



# Conveyance Inspection Guidance

(Effective 6/6/2011; Revised 6/13/2012, 2/3/2014, 3/13/2015 and 6/6/2017)

This guidance document outlines, but does not replace, the requirements of inspection standards listed in the Colorado Conveyance Regulations (7 CCR 1101-8) or the Elevator and Escalator Certification Act (CRS Title 9 Article 5.5). This guidance focuses on the third-party Private Conveyance Inspector procedures as the Approved Authorities Having Jurisdiction (AHJ) may develop alternative procedures for their inspectors. The Approved AHJ may be more stringent than the Division of Oil and Public Safety (OPS) Conveyance Regulations; although, the Approved AHJ must consider the Conveyance Regulations as the minimum standard in Colorado.

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## Section A: General Inspection Procedures

The Private Inspector shall:

- (1) Only conduct conveyance inspections in a territory of an Approved AHJ with the approval of the Approved AHJ and in compliance with the procedures of the Approved AHJ. The Private Inspector must be familiar with and obtain any license or certification necessary from the local jurisdiction to work in that territory. The Private Inspector has the responsibility to be knowledgeable of and inspect according to local jurisdiction requirements.
- (2) Maintain *third-party* status.
  - (a) The Private Inspector shall not be affiliated, by employment or a subsidiary relationship, with the conveyance owner or maintenance contractor.
  - (b) The Private Inspector shall not develop specifications for conveyance installation or alteration work **and** conduct the acceptance inspection following the work.
  - (c) The Private Inspector who is also licensed as a mechanic shall not conduct maintenance on a conveyance **and** conduct an acceptance or periodic inspection of the same conveyance.
  - (d) The Private Inspector is allowed to conduct maintenance audits for the conveyance owner and conduct acceptance or periodic inspections of associated conveyances.
- (3) Comply with the QEI-1 Code of Ethics (code of conduct) established by your accredited certifying organization. This Code of Ethics is enhanced as follows.
  - (a) Private Inspectors shall not represent themselves as “State inspectors,” but they shall explain that they are licensed by the State to conduct work in Colorado.
  - (b) Private Inspectors shall not state to owners that the owner must select them as their inspector.
  - (c) Private Inspectors shall not represent themselves as being exclusive to any one area within the OPS territory.
  - (d) Private Inspectors shall make known to OPS all potential conflicts of interests.

- (e) Private Inspectors shall not coerce conveyance owners, mechanics or contractors with retaliation under any circumstance.
- (4) Obtain the permission of the Conveyance Owner prior to commencing inspection activities.
- (5) Conduct the inspection using the appropriate edition of adopted code, the latest edition of ASME A17.2 as guidance and the inspection checklist as provided with the **Conveyance Inspection Report Form** that is available on the Conveyance Program's [Forms web page](#). The ASME A17.2 code refers back to the earlier edition of the ASME A17.1 code (i.e., A17.2-2012 refers to A17.1-2010).
- (6) Possess, and have available during inspections, the references and recommended equipment as listed in ASME QEI-1 and ASME A17.2.
- (7) Legibly document the inspection results on the **Conveyance Inspection Report Form**.

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## Section B: Conveyance Inspection Report

It is the sole responsibility of the Private Inspector to fully and accurately complete all components of the inspection report. If the report is not complete, the Private Inspector will be subject to enforcement, which will include a requirement for mandatory training on how to properly complete the inspection report form. In addition, the report will be returned to the conveyance owner, a new Certificate of Operation will not be issued and the conveyance owner may be subject to enforcement action for having an expired Certificate of Operation.

Components of the Conveyance Inspection Report are as follows.

- (1) **Facility and Owner Information:** all facility and owner contact information fields must be completed.
- (2) **Elevator Information**
  - (a) The State Registration ID Number can be obtained by accessing the [OPS Conveyance Database](#).
  - (b) For Code Data Plate information, refer to Section 2-7(6) of the Conveyance Regulations.
    - (i) For conveyances installed on or after 7/1/1997, a code data plate must be present or a new data plate must be installed.
    - (ii) For conveyance installed prior to 7/1/1997, use the existing data plate (if present) or the ASME A17.1 edition adopted by the AHJ at time of installation. If the jurisdiction did not have an adopted edition, then the ASME A17.1 edition in effect at the time of installation will become the date for the code data plate.
    - (iii) For an altered conveyance, the new data plate installed must indicate the original code data information as well as the code adopted at the time of each subsequent alteration and alteration scope.
  - (c) Year Installed: enter the year the elevator was installed. This information is critical, as it will be used to determine the code to which the conveyance is required to be inspected. This information will also be used to determine if the conveyance is required to comply with other provisions of the Conveyance Regulations.
  - (d) Conveyance Type: select the specific conveyance type as listed on the form.  
*Note: Vertical Reciprocating Conveyors (VRC) are listed in ASME B20.1 and are exempt from the Conveyance Regulations per the Elevator and Escalator Certification Act.*
- (3) **Inspection Information**
  - (a) Inspection Date and Time: this field shall include the time the inspection began and the date the inspection was completed. For an acceptance inspection, the inspection date is the date on which the inspection was completed, even though the safety test may have been completed at an earlier date.
  - (b) Inspection Type: select the type of inspection. The options include witnessing a Category test, if it was performed and a witness is warranted.

