

# Snorkeling and Scuba Diving Policy

PS-EHS-08



## About This Policy

**Effective Dates:**

11-18-2016

**Last Updated:**

11-18-2016

**Responsible University Administrator:**

Office of the Executive Vice President for University Academic Affairs

**Policy Contact:**

University Environmental Health and Safety

[iuehs@indiana.edu](mailto:iuehs@indiana.edu)

## Scope

The following snorkeling and scuba diving activities are covered by this policy:

- Snorkel or scuba diving activities that take place on University property;
- Anyone participating in snorkel or scuba diving activities as part of a University class or University program; or
- Employees participating in or supervising snorkel or scuba diving activities as part of their University employment.

Participants may include employees; students; guests utilizing University facilities, equipment, and services; and contracted organizations of the University.

## Policy Statement

Indiana University is committed to 1) ensuring the safety of its students, employees, and visitors; and 2) complying with all applicable regulatory environmental, health, and safety requirements.

University faculty, staff and students perform diversified tasks in various confined water and open water settings to further education through scientific, recreational, instructional, and academic activities. Additionally, non-University organizations and individuals engage in similar activities as part of Indiana University programs and must comply with the guidelines established by the [University Diving Safety Program \(DSP\)](#).

Indiana University operations that involve snorkeling, scuba diving, or scuba-related equipment use or handling are subject to the minimum requirements set forth by Occupational Safety and Health Administration (OSHA), World Recreational Scuba Training Council (WRSTC), and additional nationally or internationally recognized scuba diving certification agencies. These regulations and standards, in addition to University guidelines, are compiled within the [DSP](#), and impose significant educational and operational responsibilities on the University's faculty, staff, students, and guests.

The following briefly identify general University snorkeling and scuba diving requirements and specific areas of work that are enforceable by this policy. Compliance with federal, state, and local regulations is also required.

1. The Diving Safety Officer (DSO) and the Diving Control Board (DCB) shall review and approve in advance all snorkeling or scuba diving activities that are covered by this policy.

2. Snorkel and scuba dives shall consist of no less than two members. Such dives shall be planned according to the competency of the least experienced diver. Solo diving is prohibited.
3. Participants shall maintain continuous, close contact with their buddy and be in a position to render assistance at all times.
4. The decision to snorkel or dive is that of the individual. A snorkeler or diver may refuse to dive, without fear of penalty, whenever he/she feels it is unsafe for him/her to make the dive. An individual may participate in activities covered by this policy only after signing a liability waiver approved by the Office of the Vice President and General Counsel.
5. All snorkeling and scuba diving must occur only with equipment that conforms to the standards set forth by the [Academic Diving Manual \(ADM\)](#). Abiding by minimum standards are required and essential to protect the health and safety of University faculty, staff, students, and guests.
6. All diving equipment, regardless of ownership, used as part of University program is subject to inspection and approval by the DSO and DCB. Equipment inspection and tests shall occur in accordance with [ADM](#) and manufacturer specifications.
7. Breathing air for scuba diving shall meet the specifications as set forth by [OSHA 29 CFR 1910.134](#) and by the [ADM](#).
8. Only personnel authorized by the DSO shall perform routine operation and maintenance of breathing air compressors and compressed gas cylinders, in accordance with the [ADM](#) and manufacturer specifications.
9. Compressed gas cylinders used for scuba diving or to support scuba diving activities shall meet the specifications set forth by [OSHA](#), Department of Transportation ([DOT](#)), and [Compressed Gas Association](#).
10. Any diver may deviate from the requirements of the [ADM](#) to the extent necessary to prevent or minimize a situation, which is likely to cause death, serious physical harm, or major environmental damage. A written report of such actions must be submitted to the DSO and the DCB explaining the circumstances and justifications, in advance if possible.
11. Any rental of University diving or snorkeling equipment for use outside of the scope of this policy must be pursuant to an agreement approved by the DSO, the Office of the Vice President and General Counsel, and Insurance, Loss Control and Claims (INLOCC).

## Reason For Policy

This policy and associated procedures set Indiana University's expectations in the area of snorkeling and scuba diving safety and associated equipment use and handling, toward the goal of protecting individuals, ensuring effective operations, and satisfying federal, state, and local regulations, as well as industry standards. Indiana University's [Principles of Ethical Conduct](#) specifically mentions a culture of compliance with laws, regulations and policies; ethically conducting teaching and research; and promoting health and safety in the workplace.

## Procedure

### General Reporting and Records Management

Snorkeling plans, dive plans, and emergency management plans shall be submitted and filed with the DSO by the activity supervisor or leader before commencement of operations. Such plans shall be submitted 30 days in advance of the planned activity for approval by the DSO and DCB.

