

U.S. Department of
Homeland Security

United States
Coast Guard



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CG-MMC Policy Letter
No. 01-22

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From: M. Medina
COMDT (CG-MMC)

To: National Maritime Center

Subj: MERCHANT MARINER CREDENTIAL ENDORSEMENTS FOR SERVICE ON
FLOATING OUTER CONTINENTAL SHELF (OCS) FACILITIES

1. PURPOSE. This policy letter provides guidance for endorsements as Offshore Installation Manager, Barge Supervisor, and Ballast Control Operator restricted to service on Floating Outer Continental Shelf (OCS) Facilities (FOFs) that are not vessels.
2. ACTION. The Coast Guard will use this policy to evaluate applications for Merchant Mariner Credential(MMC) endorsements restricted to service on FOFs.
3. DIRECTIVES AFFECTED. Eighth District (D8) Policy Letter 08-2001, *Licensing Requirements for Personnel on Non-Self Propelled Floating Outer Continental Shelf (OCS) Facilities* is cancelled.
4. BACKGROUND.
 - a. Since approximately 2001, the Coast Guard issued MMC endorsements as Offshore Installation Manager (OIM), Barge Supervisor (BS), and Ballast Control Operator (BCO) that are restricted to service on specific types of FOFs. The endorsements are not specified by regulation, but were developed through Eighth District (D8) Policy Letter 08-2001, *Licensing Requirements for Personnel on Non-Self Propelled Floating Outer Continental Shelf (OCS) Facilities*. Until recently, all FOFs were treated as vessels and their personnel were required to hold MMCs with the appropriate endorsements. In that policy letter, non-self propelled floating OCS facilities were referred to as Floating Offshore Installations (FOIs).
 - b. The Coast Guard has broad authority to regulate FOFs under the Outer Continental Shelf Lands Act and its implementing regulations in 33 CFR Subchapter N. In addition, FOFs that qualify as seagoing motor vessels may also be regulated under United States Code Title 46 and associated regulations. Mariners serving on non-vessel FOFs will no longer be required to hold Merchant Mariner Credentials.

- c. As is specified in CG-OES Policy Letter 01-22, *Determination of Whether a Floating Outer Continental Shelf Facility Qualifies as a Vessel*, the Coast Guard will determine whether an FOF is considered to be a vessel. This determination will be made on a case-by-case basis by the cognizant OCMI.
5. DISCUSSION. The Coast Guard will take the following actions with regard to credentialing of personnel serving on FOFs.
- a. Original MMC Endorsements Restricted to FOFs. Effective on March 7, 2022, the Coast Guard will no longer issue original MMC officer endorsements that are restricted to service on specific types of FOFs (FOIs). This applies to the following endorsements:
 - 1) Offshore Installation Manager (Active Ballast FOI);
 - 2) Offshore Installation Manager (Passive Ballast FOI);
 - 3) Barge Supervisor (Active Ballast FOI);
 - 4) Barge Supervisor (Passive Ballast FOI);
 - 5) Ballast Control Operator (Active Ballast FOI); and
 - 6) Ballast Control Operator (Passive Ballast FOI).
 - b. The Coast Guard will continue to issue the following original endorsements to mariners meeting applicable service and training requirements specified in 46 CFR Part 11:
 - 1) Offshore Installation Manager (OIM) [46 CFR 11.470]:
 - A) OIM Unrestricted;
 - B) OIM Surface Units on Location;
 - C) OIM Surface Units Underway;
 - D) OIM Bottom Bearing Units on Location; and
 - E) OIM Bottom Bearing Units Underway;
 - 2) Barge Supervisor (without restriction to specific MODU or FOF/FOI types) [46 CFR 11.472]; and
 - 3) Ballast Control Operator (without restriction to specific MODU or FOF/FOI types) [46 CFR 11.474].
 - c. Renewal of Previously Issued Endorsements. The Coast Guard will continue to renew the endorsements restricted to FOFs/FOIs that are listed in paragraph 5.a, above. Mariners who

served aboard FOFs determined to not be vessels may renew their MMCs under the provisions in 46 CFR 10.227(e) that are applicable to mariners who do not have evidence of at least one year of sea service during the past five years. Service on FOFs that are not vessels may be accepted if it is found to be "closely related service" as specified in 46 CFR 10.232(g) to renew an MMC. Mariners who served on FOFs found to be vessels may use their service to renew their endorsements under 46 CFR 10.227(e)(1).

