



— OSHA-ALIGNED WRITTEN SAFETY PLAN

Gutter Cleaning & Commercial Roof Drain Maintenance Safety Program

Residential gutter cleaning up to 3 stories, and commercial flat-roof drain servicing. Built around 29 CFR 1910 (general industry), with 1926 (construction) cross-references where crews or activities overlap.

Company: _____

Review cycle: **Annual + after incident****PROGRAM APPROVAL & SIGN-OFF**

ROLE	NAME (PRINT)	SIGNATURE	DATE
Prepared By			
Reviewed By			
Approved By (Owner / Officer)			
Competent Person on Record			

Effective date: _____

Next scheduled review: _____

Revision #: _____

1.1 Purpose

This written program establishes minimum safety requirements for employees and subcontractors performing (a) residential gutter cleaning on structures up to three stories in height, and (b) commercial flat-roof drain, scupper, and roof-drain-system servicing. Its purpose is to eliminate or control fall, ladder, electrical, and environmental hazards inherent to this work and to meet or exceed applicable OSHA standards.

1.2 Scope

This plan applies to all employees, supervisors, and subcontracted crews who access ladders, roofs, or roof-adjacent structures to remove debris, clear downspouts, clean gutters, or clear/service roof drains, scuppers, and overflow systems. It covers work performed from ground-supported portable ladders, and work performed on low-slope (flat) commercial roofs accessed by fixed ladders, roof hatches, or stairways.

1.3 Regulatory Framework

Gutter and roof-drain maintenance is typically classified as general industry maintenance work under 29 CFR 1910, not construction, unless the activity is part of new construction, repair, renovation, or demolition (in which case 29 CFR 1926 governs). Employers must confirm their correct classification; both standard sets are referenced below since crews and equipment often overlap.

TOPIC	GENERAL INDUSTRY (1910)	CONSTRUCTION (1926)
Walking-Working Surfaces / Fall Protection	1910 Subpart D; 1910.28, 1910.29	1926 Subpart M; 1926.501–503
Ladders (portable & fixed)	1910.23	1926.1053
Personal Fall Protection Systems	1910.140	1926.502
PPE (general)	1910 Subpart I (1910.132–138)	1926 Subpart E
Training	1910.30	1926.503
Electrical / Overhead Lines	1910.333, 1910.269 (if applicable)	1926.416, 1926.1408
Recordkeeping / Injury Reporting	1910.1904	1904 (applies to both)

Where a state operates its own OSHA-approved State Plan (e.g., California, Washington, Oregon, Michigan), state-specific standards may be more stringent and take precedence — verify locally before finalizing this plan.

2.1 Employer / Management

- Provide, maintain, and pay for all required PPE and fall protection equipment (29 CFR 1910.132(h)).
- Ensure a written, site-specific Job Hazard Analysis (JHA) is completed before each job.
- Designate a qualified Competent Person for each crew, authorized to identify hazards and stop work.
- Provide initial and refresher training and retain training records.
- Investigate all incidents, near-misses, and equipment failures.

2.2 Competent Person / Site Supervisor

- Conducts and documents the daily pre-job hazard assessment (Appendix A).
- Verifies ladder and fall-protection equipment inspections before use (Appendices B & C).
- Confirms weather conditions are within safe operating limits (Section 12).
- Has authority to halt work if conditions become unsafe.

2.3 Employees

- Complete all required training before performing gutter or roof-drain work unsupervised.
- Inspect their own PPE, ladders, and fall arrest equipment before each use.
- Report hazards, damaged equipment, near-misses, and injuries immediately.
- Follow the fall protection and ladder safety procedures in this plan at all times — no exceptions for schedule pressure.

Job Hazard Analysis (JHA) Summary

A site-specific JHA (Appendix D) must be completed before work begins at every property. At minimum, the JHA must evaluate:

- 1 Height of structure and ladder/roof access method.
- 2 Roof pitch, surface material, and condition (moss, algae, wet leaves, rust, deterioration).
- 3 Proximity of overhead electrical service lines/weatherheads to the work area.
- 4 Ground surface stability for ladder footing (soft soil, slopes, pavers, mulch beds).
- 5 Skylights, roof hatches, vents, and other fall-through hazards on commercial roofs.
- 6 Presence of pests, mold, or biological contamination in gutters/drains.
- 7 Weather: wind speed, precipitation, temperature, lightning risk.
- 8 Need for spotters, warning lines, or a second crew member.

