

This document contains extracts from an OSHA Standards Interpretation and Compliance Letter (04/07/1999 - Procedures and precautions for employees using descent control equipment). The extracts refer to a Memorandum to Regional Administrators (March 12, 1991) from Patricia K. Clark, Director, Directorate of Compliance Programs. The subject relates to a December 5, 1989 letter from Mr. Thomas J. Shepwich to Mr. Carl A. Pedersen regarding Descent Control Devices.

The purpose of the memorandum is to clarify statements made in the above-referenced letter regarding the use of descent control equipment by employees performing building exterior cleaning, inspection and maintenance. The extracts pertain to fall protection anchorages.

REQUIREMENT

Descent control equipment (friction devices such as "Sky Genies", "racks" and "figure eights") is not covered by existing Occupational Safety and Health Administration (OSHA) standards. Therefore, the Agency addresses the safety of descent control devices through its enforcement of section 5(a)(1) of the OSH Act. Under this approach, OSHA references the safety principles applicable to similar equipment (in this case, boatswains' chairs, single-point and two-point suspended scaffolds) and national consensus standards (such as ANSI A39.1-1987, with addenda A through C, "Safety Requirements for Window Cleaning") insofar as they are pertinent to the subject matter. As indicated in the December 5, 1989 letter, OSHA allows employees to use descent control equipment, provided that the equipment is used in accordance with the instructions, warnings and design limitations set by manufacturers or distributors. In addition, the Agency expects employers whose employees use descent control devices to implement procedures and precautions, as follows:

1. Training of employees in the use of the equipment before it is used;
2. Inspection of equipment each day before use;
3. Proper rigging, including sound anchorages and tiebacks, in all cases, with particular emphasis on providing tiebacks when counterweights, cornice hooks, or similar non-permanent anchorage systems are used;
4. Use of a separate fall arrest system (including bodybelt, sit harness, or full body harness; rope grab or similar device; lifeline; and anchorage (all of which are completely independent of the friction device and its support system), so that any failure in a friction device, support seat (or harness), support line, or anchorage system will not affect the ability of the fall arrest system to operate and quickly stop the employee's fall;
5. All lines installed (such as by using knots, swages or eye splices) when rigging descent control devices shall be capable of sustaining a minimum tensile load of 5,000 pounds.
6. Provisions are made for rescue;
7. Ropes are effectively padded where they contact edges of the building, anchorage, obstructions, or other surfaces which might cut or weaken the rope;
8. Provisions are made for intermittent stabilization for descent in excess of 130 feet.

In accordance with ANSI A39.1-1987 (and addenda a-c), emergency descent devices are prohibited for use in window cleaning. That statement pertains to devices designed only for emergency use. The statement would not preclude the use of descent control equipment designed to be used for window cleaning, nor would it preclude the use of devices that are designed for both window cleaning and emergency descent, provided these devices are used in accordance with the guidance outlined in this memorandum.

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