



UNITED STATES DEPARTMENT OF LABOR

MANDATORY OSHA SAFETY INSPECTION REQUIREMENTS

The Occupational Safety and Health administration (OSHA), Department of Labor, sets out standards or duties and responsibilities for owners of buildings to ensure that the health and safety of all workers is protected while performing suspended maintenance operations, or working within 6'-0" (1.8 m) of a roof edge with out a guard rail. Window cleaning equipment that is supplied and installed must be inspected annually as a minimum requirement. OSHA addresses the annual inspections through the enforcement of the General Industry and Duty clause, Section 5(a)(1) of the OSHA Act. OSHA will support that enforcement by citing fall protection requirements using any one of the following labor regulations contained in CFR 29 relating to fall arrest equipment:

1. Part 1910.28, Subpart D (Walking-Working Surfaces)
2. Part 1910.66, Subpart F (Powered Platforms)
3. Appendix C to Part 1910.66, Personal Fall Arrest System (Section I-Mandatory)
4. Part 1926.50, Subpart M (Fall Protection)

OSHA takes the approach that if a work site is not specific to construction or building maintenance performed using a powered platform, it will be specific to a walking-working surface. In addition, an important milestone event has taken place in the window cleaning industry. It is the release of the new ANSI/IWCA I-14.1-2001 Window Cleaning Safety Standard which was specifically written to identify accepted safe practices and building requirements for window cleaning. The "I-14.1" states that "where the window cleaning contractor provides transportable or personal fall protection equipment, that equipment shall be designed, maintained and inspected in accordance with this (I-14.1) standard."

BUILDING OWNER'S RESPONSIBILITY

Under the OSHA Department of Labor standards, building owners are required to provide a safe working environment for all workers performing tasks at height. In the event of a fall from elevation, for example by a window cleaner, the owner's best defense is the documentation showing:

- the design of suspended maintenance equipment, and tieback and lifeline anchors;
- engineer certified performance and test data;
- Maintenance personnel training/work procedures;
- Annual inspection and 10 year re-certification confirmation.

Note: In the ANSI/IWCA I-14.1 Window Cleaning Safety Standard Part B

Building and Equipment Design Requirements

(8 Inspection and testing), "all aspects of the (window Cleaning) installation shall be serviced and maintained in strict accordance with its manufacturer's frequency and instructions and shall be further inspected, maintained and tested annually as well as recertified every 10 years (9.19).

DUTIES OF THE BUILDING OWNER/PROPERTY MANAGER

Essentially, building owners of all installations where a suspended scaffold or bosun's chair equipment is to be used for suspended maintenance operations shall inform the window cleaning or maintenance contractor that the building roof top equipment (anchors, davits etc.) has been inspected, tested (if necessary), and maintained in compliance with OSHA and ANSI/IWCA I-14.1 requirements.

OSHA AND ANSI/IWCA I-14.1 ANCHORAGE REQUIREMENTS

Typically, U-bar safety anchors are used for securing lifelines, as a tie-back for primary rigging equipment (outriggers), or to directly rig (secure) a bosun's chair. Anchors protect workers' lives in case the suspension equipment fails, or in the event a worker momentarily loses control. OSHA and ANSI/IWCA I-14.1 requires all anchorages to which personal fall arrest equipment is attached shall be capable of supporting at least 5,000 lbs (22.2 kN) per employee attached, or shall be designed, installed, and used as part of a complete personal fall arrest system. Section 3.9 Anchorages, of the ANSI/IWCA I-14.1 states that "Building owners and window cleaning contractors shall not allow suspended work to be performed unless it has been determined that the building has provided, identified and certified anchorages. Section 4.1.1 Building Requirements, of the ANSI/IWCA I-14.1 states that "All buildings where window cleaning is performed that employ suspended equipment shall be equipped with roof anchorages or other approved devices.