



Office of the Illinois  
**State Fire Marshal**

*"Partnering With the Fire Service to Protect Illinois"*

ELEVATOR SAFETY DIVISION  
312-814-1325

DATE: March 25, 2011

TO: All Local Authorities (Illinois Municipalities Party to a Local Agreement  
With the Office of the State Fire Marshal)

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, local authorities, Illinois-licensed elevator inspectors or their employers. (Extensive information regarding ASME General Maintenance Requirements, including ASME interpretations, are available on the OSFM website 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General Maintenance Requirements should have been enforced since their adoption, and will continue to be enforced until superseded by newer versions in the future.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 considering 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. The Elevator Safety and Regulation Act provides Local Authorities with certain powers, including the ability to “grant exceptions and variances from the literal requirements of applicable State codes, standards, and regulations in cases where such variances would not jeopardize the public safety and welfare.” (225 ILCS 312/140(a)). If a Local Authorities sees a need, it can grant an exception from the 30-day compliance period for Code Data Plate compliance. In such cases, the OSFM recommends that Local Authorities grant up to six (6) months (or until the date of the next inspection) for Code Data Plate compliance, so long as the conveyance owner demonstrates good faith efforts to comply with the code. Please notify the OSFM in any instance where your Municipality grants such an extension, either on an individual or Municipality-wide basis.

Finally, prior to the establishment of the Elevator Safety and Regulation Act, there was no uniform Elevator Safety code in the State of Illinois. As such, each Municipality throughout the State adopted and applied different codes to conveyances within their boundaries. Given the number of Conveyance Owners seeking to install or upgrade their Code Data Plate, the OSFM requests that all Municipalities supply our office with a list of the Codes that were adopted by the Municipality from 1950 to the present. As such, please provide the OSFM with a chronological list of the elevator codes adopted by your Municipality, including each code's effective dates.

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

Sincerely,



Robert Capuani  
Director, Elevator Safety  
Office of the State Fire Marshal

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