



STATE OF WASHINGTON
DEPARTMENT OF LABOR & INDUSTRIES
ELEVATOR PROGRAM
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I am Gerald R. Brown, Labor & Industries Public Safety Elevator Program Manager, AHJ and Chief Elevator Inspector for the State of Washington. I am here to speak against the proposed changes that diminish fire life safety as it pertains to the elevator riding public. There is a long standing requirement found in the NFPA 13 - "Standard for the Installation of Sprinkler Systems" Section 9.3.6.3 that is there to provide a level of safety being overlooked recently with an Emergency Ruling CR-103E to eliminate crucial fire sprinklers located in elevator pits and machine rooms. Along with the requirement for Shunt Trip breakers which remove power from the elevator system after it has been safely recalled to the main lobby floor by the smoke detectors, and placed out of service after the passengers have exited. The rationale listed in the justification doesn't consider the changing elevator technology of products being installed in Washington State after the latest WAC rule adoption from Oct. 1, 2021 which allows machine-room-less hydraulic elevators which have the oil tanks in the hoistway and pit. The pit hydraulic tank with several barrels of flammable hydraulic oil is located 6 inches below the elevator floor at the bottom landing. The elevator industry is depending on the provisions of NFPA 13 to be in place, and NOT amended. Perhaps the fact we don't hear about hydraulic elevator pit fires is **because these NFPA life safety code requirements work.**

The sponsors of this unjustified Emergency Rule are apparently still upset because my department went to bat and made them put in the required sprinklers in a new elementary school elevator pit and machine room. Actually they were installed, and they told them to remove them. They propose all elevator pits are clean. They are trying to put this unsafe practice into place for the entire state, and using this organization to do it. I'm quite sure we'd save a whole lot of money if we removed the entire sprinkler system from the entire building instead of **ONE** sprinkler head in the pit and **ONE** sprinkler head in the machine room. Many of the proposed hydraulic machine-room-less elevators provide the shunt trip disconnect so the building doesn't have to pay anything extra.

I am asking that the revisions proposed in WAC 51-54A-8000 be revised to reinstate this NFPA 13-2019 requirement noted as (except 9.3.6.3(5)).

WAC 51-54A-8000 Referenced standards. NFPA 13-19: Standard for the Installation of Sprinkler Systems (~~except 9.3.6.3(5)~~) 903.3.1.1, 903.3.2, 903.3.8.2, 903.3.8.5, 904.13, 905.3.4, 907.6.4, 914.3.2, 1019.3, 1103.4.8, 3201.1, 3204.2,

3205.5, Table 3206.2, 3206.4.1, 3206.10, 3207.2, 3207.2.1, 3208.2.2, 3208.2.2.1, 3208.4, 3210.1, 3401.1, 5104.1, 5104.1.1, 5106.5.7, 5704.3.3.9, Table 5704.3.6.3(7), 5704.3.7.5.1, 5704.3.8.4

The actual NFPA code that this proposal would eliminate reads as follows;

9.3.6 Elevator Hoistways and Machine Rooms.

9.3.6.1* Sidewall spray sprinklers shall be installed at the bottom of each elevator hoistway not more than 2 ft (600 mm) above the floor of the pit.

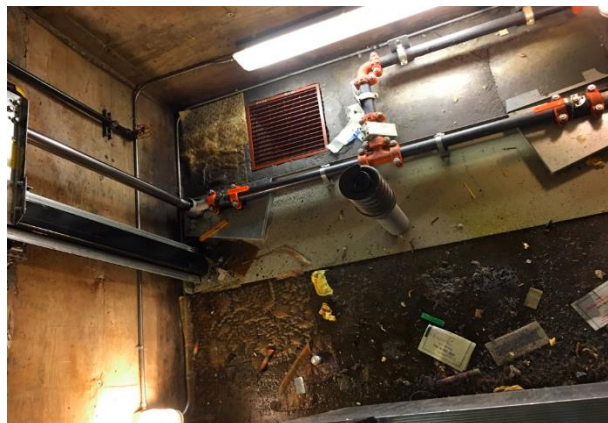
9.3.6.2 The sprinkler required at the bottom of the elevator hoistway by 9.3.6.1 shall not be required for enclosed, noncombustible elevator shafts that do not contain combustible hydraulic fluids.

9.3.6.3 Automatic fire sprinklers shall not be required in elevator machine rooms, elevator machinery spaces, control spaces, or hoistways of traction elevators installed in accordance with the applicable provisions in NFPA 101, or the applicable building code, where all of the following conditions are met:

- (5) The elevator machinery is not of the hydraulic type.

NFPA Flammability rating for Elevator hydraulic oil is given a 1(one). What this means is that elevator hydraulic fluid is actually flammable if it's heated up. What the concern is if a dirty elevator pit debris or paper records in the machine room catch fire, the exposed film of oil will heat up and cause the oil to burn. In an enclosed elevator hoistway the riding public is standing on a plywood floor and inside a ventilated cab that would allow toxic smoke to fill their lungs. The elevator pits are constantly accumulating paper and other flammable debris. The elevator service techs are only there quarterly or semiannually to service the equipment and check the pits. Hydraulic elevator pistons that move the car require a slight film of hydraulic oil to move freely. Each trip leaves more oil that goes into a catch container in the pit. Typical elevator pits have a heavy film of oil that gathers on the pit floor along with oil saturated paper etc. I have photos of elevator pits with varying degrees of debris.

Elevator Pit Photos examples NEW, typical, bad, and worst. All dirty would burn!



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This Emergency Ruling CR-103E to eliminate crucial fire sprinklers located in elevator pits and machine rooms should also be repealed.

As the Labor & Industries Public Safety Elevator Program Manager, AHJ and Chief Elevator Inspector for the State of Washington. I am here to speak against any changes to fire life safety as it pertains to the elevator riding public. My department wasn't invited to participate in any of the discussions that promulgated this Emergency Ruling based on no known emergency.

The emergency seems to be based on the cost of adding 2, **just 2**, essential lifesaving safety sprinklers as outlined in NFPA for years. I'm pretty sure they require a sprinkler the janitor's closet. I don't think it's too far of a stretch to think the potentially burning elevator hoistway pit, where human beings are trapped in a box of the same size, deserves any less of a consideration for safety than the janitor's closet.

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