

Department of Industrial Relations
Division of Occupational Safety and Health
ELEVATOR UNIT HQS
6980 Santa Teresa Boulevard, Suite 130
San Jose, CA 95119
Phone: 408.362.2120
Fax: 408.362.2131



February 8, 2017

MEMORANDUM

TO: Senior and Associate Safety Engineers

SUBJECT: Retractable Pit Ladders

It has come to my attention that there has been some confusion as to the intent of Circular E-10-02 (attached).

The purpose of Circular E-10-02 was to afford some safe access to existing elevator pits which were not required to have pit ladders when they were originally constructed and where clearances may not allow a traditional fixed ladder.

The Circular requires that a letter of intent to alter an elevator be submitted and requires an inspection.

Circular E-10-02 does not sanction the use of retractable ladders on newly constructed elevators. These ladders must be fixed, non-retractable ladders in conformance with the current Elevator Safety Orders.

ERT Memo dated 6-27-2010 (attached) gives further guidance on the Divisions enforcement policy regarding the toe clearance required for pit ladders constructed pursuant to the Group IV, Elevator Safety Orders.

Because there has been confusion regarding the use of retractable pit ladders on some new elevators, HQ will be providing a list of sites where a limited number of retractable pit ladders will be permitted. If you encounter a retractable pit ladder on a N1 inspection, please consult with your Senior.

As we are considering the allowance of retractable pit ladders in future code adoptions, please forward any pros, cons or observations you may have to your Senior.

Thank you,

Debra Tudor
Principal Engineer
DOSH-Elevator Unit HQS