REGULATORY COMPLIANCE, INC.
Helping Industries Comply With The Law

July 21, 1998

Docket Management Facility USCG- 1998-3786
U.S. Department of Transportation Room PL-401
400 Seventh Street
SW Washington, DC 20590-0001

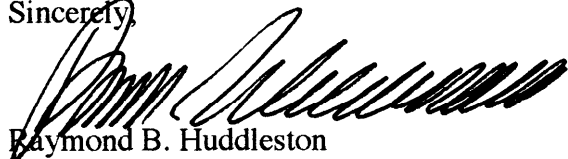Subject: Advance notice # USCG- 1998-3786 — 6

Dear USCG:

This is to comment on the proposed amendments and the comment request put forth by the U.S. Coast Guard (USCG) on June 26, 1998 (FR Vo163 #123). After review of the proposed changes to 46 CFR Part 197 by the Association of Diving Contractors, we have no objection and agree to the recommendations in the report. However, we are concerned that since most of these operations are not supervised by the USCG when they are being performed and in order to recommend effective guidelines for the assurance of the safety and health of commercial diving personnel, we recommend the following:

Commercial diving operations should be required to submit to the cognizant Captain of the Port (COTP) for review and subsequent approval, a Diving Operations Manual (DOM) for commercial diving operations. Similar to the oil transfer facility operations manual which must be submitted for COTP approval, the DOM should address areas as first aid, emergency phones, designation of person in charge, dive procedures, decompression tables, breathing gas equipment test certification, declarations of inspection, etc. and, that this manual be kept on site for COTP inspection.

This would ensure that commercial diving operations have addressed all aspects of safety and will provide the cognizant COTP's with assurance that safety issues for safe diving operations are been addressed. We believe that this would not create excessive paperwork for COTP personnel and will have no adverse financial impact on the commercial diving industry.

If you would have any questions or points of discussion, please don't hesitate to contact us at the below address, phone, or Email.

Sincerely,

Raymond B. Huddleston
QA Manager
Regulatory Compliance, Inc.