



WHITE PAPER

Cal/OSHA Window Cleaning Rules: What Bay Area Building Owners Must Provide

A plain-language guide to California Title 8 §3282 and §3283 and federal OSHA 29 CFR 1910.27 for building owners and property managers: written assurance, annual inspection, Operating Procedures Outline Sheets and anchorage requirements.

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Executive Summary

California regulates window cleaning as a shared responsibility. The window cleaning contractor is responsible for equipment, training and supervision of its crew, but Title 8 of the California Code of Regulations also places specific duties on the **building owner**. Those duties center on the building's permanent safety devices: anchors, davits, tie-backs and other equipment a crew attaches to.

Key Owner Obligations at a Glance

- **Written Assurance Before Use:** Owners must give the employer written assurance that the building's safety devices and equipment meet Title 8 before they are used. §3282(p)(1)(A)
- **Inspection At Least Every 12 Months:** Devices and equipment covered by the written assurance must be inspected, and tested where necessary, at least annually. §3282(p)(1)(B)
- **OPOS for Buildings 36 Feet or Taller:** Certain buildings need an Operating Procedures Outline Sheet. §3282(p)(1)(C)
- **Anchors Where Fall-Through Is Possible:** Approved safety anchors are required where workers stand on sills or could fall through an open window. §3282(g)
- **Federal Rope Descent Anchorage Rule:** Anchorages must support at least 5,000 lb per attached employee, confirmed in writing. 29 CFR 1910.27(b)(1)

The practical consequence is direct: under §3282(p)(2), a contractor's employees may not use building safety devices until the employer has received the written assurance and, if required, the OPOS. Missing paperwork can stop a job before it starts.

Scope: What Counts as Window Cleaning

Article 5 of the General Industry Safety Orders applies to "the cleaning of all windows of all buildings." Window cleaning includes washing, wiping or other cleaning of windows, window frames, curtain wall components and building panels. The rule's opening requirement is simple: windows shall not be cleaned from the outside or inside unless means are provided to do the work safely. §3282, §3282(a)

Duties are split. Employers must provide conforming safety equipment, keep it in safe condition, instruct employees in its use and supervise them. Only properly trained employees may work from scaffolds or boatswain's chairs. §3282(c)-(f)

Building Owner Duties Under §3282(p)

1. Written Assurance

Before use, owners must provide written assurance that the building's safety devices and equipment meet Title 8. The assurance must consider, but is not limited to: window anchors and fittings; load capacity of platforms, building components and hoisting equipment; stability of carriages and platforms; maximum horizontal force for moving carriages and davits; design of hoisting machines, wire rope and stabilization systems; and electrical design criteria.

2. Annual Inspection

All safety devices and equipment in the written assurance, including related building support structures, must be inspected at least every 12 months and tested where necessary, as required in §3296(b).

3. Operating Procedures Outline Sheet (OPOS)

Owners of buildings **36 feet or more in height** must have an OPOS when any of these apply:

- The Building Has No Established Window Cleaning System or Procedures Meeting Articles 5 and 6
- Original Procedures Changed Because of Building Modifications
- Extreme Architectural Features Require Complex Rigging, or Equipment Not Covered by the Orders Is Used

The OPOS must be developed by a person with knowledge of building maintenance equipment (for example, Scaffold Inspection Testing certification per §3296) and contain at least the elements of Appendix A. Structural modifications it calls for must be designed by a California-registered mechanical, structural or civil engineer.

Anchor and Window Design Requirements (§3283)

Requirement	What Title 8 Says
Anchor Use	Installed anchors may be used only to attach window cleaners' belt terminals. §3283(a)(1)
Fall-Through Hazard	A window whose fully opened clear opening has a lesser dimension over 18 inches is treated as a fall-through hazard. §3282(g)(2)
Sill Access Openings	Pivoted or hinged windows: at least 16 in. wide by 40 in. high. Double- or single-hung: at least 21 in. wide by 30 in. high. §3283(a)(4)
Anchor Spacing	Generally no more than 4 ft apart horizontally; up to 6 ft if the ledge is at least 12 in. wide with under 5° slope. §3283(a)(9)
Roof or Ledge Width	8 ft or more: no special protection required. 6–8 ft: anchors unless a parapet or railing at least 2 ft high. Under 6 ft: anchors or equivalent protection. §3283(a)(10)
Approved Hardware	Anchors and fittings must meet ANSI/ASME A39.1-1991 §4.5, and only Division-approved anchors may be used. Lag screws are banned in new or replacement installations. §3283(b)(1), §3282(h)

Federal Overlay: OSHA 29 CFR 1910.27

Federal OSHA's rule on rope descent systems (RDS) adds a parallel owner duty. Before any RDS is used, the building owner must inform the employer **in writing** that each anchorage has been identified, tested, certified and maintained to support at least **5,000 pounds in any direction for each employee attached**. This must be based on an annual inspection by a qualified person and certification as necessary, and at least every 10 years. The employer must keep this information for the duration of the job. 1910.27(b)(1)

