not required at openings in machine room or control room floors for access to machinery spaces outside the hoistway, provided the access opening is provided on all four sides with a standard railing conforming to 2.10.2, one side of which is arranged to slide or swing to provide access to the ladder or stairs leading to the space. Trap doors, where provided, shall have a standard railing conforming to 2.10.2 or guard wings on all open non-access sides.

2.7.3.4.6 Access openings located in the machinery space floor, secondary level floor, machine room floor, control space floor, or control room floor for access into the hoistway shall be provided with doors that shall be kept closed and locked. Keys to unlock the access doors shall be of Group 1 Security (see 8.1).

2.7.3.4.7 Access openings in elevator hoistway enclosures where full bodily entry is not necessary for maintenance and inspection of components shall be

(a) located to permit the required maintenance and inspection

(b) of maximum width of 600 mm (24 in.) and a maximum height of 600 mm (24 in.).

These dimensions shall be permitted to be increased, provided that any resultant opening through the access opening into the hoistway shall reject a 300 mm (12 in.) diameter ball.

(c) provided with doors that shall be kept closed and locked. Keys to unlock the access doors to the elevator hoistways shall be of Group 1 Security (see 8.1).

1. New names from the meeting. I see that Carisa Barrett and Gregg Rogers both spoke and that they list their organization as EIWPF. I don't see that they were ever introduced to the committee and I haven't learned very much about their organization or what its relationship is to the IUEC. Can you fill in that information for us? (By the way, I did meet Ms. Barrett at the December sub-committee meeting but the November transcript had not yet been published so I didn't know that she had attended the November meeting and had spoken).

What is the relationship of the EIWPF with the IUEC?

The Elevator Industry Work Preservation is a Labor Management Organization between the Signatory Contractors and the International Union of Elevator Constructors. It is a 501c3 corporation that was created in 1997 during the collective bargaining process. Its roll is the development of safety programs that will benefit the signatory industry and to promote safety for the riding public and the elevator industry in general. It produces safety posters and videos. It conducts code classes for members who serve on different code committee and state elevator boards. It provides continuing education classes to meet the requirements for state license holders and for QEI inspectors. It monitors prevailing wages nationally and assist local unions in filling out the necessary forms for the Department of Labor. It works with the Elevator Contractors of America (ECA) and the National Elevator Industry, Inc., (NEII) providing assistance with prevailing wage data gathering and submittal of the required forms. And it works with NEII in the introduction of the Model Elevator Bill on a national level.

2. You asked Mr. Rogers what other states had adopted similar laws and he couldn't answer at that time. Has there been follow-up since the meeting to get an answer to this question?

What other states have adopted similar language for inspection of residential conveyances?

We are still waiting on replies from several AHJ's on who inspects residential equipment. We know there is a nationwide effort to get equipment inspected at the completion of the installation and at the transfer of deed when a property is sold. This has been accomplished either through legislation or by adding the inspection requirement to the Real Estate, Sellers Disclosure List in states that have them.

3. Mr. Rogers also referred to "this language" when you asked about other states and other legislation. I'm curious if he is referring to the model law that has been mentioned. Did he give you a copy of that? If it is the basis of a proposed law in Washington I think your committee would want to see it.

Is Mr. Rogers referring to the Model Law that has been mentioned when he referred to "this language"?

The language that Mr. Rogers was referring to was what is called the real estate project where the EIWPF is trying to get home elevators inspected at the completion of the installation and at the transfer of Deed. The Model Law has some language pertaining to residential elevators and would allow for inspection but that language usually is removed during the legislative process due to the old adage that a man's home is he castle and government has no business intruding. So the real estate project was

developed as an alternative. Since the EIWP number one goal is safety of the riding passengers and the workers who perform the work on conveyances.

4. Toward the end of the discussion (Pages 69 and 70) there is mention of the language of the bill and putting it on the list server. I know the short statement of the purpose of the bill was sent out by email but has the language of the bill itself been published?

No. It is too late to get this in the current Legislative cycle. We have worked on the language but won't have the final language until we have someone to sponsor the bill. At that time it will go on the list server. I think this is probably standard procedure for pending bills. The language proposed is below:

Conveyances, as listed in 70.87 RCW, located in a private residence, shall be inspected, per 70.87.120 RCW, upon completion and at the transfer of title/deed to ensure code compliance for the adopted code they were installed or altered. Any unit installed or altered without a permit must be brought up to the code adopted when discovered.

5. On pages 50 and 51 Jack Day makes a very concise statement of what he wants to see regarding the implementation steps that will be taken. As you and I discussed this morning it is very easy to state the overall intent of the proposal in 25 words or less. On the other hand there are still many questions of exactly how the final process would be implemented and I believe this is what Jack is asking for. I don't see that those steps have been outlined. The trend of the discussion and the questions that are being asked indicate there are a lot of questions in many minds.

