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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

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My comments/suggestions:

Current rule - 197.241 Standby divers.

(a) No standby diver may perform any other duty that might interfere with his or her duties as a standby diver while another diver is in the water.

(b) Each standby diver must

- (1) Be fully dressed and able to enter the water in less than 1 minute and when directed to do so by the dive supervisor;
- (2) Stay in the immediate location of the dive and dive support equipment while a diver is in the water; and
- (3) Stay aware of events and conditions relevant to the dive.

Additions to stand-by divers:

Stand by diver must don all gear and ensure proper operation in the water and report this status to the Dive Supervisor prior to entering stand by status.

Stand by diver must be adequately rested and fit for duty to perform rescue of diver(s) in the water. For example, have a clear enough time out of water to ensure the stand-by diver will not be in danger of developing the bends in a the reasonably expected time to submerge, assist, and ascend with the in-danger diver.

Stand-by diver must carry an additional bail-out bottle to further support the potential distressed diver.

Rescue Oxygen All Dive Supervisors and Life Support Technicians each must have ready access to medical oxygen for immediate treatment of potential health conditions of persons subjected to Barotrauma. This medical oxygen must be clearly marked as such and set aside so as not to be confused with other high pressure bottles. A medical oxygen aid card must be affixed to the medical oxygen bottle or cart to clearly show when and how to use this medical oxygen to help treat diving related injuries with oxygen.

All equipment must be tested prior to that operation, including rescue equipment and outfits to ensure a rapid response to an emergency

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situation. The testing results must be told to the Dive Supervisor and Life Support Technician.

All dives, regardless of depth, must develop a job specific, written dive operations plan and rescue plan. Included must be verified addresses and contact phone numbers of the nearest medical facility as well as the nearest medical facility that can treat barotrauma via a pressure chamber or other equivalent.

All commercial dive jobs must notify the local USCG safety office of this event with Dive supervisors name, contact information (address and cell phone), location of event, expected job length, and any potential hazards pre-identified (The written dive operations plan and rescue plan can meet all of these requirements. Notification must be 3 business days before the intended event.

The USCG should ensure (advertise and outreach) all commercial diver operators in their AOR of the CG expectations and the appropriate place to contact about upcoming dive operations or questions. The USCG should develop a plan to train its members (AD, Reserve, Aux) on the standards who can assist in inspections much like the fishing vessel decal program.

Dives that likely involve substantial entanglement hazards (such as sunken fishing vessels with multiple rigging lines or other snags) must have additional personnel or other retrieval methods to assist the diver immediately. These entanglement hazards must be identified and plans developed on how to avoid or minimize the risk of entanglements. Both the primary and stand-by diver must agree on hazards and mitigation methods prior to diving the site.

The USCG should train marine science technicians or other marine safety personnel with dive experience to visit these sites for assessment of safety equipment and hazard awareness to help identify potential issues. The USCG should spot check these events for a safety advisory visit in nature and not for regulatory control. While not experts, they could ask questions and verify the minimum safety requirements are in place.

Each diver must be equipped with a secondary breathing apparatus or bailout bottle of appropriate size for intended escape depth/complexity in case of catastrophic failure of the primary system. This secondary system must be held to all the same testing methods as the primary breathing system.

Salvage diving is commercial diving that has inherent risks of entanglement or vessel/structure movement that can easily kill or trap a diver and should have all the protections of other commercial dive operations unless the unified command or other formal supervisory authority deems the conditions of that dive or operation can officially lower some set standards to address the lower risk profile of the operation.