
BMU Inspection and Certification: Who Is Actually Responsible, and What the Certificate Does Not Tell You

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For a building owner, contracting out the inspection, testing, maintenance, or certification of a building maintenance unit does not, by itself, transfer the owner's underlying responsibility for the condition and safe operation of the permanent access system. The manufacturer, the installer, and the inspecting service company each carry duties of their own — and the regulatory framework distributes named obligations among them — but when the consequences of the system's condition arrive, they arrive at the asset, and the questions that follow are addressed to the owner's posture. In the United States, the periodic inspection framework for permanent powered platforms derives principally from OSHA's powered-platform regulation, 29 CFR 1910.66, which provides for periodic inspection and testing of the installation at intervals set by the manufacturer and not exceeding twelve months, alongside the more frequent maintenance and pre-use checks the regulation and the manufacturer's manual provide for. The certificate produced by that annual inspection answers a narrower question than an owner may assume. The purpose of this article is to state plainly what the certificate answers, what it does not, and where the difference tends to matter.

What the regulations actually require

The US framework for permanent access equipment is assembled from several instruments rather than one. OSHA 1910.66 governs powered platforms for building maintenance: it addresses the installation as a system — platform, hoisting equipment, roof car or davit arrangement, supports, and the building interfaces they depend on — and it establishes the operative requirements for periodic inspection, testing, and maintenance, including the periodic inspection at intervals not exceeding twelve months; the operative intervals and scopes are set in the regulation itself and in the manufacturer's manual, and that is where an owner should look for them. OSHA 1910.27 governs rope descent systems and, since the 2016 walking-working-surfaces rulemaking, requires that anchorages used for rope descent be identified, tested, certified, and maintained, with certification revisited on a defined cycle. A point of precision worth holding: OSHA's obligations run formally to employers, and specific provisions — such as the anchorage certification requirements of 1910.27 — place defined duties on building owners; contractual arrangements can allocate tasks among the parties, but the allocation of tasks and the location of consequence are not the same question. ASME A120.1, currently in its 2021 edition, establishes consensus safety requirements for powered platforms and permanent traveling ladders and gantries used in building maintenance. The window-cleaning industry's consensus standard, IWCA I-14.1, provides an additional industry reference for window-cleaning operations and anchorage practice. Above all of this sit jurisdictional overlays —

several major cities and states impose their own filing, inspection, or licensing requirements on suspended access equipment — and the manufacturer's own maintenance manual, which in practice functions as a compliance document, because both the regulation and the consensus standards defer to it on intervals and scope.

One further layer is easy to miss. A machine designed and manufactured abroad under EN 1808, a principal European standard for suspended access equipment, may carry documentation and design assumptions developed under a different originating regime than the one governing the installed asset — an additional correspondence question that belongs, in the end, to the owner. How that correspondence is established, and where it breaks down, is a subject of its own, addressed separately in this series.

What the annual certificate certifies

A periodic inspection, competently performed, verifies defined things: that the equipment operates through its functional sequences, that required safety devices engage, that visible components show no disqualifying damage or wear, that load-bearing elements pass the tests the inspection scope includes, and that the documentation required to accompany the system is present. That is genuine work with genuine value, and nothing in this article should be read as suggesting otherwise. The certificate that results is a statement that, on the day of inspection, within the scope of the inspection, the system met the criteria the inspection applies.

What the certificate is not — and does not claim to be — is an engineering assessment of the system's condition and remaining life. The distinction is not a technicality. A periodic inspection is bounded by its scope, its duration, its access to the system, and its method. It examines what can be examined from the positions the inspector can safely reach, in the time the inspection allows, against the criteria the inspection applies. It is not designed to answer questions such as: whether wear observed on wire rope guides is early for the system's service life and what that implies about alignment or loading; whether the machine's behavior under load is consistent with its design assumptions; whether components in areas no inspection position reaches have degraded; whether the system as installed still matches the configuration that was originally engineered and accepted; or whether the asset is approaching a point where retrofit planning should begin. Those are engineering questions. The annual inspection was never the instrument built to answer them, and a certificate cannot certify what the inspection did not examine.

The structural condition nobody designed

Where the party that inspects and certifies a permanent access system also holds the service contract for it — or has commercial relationships with the equipment's manufacturer or supplier — the owner should recognize a structural condition. No one designed the arrangement, and it has practical logic: the service company knows the machine. But in that arrangement, the certification may be produced by a party whose own work forms part of the system history being evaluated, and the owner's file is

assembled from within the same commercial chain that supplies, maintains, or inspects the asset. The point is not that any party is acting improperly. It is that information generated within a commercial chain is produced for the purposes and scopes carried within that chain. An owner seeking a separate engineering view of the asset's condition may therefore need a line of sight outside it.

