WINDOW CLEANING BAY AREA

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.

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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

This paper summarizes regulations and agency guidance for general information and is not legal advice. Requirements may change and vary by city; consult the current text, your local agency 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. Contact: grayson@windowcleaningbayarea.com