The rule also limits RDS use above 300 feet unless other access is infeasible or more hazardous, and requires a separate, independent personal fall arrest system for each employee. 1910.27(b)(2)

A Practical Owner Checklist

- Locate or Prepare the Written Assurance for All Building Safety Devices
- Confirm the Date of the Last 12-Month Inspection and Keep the Records
- Determine Whether the Building Is 36 Feet or Taller and Needs an OPOS
- Confirm Rope Descent Anchorages Are Certified for 5,000 lb per Worker
- Share These Documents With Your Contractor Before the First Visit

Sources

- Cal. Code Regs., Title 8, §3282, General Requirements for All Window Cleaning Operations. <https://www.dir.ca.gov/title8/3282.html>
- Cal. Code Regs., Title 8, §3283, Anchors and Fittings. <https://www.dir.ca.gov/title8/3283.html>
- 29 CFR 1910.27, Scaffolds and Rope Descent Systems. <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.27>

This paper summarizes regulations for general information and is not legal advice. Regulations may change; consult the current text and qualified professionals.

About Window Cleaning Bay Area

Window Cleaning Bay Area provides residential and commercial window cleaning, pressure washing and solar panel cleaning across the San Francisco Bay Area. Founded by Grayson Dyer.

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WHITE PAPER

Hiring An Exterior Cleaning Contractor: COI, Workers' Comp And Additional Insured Checklist

The insurance and licensing documents California property managers should collect from window cleaning and pressure washing contractors, the Labor Code workers' compensation rules behind them, and how to verify what you receive.

Executive Summary

When a cleaning contractor's technician is hurt on your roof, or a ladder scratches a tenant's car, the paperwork collected before the job decides who pays. This paper covers the documents property managers should collect from exterior cleaning contractors and the California rules behind the most important one: workers' compensation.

Key Points

- **Workers' Comp Is Mandatory:** "Every employer except the state shall secure the payment of compensation," by insurance or a DIR certificate to self-insure. Lab. Code §3700
- **Even One Employee:** California employers must have workers' compensation insurance "even if they have only one employee." DWC Employer Information
- **Uninsured Employers Face Serious Penalties:** Knowingly failing to secure coverage is a misdemeanor with a fine of at least \$10,000. Lab. Code §3700.5
- **Verify, Don't Just File:** Confirm license status with CSLB and the issuing insurer with the Department of Insurance.

Why Documentation Protects Owners

Exterior cleaning puts people on ladders, lifts and roofs and puts pressurized water and equipment near tenants, vehicles and glass. A complete, current file shows that the contractor carries its own coverage for its own workers and its own operations, and gives the owner a record to point to if a claim arises. Collect it before the first visit and refresh it when policies renew.

Workers' Comp Is Mandatory In California

Labor Code §3700 requires every employer except the state to secure the payment of compensation, either by insurance from an insurer authorized to write workers' compensation in California or by a certificate of consent to self-insure from the Director of Industrial Relations. §3700(a)-(b) The Division of Workers' Compensation states the requirement applies even with only one employee, and that out-of-state employers may need coverage if employees regularly work in California. DWC

What Happens When A Contractor Is Uninsured

Failing to secure compensation, by someone who knew or should have known of the obligation, is a misdemeanor punishable by up to one year in county jail and/or a fine of up to double the premium that would have been due, but not less than \$10,000; a repeat conviction carries a minimum of \$50,000.

§3700.5 An injured employee of an uninsured employer may also sue that employer for damages outside the workers' compensation system. §3706 For an owner, an uninsured contractor is a warning sign about everything else in the file.

General Liability, Auto, Umbrella And Additional Insured

Beyond workers' comp, most commercial owners ask for a certificate of insurance (COI) showing commercial general liability, commercial auto for vehicles used on site, and often an umbrella policy. Many contracts also require the owner and its management company to be named as additional insured on the general liability policy. Limits and wording are set by your contract and your own insurance advisor; this paper does not recommend specific amounts.

- Check That The Named Insured Matches The Company On Your Contract
- Check Policy Effective And Expiration Dates Cover The Work
- Request The Additional Insured Endorsement, Not Only A Note On The COI
- Confirm The Insurer With The California Department Of Insurance

License Checks

The Contractors' State License Law applies to construction work. It has a minor-work exemption for contracts under \$1,000 in aggregate that need no building permit, but that exemption does not apply to anyone who employs another person to do the work. Bus. & Prof. Code §7048 Whether a cleaning scope requires a CSLB license depends on the work; when a contractor holds one, confirm it on the CSLB license lookup.