The JHA must be re-evaluated if conditions change (e.g., weather shifts, additional hazards discovered upon setup).

Minimum PPE for all gutter and roof-drain work:

PPE ITEM	REQUIREMENT	STANDARD
Hard hat / bump cap	Hard hat required near overhead hazards or when others work below; bump cap acceptable on low-clearance residential work only	1910.135
Safety glasses / goggles	Required at all times — debris, insect stings, dust	1910.133
Cut-resistant / puncture-resistant gloves	Required when hand-clearing gutters/drains	1910.138
Slip-resistant footwear	Required; soft/gum-rubber soles for roof work	1910.136
Fall protection harness & lanyard/SRL	Required per Sections 6–8	1910.140
Hearing protection	Required when using gas-powered vacuum/blower equipment above 85 dBA TWA	1910.95
Respiratory protection (dust mask min.)	Required when disturbing dried debris, bird/rodent droppings, or mold	1910.134

All PPE must be inspected before each use and replaced immediately if damaged, expired, or defective.

5.1 Ladder selection

- Use only Type IA or IAA (extra-heavy-duty, 300–375 lb rated) fiberglass or approved-material extension ladders for gutter work near power lines. Fiberglass rails are required whenever electrical hazards are present — never use metal or metal-reinforced ladders near overhead lines.
- Ladder length must allow the top three rungs to remain unused and must extend at least 3 ft above the roof/gutter line when used for roof access.
- Inspect every ladder before first use each day using Appendix B.

5.2 Set-up rules

- Maintain a 4:1 climb angle (the base set out 1 ft for every 4 ft of working height).
- Set on firm, level ground; use ladder levelers or leg extensions on uneven ground — never improvise with blocks, boxes, or bricks.
- Secure the ladder at the top (tie-off) and/or have a second person foot/stabilize the base whenever practical, especially above one story.
- Never set a ladder on a porch roof, shed roof, or other unstable surface to gain additional height.

5.3 Climbing & working rules

- Maintain three points of contact at all times while climbing.
- Face the ladder when climbing or descending; never carry tools in-hand — use a tool belt or hoist line.
- Do not stand on the top three rungs of any extension ladder.
- Do not overreach — keep your belt buckle between the side rails; re-position the ladder rather than lean or stretch.
- Maximum one person per ladder section at a time.

5.4 Story-height specific controls

STRUCTURE HEIGHT	ADDITIONAL REQUIRED CONTROLS
1 story (up to ~12 ft eave)	Standard ladder setup (5.1–5.3); second employee present recommended
2 stories (up to ~22 ft eave)	Second employee mandatory for footing/spotting; ladder tie-off required; fall arrest harness recommended if working from roof edge
3 stories (up to ~33 ft eave)	Second employee mandatory; ladder tie-off at top AND base stabilization; personal fall arrest system REQUIRED; wind speed limit reduced (Section 12); no solo work permitted

6.1 Work method hierarchy

Select the least-hazardous method capable of completing the work, in this order of preference:

- 1** Ground-based cleaning using a gutter-cleaning wand/vacuum attachment or extension tools while standing on the ground (no ladder).
- 2** Ladder-based cleaning per Section 5, staying at or below the top-3-rung limit, without stepping onto the roof or gutter.
- 3** Roof-edge access with full personal fall arrest system, used only when the two options above are infeasible and only by trained, equipped personnel.

Employees must never straddle a gutter, stand inside a gutter, or use a gutter as a foothold or anchor point — gutters are not rated to support body weight and commonly fail.

6.2 Ladder positioning for gutter access

- Position the ladder so the employee's hands and tools can reach the gutter section without leaning past the side rails.
- Move the ladder frequently rather than reaching — this is the single most common cause of residential ladder falls.
- Never lean a ladder directly against a gutter; use a ladder stand-off/stabilizer bar to rest against the roofline or fascia instead, protecting both the gutter and the ladder's stability.