This isn't in the form of a question but a statement. Further discussion will be held with the State to make sure this moves forward in a way that is acceptable to them and conditions have been met to insure this functions the way it is intended.

6. It isn't clear from the discussion as to who will do the inspections. The Department? The elevator companies? Some other organization? There was discussion both pro and con regarding the possibility of a company engaged in regular servicing of a conveyance being the one to certify an inspection.

To answer this question I will refer to language in an email I sent to Bob McLaughlin that lays out the answer and the rationale for the answer.

At 08:09 1/27/2014, you wrote:

>Bob, I am forwarding this to you, because I think it may answer your
>question. It appears the answer from the response is; Home conveyances
>are complicated systems with a large liability attached to them. The
>average home inspector has had no training in this field and are more
>confident in areas they have trained in. This arena takes some very
>specific training and if something is missed it can have dire
>consequences. I understand the home inspectors wanting to shy away from

>something they know little about and may be the reason conveyances were
>written out of the law. I think that was a mistake...

>You asked "who will do the inspections?" My answer based on what makes
>the most sense to me is the people who are trained to do the
>inspections, elevator inspectors. You asked about costs and I know the
>hourly rate the department of L&I charges, \$70.00 per hour and mileage
>to the site at the IRS mileage rate. Depending on location, I would
>think a total of 3 hours, and that includes drive time, would take care
>of most inspections. For an average of three hundred dollars per
>conveyance it looks like money well spent, for some peace of mind for
>all those involved. The financial impact on the department of L&I will
>have to be figured out in a financial note when and if this goes
>forward. It will be a calculation based on the total number of
>conveyances, and the average home sales rate. Please let me know any
>other questions you may have and I will do the work of finding the
>answer. I will give you my rational and will keep an open mind and
>listen to others opinions and am willing to look at the evidence with
>neither fear nor favor. I think this is important legislation.

To the second part of your question: The inspection should be done by an outside entity. Self inspections are not the standard in the rest of the Industry for obvious reasons.

7. What standard will be applied to the inspection? There are many references to the code in effect at the time of installation, but the general discussion shows this remains very much a gray area. Codes change. Interpretations change. I think we all know that lot depends upon the individual inspector. There is also mention of "maintenance, examination, and safety tests." I'm not sure how those fit in.

The standard that will apply is the standard in place when the conveyance was installed if a permit was issued. This mirrors the commercial side of the Industry. Units are grandfathered to the code in place at the time of installation. If permits were available and the installer disregarded the permit process, then the unit would have to be brought up to the code in effect when discovered by the Elevator Inspectors. Not to do this rewards people who have tried circumventing the law and penalizes the people who have played by the rules. If permits were not being issued by the State for a time period, those units would not be required to be brought up to current code but would be inspected to the code installed under.

Codes and interpretations do change as knowledge increases. An example would be adding seatbelts and airbags in the auto industry. Preexisting vehicles weren't forced to go back and add those things at a later date.

I will let the State respond to your comment about individual inspectors. I have no base to formulate a comment.

Answer to your last question is, in the draft language the only thing addressed is requiring an inspection on turn over and at point of sale. Period. Inspections maintenance and testing is out of the proposed language.

8. What happens if a conveyance does not pass inspection? I don't see that this has been discussed.

If a conveyance doesn't pass inspection and it is unsafe it should be red tagged and taken out of service. All deficiencies that are found will be placed in a report ,just like a termite or septic inspection and given to the appropriate parties. It then becomes a negotiation between the buyer and seller how it is handled.

9. How many conveyances do we foresee that will be involved? You and Jack talked about this on page 52 of the transcript. Have those numbers been generated yet?

Yes. In the meeting minutes dated 12-19-13, the State reported there were a total of 6,673 units permits issued to them. Since the meeting, Seattle came up with their permit totals. I will attach the language from their response.

Hi Swen,

Attached is a partial list of our residential elevators.

The list shows all residential elevators from 7-19-2002 to present day. (About 683 units).

We are still searching for a way to locate archived records for residential elevator records prior to the 7-19-2002 date. A safe guess for the total number of residential installs prior to 7-19-2002, may be double or triple the number listed on this report.

Most of the Elevators and some Vertical Platform Lifts are probably still in place but many of the Chair Stair Lifts may have been removed over the years.

Have a Great Day!

As evidenced by this reply and coupled with the fact that many have been installed without permits or may have been removed it will be impossible to come up with a precise number and even if you did it would only be current for a very short period of time. All indications point to this number increasing.

I would expect Spokane numbers will be about a third of Seattle's. Ten thousand units would be my estimate.