



**WHARF, DOCK BUILDERS AND PILE DRIVERS,  
HOUSE MOVERS, UNDERPINNING, SHORING & CAISSONS  
LOCAL UNION No. 454**

**UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA**

1803 SPRING GARDEN ST., PHILA., PA 19130  
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MEETS THIRD FRIDAY



DENNIS SZUMSKI  
Business Representative

JAMES BOYLE, JR.  
President

DAVID RONCINSKE  
Recording Secretary

JOHN P. McANENY  
Financial Secretary

SAMUEL C. CHAMBERLAIN, III  
Treasurer

April 12, 2011

Docket No. OSHA-2011-0008]

Standard on Commercial Diving Operations; Extension of the Office  
of Management and Budget's (OMB) Approval of Information Collection  
(Paperwork) Requirements

AGENCY: Occupational Safety and Health Administration (OSHA), Labor.

**RE: ACTION: Request for public comments.**

My name is David Roncinske. I am a representative with the Wharf & Dock Builders, Pile Drivers & Divers, Local Union #454. Our members and signatory contractors serve the heavy foundation, marine construction, and commercial diving markets through out our geographic territory. We build foundations for bridges and buildings of any design, waterfront structures of any type, and provide any commercial diving services that may be required. The territory of Local Union #454 spans Philadelphia and the eight surrounding counties in Pennsylvania, the Southern half of New Jersey, all of Delaware, and the North Eastern Shore of Maryland. Our Union is affiliated with the Metropolitan Regional Council of Carpenters of Philadelphia and Vicinity, of the United Brotherhood of Carpenters and Joiners of America.

There are 60 commercial divers who are members of Local Union #454. Nationwide there are approximately 1,000 commercial divers represented by the UBC&JA working on an annual full-time basis in every facet of the commercial diving market. There is no company or organization that represents more commercial divers than those represented by the UBC&JA.

Our office is writing in response to the request for public comment pertaining to the efficiency of the record keeping requirements as listed under CFR 29 1910 Subpart T. Our signatory contractors have all stated that the requirements are hard to meet.... due solely to the format by which the requirements and the over all regulations are listed. The current format of CFR 29 1910 Subpart T does not facilitate an efficient system of records keeping because one has to read and interpret how each requirement is related to

their particular companies operations. The most common solution suggested to this most pressing problem is to develop a table and chart format that simply lists each requirement by subject. In this format a contractor can quickly go down the line and identify what subjects apply to their operations and what subjects do not.

The US Army Corp of Engineers and the Oil and Gas Producers Association both utilize a chart and table format when listing commercial diving procedures. This format should be adopted by OSHA and used to list both the record keeping requirements and the commercial diving procedures. This change would benefit all parties by streamlining record keeping, clarifying safety requirements, and enhancing the industry over all by increasing standardization in both of these aforementioned areas.

If there are any changes to be made to the way in which records pertaining to CFR 29 1910 Subpart T are collected and/or retained, our office would like to participate in the process by which those rules are changed.

We look forward to working with you and your agency regarding this matter. If we can provide you with any additional information or assistance in reference to this subject please don't hesitate to ask.

Sincerely,



DAVID RONCINSKE  
Representative

cc: Edward Coryell – EST – MRC