6.3 Third-story work

- Confirm ground conditions and clearances with a second employee before setup; three-story ladder work is never performed solo.
- A personal fall arrest system anchored to a rated structural anchor (not the gutter or fascia) is required whenever the employee's feet leave the ladder or work is performed above 20 ft with sustained reach beyond the ladder's rails.
- Consider alternative access (aerial lift, roof anchor system, or ground-based vacuum extension) before committing to three-story ladder work in adverse weather.

6.4 Downspouts & debris disposal

- Clear downspouts from the bottom when possible to avoid repeated trips up the ladder.
- Never drop debris, tools, or materials from height — lower via bucket/rope or bring down by hand.
- Bag and remove organic debris promptly; wet leaf mass can be a slip hazard for the crew and homeowner alike.

7.1 Roof access

- Use permanent fixed ladders, stairways, or roof hatches where provided; fixed ladders over 24 ft require cages, wells, or a personal fall arrest/ladder safety system per 1910.23.
- If portable ladder access to the roof is necessary, follow Section 5 in full, and extend the ladder 3 ft above the access point with a secured/tied-off top.

7.2 Fall protection on low-slope roofs

Under 29 CFR 1910.28(b)(13), employees on a low-slope roof with an unprotected roof side or edge more than 4 ft above a lower level must be protected by one of the following, in order of preference:

- 1 Guardrail system (top rail 42 in $\pm$ 3 in, midrail, toeboard where debris fall-through is a concern).
- 2 Personal fall arrest system (PFAS) — full-body harness, shock-absorbing lanyard or self-retracting lifeline (SRL), anchored to a point capable of supporting 5,000 lb per employee.
- 3 Travel restraint system — anchored so the employee physically cannot reach the roof edge.
- 4 Warning line system + safety monitor, only where work is more than 6 ft from the roof edge and only as allowed under 1910.29 — never within 6 ft of an edge.

Roof drains are frequently located near roof edges, scuppers, and parapets — assume PFAS or guardrails are required unless the JHA confirms the drain is more than 6 ft from every unprotected edge and a warning line system is properly installed.

7.3 Skylights, hatches & roof openings

- Treat every skylight, smoke hatch, and roof opening as a fall-through hazard — skylights are a leading cause of fatal falls in flat-roof maintenance work.
- Route travel paths and staging areas at least 6 ft from any skylight or unguarded opening; use screens/covers or guardrails around openings where work must occur nearby (1910.29(b)).
- Never step on, sit on, or use a skylight/hatch cover as a work platform or anchor.

7.4 Roof drain / scupper servicing procedure

- 1 Establish fall protection (guardrail, PFAS, or travel restraint) before approaching within 6 ft of any edge, scupper, or opening.
- 2 Clear surface debris (leaves, gravel, membrane fragments) from the drain bowl by hand or vacuum before removing the drain strainer/dome.
- 3 Remove and inspect the strainer/dome; clear the drain body and visible portion of the leader line; do not force rigid tools into the pipe below the roof deck.

- 4 If a blockage requires drain-line clearing (rodding/jetting) below deck, treat this as plumbing work — verify it is not a permit-required confined space per 1910.146 before any employee's head or torso enters a drain sump, vault, or interior roof-drain chase.
- 5 Reinstall strainer/dome; confirm free water flow with a test pour where practical; photo-document before/after for the client.

7.5 Ponding water & standing water hazards

- Standing water on flat roofs can obscure slip hazards, skylights, and structural deterioration — increase caution and reduce pace in ponded areas.
- Use appropriate slip-resistant footwear and avoid electrical equipment near standing water unless GFCI-protected (1910.304).

GUARDRAIL/PFAS TRIGGER HEIGHT

4 ft

Unprotected low-slope roof edge

MINIMUM ANCHOR RATING

5,000 lb

Per attached employee

WARNING-LINE MINIMUM SETBACK

6 ft

From any unprotected edge

8.1 Personal Fall Arrest System (PFAS) components

- Full-body harness meeting ANSI Z359.11 / OSHA 1910.140 — no body belts.
- Shock-absorbing lanyard or self-retracting lifeline (SRL), inspected before each use.
- Anchor point rated for 5,000 lb per attached employee, or engineered system with a safety factor of at least 2, independent of any anchor used for other purposes.
- Maximum free-fall distance and clearance below the anchor calculated before use to prevent ground/lower-level contact (“fall clearance calculation”).

