



Subject: Window Washing and Elevated Interior and Exterior Building Maintenance Guideline

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Page: 1 of 3

This Guideline is issued by the Environment, Health & Safety Department to explain the safety standards required during window washing operations and other building maintenance activities requiring elevated interior and exterior work on University buildings. The Plant Operations Building Services Department typically manages window washing work through a contract with an outside vendor and serves as the University Responsible Party to ensure the overall safety of such work. If other work activities or window washing work is contracted or performed by another method, then the University employee originating the work serves as the University Responsible Party to ensure the safety of such work. In all cases the provisions of this Guideline must be followed.

SUMMARY: Window washing and other elevated interior and exterior building maintenance presents the unique danger of serious injury or death from falls. Whether work is performed by an outside vendor or University employee(s), fall protection in accordance with the MIOSHA and ANSI/IWCA standards and University Guidelines listed below must be strictly adhered to.

Regardless of who conducts elevated interior and exterior work, the University Responsible Party must ensure that building anchor points used to protect workers from falls are properly inspected, serviced, and documented to be safe, prior to the commencement of work. This information is available from EHS.

SCOPE: This Guideline applies to window washing operations and all other interior and exterior building maintenance tasks above six (6) feet.

REFERENCE

REGULATIONS: [MIOSHA General Industry Standard, Part 5. Scaffolding](#)

[MIOSHA Construction Safety Standard, Part 12. Scaffolds and Scaffold Platforms](#)

ANSI/IWCA I-14.1 Window Washing Standard (International Window Cleaning Association) – Available for review from EHS

[University of Michigan: AEC Design Guideline Section: 07500 Roofing Systems, Fall Protection on Roofs](#)

[EHS Guideline: Roof Access for Buildings with Potentially Hazardous Exhaust](#)

RESPONSIBILITY: Procurement Services

- Procurement Agent must include the following statement in all contracts for window washing or other elevated work:

SAFETY REQUIREMENTS—See EHS Guideline Window Washing and Elevated Interior and Exterior Building Maintenance. Strictly adhere to safety requirements and procedures in this Guideline.

- Obtain the current anchor point inspection documentation from EHS prior to awarding and commencing work. (This requirement only applies to buildings having anchor points, see Procedures below.)

Plant Operations – Facilities Maintenance

- Identify, inspect, maintain and document anchor points services in the Preventative Maintenance program. Inspection and documentation is required to be completed within one year of using any anchor point.

Plant Operations - Building Services

- Serve as primary contact and oversight for the window washing service contract companies at the Ann Arbor campus.
- Include this Guideline into the window washing contract documentation with Procurement Services.
- Obtain the current anchor point inspection documentation prior to commencing work.
- Maintain communication with other departments in the vicinity of work about access limitations and schedule of activities.
- Ensure safe work perimeter is established and marked, and that people below are not exposed to potential falling objects from above.
- Report any safety concerns to EHS immediately and stop work if necessary.

Architecture, Engineering, and Construction

- To the greatest extent practicable, ensure fall protection and building anchor points are included during building planning and design.

Building Facility Managers or University Responsible Party

- If work is contracted or performed by a method other than through Plant Operations - Building Services then the University employee originating the work serves as the University Responsible Party to ensure the overall safety of the work. In such circumstances, carry out the responsibilities of Plant Operations - Building Services listed above.
- Labor services require a written contract through Procurement Services, to include applicable Terms & Conditions and insurance coverage.

- Implement this Guideline and the University requirements associated with work activities requiring access to building rooftops and interior or exterior building components. (See Reference Regulations above.)
- Advise Plant Operations prior to conducting window washing or other activities involving elevated interior and exterior work.

EHS (Environment, Health & Safety)

- Maintain and update this written Guideline.
- Provide current regulatory information to the University community performing window washing or elevated interior and exterior work.
- Provide the inspection and testing report documentation until the work is included in the Plant Operations – Facilities Maintenance, Preventative Maintenance Program.

PROCEDURES: University Responsible Party must ensure window washing or other elevated interior and exterior work is performed according to all applicable requirements in the Reference Regulations above, and all contract specifications.

Consider hazards to people and property in the designated work area.

For buildings with existing roof anchor points:

- Ensure anchor points have been inspected, are rated to hold the weight of the equipment, tools, and supplies to be used.

For buildings without roof anchor points:

- Alternative securing plans must be approved by Plant Operations Building Services.

Buildings with identified anchor points:

- Crisler Arena
- Haven Hall
- Life Sciences Institute (LSI)
- Lurie Biomedical Engineering (LBME)
- Michigan Stadium
- NCRC
- Phoenix Memorial Laboratory (PML)
- Ross School of Business
- Taubman Biomedical Science Research Building (BSRB)

**TECHNICAL
SUPPORT:**

All referenced materials are available through EHS at 647-1142.