



STATE OF WASHINGTON
DEPARTMENT OF LABOR AND INDUSTRIES
PO Box 44480 • Olympia Washington 98504-4480

Technical Clarification

July 28, 2014

NOTICE: Alteration Requirements.

- All alterations must be permitted and inspected.
 - *See attachment for RCW 70.87.100*
- Once alteration has begun, the annual operating certificate is considered suspended.
 - *See attachment WAC 296-96-01000*
- All alteration permits must be posted on the job site and code data tags installed for final inspection.
 - *See attachment WAC 296-96-01000*
 - *See ASME A 17.1 8.6.1.5.1 & 8.9*
 - *See attachment WAC 296-96-02466*
- The 2014 WAC rules changed for alteration inspections. (*See attachment WAC 296-96-02405*)
 - All alterations must be inspected with a licensed mechanic present.
 - Company representative/mechanic must call to schedule an appointment seven days in advance.
 - The permit will state if the conveyance needs to be shut down until inspected.
 - The inspector has the discretion to allow a conveyance to be turned on prior to inspection with written permission, per *items listed in this document.

Note: There are penalties for allowing an elevator to run without permission after starting any alteration as per WAC 296-96-01070(1)(a).

Alterations are found in ASME A17.1 Section 8.7. In the event an alteration is not referenced, refer to the following pages which identify alterations that are not found in ASME A17.1 Section 8.7.

- Alteration Description
 - *Denotes conveyance may be returned to service with written permission from inspector.
- Additional Requirement
 - Identifies general information about particular alterations.
- Code Data Plate Info
 - Information that is required to be on the code data plate may be a combination of the three codes below:
 1. 8.7 reference, use first if applicable.
 2. When not in 8.7, reference WAC requirement.

3. When not addressed by WAC or 8.7, reference ASME requirement from the main body of the code.

- Conform to/Required Test
 - Provides what part(s) of the code are to be applied for conformance/inspection.

Alteration Description	Additional Requirement	Code Data Plate Info.	Conforms to and Test per
* Denotes conveyance may be returned to service with written permission from inspector			
Alterations not covered by 8.7			
INSIDE CAR			
* Phones	See Technical Clarification		2.27.1
* Intercoms		2.27.1.1.4	2.27.1.1.4
* Security		2.27.3.1(i)	2.27.3.1(i)
Ceilings		2.14.7.3	2.14.7.3
Flooring		2.14.2.1.1	2.14.2.1.1/8.7.2.15.2
* Handrails		WAC 296-96-02530	WAC 296-96-02530
Cab interior		2.14.2	8.7.2.14
* Ventilation		2.14.2.3	2.14.2.3
COP	ADA Phone	2.27.1	2.27.1
	Firemens service	2.27.3	2.27.3
	Emergency Light	2.14.7.1.3	2.14.7.1.3
	Button Height	WAC 296-96-0215	WAC 296-96-0215
	Symbols	2.26.12	2.26.12
Car Doors. Including but not limited to re-skinning.		2.12.4	2.12.4, 2.26.4
* Emergency Light		2.14.7.1.3	2.14.7.1.3
* Car Lighting		2.14.7	2.14.7
* Camera		2.14.1.9	2.14.1.9
Machine/Control Room/Spaces			
Electronic Starters (requiring circuit changes)		WAC 296-96-01006	Per Company written test procedure
Starters (like for like)	No permit		
Oil cooler/heater		WAC 296-96-01006	NEC 620.55
Environmental Control		WAC 296-96-01006	WAC 296-96-02465
Sprinkler System	City of Seattle Requirements	WAC 296-96-02475	WAC 296-96-02470 WAC 296-96-02475
Relocation of Equipment (within existing space)		WAC 296-96-01006	WAC 296-96-02455
Disconnect	Electrical signoff	WAC 296-96-02460	WAC 296-96-02460 NEC 620.51
Smoke Detector (only)	When landing wires in controller	WAC 296-96-01006	WAC 296-96-02470
Controller Overlays		WAC 296-96-01006	Test per Device
Pumps/Motors (like for like)	No permit		
Driving machine Sheave	Like for like test required	WAC 296-96-01006	8.10.2.2.2(cc)
Brake Pads	No permit		
Brake Assembly (entire)		8.7.2.25.1(b)	8.6.4.20.4