8.2 Anchor points

- Never anchor to gutters, downspouts, vent stacks, HVAC curbs, railings not rated for fall arrest, or any unengineered point.
- Use manufacturer-installed roof anchors, engineered lifeline systems, or structural steel/beams verified by a qualified person.
- For residential work, portable counterweighted roof anchors or through-bolted temporary anchors installed per manufacturer instructions may be used if rated for the application.

8.3 Rescue planning

A PFAS is only acceptable where a prompt rescue plan exists (Section 14) — suspension trauma can become life-threatening within minutes of a fall being arrested.

MINIMUM CLEARANCE

10 ft

From lines up to 50kV

- Survey the property for overhead service drops, weatherheads, and utility lines before setting any ladder (1910.333).
- Maintain a minimum 10 ft clearance between any ladder, tool, or employee and energized lines up to 50kV; greater clearance is required for higher voltages — treat all overhead lines as energized.
- Use only fiberglass (non-conductive) ladders and non-conductive tools when working within 10 ft of overhead lines cannot be avoided; if 10 ft clearance cannot be maintained, contact the utility to request de-energization or line covering before proceeding.
- Be alert to satellite dishes, low-voltage wiring, and antenna guy-wires which can obscure judgment of ladder placement near a roofline.

10.1 Biological hazards

- Gutters and roof drains commonly harbor mold, bird/rodent droppings, wasp or bee nests, and standing organic sludge.
- Wear gloves and eye protection at all times when hand-clearing debris; use a dust mask (minimum N95) when disturbing dried droppings or visible mold.
- If a live wasp/bee nest or aggressive wildlife is discovered, stop work, retreat to a safe distance, and notify the supervisor before continuing — do not attempt nest removal without appropriate training/PPE.

10.2 Chemical hazards

- If cleaning solutions, moss/algae treatments, or roof coatings are used, maintain Safety Data Sheets (SDS) on-site and follow label PPE requirements (1910.1200).
- Never mix chemical products; ensure adequate ventilation and eye-wash capability is identified before use.

11 Equipment Inspection & Maintenance

EQUIPMENT	INSPECTION FREQUENCY	KEY CHECKS
Extension ladders	Before each use + monthly documented inspection	Rails, rungs, feet, rope/pulley, locks, labels/rating
Fall arrest harness/lanyard/SRL	Before each use + annual competent-person inspection	Webbing cuts/UV damage, stitching, D-rings, shock pack indicator, SRL lock/retract function
Anchor devices	Before each use + per manufacturer schedule	Corrosion, mounting hardware torque, rated capacity label
Vacuum/blower equipment	Before each use	Cords/hoses intact, guards in place, GFCI function
Ladder stabilizers/stand-offs	Before each use	Cracks, secure attachment, padding intact

Any equipment that fails inspection must be immediately tagged out of service and removed from the jobsite until repaired or replaced.

12 Weather & Environmental Work Restrictions

CONDITION	RESTRICTION
Wind	No ladder or roof-edge work above 20 mph sustained; no 3-story ladder work above 15 mph sustained
Precipitation	No ladder or roof work during active rain, sleet, or snow, or on visibly wet/frosted roofing/rungs until dry or treated for traction
Lightning / thunderstorm	Suspend all outdoor work; resume only after 30 minutes have passed since the last observed lightning/thunder
Extreme heat	Follow a heat illness prevention plan (water, rest, shade) consistent with OSHA's heat guidance for outdoor work
Ice / frost	No roof or ladder access until surfaces are cleared and dry

Per 1910.30 (and 1926.503 for construction-classified work), all employees must be trained before performing unsupervised gutter or roof-drain work, and retrained whenever equipment, procedures, or worksite conditions change.

Training must cover:

- Recognition of fall hazards specific to gutters, ladders, roof edges, skylights, and openings.
- Correct selection, inspection, set-up, and use of ladders.
- Correct donning, inspection, anchoring, and use of personal fall arrest/restraint systems.
- Procedures in this written program, including rescue and emergency procedures.
- Electrical hazard awareness and minimum clearance distances.
- Recognition of biological/chemical hazards and required PPE response.

