



Elevator Safety Program - Technical Clarification

Equipment: Passenger/Freight Elevators & other conveyance types	Topic: TC 18-05 Alterations, Repairs, & Replacements
December 21, 2018	#: 18-05 Code/Rule: ASME A17.1-2016/CSA B44-16, Section 8.7

Issue: New requirements beginning October 1, 2018.

Background and Concerns: In the previous WAC rules, permits were being required for repairs and replacements. The statute does not require permits for repairs and replacements as they are considered part of maintenance. Maintenance does not require permits by law.

RCW 70.87.080

Permits—When required—Application for—Posting.

- (1) A permit shall be obtained from the department before performing work, other than maintenance, on a conveyance under the jurisdiction of the department.*
- (2) The installer of the conveyance shall submit an application for the permit in duplicate, in a form that the department may prescribe.*
- (3) The permit issued by the department shall be kept posted conspicuously at the site of installation.*
- (4) A permit is not required for maintenance.*
- (5) After the effective date of rules adopted under this chapter establishing licensing requirements, the department may issue a permit for conveyance work only to an elevator contractor unless the permit is for conveyance work on private residence conveyances. After July 1, 2004, the department may not issue a permit for conveyance work on private residence conveyances to a person other than an elevator contractor.*

70.87.010 (23) *"Maintenance" means a process of routine examination, lubrication, cleaning, servicing, and adjustment of parts, components, and/or subsystems for the purpose of ensuring performance in accordance with this chapter. "Maintenance" includes repair and replacement, but not alteration.*

By definition, maintenance includes repair and replacement; maintenance does not require a permit; ergo permits are not required for repairs or replacements. Repairs and replacements are defined as:

RCW 70.87.010 (35) "Repair" means the reconditioning or renewal of parts, components, and/or subsystems necessary to keep equipment in compliance with this chapter.

RCW 70.87.010(36) "Replacement" means the substitution of a device, component, and/or subsystem in its entirety with a unit that is basically the same as the original for the purpose of ensuring performance in accordance with this chapter.

These terms are further defined by WAC 296-96-00700 to ensure that there is a clear distinction between repairs, replacements, and alterations.

"Alteration" means an intended change to the original design of elevator equipment.

"Repair" means a procedure used to restore a device or system to its original design parameters without supplying a complete new component or device.

"Replacement" means the complete replacement of a device or component that has the same "form, fit, and function" as the original but is not intended as a change in design.

"Form, fit, and function" means specific characteristics of a device (such as a component or assembly) that enable direct substitution of the device for a similar device without adversely affecting the operation or safety of the overall equipment. Factors to be considered with respect to form, fit, and function include, but are not always limited to: The ability of the device to be connected in place of the original; having similar size, shape and appearance; ability to perform the same function as the original device; and having ratings equal to or greater than the original device.

Clarification: Beginning October 1, 2018, alterations are considered to be the following:

1. Any new item being provided for elevator equipment;
2. Any item under ASME A17.1/CSA B44, Section 8.7, Alterations; or
3. Basic changes in design where not specifically covered by ASME A17.1/CSA B44, Section 8.7.

Action Required: Where a repair or replacement involves a device or system that has an associated test requirement, the device or system shall be tested according to the applicable test requirements of ASME A17.1/CSA B44, Section 8.10. The testing shall be documented in the required maintenance records. (Also, see ASME A17.1/CSA B44, 8.7.1.3 for required alteration testing).

Questions may be directed to:

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Reviewed by Technical Specialists