Alteration Description * Denotes conveyance may be returned to service with written permission from inspector		Additional Requirement	Code Data Plate Info.	Conforms to and Test per
	Emergency Brake		8.7.2.25.1(b)/2.19.3	8.6.4.20.11
	Seismic		WAC 296-96-02410	8.4.3, 8.4.10
	Piping/Overspeed Valve	Note: Required to meet WAC 296-96-02410(4)		8.10.3.2.2(t,u,v,x,y) 8.10.3.2.5(o)
	Control Valves	Like for like	WAC 296-96-01006	
		All others	8.7.3.24	
	Fittings/Seals	No permit		
	Governors	All	8.7.2.19	8.10.2.3.2(f)
Top of Car				
	Inspection Station		WAC 296-96-23270(3)	8.10.3.2.3(c)
	Suspension	No Permit Unless changing type/size	8.6.3.2	8.10.2.2.2(cc)
	Governor Rope	No Permit Unless changing type/size	8.7.2.19	8.10.2.2.2(hh) 8.10.2.2.3(z)
	Rope Fastenings/Hitch Plates	No permit		
	Door Operator (entire)	Door Restrictors	WAC 296-96-01006	8.10.3.3.2(a)
	Handrails (Top of Car)	No Permit	When installed must meet WAC 296-96-23117	
	Car and/or CWT Guides	No permit unless changing type	2.15.2/2.15.3	2.15.2/2.15.3
	Top of Car lighting	No Permit	When installed must meet WAC 296-96-02566	
	Stop Switch	No Permit		
Hoistway				
	Sprinkler	City of Seattle Requirements	WAC 296-96-02475	WAC 296-96-02470 WAC 296-96-02475
	Seismic		WAC 296-96-02410	8.4.3,8.4.10
	Hoistway Ventilation/Pressurization		WAC 296-96-02570 WAC 296-96-02575	WAC 296-96-02570 WAC 296-96-02575
	Travelling Cables	No Permit	When installed must meet NEC 620.41	
	Environmental Controls		WAC 296-96-01006	WAC 296-96-02465
	Glass or walls	No Permit		
Outside Hoistway				
	Doors including but not limited to re-skinning		2.11	2.11
*	Hall buttons	Like for like - no permit	WAC 296-96-02540	WAC 296-96-02540 A117.1-407.2
*	Position Indicator	Like for like - no permit	A117.1-407.2.2	A117.1-407.2.2
*	Security		2.27.3.1(i)	2.27.3.1(i)
	Building Fire Doors	No permit		WAC 296-96-02585
*	Hall Lanterns	Like for like - no permit	WAC 296-96-02545	WAC 296-96-02545
Pit				
	Overspeed Valve		3.19	8.10.3.2.5(o)
	Hydraulic Supply Piping	Note: Required to meet WAC 296-96-02410(4)	WAC 296-96-02410(4)	WAC 296-96-02410(4)
	Stop Switch	No Permit		

****This should not be considered an all-inclusive list, as items may change at the discretion of the department**

For any question contact either Becky Ernstes at 360-902-6456 or Mike Wilson at 253-377-5495

ATTACHMENTS

RCW 70.87.100 Conveyance work to be performed by elevator contractors — Acceptance tests — Inspections.

(1) All conveyance installations, relocations, or alterations must be performed by an elevator contractor employing an elevator mechanic.

(2) The elevator contractor employing an elevator mechanic performing such conveyance work shall notify the department before completion of the work, and shall subject the new, moved, or altered portions of the conveyance to the acceptance tests.

