WINDOW CLEANING BAY AREA

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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