

OFFICE MEMORANDUM



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DATE: November 20, 2008

TO: All elevator contractors and interested owners

FROM: Bill Reinke / Elevator Safety Section Supervisor

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SUBJECT: Maintenance Control Programs

Since adoption of the ASME A17.1- 2004 in January of 2007 there has been a lot of discussion over the methods utilized in record keeping. The following points are intended to clarify the requirements.

What is a Maintenance Control Program?

Every elevator is required to have a documented Maintenance Control Program (MCP) that is based on the following criteria:

1. Examinations, maintenance and tests at scheduled intervals to ensure that the equipment conforms to the requirements of the ASME A17.1-2004 sections 8.6 and 8.11. Intervals and procedures should be based on the following.
 - Age and condition
 - Usage
 - Inherent design and quality
 - Environmental conditions
 - Improved technology
2. Cleaning, and adjusting components at regular intervals and repairing or replacing all worn or defective parts.

Maintenance records are required to be maintained and documented.

Documentation shall include:

- Description of the maintenance tasks performed and the dates.
- Description and dates of examinations, tests, adjustments, repairs, and replacements.
- Description and dates of call backs or reports that are reported to elevator personnel by any means and the corrective action taken.
- Oil usage documentation. (monthly logging of oil levels is required for cylinders that were installed prior to 1972 until those cylinders are replaced)
- Results of the monthly Fire service Phase I and II tests.

Where should these records be stored?

Records are required to be stored at a central location and must be available to “elevator personnel.” That location must be identified on the elevator controller.

Who are elevator personnel?

By definition within the elevator code, elevator personnel are persons who have been trained in the installation, maintenance, repair, testing or the inspection of elevators.

Can records be stored electronically?

The best way to answer this question is to ask another question. If the inspector requests the records on an annual inspection will they be made available to him upon request, and will it include all records showing compliance with sections 8.6 and 8.11?

Who is responsible for keeping the records?

Ultimately the owner is responsible for maintaining the elevator. However it is the elevator contractor that is qualified to maintain the equipment and not the owner. Owners should be shown where and how to provide these records to elevator personnel.

What if the records are not available when requested?

Then the elevator is not in compliance with rules 8.6.1.4 and 8.6.1.2

What happens if the records are not provided?

While the owner is responsible for the elevator, the department recognizes that it is the elevator contractor that has to provide the service and the documentation. Where there is documentation that contractors continually fail to provide this information when requested, a “Notice of Violation” will be issued against the elevator contractor. Further action may be taken in either an “Administrative Order” or a “Licensing Order,” which may include monetary penalties of up to \$10,000 per violation and possible revocation of the contractor’s license.

When did this requirement go into effect?

The rule was adopted in January 29, 2007, compliance was required upon adoption.