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Division of Occupational Safety and Health
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CIRCULAR LETTER E-11-01

TO: Owners, Operators, Installers, Manufacturers of Conveyances and Related Equipment and other Interested Parties

SUBJECT: Certification Requirements

The purpose of this circular is to clarify the Division's policy on certification, primarily as it relates to California Labor Code Sections 7311.1 and 7311.2, which define work on conveyances that require certification. A circular letter cannot address every example and the Division may have to rule on unusual situations on a case by case basis. The most common areas of concern are discussed below.

Section 7311.1 requires companies who erect, construct, install, materially alter, test, maintain, repair or service a conveyance to be certified by the Division. This means that a letter of intent for the installation of a new conveyance or the alteration of an existing conveyance required by California Code of Regulations (CCR) Title 8, §3001(a)(1), will only be accepted by the Division from a certified qualified conveyance company. Alteration work is defined in the alteration sections of ASME A17.1 and ASME A18.1.

ASME A17.1-2004, 8.7.2.14 is currently used to determine what constitutes an alteration to the car enclosure of an elevator. Alterations to a car enclosure which require certification would include changing or altering (including painting) the flooring, walls, ceiling, or lighting fixtures.

Certified companies may be required to submit documentation with their letter of intent demonstrating that the materials used are in compliance with the Elevator Safety Orders. Upon completion of the work, an inspection by the Division is required before returning the elevator to service.

LC §7311.2 requires in part that any person who, without supervision, erects, constructs, installs, alters, tests, maintains, services or repairs, removes, or dismantles any conveyance covered by this chapter to be certified as a certified competent conveyance mechanic by the Division. This provision allows work to be done on a conveyance such as flooring in an elevator or millwork on the interior of an elevator only under the supervision of a certified mechanic.

A certified mechanic is required for the dismantling or removal of any conveyance covered by this section of the labor code unless the conveyance is destroyed as a result of the complete

demolition of a secured building or structure or where the hoistway or wellway is demolished back to the basic support structure and no access is permitted that would endanger the safety of any person. The Division considers the support structure to be the support skeleton of the building with the absence of a hoistway. An elevator which is removed from an existing hoistway requires a certified mechanic. The dismantling, removal or relocation of an escalator requires a certified mechanic. If parts of a conveyance are removed, a certified mechanic is required. If the conveyance is dismantled or removed by machine or wrecking ball and no one is allowed in harm's way, a certified mechanic is not required.

All work performed from the elevator car top must be supervised by a certified mechanic.

All work performed on elevator equipment in an elevator pit/hoistway must be done by or supervised by a certified mechanic. Work which is performed on non-elevator equipment in the elevator pit/hoistway or the pit/hoistway structure may be performed by non-certified people only after a certified conveyance mechanic has properly landed the elevator, removed all stored energy such as counterweight, removed the power, eliminated the potential for interaction with all other moving equipment in adjacent hoistways and barricaded the opening. In some cases the Division will require a plan to be submitted for approval.

All work performed on elevator equipment in the elevator machine room must be done by or supervised by a certified mechanic. The installation, alteration, and maintenance of all elevator equipment including electrical and hydraulic piping between the elevator hoistway and the controls require a certified mechanic. Work performed on non-elevator equipment in the elevator machine room does not require a certification by the Division but may require other certifications not addressed by this code. Access to an elevator machine room is limited to qualified persons only. This does not mean that a person must be certified to be granted access to a machine room. This means that building owners or engineers may only grant access to qualified people when necessary to perform duties such as changing light bulbs, repairing air handling units, door repairs, fire extinguisher maintenance, floor painting, sprinkler maintenance and smoke/heat detector maintenance in this space.

All testing required by the Elevator Safety Orders including monthly fire phase one and two testing must be performed by a certified competent conveyance mechanic. A compliance document for these tests will only be accepted from a certified mechanic.

LC §7300.4 states in part: Work exempted pursuant to this section includes, but is not limited to, routine non-mechanical maintenance, such as cleaning panels and changing light fixtures. This does not include changing the bulbs or fixtures of elevator specific items such as arrival fixtures or car operating panels. This allows non-certified people to clean the interior of the elevator, vacuum door sills, change accessible light bulbs and change light fixtures. The Division will only allow a non-certified person to change a light fixture if it can be properly done from inside the car enclosure.

For purposes of this circular letter, the Division defines supervision as a critical watching and directing of activities as in direct supervision.

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