

## CDO Ex-Parte Communications Memorandum of Record

Name: Steven J. Janek

Date: 20 October, 2010

Summary: The ADCI, being comprised of dive companies rather than divers, is not in a position to effectively dictate to the best interests of divers, supervisors and tenders on dive teams.

The minimum manning level for any dive team should be five, comprised as follows:

- One supervisor;
- One working diver;
- One tender who will tend only the working diver;
- One diver on standby, dressed, equipped and ready to enter the water; and
- One tender who will tend only the standby diver.

Any dive team composed of less than this will increase the likelihood of failure in the event of an emergency.

Coast Guard's Response: The Coast Guard thanked Mr. Janek for his input and encouraged him to submit his comments directly to the public docket.

Name: Joseph Passero

Date: 21 October, 2010

Summary: 29 CFR 1910.424 Surface-supplied air diving (Part 3) should be changed to the following:

“For ALL Commercial surface-supplied air diving with one diver in the water requires a minimum of five dive-team members: a DPIC (see 29 CFR 1910.410(c)), a diver{the working diver} "who shall be continuously tended [by a tender other than the DPIC] while in the water" (see 29 CFR 1910.425(c)(1)), a standby diver "who shall be continuously tended [by a tender other than the DPIC or the tender for the working diver] while in the water" However, based on the requirements of 29 CFR 1910.421(d) Planning and assessment, the hazard analysis and assessment of the dive will dictate the use of additional personal when underwater conditions and hazards or potential hazards involve: proximity to an underwater suction, no free access to the surface, the possibility of diver entanglement or entrapment, or unknown bottom conditions.”

Coast Guard's Response: the Coast Guard thanked Mr. Passero for his input and encouraged him to submit his comments directly to the public docket.

Name: Roc Taylor

Date: 21 October, 2010

Summary: The minimum manning level for any dive team should be six, comprised as follows:

- One supervisor;
- One designated rack operator;
- One working diver;
- One tender who will tend only the working diver;
- One diver on standby, dressed, equipped and ready to enter the water; and
- One tender who will only tend the standby diver.

Furthermore, additional work would require additional team members to ensure the safe performance of duties.

Coast Guard's Response: The Coast Guard thanked Mr. Taylor for his input and encouraged him to submit his comments directly to the public docket.

Name: Ron Null

Date: 21 October, 2010

Summary: For offshore oilfield operations, a five-man dive team should be the minimum required number. However, in smaller-market operations, such as small inspections in shallow water that require 10 minutes of bottom time, five is an unnecessary number of team members to achieve adequate safety, and such a requirement would create complications in the commercial diving industry.

A greater concern to the safety of three-man dive teams is the practice by “unions and civil marine construction companies” to assign unqualified workers from other fields to serve as dive team members in order to meet the minimum of three.

Such employers cite the unqualified and uncertified workers' experience in performing such duties as evidence that they do not need to be certified by an accredited commercial diving education institution. "Experience" performing dive duties is a gray area and impossible to satisfactorily quantify. Acceptable training levels for satisfying life support and dive supervision roles should be required for all personnel involved in manning a dive team.

Distinguishing between a need for three-man and five-man crews is tricky, and requiring five-man crews in the offshore oilfield domain is a simple solution. However, mandating that non-diving contractors adhere to strict personnel guidelines when filling dive teams for less complex operations will enable a minimum of three members to constitute a safe threshold.

Coast Guard's Response: The Coast Guard thanked Mr. Null for his input and encouraged him to submit his comments directly to the public docket.

Name: Jerry Cottrell

Date: 25 October, 2010

Summary: The minimum manning level for any dive team should be five, comprised as follows:

- One supervisor;
- One working diver;
- One tender who will tend only the working diver;
- One diver on standby, dressed, equipped and ready to enter the water; and
- One tender who will tend only the standby diver.

Coast Guard's Response: The Coast Guard thanked Mr. Cottrell for his input and encouraged him to submit his comments directly to the public docket.