

A N N U A L

# Inspections

## RDS and Fall Protection Safety Systems



OSHA has released a long-awaited update to its standard on walking-working surfaces.  
~ Brent LaPorte, National Inspections Manager, Pro-Bel Enterprises Limited

On Friday November 18, 2016 the Federal Register published proposed amendments to the walking-working surfaces regulations.

The entire document is over 500 pages of explanations, tables, charts and the new regulations.

So what does it all mean and who does it affect?

Well, the document affects anyone in general industry that happens to be working on any surface, vertical or horizontal. So, in short, it affects us all.

The real question most building owners, property managers and employers should be asking is: "What does it all mean to me?"

I will do my best to answer that, specifically with respect to the use of rope descent systems (RDS) and window cleaning.

OSHA has previously required the use of personal fall protection equipment whenever a worker was exposed to a fall hazard of 4' or greater. However, OSHA did not specifically address window cleaning, more specifically the use of RDS (rope descent systems).

Up until now these systems were regulated through a series of memorandums, letters of interpretation and by referencing other more stringent standards (ANSI - I-14).

OSHA has addressed this with amendments to the regulations which make the use of this common equipment more clear.

I am only going to address one small area of this document at this time. There are many sections to review and comment on, but this is the most pressing and will require planning, budgeting and implementing.

**1910.27: Scaffolds and rope descent systems-**

(a) **Scaffolds.** Scaffolds used in the general industry must meet the requirements in 29 CFR part 1926, subpart L (Scaffolds).

(b) **Rope descent systems-** (1) **Anchorage**. (i) Before any rope descent system is used, the building owner must inform the employer in writing that the building owner has identified, tested, certified and maintained each anchorage so it is capable of supporting at least 5,000 pounds (268 kg), in any direction, for each employee attached. The information must be based on an annual inspection by a qualified person and certification of each anchorage by a qualified person, as necessary, and at least every 10 years.

(ii) The employer must ensure that no employee uses any anchorage before the employer has obtained written information from the building owner that each anchorage meets the requirements of paragraph (b)(1)(i) of this section. The employer must keep the information for the duration of the job.

(iii) The requirements in paragraphs (b)(1)(i) and (ii) of this section must be implemented no later than November 20, 2017.

This small section of the regulations will have an impact on building owners, property managers and employers who utilize RDS as a means of maintaining their buildings- specifically window washing contractors.

The regulation language is quite strong in that it establishes that it is the building owner's responsibility to do the following, in writing, prior to any RDS being used:

- 1) **Identify the anchorages**- (via roof plan showing approved anchorages)
- 2) **Test**- (through load testing either in the manufacturing facility or in the field)
- 3) **Certify**- (based on inspection, calculations and/or testing)
- 4) **Maintain**- (correct any deficiencies during or immediately after annual inspection)
- 5) **Recertify** as necessary, at least every 10 years- (load test at the engineer of record's discretion)

Section (ii) then indicates that the employer (window washing contractor) must ensure that no employee uses any anchorages before the requirements above are met.

The last part of this section notes that this must be implemented no later than **November 20, 2017**; One year away. In my experience, this is not as much time as we'd like to think.

We, at Pro-Bel, inspect and certify almost 2000 buildings in the United States annually. However, we know that there are many buildings where anchorages have been installed, yet they have not been inspected or certified in years.

We also know that there are other buildings which have no certified anchorages.

Pro-Bel addresses the first issue by reaching out to you to implore you to begin to schedule your OSHA mandated annual inspections and 10 Year re-certification **now**. We have a team of qualified technicians across the United States who can gather the information we require to ensure that when it comes time to clean your windows, you can do so with the peace of mind that your anchorages are certified for use. If reviewed by an OSHA Inspector, you will have the correct paperwork to present so that you are not faced with a

stop work order or fines. We want to help you to be OSHA compliant in a timely fashion. So, we ask that you work with us at being proactive and book your inspection today. In the event that you do not have identifiable roof anchors, we at Pro-Bel can help you there as well. Our team of technicians and designers, both inside and outside of our head office, can assist you in assessing any potential fall hazards. By working with your window cleaning contractor, we will develop an OSHA compliant plan. This will allow you to create a budget to have certifiable anchorages installed and to ensure you will be in compliance by the **November 2017** deadline.

This regulation does have an impact on **building owners**, **property managers** and **employers** who are working at heights, on ladders or on any walking-working surface. Pro-Bel can help you navigate this complicated legislation to ensure that you are taking the steps necessary to protect your workers from potential hazards and you from fines and litigation.

Please call with any questions, comments or concerns at 1-800-461-0575 or email [finalosharule@pro-bel.ca](mailto:finalosharule@pro-bel.ca)

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