

Required Elevator Maintenance Checklists and Routine Inspections

In 2017, the Department adopted amendments to the Uniform Construction Code (N.J.A.C. 5:23) that discontinued the performance of routine (six-month) elevator inspections done by the Elevator Safety Unit (ESU). This did not, however, relieve the owners of such devices of the need to continue to maintain those devices in accordance with the code. The onus was placed on those owners to retain a checklist of maintenance performed by their elevator maintenance company and produce same to the ESU inspectors when the annual, periodic inspection was completed.

It has come to the attention of the Department that there may be firms in the state informing building owners that these routine inspections are still required and soliciting the performance of these “inspections” to meet that requirement. There is no inspection requirement and, in order to do an elevator inspection, one must not only be a properly licensed elevator inspector by the Department, but more importantly, must be employed as and inspecting on the part of a duly authorized authority having jurisdiction (AHJ). The intent of the regulations adopted back in 2017 was to put the responsibility of maintenance on the owner and their elevator maintenance company, which now requires that elevator maintenance be carried out by a licensed elevator mechanic.

Let’s examine the code requirements:

The required checklist, as per the UCC 5:23-12.2.1. (b):

(b) All operating and electrical parts and accessory equipment for elevator devices shall be maintained in safe operating condition.

In this opening sentence, the reference to maintenance must be defined. ASME A17.1 states,

Maintenance: a process of routine examination, lubrication, cleaning, and adjustment of parts, components, and/or subsystems for the purpose of ensuring performance in accordance with the applicable Code requirements. (See also *repair* and *replacement*.)

This definition provides all the “duties” for the qualified personnel to follow. The Division of Consumer Affairs has adopted regulations which require that elevator mechanics must be licensed. The New Jersey Administrative Code, at N.J.A.C. 13:44M, details these requirements. . Specifically, N.J.A.C. 13:44M-5.2(f)1(i) and (ii) state that only a licensed mechanic or a mechanic being supervised by a licensed mechanic, but not holding the license themselves, can perform.

(i) Equipment governed by ASME A17.1, not including section 5.3, and the work includes: cleaning; oiling; greasing; painting; changing brushes; fixture maintenance; observing the operations of equipment; relamping; replacing comb plate teeth; replacing carbons, contacts, and shunts (not including soldered contacts or shunts); replacing door gib inserts; or clearing obstructions; and

(ii) Equipment governed by ASME A17.1 section 5.3 or A18.1, or the equipment is a dumbwaiter in a residential property, and the work includes: testing; oiling; greasing; cleaning; observing elevator operations; clearing obstructions; cleaning and adjusting contacts; replacing plug and play devices such as: fixtures, ice cube relays, solid state relays, programmable logic controllers, direct plug in printed circuit boards, and selector heads; replacing fuses, batteries, uninterrupted power supplies, position indicators, lamps, and bulbs; replacement of rollers, guide shoes, valve coils, and seals; adjusting swing door interlocks; replacing collapsible/accordion gates and operators, not including single or multispeed commercial sliding doors; or using a diagnostic tool to identify issues.

With all this in mind, for the definition of elevator maintenance, it is understood you must be a licensed mechanic.

Referring back to N.J.A.C. 5:23-12.2(b) it states:

The maintenance of elevator devices shall conform to the most recent edition of ASME A18.1 or ASME A90.1, or ASME A17.1 referenced in the building subcode. **Additionally, maintenance of ASME A17.1 elevator devices shall be in accordance with (c) below. Checklists of maintenance performed according to the applicable six-month inspection section of ASME A17.1** shall be maintained by the building owner and the owner shall make such records available to the authority having jurisdiction.

The above highlighted section specifically calls out maintenance, and the Division of Consumer Affairs dictates that only licensed personnel may undertake maintenance work. This also states that a record of the maintenance shall be kept in accordance with the applicable to the six-month inspection. This places the duty of the elevator company responsible for maintenance of the device to complete the checklist as performed.

As such, there is no path for outside inspectors or consulting firms to have the ability to complete the required checklist in place of the six-month inspection.