

Hart, Marley@DIR

From: Shiraishi, David - OSHA <Shiraishi.David@dol.gov>
Sent: Wednesday, November 26, 2014 10:08 AM
To: Hart, Marley@DIR
Subject: FW: California Diving Standards vs CFRs
Attachments: Cal vs OSHA - Diving Standards.xlsx

Follow Up Flag: Follow up
Flag Status: Flagged

Marley,

FYI.

VR,

David

From: Butler, Steve - OSHA
Sent: Thursday, August 07, 2014 8:02 AM
To: Wulff, James - OSHA
Subject: California Diving Standards vs CFRs

Jim:

In response to a complaint about the Cal-OSHA Commercial Diving Standard from an Association of Diving Contractors Int'l, our office conducted a review of the Cal-OSHA standard.

The results of this review are forwarded for your information.

R/Steve

From: DeAngelis, Nicholas - OSHA
Sent: Wednesday, June 18, 2014 2:34 PM
To: Sollers, Chantel - OSHA
Cc: King, John E. - OSHA; Lahaie, Eric - OSHA; Butler, Steve - OSHA; Rossi, Paul - OSHA; Comolli, Paul M. - OSHA
Subject: California Diving Standards vs CFRs

Chantel

This is the follow up information to our meeting on 6/17 at 1015 concerning the California Diving Standards vs the CFR Standards.

The California Standard in question are: California Code of Regulations, Title 8, Section 6050-6063:
<http://www.dir.ca.gov/Title8/sb7g26.html>

Attached you will find an excel spreadsheet with 4 worksheets. The first being a Definitions page outlying what different words are defined per the two standards. The second worksheet is the CA diving, the third is CA Comm Diving, and last is CFRs not covered by Cal. I took all the CA standards and provided a side by side comparison in the OSHA CFR standards we had that are related. As we discussed the color coding system works the following:

Red - Does not meet OSHA standard

- Yellow – Need further investigation to see if Cal standard meets or exceeds OSHA standard
- Green – Meets or exceeds OSHA standard
- White – Additional Cal standard that may or may not comply with the OSHA standard

In general the big ticket items that really concern Maritime Enforcement of all the red items are:

- | | | | | |
|----|-----------------------|----|----------------------|--------------------------------------|
| 1. | CFR 1910.410 (c)2 | vs | Cal 6052 (c)(1)(A) | Dive Location |
| 2. | CFR 1910.424 (b)(1) | vs | Cal 6056 (a)(1)(A) | Scuba Maximum Depth 130fsw vs 190fsw |
| 3. | CFR 1910.424 (b)(2) | vs | Cal 6056 (a)(1)(B) | Decompression Chamber location |
| 4. | CFR 1910.424 (b)(3) | vs | Cal 6056 (a)(1)(C) | Line-tended 1knot vs 3knots |
| 5. | | | Cal 6056 – a(5)(A-D) | Hookah |
| 6. | 1910.440(b)(3)(i-vii) | vs | Cal 6058 (b)(3)(A-F) | Depth time profile |

These Items California didn't address

7. 1910.424 (b)(4) – Scuba Confined Spaces (Cal might argue 6056 (a)(2)(D) covers this but we would disagree
8. 1910.430 (d)(3) – Buoyancy compensator
9. 1910.430 (d)(4) – inflatable flotation device
10. 1910.403 (h)(1) – Surface-supplied air – non return valve

On a side note California did exceed our standards when it came to Medical Requirements of the Dive Team -6053 and in parts of Equipment and Requirements - 6057

Also the link provided will give you our OSHA Commercial Diving Operations Directive – CPL 02-00-151. In the Directive you will find the following:

https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=DIRECTIVES&p_id=4995

1. OSHA Commercial Diving Operations Directive - Q and A section that covers “Hookah rigs” which we don't allow – Question 7 Appendix A pg4
2. OSHA Commercial Diving Operations Directive – List of the States and whether they are under federal or state coverage for diving -Appendix B pg6

The states that have their own diving standard are: California, Hawaii, Michigan, Oregon, and Washington. After research into the other states that have their own diving standards only California drastically varies and in many cases does not meet or exceed our standards.

Anything else please let me know

Nick DeAngelis
 Dept. of Labor - OSHA - Maritime Enforcement
 202-693-2186