Procurement Checklist

Document	What To Confirm
Workers' Comp Certificate	Current policy from an authorized insurer, or DIR self-insurance certificate (\$3700)
General Liability COI	Named insured, dates and limits match your contract
Additional Insured Endorsement	Owner and manager named as required by contract
Commercial Auto	Covers vehicles brought on site
License (If Applicable)	Active status on CSLB lookup
Safety And Site Documents	Fall protection plan; for buildings with anchors, the owner's own Title 8 paperwork (see G1)

Red Flags

- Workers' Comp Missing Or Claimed "Not Needed" Despite Employees
- Expired Or Soon-Expiring Policies
- Named Insured Differs From The Contracting Company
- Reluctance To Provide An Endorsement Or Let You Verify Coverage

Sources

- Cal. Labor Code §3700. https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=LAB&sectionNum=3700.
- Cal. Labor Code §3700.5 and §3706. https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=LAB&sectionNum=3700.5.
- DIR Division of Workers' Compensation, Employer Information. <https://www.dir.ca.gov/dwc/employer.htm>
- Cal. Bus. & Prof. Code §7048. https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=BPC&sectionNum=7048.
- Contractors State License Board. <https://www.cslb.ca.gov/>
- California Department of Insurance. <https://www.insurance.ca.gov/>

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Employee vs. Independent Contractor In Exterior Cleaning: AB 5 Risk For Property Owners

How California's ABC test under Labor Code §2775 applies to window cleaning and pressure washing crews, what misclassification can cost, and what owners should ask contractors.

Executive Summary

California's "ABC test," the worker classification test associated with Assembly Bill 5, now appears in Labor Code §2775. Under it, a person paid to provide labor or services is presumed to be an employee unless the hiring entity proves all three conditions. For property owners and managers, the question matters in two ways: when they hire an individual cleaner directly, and when they rely on a cleaning company that staffs jobs with workers it calls independent contractors. This paper summarizes the statute and the state's own guidance.

Key Points

- **Employee By Default:** A worker is an employee unless the hiring entity demonstrates all three ABC conditions. Lab. Code §2775(b)(1)
- **All Three Prongs:** Free from control, outside the usual course of the hiring entity's business, and independently established in the trade. §2775
- **Penalties For Willful Misclassification:** \$5,000 to \$25,000 per violation under Labor Code §226.8, per the Labor Commissioner. DLSE FAQ
- **Workers' Comp Follows Employment:** Every employer must secure workers' compensation coverage. Lab. Code §3700

The ABC Test

Section 2775 provides that "a person providing labor or services for remuneration shall be considered an employee rather than an independent contractor unless the hiring entity demonstrates that all of the following conditions are satisfied." §2775(b)(1)

Prong	Statutory Condition
A: Control	The person is free from the control and direction of the hiring entity in performing the work, under the contract and in fact.
B: Usual Course	The person performs work outside the usual course of the hiring entity's business.
C: Independent Business	The person is customarily engaged in an independently established trade, occupation or business of the same nature as the work.

Source: Cal. Labor Code §2775(b)(1)(A)–(C).

Applying It To Exterior Cleaning

Prong B is often the hardest for a cleaning company: a window cleaning business that pays individuals to clean windows is asking them to do work squarely within its own usual course of business. That is why owners should expect the technicians a cleaning company sends to be its employees.

Why Misclassification Matters To Owners

According to the Labor Commissioner's Office, employers found to have misclassified workers "may face significant liability for restitution and penalties," including minimum wage and overtime, unemployment insurance taxes and workers' compensation insurance, plus payroll taxes, penalties and interest. Willful misclassification carries civil penalties of \$5,000 to \$25,000 per violation. DLSE FAQ Q10 Because §3700 requires every employer to secure workers' compensation, a vendor that misclassifies its crew may also lack coverage for injuries on your property (see G4). §3700

Questions To Ask Contractors

Question	Why It Matters
Are The Technicians On Site W-2 Employees?	ABC test presumption (§2775)
Can You Provide A Current Workers' Comp Certificate?	§3700 coverage duty
Who Supervises And Directs The Crew?	Prong A control
Do You Subcontract Any Work, And To Whom?	Identifies who employs the workers
Will The COI Name Us As Additional Insured?	Contract risk transfer (G4)

If you hire an individual cleaner directly rather than a company, the ABC test applies to your relationship with that person. Talk to counsel before treating them as an independent contractor.

Sources

- Cal. Labor Code §2775. https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=LAB&sectionNum=2775.
- Cal. Labor Code §3700. https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=LAB&sectionNum=3700.
- Labor Commissioner's Office, Independent Contractor FAQ. https://www.dir.ca.gov/dlse/faq_independentcontractor.htm

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WHITE PAPER

Fall Protection For Exterior Building Maintenance: Ladders, Lifts And Rope Access Compared

How federal OSHA and Cal/OSHA fall protection rules apply to ladders, aerial lifts, rope descent and suspended work on commercial buildings.

Executive Summary

Exterior building maintenance happens from the ground, from ladders, from aerial lifts and, on taller buildings, from rope descent systems or suspended platforms. Each method carries its own fall protection rules. This paper summarizes the federal OSHA baseline in 29 CFR 1910.28 and 1910.140 and the California window cleaning orders in Title 8 §3282 and §3295, so safety and property managers can match the method to the building.