I have reviewed systems that carried an unbroken sequence of annual certificates and also carried conditions — progressive, developing over years — that no document in the file mentioned. The certificates were not fraudulent. They were accurate statements of what the inspections examined. The conditions lay outside what the inspections examined. Both things were true at once, and the owner learned the second one late.

What tends to fall between inspections

Certain categories of condition recur in the gap between what periodic inspection covers and what the system's actual state comprises. Wear that is present but not yet disqualifying, whose rate rather than whose presence is the significant fact. Behavior under load — sounds, movements, drive characteristics — that operators notice and inspection checklists do not capture. Components in positions that cannot be examined from safe access points, which in practice may not have been closely examined by anyone since installation. Corrosion and fatigue mechanisms at interfaces between the machine and the building structure, where two parties' scopes meet and neither fully owns the joint. Configuration drift — modifications, substituted parts, revised counterweights, altered restraint arrangements — accumulated across years of service events, no single one of which seemed material. And documentation decay: manuals, load charts, and acceptance records that thin out across ownership transitions until the institutional memory of how the system was specified and accepted no longer exists within the owner's organization. None of these conditions is exotic. They are the kinds of conditions an engineering examination can be designed to investigate — and they may fall outside the purpose and scope of a routine periodic inspection.

Where the consequences land

The reason the distinction matters is that the consequences of the gap do not distribute themselves according to who held which contract. Whatever the contractual allocation of tasks, the condition remains attached to the owner's asset. An incident on a permanent access system triggers questions — from investigators, insurers, and counsel — that are addressed to the owner's posture: what the owner knew, what records the owner held, what engineering basis existed for continued operation. A certificate file answers some of those questions. It has not, in my experience, answered the ones that follow: whether the owner had engineering visibility into the system's condition, or only a sequence of routine documents produced within the service and supply chain. The same distinction surfaces wherever the owner's posture is examined by a party with something at stake in the answer — an insurer at claim, a counterparty in a transaction, counsel after an event. Retrofit economics

follow the same logic from a different direction: a major BMU retrofit is a capital event, and the difference between planning one and being surprised by one is, in substance, the difference between having engineering visibility early and receiving it late.

What an independent engineering review adds

The routine inspection and the engineering review are different instruments answering different questions, and the point is not to replace the first with the second. The service relationship maintains the machine; the periodic inspection verifies it against its criteria; both continue. What an independent engineering review adds is the layer neither is built to supply: an examination of the system's condition, configuration, and lifecycle posture, conducted independently of the service relationship and the equipment supply chain — producing a record that belongs to the owner. The record establishes what the system's condition actually is, measured against what it was engineered and accepted to be; what the certificates have and have not been covering; and what the owner's technical posture and planning horizon look like on the asset's real timeline rather than on the service calendar. In my experience, owners commission this work in one of three postures: before a triggering event, because the asset matters; at a transition — acquisition, refinancing, change of operator — when representations need verification; or after something has already gone wrong.

The practical posture for an owner

An owner who wants to hold this category of risk properly does not need to become an expert in suspended access engineering. The posture is simpler: know what your certificate actually certifies, by reading the inspection scope rather than the cover page; hold the documentation — manuals, load charts, acceptance records, modification history — as owner's records rather than assuming the service chain retains them; treat operator observations about the machine's behavior as data rather than noise; understand which regulatory framework, or frameworks, your particular machine answers to, especially if it was manufactured abroad; and obtain, at some deliberate point in the asset's life, an engineering view of the system from a party independent of the equipment supply and service relationships. The same engineering questions arise whether they are asked proactively or after an event. What changes is when the owner holds the answers, and what options remain open at that point.

Rauch Safety & Engineering performs this work as the Installed Systems Engineering Review™ — an independent engineering assessment of permanent access systems in operation, conducted independently of the equipment supply chain and service relationship, producing an engineering record that is the owner's to hold. RSE does not sell equipment, perform service work, or compete with the parties who do; its role is to provide an independent engineering record outside those commercial relationships.

Standards designations current as of August 2026 (ASME A120.1-2021; EN 1808:2015; 29 CFR 1910.66, 1910.27). Users are responsible for verifying the current text of any standard or regulation applicable to their project and jurisdiction.

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