



Hal Lomax

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

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Due May 20 2015, at 11:59 PM ET

Comment

QUESTION 1: The Coast Guard proposes a SCUBA dive team consisting of four members, based on the assumption that prudent commercial diving operators use SCUBA only when conditions are favorable to the diver and risk is minimal: that is, underwater visibility is greater than 3 feet, currents are less than 1 knot, and dive depth is no more than 100 fsw with no decompression. Is that assumption valid? Should a SCUBA dive team consist of more or fewer than four members? Why? What costs would be incurred and what benefits would be gained by setting the minimum higher or lower than four members? Medical technicians.

Having worked in the commercial diving industry for over 39 years, I can say that SCUBA is not a safe mode of diving, when it comes to working. The diver has a limited supply of breathing gas, no communications and no safety line. SCUBA operations represent a large part of the total diver deaths, and the vast majority of these could have been avoided by not using SCUBA. Having a crew of one hundred would not make SCUBA safe.

QUESTION 2: Should a DMT always be available, either as part of the dive team or at the dive site during a dive? Why or why not? What costs would be incurred and what benefits would be gained by requiring this level of availability?

Underwater work involves the possibility of pressure related injury and illness. DMTs are trained to deal with pressure related injury and illness. Any delay in proper treatment of pressure related injury or illness substantially decreases the chances of successful treatment. A DMT should be always available on every dive site. Furthermore, if the DMT is included in the diving rotation, there should be more than one on the crew. The additional cost is pennies per hour.

QUESTION 3: Under one alternative to our proposals, the Coast

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Guard would not directly
over see TPO audits of commercial diving operations and would allow
TPOs to self-certify that
their audits comply with Coast Guard standards. However, we would
indirectly oversee audits
by investigating reported marine casualties and associated civil
penalty proceedings. Under a
second alternative, neither the Coast Guard nor a TPO would conduct
inspections or audits of
commercial diving operations. The only compliance oversight would
come through casualty
investigations and civil penalty proceedings. The Coast Guard
requests input on what merits and
drawbacks may be associated with these two alternative approaches

I am not at all comfortable with any talk of Third Party Organizations
when it comes to safety regulations
and compliance. The United States Coast Guard ought to perform any
inspections or audits required in
my opinion. Waiting for a casualty investigation to get involved is not
the right approach.