

Interagency Collaboration, One Gulf Policy

I request that the Office of Management and Budget: Direct the Coast Guard and OSHA to come to agreement on one of two options.

- 1) OSHA bring their Commercial Diving CFRs in line with the higher standard in the Coast Guard CFR's or at a minimum
- 2) OSHA become a member of: Bureau of Safety and Environmental Enforcement (BSEE) Interagency Collaboration

We have a major problem with Jurisdiction on Regulation/CFRs governing Commercial Diving in the Gulf of Mexico and the ports and harbors of the USA.

The Coast Guard covers anywhere you are diving off a Coast Guard Licensed Vessel, in the Outer Continental Shelf, Deep Water Ports or any docking facility that comes under Homeland Security. OSHA Covers inland out to the Three Mile Limit.

There are three major problems for those contracting diving services, offering diving services performing diving services and regulation diving services.

- 1) OSAH & Coast Guard CFRs differ on Minimum manning Levels.
 - a. A diving company can have two diving jobs going on inside the 3 Mile limit. One coming under OSHA CFRs the other under Coast Guard CFRs. The OSHA job diving off a small platform and the Coast Guard a boat with a licensed Captain or in a deep water port.
 1. Manning levels requirements are different OSHA Minimum manning level 3 , Coast Guard Minimum manning 5
- 2) Reporting and Investigation of Serious Diving Incidents Standards and paperwork are different see Attached.
 - a. This is an extra burden on the employers and employees
 - b. Currently OSHA nor the Coast Guard have a satisfactory way of investigating serious accidents and issuing a timely reports. What they do have is vastly different.
- 3) Under the current CFRs both OSHA and the Coast Guard the Dive Supervisor is the only person listed as having any responsibility. They both require only that he be appointed by name and require no proof of knowledge or training for the position. (See Attached Petition)

All the following Government Agency with the exception of OSHA have a, **Interagency Collaboration with BSEE:** U.S. Coast Guard (USCG), U.S. Department of Energy (DOE), U.S. Department of Transportation, Pipelines and Hazardous Materials Safety Administration (PHMSA), Bureau of Transportation Statistics, U.S. Environmental Protection Agency, National Oceanic and Atmospheric Administration, U.S. Army Corps of Engineers, Interagency Coordinating Committee on Oil Pollution Research (ICCOPR), Bureau of Ocean Energy Management, Office of Natural Resources Revenue, U.S. Fish and Wildlife Service. (See Attached Interagency Collaboration)

“BSEE's responsibilities for the regulation of offshore energy development on the U.S. Outer Continental Shelf (OCS) often overlap with the responsibilities and regulations of other federal agencies. The Bureau works closely with our partners to ensure we approach this shared regulatory space in an efficient and consistent manner. The Bureau also leverages its limited resources through agreements with federal partners and other agencies through memoranda of understanding or agreement (MOU, MOA) and interagency agreements (IAA).” See Attached

In closing I would like to point out to the Office of Management and Budget that although the working force of commercial divers is small, estimated between 3,000 and 5,000 working divers, we dive in or on ever power plant to include Nuke plants, harbors, bridges, offshore oil and water pumping station in this country. All of which I consider critical infrastructure that should come under the Coast Guards Homeland Security function.

Sincerely,
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Quality Manager & ISO Team Member



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Dive Safe! It is profitable and it hurts less