Key Points

- **4-Foot Baseline:** Federal rules require fall protection on walking-working surfaces 4 ft or more above a lower level. 29 CFR 1910.28(b)(1)
- **Portable Ladders Are Separate:** 1910.28 does not apply to portable ladders or to aerial lifts covered by 1910.67. 1910.28(a)(2)
- **Rope Descent Needs Fall Arrest:** Each worker on a rope descent system 4 ft or more up needs a personal fall arrest system. 1910.28(b)(12)
- **Height Limits:** Rope descent is limited to 300 ft above grade unless no feasible alternative exists, and descents over 130 ft need stabilization. 1910.27(b)(2)
- **California 36-Foot Trigger:** Owners of buildings 36 ft or more in height may need an Operating Procedures Outline Sheet. T8 §3282

Hierarchy Of Access Methods

For general walking-working surfaces 4 ft or more above a lower level, the federal rule lists guardrail systems, safety net systems, or personal fall protection systems such as fall arrest, travel restraint or positioning. 1910.28(b)(1)(i) Guardrails protect everyone without relying on worker action, which is why planning starts by asking whether the work can be done from the ground or from a guarded surface before moving to personal systems.

Ladders

1910.28 expressly "does not apply" to portable ladders, which are governed by separate ladder rules. 1910.28(a)(2)(i) Fixed ladders that extend more than 24 ft above a lower level are covered: ladders installed on and after November 19, 2018 need a personal fall arrest or ladder safety system, and by November 18, 2036 all fixed ladders must have one. 1910.28(b)(9)

Aerial Lifts

Aerial lifts covered by 1910.67(c)(2)(v) are excluded from 1910.28, so lift operations follow the aerial lift standard rather than the general walking-working surface rules. 1910.28(a)(2)(v) California §3282 lists elevating platforms among the accepted provisions for window cleaning. T8 §3282

Rope Descent And Suspended Work (Partner Crew Only)

Rope descent and suspended work are specialty operations. At Window Cleaning Bay Area, that work is performed by a vetted partner crew; WCBA crews do not perform rope or suspended work.

Federal Requirements

Workers on a rope descent system 4 ft or more above a lower level must be protected by a personal fall arrest system. 1910.28(b)(12)(ii) Anchorages for personal fall protection must support at least 5,000 lb, and personal fall arrest systems must limit arresting force to 1,800 lb. 1910.140 No rope descent system may be used above 300 ft unless the employer shows no other feasible means, and stabilization is required for descents greater than 130 ft. 1910.27(b)(2)

California Requirements

Under §3282, owners of buildings 36 ft or more in height must have an Operating Procedures Outline Sheet where the building lacks an established window cleaning system meeting the orders. T8 §3282 Under §3295, portable outriggers for ground-rigged working platforms are limited to a suspension point no more than 130 ft above a safe surface unless acceptable to the Division. T8 §3295

Choosing By Building Type

Method	Key Rule	Source
Ground-Based Tools	No elevation exposure	—
Portable Ladders	Outside 1910.28; separate ladder rules	1910.28(a)(2)
Fixed Ladders Over 24 Ft	Fall arrest or ladder safety system (new and by 2036)	1910.28(b)(9)
Aerial Lifts	Covered by 1910.67	1910.28(a)(2)(v)
Rope Descent (Partner Crew)	Fall arrest at 4 ft; 300 ft limit; stabilization over 130 ft	1910.28, 1910.27
Ground-Rigged Platforms (Partner Crew)	Outriggers limited to 130 ft unless approved	T8 §3295

Low-rise retail and offices are usually reachable from the ground or ladders; mid-rise buildings often call for lifts; buildings 36 ft and taller bring §3282 owner duties into play, and towers need engineered roof systems and specialty crews.

Sources

- 29 CFR 1910.28. <https://www.ecfr.gov/current/title-29/section-1910.28>
- 29 CFR 1910.140. <https://www.ecfr.gov/current/title-29/section-1910.140>
- 29 CFR 1910.27. <https://www.ecfr.gov/current/title-29/section-1910.27>
- Cal. Code Regs. Title 8 §3282. <https://www.dir.ca.gov/title8/3282.html>
- Cal. Code Regs. Title 8 §3295. <https://www.dir.ca.gov/title8/3295.html>

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WHITE PAPER

Heat Illness Prevention For Outdoor Crews: Cal/OSHA §3395 And What Clients Should Expect

What California's heat illness standard requires of outdoor cleaning crews:
water, shade above 80°F, high-heat procedures at 95°F, acclimatization and a
written plan.

Executive Summary

California's heat illness standard, Title 8 §3395, applies to all outdoor places of employment, including exterior window cleaning, pressure washing and solar panel cleaning. It sets requirements for water, shade, cool-down rest, acclimatization, training and a written plan. This paper summarizes the rule from its text so property and safety managers know what a compliant outdoor crew should look like on their site.