- (c) Test Tags and Test Dates: indicate whether the test tags are in place and, if so, indicate the test dates as listed on the tags.
- (d) Effective January 1, 2019, non-witnessed Category 1 tests shall be conducted within 60 days prior to the occurrence of the periodic inspection described in Section 2-3-1-1 of the [Conveyance Regulations](#). This requirement does not apply to an Approved AHJ that controls inspections and testing within its territory or to other entities that have demonstrated to the Administrator that processes are in place for the Administrator to verify annual testing.
- (e) Test(s) Witnessed: indicate whether you are witnessing a test during this inspection. Test witnessing shall be conducted as follows.
  - (i) The Private Inspector shall ensure that testing is completed according to the associated adopted code or standard and properly documented on the **Conveyance Test Report** provided on the [OPS website](#).
  - (ii) The Private Inspector shall be present during and witness all components of the acceptance test.
  - (iii) Category 1 and 5 Tests shall be witnessed on the frequency listed in Table 1.

**Table 1. Category 1 and 5 Test Performance and Witness Frequency**

Conveyance Type	Category 1 Test		Category 5 Test	
	Performed	Witnessed	Performed	Witnessed
Traction Elevators	Annually	Every 5 years	Every 5 years	Every 5 years
Hydraulic Elevators <sup>1</sup>	Annually	Every 5 years	Every 5 years <sup>1</sup>	Every 5 years <sup>1</sup>
Dumbwaiters	Every 5 years	Not Required	Not Required	Not Required
Other Elevators <sup>2</sup>	Annually	Every 5 years	Every 5 years	Every 5 years
Platform Lifts – installed indoors	Every 5 years	Every 5 years	Every 5 years	Every 5 years
Platform Lifts – installed outdoors	Every 3 years	Every 6 years	Every 3 years	Every 6 years
Escalators & Moving Walks	Annually	Annually	Not required	Not required
Private Residence Elevators installed in commercial buildings	Every 5 years	Every 5 years	Every 5 years	Every 5 years

<sup>1</sup>For hydraulic elevators, a Category 5 test is only required to be conducted and witnessed if the elevator is equipped with safeties, a plunger gripper, a governor, an oil buffer or an overspeed valve.

<sup>2</sup>Includes Roped Hydraulic Elevators, LU/LA Elevators and Hydraulic Elevators that have car safeties, governors, oil buffers, plunger grippers or overspeed valves.

- (iv) The test shall be properly conducted by the licensed mechanic. The Private Inspector may verify that the mechanic is licensed by OPS for the type of test (e.g., a mechanic with a Type 1 license may conduct a 5-year test on an elevator but may have an exclusion that prohibits him or her from working on and testing escalators).
- (v) If the test is **not** properly conducted, The Private Inspector shall **not** sign the **Conveyance Test Report** and shall report the event to OPS.
- (vi) If the test is properly completed, the Private Inspector and mechanic shall sign the **Conveyance Test Report**.
- (vii) The test reports shall not be submitted to OPS but must be made available to OPS upon request.
- (f) Firefighter Service Operation
  - (i) Phase I and II Fire Service Operation must be tested by The Private Inspector during the periodic inspection.
  - (ii) Fire service operation upgrade is **not** required by OPS if **one** of the following exists:
    - The elevator complies with ASME A17.1 – 1981 Rules 211.1 & 211.3;
    - The total rise is less than 75 feet above or below the emergency personnel access; or

- The building is equipped with an automatic sprinkling system that meets the requirements of the International Building Code. To verify this condition, The Private Inspector must contact the local jurisdiction, which may be the building or fire department.

If none of these scenarios exists, the elevator must comply with the current adopted version of ASME A17.1. In addition, a local jurisdiction may have more stringent requirements than those of OPS.

