



Office of the State Fire Marshal

MEMORANDUM

TO: All Owners of Illinois-Registered Conveyances Located in Municipalities without a Local Agreement

FROM: Robert Capuani
Director, Elevator Safety Division

DATE: March 25, 2011

RE: ASME General Maintenance Requirements

Certain confusion surrounding the Office of the State Fire Marshal's ("OSFM's) position regarding the General Maintenance Requirements in ASME A17.1, §8.6.1.2 has been brought to this Office's attention. Specifically, misinformation has been circulated regarding the following provisions, and their applicability to Illinois-registered conveyances:

- Maintenance Control Program, ASME A17.1 (2007), §8.6.1.2.1
- Maintenance Records, ASME A17.1 (2007), §8.6.1.4.1
- Wiring Documents, ASME A17.1 (2007), §8.6.1.6.3
- Code Data Plate, ASME A17.1 (2007), §8.6.1.5.1

All of the above-cited provisions have been Illinois Law, and enforceable as to all Illinois-registered conveyances since **April 24, 2007**. The applicability of A17.1's General Maintenance Requirements to Illinois conveyances should come as no surprise to either conveyance owners, Municipalities without Local Agreements with the OSFM, Illinois-licensed elevator inspectors or their employers. (Extensive information regarding ASME General Maintenance Requirements, including ASME interpretations, are available on this OSFM webpage at:

<http://www.sfm.illinois.gov/commercial/elevators/maintenancecontrolprogram.aspx>).

As Illinois law, the ASME General Maintenance Requirements should have been enforced since their adoption, and will continue to be enforced until superseded by newer versions in the future.

If either your Illinois-licensed inspection company or its individual inspectors do not understand, and cannot clarify, these code requirements, please contact the OSFM immediately. Similarly, instances where elevator inspectors are only just now writing General Maintenance Requirement violations for pre-existing conditions raise questions about said inspector's understanding of Illinois Elevator Safety Regulations. You are, therefore, encouraged to notify this Office at 312-814-1325 of any such instance for prompt investigation.

The OSFM would also like to address certain claims that violations of ASME A17.1 (2007) General Maintenance Requirements “will constitute an immediate failure” and lack any “grace period” to allow for the achievement of compliance. Generally speaking, conveyance owners “shall have 30 days from the date of the published inspection report to be in full compliance by correcting the violations” noted in an inspection report. (225 ILCS 312/120). It is the OSFM’s position that this 30- day grace period applies to, among other provisions, those noted above: Maintenance Control Program (§8.6.1.2.1), Maintenance Records (§8.6.1.4.1), Wiring Documents (§8.6.1.6.3), and Code Data Plate (§8.6.1.5.1).

Lately, issues surrounding a conveyance’s need for a Code Data Plate have also arisen. (ASME A17.1 (2007), §8.6.1.5.1). Because a large number of violations are being written, expectations for Code Data Plate compliance – even in the 30-day grace period – are not able to be met. This is largely due to the time-intensive process for creating a data plate, which involves not only in-depth research into a conveyance’s history but also time for data plate manufacture. As such, and pursuant to Sections 35(b) and 120(a) of the Elevator Safety and Regulation Act, the OSFM hereby grants an exception from the 30-day compliance requirement for all violations involving non-existent or out-dated Code Data Plates. Conveyance owners will have either six (6) months from the date of non-compliance or until the next inspection (whichever comes first) to obtain or bring an existing Code Data Plate into compliance (i.e., accurately reflect the history of the conveyance). Such extensions will be granted only in instances where the conveyance owner demonstrates good faith efforts to obtain code compliance.

Thank you for your immediate attention to these matters. Please do not hesitate to call this office with any questions you may have.

Cc: Contractors, Inspection Companies and Inspectors – sent via email