



Neil Hansen

This is a Comment on the **Coast Guard (USCG) Rule: Commercial Diving Operations**

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Comment Period Closed

Mar 9 2009, at 11:59 PM ET

Comment

James, a point of clarification - this directive (CPL 02-00-151) is not an update to the OSHA commercial diving standard - it is an internal instruction to OSHA inspectors to provide guidance and amplification for the interpretation and enforcement of the existing OSHA commercial diving standard (29 CFR 1910 Subpart T/29 CFR 1926 Subpart Y), which remains unchanged. The new directive replaces a similar instruction from 2006 (CPL 02-00-143).

Comments to OSHA indicating a need to change the actual standard will probably not produce any immediate change, unless/until Congress authorizes funding to upgrade the actual standard. This is not to say that such comments should not be made – your comments on the standard are entirely valid. The OSHA commercial diving standard was issued in 1977, and to my knowledge, has not been updated since. There are a lot of other issues with it (allowing penetration and decompression diving in SCUBA, for example), but while OSHA can adjust its interpretation of and enforcement policies regarding existing standards pretty much at will, it cannot so easily rewrite an existing standard or promulgate new regulations - I believe funding from Congress, and a public comment period are required.

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