



State of Washington-Department of Labor and Industries

**Elevator Section**

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Web Site [www.lni.wa.gov/tradeslicensing/elevators](http://www.lni.wa.gov/tradeslicensing/elevators)

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In reference to: WAC 296-96-02410 (1)(B), **Seismic requirements when replacing a controller.**

When a controller is replaced, does this section require all conveyances listed in ASME A17.1 to be upgraded with seismic or just elevators?

The goal is to determine the proper application of seismic requirements due to an escalator modernization as it applies to WAC 296-96-02410. Understand that there is some building work that may make some or all of the seismic applications economically unfeasible.

The department will require a technical feasibility statement from the elevator contractor. The elevator company field engineer will prepare the statement. The statement will address the seismic design, functions or devices that will be waived, the rationale behind each item waived and the associated costs of the item.

It is expected that due to inherent building design and/or construction methods used during building assembly that some seismic upgrades may not be technically feasible. A licensed Washington State PE will review and approve the company-supplied information for accuracy of application. Once completed, please submit a variance request with the alteration permit for review by the Department of Labor and Industries, Elevator Section. Please note that the Department reserves the right to accept or decline the variance request in part or in whole.

Please don't hesitate to call with any additional questions or concerns at 360-902-6130.

Sincerely,

A handwritten signature in cursive script that reads "Jack Day".

Jack Day  
Chief Elevator Inspector,  
State of Washington