Key Points

- All Outdoor Work:** §3395 "shall apply to all outdoor places of employment." T8 §3395(a)(1)
- Water:** Enough fresh, pure, suitably cool water for one quart per employee per hour, free of charge. §3395(c)
- 80°F Shade Trigger:** Shade must be present when the temperature exceeds 80°F. §3395(d)(1)
- 95°F High-Heat Procedures:** Required at 95°F or above for listed industries, such as construction and landscaping. §3395(a)(2), (e)
- Written Plan:** A written Heat Illness Prevention Plan, which may sit within the §3203 IIPP. §3395(i)

§3395 Triggers

Temperature	Requirement	Source
Any Temperature	Water; preventative cool-down rest in shade on request	§3395(c), (d) (3)
Above 80°F	Shade present at all times while employees are present	§3395(d)(1)
Heat Wave (≥80°F And ≥10°F Above Prior 5-Day Average High)	All employees closely observed	§3395(g)(1)
95°F Or Above	High-heat procedures (listed industries)	§3395(e)

The high-heat procedures in subsection (e) apply to the industries listed in (a)(2): agriculture, construction, landscaping, oil and gas extraction, and certain transportation or delivery. Employers outside those industries are not required to comply with subsection (e), though all other provisions still apply. §3395(a)

Water, Shade, Rest, Acclimatization

Water

Water must be "fresh, pure, suitably cool, and provided to employees free of charge," located as close as practicable to the work. Where it is not plumbed, enough must be on hand at the start of the shift for one quart per employee per hour, unless effective replenishment procedures exist. §3395(c)

Shade And Cool-Down Rest

Above 80°F the employer must maintain shade open to the air or ventilated. Employees must be allowed and encouraged to take a preventative cool-down rest in the shade, must be monitored for symptoms, and may not be ordered back to work until symptoms have abated. §3395(d)

High-Heat Procedures

At 95°F or above, covered employers must maintain effective communication, observe employees for signs of heat illness (for example, a supervisor observing 20 or fewer employees, or a mandatory buddy system), remind workers to drink water, and hold pre-shift meetings reviewing the procedures. §3395(e)

Acclimatization

All employees must be closely observed during a heat wave, and an employee newly assigned to a high heat area must be closely observed for the first 14 days. §3395(g)

Written Plan

Employers must keep a written Heat Illness Prevention Plan in English and in the language understood by most employees, available at the worksite. It must cover water and shade, high-heat procedures, emergency response and acclimatization, and may be part of the Injury and Illness Prevention Program that §3203 requires every employer to keep in writing. §3395(i); §3203(a) Training on risk factors, water intake, acclimatization and symptoms must happen before exposure. §3395(h)

What Clients Should See On Site

On-Site Check	Basis
Water Near The Work Area	§3395(c)
Shade Available Above 80°F	§3395(d)
Written Plan Available On Request	§3395(i)
Supervisor Or Buddy Observation In Heat Waves	§3395(e), (g)
Flexible Scheduling On Hot Days	Client coordination

Clients can help by allowing early starts in hot weather and pointing crews to shaded areas on the property.

Sources

- Cal. Code Regs. Title 8 §3395. <https://www.dir.ca.gov/title8/3395.html>
- Cal. Code Regs. Title 8 §3203. <https://www.dir.ca.gov/title8/3203.html>
- Cal/OSHA, Heat Illness Prevention. <https://www.dir.ca.gov/dosh/heatillnessinfo.html>

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ANSI/IWCA I-14.1 Explained: Roof Anchors, Rope Descent And Building Design

What the window cleaning industry's ANSI/IWCA I-14.1-2001 safety standard is, how it relates to the binding Cal/OSHA Title 8 and federal OSHA 1910.27 rules, and what owners should plan and document for anchors and access.

Executive Summary

Building owners, architects and property managers often hear "I-14" when roof anchors or rope descent come up. ANSI/IWCA I-14.1 is the window cleaning industry's consensus safety standard. It is not itself a California regulation, but it sits alongside the rules that are: Cal/OSHA Title 8 Article 5 and federal OSHA 29 CFR 1910.27. This paper explains what the standard is and how it relates to the binding rules.

Key Points

- **Current Edition Is 2001:** ANSI/IWCA I-14.1-2001, for which the IWCA served as Secretariat. [IWCA](#)
- **Industry-Specific:** IWCA describes it as "the only standard of its type that is specifically for those in the window cleaning industry." [IWCA](#)
- **Two Parts:** Part A covers use of access equipment; Part B covers design, manufacture and installation. [IWCA](#)
- **California Rules Reference A39.1:** Title 8 §3283 requires anchors and fittings to comply with ANSI/ASME A39.1-1991 §4.5 and Division approval. [§3283\(b\)\(1\)](#)
- **Federal Anchorage Rule:** 5,000 lb in any direction per attached employee, certified in writing by the owner. [1910.27\(b\)\(1\)](#)

What I-14.1 Is And Who Publishes It

The International Window Cleaning Association (IWCA) was the Secretariat of the 2001 ANSI/IWCA I-14 Window Cleaning Safety Standard, which IWCA says "is still being referenced by building owners and property managers as well as the Occupational Safety and Health Administration (OSHA)." The standard is sold by IWCA (listed at \$50, free for members), so this paper describes it by name and structure only and does not reproduce its text. [IWCA I-14 page](#)

