

U.S. Department of
Homeland Security

United States
Coast Guard



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16742
CG-MMC Policy Letter
No. 01-17
March 10, 2017

From: M. Medina
COMDT (CG-MMC)

A handwritten signature in blue ink, appearing to be "M. Medina", written over the printed name and title.

To: Distribution

Subj: GUIDELINES FOR ISSUING ENDORSEMENTS FOR TANKERMAN PIC
RESTRICTED TO FUEL TRANSFERS ON TOWING VESSELS

1. Purpose. This policy letter provides guidance for issuing Merchant Mariner Credential (MMC) endorsements of Tankerman Person In Charge (PIC) Restricted to Fuel Transfers on Towing Vessels. The endorsement will be issued in accordance with the provisions for a restricted tankerman endorsement (46 CFR 13.111(a)), in order to meet the requirement of 33 CFR 155.710(e)(1).
2. Action. The Coast Guard will use this policy as a guide to issue endorsements to personnel designated as a PIC of the transfer of fuel oil under 33 CFR 155.700 on a towing vessel inspected under 46 CFR Subchapter M. This action was prompted by the final rule published by the Coast Guard on June 20, 2016 (81 FR 40004).
3. Directives Affected. None.
4. Background.
 - a. The Coast Guard published a final rule, Inspection of Towing Vessels (Subchapter M) 81 FR 40004 which became effective on July 20, 2016. Subchapter M requires towing vessels as described in 46 CFR 136.105 to obtain a Certificate of Inspection (COI). This requirement will be phased in over a six year period as described in 46 CFR 136.202. All vessels subject to Subchapter M must have a valid COI by July 19, 2022.
 - b. The provisions in 33 CFR 155.710(e)(1) require that the PIC on board inspected vessels transferring fuel oil requiring a Declaration of Inspection meet one of the following conditions:

- i. hold a valid MMC authorizing service as a master, mate, pilot, engineer, or operator as per 46 CFR Part 11, aboard that vessel; or
- ii. hold a valid MMC endorsed as Tankerman PIC as per 46 CFR Part 13.
- c. Persons designated to be in charge of fueling operations on uninspected towing vessels are not required to hold an MMC with either an officer endorsement or a Tankerman PIC endorsement as long as they hold a Letter of Designation (LOD) as described in 33 CFR 155.715. The towing vessel's transition to inspected status triggers the requirement that PICs must hold an MMC with a tankerman PIC endorsement if they are not serving as a credentialed officer on the vessel in accordance with 33 CFR 155.710(e)(1).

5. Discussion.

- a. Title 46 CFR Section 13.111 establishes the requirements to obtain a tankerman endorsement restricted to specific cargos, specific vessels or group of vessels, facilities, and/or employers. Title 46 CFR Section 13.201 establishes the requirements for original application for a tankerman PIC endorsement. The Coast Guard reviewed these requirements taking into account the reasons for the change from an LOD to a PIC endorsement, the PIC requirements for inspected vessels, and the special circumstances on towing vessels. It is a common practice for towing vessels to engage in operations such as midstreaming – fueling while holding the vessel midstream – where it is not possible for the officers holding merchant mariner credentials to serve as PIC for the fueling transfer. Additionally, the requirements in 46 CFR, Part 13 were developed primarily for the transfer of cargo, the Coast Guard recognizes that not all the training and service requirements are appropriate for towing vessels when transferring fuel. Taking this into account, the Coast Guard will issue tankerman PIC endorsements restricted to fuel transfers on towing vessels with a classification of either Dangerous Liquids (DL) or Liquefied Gas (LG), provided the mariner satisfies the conditions as described in the subsequent paragraphs. Mariners may also choose to meet the full requirements in 46 CFR Part 13 for a Tankerman PIC endorsement with the appropriate classification of either DL or LG.
- b. Requirements for Original Application. To qualify for an Original Tankerman Person In Charge (PIC) Restricted to Fuel Transfers on Towing Vessels, the applicant must:
 - i. be at least 18 years old; and submit an application (form CG-719B) in accordance with 46 CFR 10.209, including the consent for a National Driver Register check (46 CFR 10.209(d)(1)).
 - ii. pay the evaluation (\$95) and issuance (\$45) fees as described in 46 CFR 10.219.