- d. Crediting of Sea Service on FOFs for an MMC Endorsement Other Than an FOF Endorsement. The Coast Guard can only credit seagoing service required to qualify for MMC endorsements if it was obtained on a vessel. See definition of *Seagoing service* in 46 CFR 10.107. Accordingly, service on FOFs that are not vessels will not be accepted as service for qualifying for an original or raise of grade of an MMC endorsement. Service on FOFs that are not vessels may only be accepted if it is found to be "closely related service" as specified in 46 CFR 10.232(g) to renew an MMC.
 - e. Coast Guard Approved Courses for FOF Endorsements. The Coast Guard will discontinue approving stability and ballast control courses and courses that substitute for Coast Guard administered examinations for the FOF endorsements noted in paragraph 5.a, above. These approved courses will not be renewed upon expiration. If a stability course or a course in lieu of Coast Guard examination is approved for both an endorsement being discontinued and for one or more of the endorsements described in 46 CFR 11.470, 11.472, or 11.474 and paragraph 5.b above, the course approval will be amended by the National Maritime Center to omit meeting requirements for the FOF endorsements noted in paragraph 5.a, above.
6. DISCLAIMER. This guidance is not a substitute for applicable legal requirements, nor is it itself a regulation. It is not intended to, nor does it impose legally-binding requirements on any party. This guidance represents the Coast Guard's current thinking on this topic and may assist industry, mariners, the general public, and the Coast Guard, as well as other Federal and State regulators, in applying statutory and regulatory requirements. Alternative approaches for fulfilling this policy may be acceptable if the approach satisfies the requirements of the applicable statutes and regulations.
 7. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS.
 - a. The development of this guidance and the general policies contained within it have been thoroughly reviewed by the originating office in conjunction with the Office of Standards Evaluation and Development, Commandant (CG-REG). Pursuant to Department of Homeland Security Directive 023-01, Rev.1, associated implementing instructions, and Environmental Planning COMDTINST 5090.1 (series), which guide the Coast Guard in complying with the National Environmental Policy Act of 1969 (42 U.S.C. 4321-4370f), we have determined that this action is categorically excluded (CE) from further environmental analysis under paragraphs #A3, #L5 and #L56 in Appendix A, of Table 1

of DHS Directive Instruction Manual 023-01, Rev. 1. Our rationale for selecting these CEs is as follows. “Promulgation of rules, issuance of rulings or interpretations, and the development and publication of policies ... and other guidance ... that implement, without substantive change, statutory or regulatory requirements” or “...that interpret or amend and existing regulation without changing its environmental effect “ are covered under DHS CE #A3. Promulgation of this policy and its associated guidance implements, without substantive change, the applicable Commandant Instruction or other federal agency regulations, procedures, manuals, and other guidance documents. Accordingly, Coast Guard CE #L5 applies. In addition, the policy letter includes elements that pertain to training, qualifying, licensing and disciplining maritime personnel. These latter aspects of the policy letter and its associated guidance are covered under Coast Guard CE #L56.

- b. This guidance will not have any of the following: significant cumulative impacts on the human environment; substantial controversy or substantial change to existing environmental conditions; or inconsistencies with any Federal, State, or local laws or administrative determinations relating to the environment. All future specific actions resulting from the general policies in this guidance must be individually evaluated for compliance with the National Environmental Policy Act (NEPA), DHS and Coast Guard NEPA policy, and compliance with all other environmental mandates.

- 8. REQUEST FOR CHANGES. All requests for changes and questions regarding implementation of this policy and/or requests for changes should be directed to the Office of Merchant Mariner Credentialing (CG-MMC), at (202) 372-2357 or MMCPolicy@uscg.mil.

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