How It Relates To OSHA And Cal/OSHA

Item	Type	What It Does
ANSI/IWCA I-14.1-2001	Voluntary consensus standard	Industry practice for access equipment use (Part A) and design/installation (Part B)
Cal/OSHA Title 8 §3282	California regulation	Owner written assurance, 12-month inspection, OPOS for qualifying buildings 36 ft or taller
Cal/OSHA Title 8 §3283	California regulation	Anchor placement and hardware; compliance with ANSI/ASME A39.1-1991 §4.5; Division-approved anchors only
Cal/OSHA Title 8 §3295	California regulation	Powered platform equipment; 130 ft suspension-point limits for portable outriggers and ground-rigged davits
29 CFR 1910.27	Federal regulation	Rope descent anchorages, 300 ft limit, stabilization over 130 ft

In California, the enforceable anchor rules are in Title 8. §3283 requires that "only those anchors and fittings granted approval by the Division shall be used," and that anchors and fittings be inspected at least every 12 months. §3283(b)(1), (e)

Anchor And Access Planning

Title 8 sets concrete design points that I-14.1 users will recognize: anchors located 42 to 51 inches above the sill; spacing generally no more than 4 ft apart for sill travel; no expansion shield anchors; and no lag screws in new or replacement installations. §3283(d)(1), (a)(9), (d)(9); §3282(h) Federally, before any rope descent system is used, the owner must inform the employer in writing that each anchorage was identified, tested, certified and maintained for at least 5,000 lb in any direction per attached employee, based on annual inspection and certification at least every 10 years. 1910.27(b)(1)(i)

Rope Descent vs Suspended Platforms

Rope descent systems may not be used above 300 ft above grade unless other access is infeasible or more hazardous; stabilization is required for descents over 130 ft; each worker needs a separate, independent personal fall arrest system; and RDS may not be used in storms or gusty or excessive wind. 1910.27(b)(2) Powered platforms (BMUs, davits, swing stages) fall under §3295 in California, including the 130 ft limits for ground-rigged systems "unless acceptable to the Division." §3295 Rope and suspended work on high-rises is performed for WCBA clients by a vetted partner crew.

Owner Documentation

- Written Assurance For Building Safety Devices (§3282(p)(1)(A))
- 12-Month Anchor And Equipment Inspection Records (§3282(p)(1)(B), §3283(e))
- OPOS Where Required For Buildings 36 Ft Or Taller (§3282(p)(1)(C))
- Rope Descent Anchorage Certification Letter (1910.27(b)(1))
- Anchor Manufacturer And Division Approval Documentation (§3283(b))

Sources

- IWCA, I-14 Window Cleaning Safety Standard. <https://iwca.org/page/I-14Standard>
- Cal. Code Regs., Title 8, §3282, §3283, §3295. <https://www.dir.ca.gov/title8/3283.html>
- 29 CFR 1910.27 (eCFR). <https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1910/subpart-D/section-1910.27>

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WHITE PAPER

Commercial Window Cleaning Frequency By Building Type: Office, Retail, Medical And HOA

Typical commercial window cleaning schedules for offices, storefronts, medical buildings and HOA communities, based on Window Cleaning Bay Area field experience, plus the Bay Area conditions that shorten intervals.

Executive Summary

There is no law that sets how often commercial windows must be cleaned. The right schedule depends on property type, foot traffic, local conditions and the standard tenants and customers expect. This paper shares the ranges Window Cleaning Bay Area sees in its own Peninsula and South Bay work. They are field experience, not industry statistics, and the best schedule for any building comes from looking at the property itself.

Key Points

- **Field Experience, Not Rules:** The ranges below reflect WCBA field experience and are a starting point, not a standard.
- **Two Tiers Work Best:** Service high-visibility glass (entries, storefronts, lobbies) often and the full building less often.
- **Local Conditions Matter:** Fog, pollen, wildfire ash, traffic grime, irrigation overspray and nearby construction can shorten intervals.
- **Safety Devices Have A Fixed Clock:** Where Title 8 requires written assurance, safety devices must be inspected at least every 12 months. T8 §3282

Factors That Drive Frequency

- **Coastal Fog And Moisture:** Leaves a film, especially near the coast or the Bay.
- **Pollen And Trees:** Spring pollen and debris settle on glass and frames.
- **Wildfire Smoke And Ash:** Many properties schedule a cleaning once air quality improves.
- **Traffic Grime:** Buildings on busy roads and parking lots collect road film faster.
- **Irrigation Overspray:** Hard-water spots get harder to remove the longer they sit (see G12).
- **Construction Nearby:** Dust can make glass look dirty within days.

Office

Tenants notice lobby and entry glass first. In WCBA's experience, offices commonly schedule full exterior cleaning quarterly or semi-annually, with more frequent service at entries and lobbies. Interior partitions can be added on whatever cycle suits tenants.