- iii. hold a valid Transportation Worker Identification Card¹ (TWIC) or have enrolled² for a TWIC in order to meet the application requirements for a determination of safety and suitability as described in 46 CFR 10.209(e)(1) and (3). TWIC fees are periodically changed by the Transportation Security Agency and can be found at: www.tsa.gov/for-industry/twic.
- iv. meet one of the following service requirements:
 - 1. provide a LOD as PIC of a fuel transfer as described in 33 CFR 155.715 dated on or before July 19, 2022; or
 - 2. provide evidence of participation, under the supervision of someone designated as PIC of a fuel transfer, in at least five fuel transfers on Towing Vessels during the preceding 5 years.
- c. Waived Requirements. Applicants for Tankerman (PIC) Restricted to Fuel Transfers on Towing Vessels endorsement will not be required to meet the following:
 - i. the medical requirements of 46 CFR 10.209(d)(3) or 13.201(c)(1).
 - ii. the training requirements of 46 CFR 13.201(c)(3) and (c)(4).
 - iii. the requirements for a chemical test for dangerous drugs (46 CFR 10.225(b)(5)) taking into consideration the applicant is subject to the random testing requirements on inspected vessels (46 CFR 16.230(a)) and uninspected vessels (46 CFR 16.230(b)).
- d. Renewal Requirements. In order to renew an MMC endorsement of Tankerman PIC Restricted To Fuel Transfers on Towing Vessels, applicants must meet the requirements of 46 CFR 10.227, **except** 10.227(d)(2), 10.227(d)(6), and 10.227(e). Applicants must also provide evidence of having served on a Towing Vessels for at least 90 days during the preceding 5 years, and participation in at least two fuel transfers within the preceding 5 years.
- e. Removal of Restriction. MMC holders who at a later date seek to remove the restriction to “fuel transfers on Towing Vessels” from their Tankerman endorsement must meet the full requirements of 46 CFR Part 13.

¹ Mariners serving on vessels requiring a vessel security plan must hold a valid TWIC (33 CFR Part 104).

² See Processing of Merchant Mariner Credentials for Mariners Not Requiring a Transportation Worker Identification Credential (TWIC), CG-543 Policy Letter 11-15.

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- f. Transition. Until a vessel receives its COI, the Coast Guard will continue to accept the LOD permitted in 33 CFR 155.710 (e)(2) as meeting the PIC requirement of 33 CFR 155.710 (e)(1). After July 19, 2022, the LOD will not be accepted on vessels subject to inspection, regardless of whether the vessel has received a COI. Nothing in this policy letter restricts the ability of a Captain of the Port to consider and approve alternative procedures, methods, or equipment standards in lieu of the requirements in 33 CFR Part 156 (see 33 CFR 156.107).
6. The National Maritime Center will publish a checklist on their website for applicants to ensure that they are submitting the proper documentation to facilitate issuance of the restricted endorsement. This restricted endorsement does not authorize service as Tankerman on towing vessels inspected under Subchapter I.
7. Disclaimer. While the guidance contained in this document may assist the industry, public, Coast Guard, and other Federal and State regulators in applying statutory and regulatory requirements, the guidance is not a substitute for applicable legal requirements nor is it a regulation itself.
8. Changes. This policy letter will be posted on the web at <http://homeport.uscg.mil>. Changes to this policy will be issued as necessary. Suggestions for improvements of this policy should be submitted in writing to Commandant, U.S. Coast Guard Headquarters, Office of Merchant Mariner Credentialing, (CG-MMC) at the address listed on the first page

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