WINDOW CLEANING BAY AREA

WHITE PAPER

What Bay Area High-Rise Owners Must Hand Their Window Cleaner

The documents California Title 8 §3282 and §3283 and federal OSHA 29 CFR 1910.27 expect a building owner to provide before a rope descent or suspended crew uses the building's anchors and equipment: written assurance, annual inspection records, an Operating Procedures Outline Sheet and anchorage certification.

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Executive Summary

On a high-rise, the crew brings the ropes, harnesses and training, but the building supplies the anchors, davits, tie-backs and other permanent equipment the crew hangs from. California Title 8 therefore puts specific paperwork duties on the **building owner**, and those documents must be in the employer's hands before the first descent.

Key Points

- **No Paperwork, No Descent:** Employers may not let employees use building safety devices or equipment before receiving the owner's written assurance and, if required, an OPOS. §3282(p)(2)
- **Written Assurance Before Use:** The owner certifies the building's safety devices and equipment meet Title 8. §3282(p)(1)(A)
- **Inspection At Least Every 12 Months:** For all devices covered by the assurance, and separately for window cleaning anchors and fittings. §3282(p)(1)(B), §3283(e)
- **OPOS Trigger Is 36 Feet:** Owners of buildings 36 feet or more in height need an Operating Procedures Outline Sheet when certain conditions apply. §3282(p)(1)(C)
- **Federal Anchorage Letter:** Rope descent anchorages must be certified in writing for at least 5,000 lb in any direction per attached employee. 29 CFR 1910.27(b)(1)

Owner Duties Under §3282

Article 5 of the General Industry Safety Orders covers "the cleaning of all windows of all buildings," including windows, frames, curtain wall components and building panels. Its first rule is that windows shall not be cleaned from the outside or inside unless means are provided to do the work safely. §3282, §3282(a)

Most of Article 5 is addressed to the employer: providing conforming equipment, training and supervising crews, and assigning only properly trained employees to scaffolds or boatswain's chairs. §3282(c)–(f) Subsection (p) is different. It speaks directly to building owners, and it is the section a high-rise owner should know best.

Written Assurance

Building owners must provide the employer written assurance, **before use**, that all of the building's safety devices and equipment meet Title 8. The assurance must consider, but is not limited to:

- Window Anchors And Fittings
- Load-Sustaining Capabilities Of Platforms, Building Components, Hoisting And Supporting Equipment
- Stability Factors For Carriages, Platforms And Supporting Equipment
- Maximum Horizontal Force For Movement Of Carriages And Davits
- Design Of Carriages, Hoisting Machines, Wire Rope And Stabilization Systems
- Design Criteria For Electrical Wiring And Equipment

Source: §3282(p)(1)(A)

Annual Equipment Inspection

Every safety device and piece of equipment covered by the written assurance, including related building support structures, must be inspected at least every 12 months and, where necessary, tested to determine whether it is safe to use, with tests conducted as required in §3296(b). §3282(p)(1)(B) Window cleaning anchors and fittings carry their own 12-month inspection requirement, and anchors subject to impact loading or possible structural damage must be replaced. §3283(e)–(f)

Written Operating Procedure (OPOS)

Owners of buildings **36 feet or more in height** must have an Operating Procedures Outline Sheet when the building has no established window cleaning system or procedures meeting Articles 5 and 6, when original procedures changed because of building modifications, or when extreme architectural features require complex rigging or equipment not covered by the orders. §3282(p)(1)(C)1

The OPOS must be developed by someone with knowledge of the design, installation and use of building maintenance equipment (for example, Scaffold Inspection Testing certification under §3296), be readily understood by employers, and contain at least the elements of Appendix A. Structural modifications it requires must be designed by a California-registered mechanical, structural or civil engineer. §3282(p)(1)(C)2–3

What To Hand The Crew

Document	What It Covers	Basis
Written Assurance	Building safety devices and equipment meet Title 8	§3282(p)(1)(A)
Inspection And Test Records	Inspection within the last 12 months; testing where necessary	§3282(p)(1)(B), §3283(e)
Operating Procedures Outline Sheet	Required for qualifying buildings 36 ft or taller	§3282(p)(1)(C)
Rope Descent Anchorage Letter	Each anchorage identified, tested, certified and maintained for 5,000 lb in any direction per attached employee; annual inspection, certification at least every 10 years	29 CFR 1910.27(b)(1)(i)

Under the federal rule, the employer must not let anyone use an anchorage before obtaining this written information, and must keep it for the duration of the job. 1910.27(b)(1)(ii)

Where The Height Limits Come From

The 36 ft figure in §3282 is the OPOS trigger only. The 130 ft limits come elsewhere: §3295 caps the point of suspension for portable outriggers and ground-rigged davits at 130 ft above a safe surface unless acceptable to the Division, and 1910.27 requires stabilization for rope descents greater than 130 ft. 1910.27 also bars rope descent systems above 300 ft unless other access is infeasible or more hazardous. §3295; 1910.27(b)(2)(i), (x)

Sources

- Cal. Code Regs., Title 8, §3282. https://www.dir.ca.gov/title8/3282.html
- Cal. Code Regs., Title 8, §3283. https://www.dir.ca.gov/title8/3283.html
- Cal. Code Regs., Title 8, §3295. https://www.dir.ca.gov/title8/3295.html
- 29 CFR 1910.27, Scaffolds and Rope Descent Systems (eCFR). https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1910/subpart-D/section-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 commercial window cleaning, pressure washing and solar panel cleaning across the San Francisco Bay Area. High-rise rope descent work is performed by a vetted partner crew. Contact: grayson@windowcleaningbayarea.com