Prompt reporting of snorkeling or dive-related illnesses, injuries, or incidents is essential to protect the health and safety of University faculty, staff, students, and guests. Reports shall be submitted to DCB through the DSO via the IU Incident Report Form within seven days of the incident, if possible. Dangerous accidents and life-threatening incidents must be reported immediately to the DCB through the DSO.

University employees and University scientific divers shall record all open-water scuba dives in a [University Diver Log](#). The log shall be submitted to the DSO in no case longer than one month after documentation of the last dive unless approved by the DSO. The DSO shall retain records indefinitely for historical purposes.

The DSO shall maintain permanent records for each individual **scientific diver** certified. The file shall include evidence of certification level, results of current **physical examination**, training records, diver logs, and other pertinent information deemed necessary.

Records and documents required by this policy shall be retained for seven years. Exceptions include University diver logs, project and activity logs, and **ADM** revisions, which shall be retained indefinitely by the DSO.

The results of scuba-related equipment inspection and tests shall be submitted and retained by the DSO in a formal log until the equipment is withdrawn from service. This log includes equipment such as breathing air compressors and compressed gas cylinders.

### **Scientific Scuba Diving**

University Scientific Diver certifications are conducted in a manner that will maximize protection of its divers from accidental injury or illness. Section 4 of the **ADM** shall be referenced for University participants engaged in scientific scuba diving.

No person shall engage in scientific diving activities as part of a University program or as part of their University employment unless he/she holds a current and valid University Scientific Diver certification to the level of the proposed activity issued by the DSO or the DCB or is a Scientific Diver-in-training or undergoing Scientific Diver recertification.

Additional detailed procedures and information regarding this policy shall be reviewed on the Diving Safety Program's website: <https://protect.iu.edu/environmental-health/diving/index.html>.

### **Responsibilities**

Diving Control Board has authority over snorkeling and scuba diving activities conducted as part of an Indiana University program. The board is responsible for:

- Reviewing and approving all snorkeling and scuba diving activities that are covered by this policy;
- Identifying and implementing changes to this policy through IUEHS;
- Reviewing snorkeling and scuba diving incidents, or dangerous accidents, and recommending corrective actions to IUEHS.
- Formalizing University diving procedures and standards;
- Recommending use of new dive-related equipment and techniques;
- Serving as a technical reference for snorkeling and scuba diving activities for the purposes of instruction, recreational diving, and scientific diving and commercial diving;
- Formalizing and developing University diving procedures and standards as documented in the ADM;
- Taking corrective actions in the case of unsafe diving practices or in violation of the ADM, inclusive of guidance, retraining, or suspension of further diving; and
- Serving as a board of appeals to consider diving-related problems.

Additional information about the DCB may be found at <https://protect.iu.edu/environmental-health/diving/index.html>.

University Environmental Health and Safety (IUEHS) is responsible for:

- Ensuring compliance in all University programs and activities concerning snorkeling or scuba diving, and associated equipment, in accordance with federal, state, local, and industry standards, as well as standards set forth by the University **ADM**;
- Providing and documenting applicable training for University employees, students and guests concerning the requirements of this policy and their responsibilities;
- Surveillance and maintenance over University divers' **medical screening records**, **dive logs**, **incident reports** and training records;

- Providing guidance for preparation of documents and reports required by this policy;
- Assisting University employees, students, and guests with risk assessment and risk mitigation including recommendations by the DCB for training, equipment use and handling, and project and activity emergency management;
- Performing periodic inspections of breathing air compressors, high pressure fill stations, scuba cylinders, and scuba diving equipment to confirm compliance;
- Communicating snorkeling or scuba diving-related injuries, illnesses, or incidents to appropriate University personnel and industry agencies, as necessary;
- Suspending snorkeling and scuba diving operations where a lack of compliance is considered unsafe or unwise according to the DCB; and
- Acting as the point of contact between Indiana University and the governmental entities charged with enforcing the regulatory requirements represented in this policy.

University Departments, Supervisors, and Project or Activity Leaders are responsible for:

- Reviewing and adhering to this policy, supplemental information linked herein, and applicable regulations;
- Ensuring that all participants are trained and take seriously their roles in implementing the requirements of this policy;
- Communicating and registering planned snorkeling and/or scuba diving activities in a timely manner; and
- Promptly reporting to the DSO as described in the ADM.