The employer must designate at least one trained Competent Person per crew, capable of identifying existing/predictable hazards and authorized to take prompt corrective action, including stopping work (Section 2.2). Training completion must be documented using Appendix E.

TARGET RESCUE TIME

6 min

Before suspension trauma risk rises

14.1 Fall arrest rescue

- Prompt rescue (target: within 6 minutes) must be planned before any PFAS work begins, due to the risk of suspension trauma.
- Rescue methods may include self-rescue devices, ladder-assisted rescue, aerial lift retrieval, or calling local fire/EMS with advance notice that rope rescue may be required.
- Every crew member must know how to call 911, communicate the exact address, and describe the fall-arrest situation to responders.

14.2 General emergency procedures

- Stop work and call 911 immediately for any fall, suspected fracture, head injury, or loss of consciousness.
- Keep a stocked first-aid kit on every vehicle; keep an eyewash source or bottled eyewash solution available for chemical exposure.
- Do not move a fallen or injured employee unless there is an immediate life-threatening hazard (e.g., fire, traffic) — wait for EMS unless trained in safe extraction.
- Post the jobsite address and nearest cross-street on the work order so it can be relayed quickly to dispatchers.

- Report all injuries, near-misses, and equipment failures to the supervisor the same day.
- Recordable injuries/illnesses must be logged on OSHA Forms 300/300A/301 per 1904; fatalities reported to OSHA within 8 hours, in-patient hospitalizations/amputations/eye loss within 24 hours (1904.39).
- Conduct a root-cause investigation for every fall, near-miss fall, or equipment failure within 48 hours; document corrective actions and verify completion.
- Retain training records, inspection checklists, and JHAs for a minimum of 3 years (or longer per state requirements).

- This program is reviewed at least annually, after any recordable incident or near-miss, after any change in equipment or work methods, and whenever OSHA standards are updated.
- The Program Owner is responsible for maintaining the current version and distributing updates to all crews.
- Employees must acknowledge receipt of any revised program version (Appendix E).

Appendix A — Daily Pre-Job Safety Checklist

ITEM	PASS	FAIL / ACTION TAKEN
JHA completed for this site	☐	
Weather within limits (Section 12)	☐	
Overhead power lines identified & clearance confirmed	☐	
Ladder(s) inspected (Appendix B)	☐	
Fall protection equipment inspected (Appendix C)	☐	
Ground/roof surface conditions assessed	☐	
Second employee present (2–3 story residential / all commercial roof work)	☐	
Rescue plan discussed with crew	☐	
Emergency address/cross-street confirmed	☐	

Crew Lead Signature: _____

Date: _____

B

Appendix B — Ladder Inspection Checklist

ITEM	PASS	FAIL / ACTION TAKEN
Rails free of cracks, bends, corrosion	☐	
Rungs/steps secure, clean, non-slip	☐	
Feet/base pads present and undamaged	☐	
Locks, rope, and pulley (extension ladders) function correctly	☐	
Duty-rating label legible and appropriate for load	☐	
No visible repairs, splices, or makeshift modifications	☐	
Stabilizer/stand-off attachment secure (if used)	☐	

Inspector Signature: _____

Date: _____

C Appendix C — Fall Protection Equipment Inspection Checklist

ITEM	PASS	FAIL / ACTION TAKEN
Webbing free of cuts, fraying, burns, UV damage	☐	
Stitching intact, no pulled/broken threads	☐	
D-rings and buckles free of cracks/deformation	☐	
Shock-pack / impact indicator not deployed	☐	
SRL locks and retracts smoothly	☐	
Anchor point rated and free of damage	☐	
Labels/inspection tags present and current	☐	

Inspector Signature: _____ Date: _____

D Appendix D — Job Hazard Analysis (JHA) Form

JOB STEP	POTENTIAL HAZARD	CONTROL MEASURE
Ladder/roof set-up		
Debris removal		
Downspout / drain clearing		
Movement along gutter / roof		
Descent / breakdown		

Site Address: _____ Prepared By: _____ Date: _____

E

Appendix E — Training Acknowledgment Log

EMPLOYEE NAME	TRAINING TOPIC	DATE	TRAINER	SIGNATURE



Washbuddy, LLC — Safety Program, Rev. 2026.07

Reviewed annually and after any recordable incident.