Retail And Storefronts

Storefront glass collects fingerprints and street grime fastest. Retailers and restaurants often choose weekly or every-other-week service for doors and street-facing glass, usually before opening, with upper windows and signage glass cleaned less often.

Medical

Medical and professional buildings often get frequent service at entries, where patients form first impressions, with periodic full-building cleanings.

HOA Communities

HOAs and managed communities usually run a set schedule for common-area glass timed to the budget cycle and community events. Multifamily properties often clean exterior glass once or twice a year, timed for peak leasing or inspections, with more frequent service for leasing offices and amenity spaces. Budgeting for recurring cleaning is covered in G14.

Owner Safety Duties On Taller Buildings

Cleaning frequency is a business choice, but some owner duties are not. Where Title 8 §3282 requires written assurance for building safety devices, "all safety devices and equipment considered in the written assurance shall be inspected at least every 12 months." T8 §3282

Frequency By Building Type

WCBA field experience, not industry statistics.

Building Type	High-Visibility Glass	Full Exterior
Storefronts And Restaurants	Weekly Or Every Other Week	Less Often For Upper Glass
Office Buildings	More Frequent At Entries And Lobbies	Quarterly Or Semi-Annually
Medical And Professional	Frequent At Entries	Periodic
Multifamily	Regular For Leasing And Amenity Areas	Semi-Annually Or Annually
HOA Communities	Set Schedule For Common Areas	Timed To Budget Cycle

Building A Maintenance Calendar

- **Map Your Glass:** Separate high-visibility areas from the rest of the building.
- **Set Two Tiers:** Frequent service for high-visibility glass, less frequent full cleanings.
- **Plan Around The Seasons:** Consider cleanings after pollen season, after fire season and before the holidays.
- **Review Once A Year:** Adjust based on how the glass actually holds up.

Sources

- Window Cleaning Bay Area, "How Often Should a Commercial Building Have Its Windows Cleaned?" (October 29, 2026). <https://www.windowcleaningbayarea.com/blog/how-often-commercial-windows-cleaned>
- Cal. Code Regs. Title 8 §3282. <https://www.dir.ca.gov/title8/3282.html>

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WHITE PAPER

Hard Water, Mineral Etching And Glass Damage: Protecting Commercial Glazing In The Bay Area

What glass industry guidance from NGA, IWCA and Vitro says about rundown staining, products that damage glass, heat-treated and coated glass, and how often to clean.

Executive Summary

Commercial glass is durable, but it is not indestructible. Mineral-laden rundown, construction slurry and the wrong cleaning products can leave stains that become permanent damage. This paper summarizes what the glass industry itself recommends: the National Glass Association (NGA) and IWCA bulletin FB01-00, NGA's FB02-02 on heat-treated glass, and Vitro Architectural Glass technical document TD-142.

Key Points

- **Rundown Must Go Quickly:** Rundown from metals and masonry, such as concrete and stucco, should be cleaned as soon as possible or permanent staining or damage may occur. Vitro TD-142
- **No Acids:** Cleaning solutions should not include acids, especially muriatic/hydrochloric and hydrofluoric. FB01-00
- **No Abrasives Or Metal Scrapers:** Scrapers, abrasives and harsh chemicals can cause irreparable damage to any glass. FB02-02
- **Twice A Year Baseline:** Generally, cleaning twice a year is sufficient, with some regions needing more. FB01-00
- **Exposed Coatings:** Vitro says coated glass glazed with the coating exposed outdoors needs cleaning at least 3 to 4 times a year. TD-142

How Mineral Deposits And Rundown Stain Glass

Vitro warns that rundown from metals and masonry "should be cleaned from the glass as soon as" possible and not left on coated surfaces, because "if such rundown is not quickly removed, permanent staining and/or glass damage may occur." It notes the same can happen with uncoated glass. TD-142 FB01-00 lists mortar, concrete or cement splashing and sealer run-off from masonry waterproofing among the conditions that can call for more aggressive cleaning. FB01-00

Staining vs Permanent Surface Damage

FB01-00 states that "glass products can be permanently damaged if infrequently or improperly cleaned." Razor blades and metal scrapers "should not be part of routine cleaning." NGA members neither condone nor recommend scraping glass for routine cleaning, which can leave fine scratches. FB01-00

What Not To Use

Do	Do Not
Soak Glass With Clean Water And A Mild, Non-Abrasive Solution	Use Acids, Especially Muriatic/Hydrochloric Or Hydrofluoric
Squeegee Off All Solution	Use Harsh Cleaners, Abrasives Or Alkaline Materials
Start At The Top Of The Building	Use Metal Scrapers Or Tools
Avoid Tinted Or Coated Glass In Direct Sunlight	Use Additives That Could Form Hydrofluoric Acid

Sources: FB01-00; Vitro TD-142.