(g) Alternate Certificates of Operation or Status: for dormant, removed from service, construction use and temporary use inspections, The Private Inspector shall obtain OPS approval for the status.

(i) Dormant: the conveyance is dormant per Section 2-9 of the Conveyance Regulations.

- The traction (electric) elevator car is parked at the top of the hoistway and the counterweights are parked at the bottom of the hoistway, or the hydraulic elevator car is parked at the bottom of the hoistway.
- The hoistway doors are latched in the closed position.
- The fuses are removed from the mainline disconnect (if applicable).
- The mainline disconnect is locked in the "off" position with a wire seal or OPS red tag on the disconnect switch.

(ii) Removed from service: the conveyance shall be removed from service per Section 2-10 of the Conveyance Regulations.

- Traction (Electric) Elevators, Dumbwaiters and Material Lifts
  - The mainline disconnect is locked in the "off" position with an OPS red tag or a wire seal and an OPS red tag on the disconnect switch.
  - Suspension ropes are removed.
  - Car and counterweights are parked at the bottom of the hoistway.
  - The hoistway doors are permanently barricaded or sealed in the closed position on the hoistway side. The lowest landing hoistway door may be sealed on the lobby side.
- Hydraulic Elevators
  - The mainline disconnect is locked in the "off" position with an OPS red tag or a wire seal and an OPS red tag on the disconnect switch.
  - The hydraulic elevator car is parked at the bottom of the hoistway.
  - If provided, suspension means are removed and counterweight is parked at the bottom of the hoistway.
  - Pressure piping has been disassembled and a section removed from the premises.
  - The hoistway doors are permanently barricaded or sealed in the closed position on the hoistway side. The lowest landing hoistway door may be sealed on the lobby side.
- Escalators/Moving Walks
  - The mainline disconnect is locked in the "off" position with an OPS red tag or a wire seal and an OPS red tag on the disconnect switch.
  - Entrances are permanently barricaded.

(iii) Construction use: the conveyance shall be operated for construction use only per Section 2-3-1-4 of the Conveyance Regulations.

- The inspection is for the issuance of a Construction Certificate of Operation (CCO) for a period of 90 days.
- The conveyance cannot be accessible to the public.
- The conveyance must be re-inspected to extend the CCO for another 90-day term or for the issuance of an Annual Certificate of Operation.

(iv) Temporary use: the conveyance shall be operated temporarily per Section 2-3-1-3 of the Conveyance Regulations.

- The inspection results warrant the issuance of a Temporary Certificate of Operation (TCO) for a period of time as determined by OPS, not to exceed 180 days from the date of issuance.
- The Private Inspector must notify OPS of a TCO result.
- The conveyance can be accessible to the public.
- The conveyance must not have violations that pose an imminent danger to the riding public, as determined by OPS.

(h) Writing of Violations: the following procedures shall be followed when writing violations.

(i) A description of all code violations shall be noted on the report and shall include a reference to the applicable code and rule numbers in effect at the time of conveyance installation or as referenced on the code data plate.

(ii) New and altered conveyances: the following are the appropriate references for inspection of new and altered conveyances.

- Conveyance Regulations
- ASME A17.1 – 2013 *Safety Code for Elevators and Escalators*
- ASME A17.2 – current edition of *Guide for Inspection of Elevators, Escalators, & Moving Walks*
- ASME A18.1 – 2011 *Safety Standard for Platform Lifts*
- Other codes referenced by ASME A17.1 or A18.1

(iii) Existing conveyances: the following are the appropriate references for the inspection of existing conveyances.

- Conveyance Regulations
- ASME A17.1 – 2013 *Safety Code for Elevators and Escalators*, Sections 5.10, 8.1, 8.6, 8.7, 8.8, 8.9, 8.10 and 8.11
- ASME A18.1 – *Safety Standard for Platform Lifts* (for lifts installed in or after 1997; refer to ASME A17.1 for lifts installed prior to 1997)
- ASME A17.2 – current edition of *Guide for Inspection of Elevators, Escalators, and Moving Walks*
- ASME A17.3 – 2005 *Safety Code for Existing Elevators and Escalators* (for conveyances installed after January 1, 2008, unless there has been a substantial alteration or a material risk is present; refer Section 2-7(1) and (2) of the Conveyance regulations)
- Other codes referenced by ASME A17.1 or A18.1
- Code violation references shall be from the applicable code stated on the code data plate, if present. Refer to Section 2-7 (6) of the Conveyance Regulations for instructions regarding conveyances with no code data plate.

