



Comment from Roat, John; Private Citizen

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This is a Comment on the Occupational Safety and Health Administration (OSHA) Notice: [Standard on Commercial Diving Operations; Extension of the Office of Management and Budget's \(OMB\) Approval of Information Collection \(Paperwork\) Requirements](#)

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Secretary of Labor Thomas E. Perez "No one should have to sacrifice their life for their livelihood, because a nation built on the dignity of work must provide safe working conditions for its people." The only thing OSHA's paperwork collections system protects is the dive company and those contracting the job.

In Plain English: OSHA's method of gathering information is not adequate! Five days before you even have to report a death assures that any interviews and investigation, will be weeks if not months after the event. OSHA's system of classifying a lost diver is under whatever trade he is working for; Dockworker, Fisherman, Plant Operator etc., this obscures the true statistics and makes it difficult to get any lessons learned from a

report when they are filled. If they can regulate Commercial Diving they can have a classification of Commercial Diver, they have none. The attached is fine example of an OSHA Accident report from their current paper work system. The hot links on the attached PDF are active. The problem is they nor the ones on OSHA page take you anywhere. In other words you can get no more information. Same Document at OSHA Web Page:

https://www.osha.gov/pls/imis/accidentsearch.accident_detail?id=201262664

You will note Occupation Listed as Not Reported.

Accident: 201262664 - Employee Drowns While Cleaning Pond

Accident: 201262664 -- Report ID: 0524200 -- Event Date: 11/03/2009

Inspection	Open Date	SIC	Establishment Name
313893406	11/03/2009	7389	Us Aqua Vac, Inc.

At approximately 1:00 p.m. on November 3, 2009, Employee #1, a diver, was performing dredging operation in a retention pond. Employee #1 was using a surface supplied air. Attempts were made to rescue Employee #1 by another diver. Employee #1 was retrieved from the retention pond by the fire department rescue diver and air lifted to the hospital. Employee #1 drowned.

Keywords: drown, diver

Inspection	Age	Sex	Degree	Nature	Occupation
1 313893406					Occupation not reported