Individual Snorkelers, Scuba Divers and Equipment Handlers are responsible for:

- Reviewing and adhering to this policy, supplemental information linked herein, and applicable regulations;
- Ensuring they are trained and take seriously their roles in implementing the requirements of this policy; and
- Promptly reporting to the DSO as described in the [ADM](#), where appropriate.
- Taking responsibility for their state of health/impairment status before diving.

## Definitions

**ADM** – Academic Diving Manual.

**Commercial Diving** – diving involving industrial construction that takes place underwater. Examples of such include placing or removing heavy objects underwater; inspection of pipelines and similar objects; construction; demolition; cutting or welding; or the use of explosives.

**DCB** – Diving Control Board; an oversight body that governs the DSP with ultimate authority over all aspects of diving and diving safety conducted as part of an Indiana University program.

**DSO** – Diving Safety Officer; individual responsible for the administration of the DSP.

**DSP** – Diving Safety Program; IUEHS program through which the DCB governs all diving and diving safety activities.

**Indiana University Property** – Buildings, grounds, and land that are owned by Indiana University or controlled by Indiana University via leases or other formal contractual arrangements to house ongoing IU operations.

**Industry Standards** - Occupational Safety and Health Administration, World Recreational Scuba Training Council, Professional Association of Diving Instructors, etc.

**Recreational Diving** – scuba or snorkel diving performed as part of a leisure or educational activity to depths shallower than 130 feet (40 meters) and within no-stop decompression limits, as defined by industry dive

tables and dive computers. Recreational Diving does not include performing tasks associated with scientific or commercial diving.

**OSHA** – Occupational Safety and Health Standards.

**Scuba** – Self Contained Underwater Breathing Apparatus.

**Scuba Diving** – an activity that requires participants to breathe compressed gas underwater.

**Scientific Diving** – scuba diving performed solely as a necessary part of a scientific, research, or educational activity by employees whose sole purpose for diving is to perform scientific research tasks (29CFR1910.402). Scientific Diving does not include performing any tasks usually associated with commercial diving such as: placing or removing heavy objects underwater; inspection of pipelines and similar objects; construction; demolition; cutting or welding; or the use of explosives.

**Snorkeling** – or skin-diving, is the practice of swimming on or through a body of water while equipped with a diving mask, snorkel, and usually fins. A weight system with a quick release mechanism or a wetsuit may be worn as part of this activity.

**IUEHS** – Indiana University Environmental Health and Safety.

## Sanctions

Failure to follow established procedures and training may subject employees to progressive disciplinary action, up to and including dismissal, in accordance with University policies. IUEHS has the authority to immediately halt non-compliant activities.

## Additional Contacts

Samuel Haskell, Diving Safety Officer, Environmental Health and Safety, Indiana University-Bloomington	812-856-5860	<a href="mailto:sihaskel@indiana.edu">sihaskel@indiana.edu</a>
Robert Kessler, Physical Activity Instruction Program Coordinator, School of Public Health-Bloomington, Indiana University-Bloomington	812-855-4232	<a href="mailto:rkessler@indiana.edu">rkessler@indiana.edu</a>
Environmental Health and Safety, IUB	812-855-6311	<a href="mailto:iuehs@indiana.edu">iuehs@indiana.edu</a>
Environmental Health and Safety, IUPUI	317-274-2005	<a href="mailto:ehs@iupui.edu">ehs@iupui.edu</a>
Environmental Health and Safety, Indiana University Regional Campuses	219-981-4230	<a href="mailto:regehs@iu.edu">regehs@iu.edu</a>

## History

This policy was established in 2016.

## Related Information

[Compressed Gas Association](#)  
[Indiana University Academic Diving Manual](#)

National Association of Underwater Instructors (NAUI)  
OSHA Scientific Diving Exemption, Appendix B to Subpart T of Part 1910  
OSHA Alternate Conditions under § 1910.401(a)(3) for Recreational Diving Instructors and Diving Guides, Appendix C to Subpart T of Part 1910  
OSHA Air Compressor Systems § 1910.430  
OSHA Compressed Gas Cylinders § 1910.101  
U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration – Cylinders  
Professional Association of Diving Instructor (PADI)  
World Recreational Scuba Training Council (WRSTC)  
OSHA Commercial Diving Operations § 1910

## **Related Forms**

IU After Action Report  
IU Assumption of Risk and Release from Liability – Snorkeling and Scuba Diving  
IU Assumption of Risk and Release from Liability – Snorkeling and Scuba Diving for MINORS  
IU Diver Log  
IU Incident Report Form – Snorkeling and Scuba Diving  
IU Medical Form – Scuba Diving and Snorkeling Activities  
IU Project Activity Information Request Form – Snorkeling and Scuba Diving  
IU Scientific Diver Application