(iv) Violation writing example

- A traction elevator was installed in 2000 and was altered in 2005. The annual (periodic) inspection is conducted using the current edition of ASME A17.2 as a guide. The original code data plate was present and indicated that the code in effect at the time of installation was ASME A17.1 – 1996, although there was no reference to the components altered in 2005. In addition, the pit light was not operational. The two violations would be written in any of the following methods:

Code Reference			Violation Description
Edition	Year	Reference	
A17.1	2013	8.9	Install code data plate that identifies altered components
A17.1	2013	8.6.1.5	Install code data plate that identifies altered components
A17.2	2012	2.14	Install code data plate that identifies altered components
A17.1	2013	8.11.2.1.5(a)	Repair pit light to operation
A17.1	1996	106.1e	Repair pit light to operation
A17.2	2012	5.1	Repair pit light to operation

Note: An existing elevator does not need to comply with the requirements in the currently adopted edition of A17.1. In the example above, The Private Inspector cannot write up the pit light violation as A17.1 – 2013 2.2.5 because A17.1 states that, “This Code applies to new installations only, except Part 1, and 5.10, 8.1, 8.6, 8.7, 8.8, 8.9, 8.10, and 8.11, that apply to both new and existing installations.”

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### Section C: Inspection Results – Pass/Fail

(1) **Passing** inspection options are as follows.

- (a) No violations identified
- (b) Violations are not listed in Table 2
- (c) Violations are listed in Table 2 with a TCO option, where there is not a consideration for shut-down. The Private Inspector must contact OPS for approval.
- (d) Violations are listed in Table 2 where there is a consideration for shut-down, but OPS has approved a TCO.

Note: In all cases of a passing inspection, The Private Inspector shall inform the owner that the inspection report must be immediately submitted to OPS with appropriate fees in order to receive a Certificate of Operation for the conveyance.

(2) **Failed** inspection is the result when any violation listed in Tables 2 and 3 is noted during any inspection where there is a consideration for shut-down and OPS has approved a shut-down.

Note: An inspection report shall not be submitted to OPS for a failed inspection. The conveyance shall be shut-down and the Private Inspector shall immediately notify the owner and OPS about the situation.

**Table 2. Inspection Violations for Elevators and Platform Lifts**

Inspection Violation Description	Shut-down <sup>1</sup>	TCO <sup>2</sup>
Failure of witnessed acceptance tests for a new installation or alteration (In this category, there may be no outstanding violations prior to releasing the car into service.)	X	
Failure of witnessed Category 5 safety test (This applies only to the category tests that are required to be witnessed as listed in 8.6.4.20 and 8.6.5.16.)	X	
Failure of witnessed Category 1 safety test items		X
Any safety test past due (as listed in Table 1)		X
Required electrical protective safety device (stop switch, door interlock, final terminal stop, car top exit device, etc.) that is missing or inoperable	X	
Jumpers installed on any electrical protective safety device or any fuses that have been jumped out	X	
Required 2-way communication (phone, intercom, etc.) that is missing or inoperable		X
Wire suspension means under-sized or with breaks not meeting code requirements		X
Suspension means monitoring devices (where required) that are missing or inoperable		X
Door restrictors are missing or inoperable for elevators: <ul style="list-style-type: none"> <li>• Installed between 1/1/1990 to present;</li> <li>• Altered between 1/1/1990 and present, where the alteration required the installation of door restrictors (i.e. alteration of hoistway openings or change in type of service); or</li> <li>• If there is evidence that door restrictors have been previously installed on an elevator.</li> </ul>		X
Fire service components that are inoperable (not including signage)		X
Hoistway door bottom guides are missing	X	
Top and/or bottom hoistway door retainers (when required) are missing		X
Door closing force exceeds 30 lbf		X
Governor ropes undersized, breaks or evidence of rouge exist		X
Group security keys not kept on premises and made available to assigned personnel		X
Any repeat violation noted on the previous year’s inspection		X

<sup>1</sup>Requires contacting OPS prior to action

<sup>2</sup>TCO = Temporary Certificate of Operation

**Table 3. Inspection Violations for Escalators**

Inspection Violation Description	Shut-down <sup>1</sup>	TCO <sup>2</sup>
Failure of witnessed acceptance test (new or altered)	X	
Any safety tests past due		X
Failure of Category 1 test items listed on the <b>Conveyance Test Report</b> (except for the items listed below)	X	
Combs plates with 2 or more adjacent broken teeth	X	
Combs plates with broken teeth not adjacent to each other		X
Failure of a step skirt indexing test		X
Any repeat violation (other than those listed above) that are not mitigated prior to the next annual inspection		X

