

March 3 2011

Comment Reporting and:

OHSA CFR 29 1910 and Coast Guard 46 CFR 197 come into conflict on the Continental Shelf and in our Harbors, Lakes and Rivers. One applies when diving from any Licensed Vessel, Coast Guard 46, the other applies when diving from anything other than a Licensed Vessel, OSHA 29.

A company can have two dive teams, doing the same job, in the same area; One under OSHA because they are not diving from a licensed vessel and the other under Coast Guard because they are. OSHA and the Coast Guard require different reporting to different agencies, different manning levels and different responsibilities. This confusion is one of our biggest safety problems and is not cost effective.

I would suggest that at the very least OSHA and the Coast Guard should come to a common minimum standard in the following areas.

- 1) Reporting.
- 2) Manning Levels.
- 3) Team Responsibilities.

This would reduce cost to both the diving contractor and the government. It would also remove the confusion and make this a safer business. As the Coast Guard is now reviewing its 46 CFR 197, I would suggest that it is a good time to bring the OHSA and Coast Guard CFRs into agreement.

Sincerely

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Dive Safe, it is Profitable and Hurts Less!