

Dive Team Staffing Chart and your statement do not match

§ 197.290

Dive team staffing requirements.

(d) Mixed gas commercial diving operations must include a life support technician dedicated for the purpose of operating the mixed gas system.

This requires a minimum of 6 personnel to make one dive. Your Chart shows 5 personnel required to for Surface Gas to make one dive.

Table 197.290—Minimum Dive Team Staffing Size and Composition

Operation	Minimum dive team size	Minimum dive team composition
Saturation diving *	14 **	2 Dive supervisors, 2 Divers, 2 Standby divers (see note 1), 4 Dive tenders, Life-support technician supervisor, Life-support technician, Saturation system technician supervisor, Saturation system technician.
SCUBA	4	Dive supervisor, Diver, Tender (see note 2), Standby diver (see note 1).
Surface-supplied air diving	5	Dive supervisor, Diver, Tender (see note 2), Standby diver (see note 1), Standby diver tender (see note 3).
Surface-supplied diving, mixed-gas	5	Dive supervisor, Diver, Tender (see note 2), Standby diver (see note 1), Standby diver tender (see note 3).

All Surface Gas Diving should require a Life Support Technician and this should be a matter of clear concise regulation. I strongly support § 197.290 (d) and do not support the number of 5 for Surface Gas Diving in your chart. Surface Gas chart should read as below!

Surface-supplied diving, mixed-gas	6	Dive supervisor, Life Support Technician/dedicated, Diver, Tender (see note 2), Standby diver (see note 1), Standby diver tender (see note 3).
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List of Life Support Technician Duties:

1. Analyze all gasses (including o/2) before hoses are hooked up to gas bottles. Make sure that all spare banks are analyzed.
2. Blow out all hoses, as attached from bottles or banks.
3. Check that all fittings on deck whips have proper fittings (high pressure when it isn't regulated at HE O/2 gas supply bank. Ensure all High Pressure Whips have Metal Whip Checks.
4. Ensure all whips/hoses are laid in such a way that they do not come into contact with anchor wire, tugger wires, crane movement or anything that could sever a crush them.
5. Ensure that the diver and the stand by diver have sufficient gas, air and 50/50 to complete the dive and enough 100% O/2 to decompress both divers and run a treatment table.
6. Write a JSA for Rack Operation prior to commencing diving operation. Hold drills, NO surprise drills allowed, with the Dive Supervisor, Divers and Lead Tenders, on loss of gas, loss of regulator, jumping the Stand-by-Diver and use of third hose, prior to commencing dive operations. Brief Supervisor, Diver and Stand-by Diver on planned Decompression prior to the dive.

- 7. Operate the rack during diving operations monitor O2% of all breathing medium used on the dive. Keep the diver's bottom time and in water decompression, write out his Surface Decompression Schedule.**
- 8. Ensure 50/50 is NOT connected to the Rack when the Diver is deeper than 100'. Ensure all 50/50 blown clear of the rack and divers hose after each dive and disconnected from Rack.**
- 9. The Dive Supervisor will check/sign for all decompression times and is overall responsible for all aspects of the dive. This will be done prior to Surface Decompression and ensure the surface decompression is run to that schedule and company policy.**
- 10. Ensure a proper turn-over at the end of his shift. Break down, properly stow and tag rack whips, regulator, gas rack and all Gas Analyzers at the end of the job.**

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Dive Safe! It is profitable and it hurts less!