<sup>1</sup>Requires contacting OPS prior to action

<sup>2</sup>TCO = Temporary Certificate of Operation

*Note: If the Private Inspector identifies items not covered in Tables 2 and 3, such as multiple violations, and is recommending shut-down of the conveyance, OPS must be contacted and must approve the action. OPS will not consider an inspection as complete if the top-of-car operating station does not function.*

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### Section D: Inspector Enforcement

The audit enforcement process will help to ensure that all licensed inspectors in Colorado are performing inspections consistently. It is conducted as listed in Table 4 below.

- (1) Enforcement will be based on shut-down items, TCO violations and repeat violations as listed in Section C not being noted on an inspection report within a 12-month period.
- (2) All audit inspections will be based on inspections that have been conducted within the previous 2 weeks.
- (3) OPS may also conduct field audits as deemed necessary to ensure compliance with the Colorado Conveyance Regulations and the Elevator and Escalator Certification Act.
- (4) The tracking of repeat violations is based on a 12-month period which shall begin the date a violation is found.
- (5) It is the sole responsibility of The Private Inspector to fully and accurately complete all components of the inspection report. If the report is not complete, The Private Inspector will be subject to enforcement that will include a requirement for mandatory training on how to properly complete an inspection form.
- (6) Non-TCO Violations
  - (a) OPS will also start tracking non-TCO violations, which are violations that do not warrant the issuance of a TCO if identified.
  - (b) There will be no enforcement associated with non-TCO violations unless the same violation is missed by the inspector multiple times within a 12-month period.
  - (c) OPS will track the non-TCO violations missed by each inspector and will notify him or her of what they are missing, as the inspector may not be aware that the violation is being overlooked.
    - (i) As a part of this effort, OPS will be sending out e-blasts to all inspectors at the beginning of each month detailing any items that are not being identified or properly noted by the entire group of licensed inspectors.
    - (ii) Inspectors should consider this an opportunity to discuss Code issues and interpretations.

**Table 4. Inspector Enforcement**

		Enforcement Type	
		TCO and Repeat Violations Not Noted by Third-Party Inspector	Shut-Down Items Not Noted by Third-Party Inspector
Enforcement Action for Each Offense within a 12-Month Period	1 <sup>st</sup>	Notice issued to the inspector showing the items that were missed	Notice of Violation issued with a \$500 fine
	2 <sup>nd</sup>	Notice of Violation issued with a \$500 fine	Notice of Violation issued with a \$1,000 fine and a mandatory meeting with the Conveyance Program Manager
	3 <sup>rd</sup>	Notice of Violation issued with a \$1,000 fine and a mandatory meeting with the Conveyance Program Manager	Notice of Violation issued with a \$2,500 fine and recommendation for license suspension up to 180 days
	4 <sup>th</sup>	Notice of Violation issued with a \$2,500 fine and a mandatory meeting with the Public Safety Manager	Recommendation for license revocation (any option to reinstate a revoked license will be at the Division Director's discretion)
	5 <sup>th</sup>	Notice of Violation issued with a \$2,500 fine and a recommendation for license suspension	
	6 <sup>th</sup>	Recommendation for license revocation	

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**Section E: Due Date and Submittals**

- (1) Following completion of the inspection and **Conveyance Inspection Report Form**, The Private Inspector shall do the following.
  - (a) Explain all violations found during the inspection to the conveyance owner
  - (b) Inform the owner that they must sign and submit the inspection report and fee (\$30 per conveyance) to OPS.
- (2) The Private Inspector must inform the owner that they must correct the violations noted on the report prior to the next annual inspection, unless a TCO stipulates a shorter time-frame.
- (3) If the conveyance that is being inspected is not registered with OPS, the Private Inspector will inform the owner of the following process.
  - (a) The Private Inspector will inform OPS of the unregistered status of the conveyance.
  - (b) The conveyance may still be inspected.
  - (c) The **Registration Notice** and the **Conveyance Inspection Report Form** can be submitted to OPS concurrently.
  - (d) OPS will not issue a Certificate of Operation until the owner submits the **Registration Notice** with appropriate fees (\$200 per conveyance).
- (4) The Private Inspector must inform the owner that the next inspection must be completed before the last day of the month of the current inspection.

**Section F: OPS Contact Information**

Current contact information is listed on the [OPS website](#).

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