(3) All new, altered, or relocated conveyances for which a permit has been issued, shall be inspected for compliance with the requirements of this chapter by an authorized representative of the department. The authorized representative shall also witness the test specified.

[2003 c 143 § 15; 2002 c 98 § 5; 1983 c 123 § 11; 1963 c 26 § 10.]

WAC 296-96-01000 What is the permit process for conveyances?

(1) Prior to construction, alteration, or relocation of any conveyance, the licensed elevator contractor shall:

(a) Submit an installation application to the department. See [WAC 296-96-01010](#) through [296-96-01025](#).

(b) Submit plans to the department for approval. See [WAC 296-96-01030](#).

EXCEPTION: *Most alterations will not require plans.*

(c) Post an approved installation or alteration permit issued by the department on the job site.

(i) The annual operating certificate is considered suspended once alteration work begins.

(ii) The certificate shall not be reinstated until the alteration work is approved by an inspector employed by the department.

(d) Obtain and pass an inspection prior to placing the conveyance in service.

(e) Abstain from working without a permit or releasing the conveyance for use without the department's written permission. Failure to comply is a violation of this chapter and may result in civil penalties See [WAC 296-96-01070 \(1\)\(a\)](#).

WAC 296-96-02405 What is the inspection and approval process for alterations?

The following process must be followed when performing alterations:

(1) Obtain an alteration permit from the department prior to performing the alteration. The permit application must include detailed information on the scope of the alteration.

(2) Take the conveyance out-of-service and perform the alteration.

(3) If the conveyance requires an inspection prior to being returned to service (as identified on the alteration permit), you must contact the department to schedule an inspection at least seven days in advance and:

(a) A licensed mechanic must be present and if the conveyance passes the inspection, the conveyance may be placed back into service.

(b) If the conveyance fails the inspection, the conveyance must remain out-of-service until the corrections are made, reinspection scheduled and approved by the department.

(4) If the conveyance is not required to be inspected prior to being returned to service, you must contact the department immediately to schedule an inspection within seven days and obtain written permission prior to returning the conveyance to service. A licensed mechanic must be present during the scheduled inspection and:

(a) If the conveyance passes the inspection, the conveyance may remain in service.

(b) If the conveyance fails the inspection, the conveyance will be placed out-of-service until the corrections are made, reinspection scheduled and approved by the department.

WAC 296-96-01070 What are the civil (monetary) penalties for violating the conveyance permit and operation requirements of chapter [70.87 RCW](#) and this chapter?

(1) Any licensee, installer, owner or operator of a conveyance who violates a provision of chapter [70.87 RCW](#) or this chapter shall be subject to the following civil penalties:

(a) Operation of a conveyance without a permit or written approval from the department:

First violation. . . .	\$171.20
Second violation. . . .	\$342.60
Each additional violation. . . .	\$500.00

Note: Each day is considered a separate violation

WAC 296-96-02466 ASME A17.1-8.9 Code data plate location and material.

(1) An individual data plate shall be provided and maintained for each unit (see 1.1.1). The data plate shall indicate:

(a) Code to be used for inspections and tests (see 8.10.1.2);

(b) Code and edition in effect at the time of installation; and

(c) Code in effect at the time of any alteration and indicate the applicable requirements of 8.7, including reference number. Note: See information above when alteration is not addressed in ASME A17.1 – 8.7

(2) The data plate shall be of such material and construction that the letters and figures stamped, etched or cast to the face shall remain permanently and readily legible. The height of the letters and figures shall be not less than 3.2 millimeters (0.125 inches).

(3) All data plates shall be provided with either of the additional requirements listed in 8.9.3 (a) or (b).

[Statutory Authority: Chapter [70.87 RCW](#). WSR 13-24-066, § 296-96-02466, filed 11/27/13, effective 1/1/14.]