Vitro adds that hydrofluoric acid "will quickly and permanently" damage glass. TD-142

Heat-Treated And Coated Glass Need Extra Care

Cleaning procedures for heat-treated glass are the same as for annealed glass, but heat treatment moves glass on hot rollers, and fine particles can fuse to the surface. FB02-02 Vitro notes that on heat-strengthened or tempered glass, "even a plastic scraper may dislodge" such fused debris and cause damage. TD-142

Prevention Schedule

Glass Condition	Recommended Response	Source
Typical Architectural Glass	Generally twice per year; more in some regions	FB01-00
Coated Glass With Coating Exposed Outdoors	At least 3 to 4 times per year	TD-142
Metal Or Masonry Rundown	Remove as soon as possible	TD-142
Mortar, Concrete, Sealer Overspray	Non-routine cleaning by professionals	FB01-00

Owners should also find out whether any glass has an exposed coating or applied film, because FB01-00 tells cleaners to check this first. FB01-00

Sources

- NGA/IWCA FB01-00 (2023), Proper Procedures for Cleaning Architectural Glass Products. https://www.agm-inc.com/images/Architectural_Glass.pdf
- NGA FB02-02 (2023), Heat-Treated Glass Surfaces Are Different. https://www.glass.org/sites/default/files/2023-10/FB02-02_2023_Heat-Treated_Glass_Surfaces_Different.pdf
- Vitro Architectural Glass TD-142, Glass Cleaning Recommendations. https://www.vitroglazings.com/media/ycnpjcpn/tech_doc_142.pdf

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WHITE PAPER

San Francisco Façade Inspection Ordinance And How Routine Cleaning Supports It

Who must comply with San Francisco's facade inspection program, the inspection deadlines by construction date, and how routine cleaning supports visibility without ever replacing a licensed inspection.

Executive Summary

San Francisco's Building Facade Inspection and Maintenance Program requires taller buildings to have their facades inspected by a California-licensed architect or engineer on a fixed schedule. Routine window and exterior cleaning can make facade conditions easier to see and keep owners attentive between inspections, but **cleaning is never an inspection and never a substitute for one**. This paper summarizes who must comply, the inspection cycle and the records owners should keep.

Key Points

- **Who:** Buildings five or more stories tall of Type I, II, III or IV construction. SF DBI
- **Who Inspects:** A California-licensed architect or engineer. SF DBI
- **Cycle:** An initial comprehensive report by a construction-date deadline, then every ten years. SF DBI
- **15+ Stories:** These buildings also need supplemental facade inspection reports. SF DBI
- **Cleaning Is Not Inspection:** A window cleaner is not the qualified professional the program requires.

Who Must Comply

According to SF.gov, the program "requires that all buildings that are five or more stories tall be regularly inspected by a California-licensed architect or engineer," with "additional inspection requirements for buildings that are fifteen or more stories tall." Covered buildings are five or more stories and of Type I, II, III or IV construction. Findings go in a written report to the Department of Building Inspection, and noncompliant conditions must be addressed. Detailed requirements are in San Francisco Existing Building Code Chapter 5F. SF DBI

Inspection Cycle

Tier	Construction Completed	Comprehensive Report Due	Supplemental (15+ Stories) Due
1	Before 1910	Dec 31, 2021	Dec 31, 2026
2	1910–1925	Dec 31, 2023	Dec 31, 2028
3	1926–1970	Dec 31, 2025	Dec 31, 2030
4	1971–1997	Dec 31, 2027	Dec 31, 2032
5	After 1997	Dec 31 of 30th year after Certificate of Final Completion	Apr 30, 2024

Source: SF.gov, DBI Facade Inspection and Maintenance Program.

After the initial report, a comprehensive report is due every ten years. Buildings 15 or more stories built after 1997 eventually alternate supplemental and comprehensive reports every five years. SF DBI A comprehensive report is "a general and detailed inspection of all building facades"; a supplemental report is "a general inspection of all facades." SF DBI

How Routine Cleaning Supports Visibility (Never A Substitute)

Dirt and staining can make it harder to see facade conditions. Regular cleaning keeps glass and cladding in a state where owners and their inspectors can see what is there, and a cleaning crew may notice something worth reporting to the owner. None of that meets the program's requirement for an inspection by a licensed architect or engineer. On taller buildings, any suspended or rope access cleaning is done by a vetted partner crew (see H12).

Owner Records

Record	Why
Comprehensive And Supplemental Reports Submitted To DBI	Program compliance
Repair Permits And Documentation	Needed for waiver requests and follow-up
Construction Completion Date / Tier	Sets deadlines
Cleaning Service Logs And Any Reported Observations	Helpful context for the inspector

SF.gov notes a waiver may be available for buildings that had a comprehensive inspection with necessary repairs in the 10 years before the due date, with documentation. [SF.gov](#)

Sources

- SF.gov, DBI Facade Inspection and Maintenance Program. <https://www.sf.gov/reports--june-2024--dbi-facade-inspection-and-maintenance-program>
- SF.gov, Submit Your Facade Inspection Report. <https://www.sf.gov/submit-your-facade-inspection-report>

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