

Coast Guard Commercial Diving Notice of Proposed Rulemaking Comments

Surface Supplied Air Diving

Requirement	USCG Regulation	Comment
Each diving operation has a primary breathing gas supply;	46 CFR197.432 (b)	Each diving operation should have a primary breathing gas supply and a secondary (reserve) breathing gas supply in addition to the diver-worn “bailout bottle” Emergency Gas Supply (EGS) regardless of depth or duration of dives. (The connections are on all dive manifolds – utilize them!)
(e) <u>For dives deeper than 130 fsw or outside the no-decompression limits—</u> (1) Each diving operation has a secondary breathing gas supply;	46 CFR197.432 (e) (1)	Each diving operation should have a primary breathing gas supply and a secondary (reserve) breathing gas supply in addition to the diver-worn “bailout bottle” Emergency Gas Supply (EGS) <u>regardless of depth or duration of dives.</u>
(e) <u>For dives deeper than 130 fsw or outside the no-decompression limits—</u> (6) A standby diver is available while a diver is in the water; and	46 CFR197.432 (e) (6)	<u>A standby diver should be a requirement for all commercial diving operations.</u> Minimum dive crew manning has been ≥3 for decades. It is ludicrous for ≥2 dive crew members to be topside without the ability to deploy a standby diver. I went through Navy and Commercial dive schools in the 1970s & 1980 and never saw a dive station without standby diver capability. (I’ve been giving the same input to USCG & OSHA since the early 1990s. I would like to see this changed before going on my final terminal leave!)
It’s hard to believe this day in age that Contractors still send out crews without reserve breathing gas and standby diver capabilities . . . but they do! I have heard of it on more than one occasion from new divers making the rounds. The additional cost is minimal considering the possible consequences!		