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CG-MMC Policy Letter
No. 01-23
March 14, 2023

From: M. Medina
COMDT (CG-MMC)

To: National Maritime Center

Subj: QUALIFICATION FOR NATIONAL ENDORSEMENTS AS TANKERMAN-
ASSISTANT AND STCW ENDORSEMENTS FOR BASIC TANKER OPERATIONS

1. PURPOSE. This policy letter provides guidance for mariners holding or qualifying for national endorsements as Tankerman-PIC (Barge) to qualify for an endorsement as Tankerman-Assistant. This policy letter also provides guidance for mariners holding an STCW endorsement for advanced oil tanker operations, advanced chemical tanker operations, or advanced liquefied gas tanker operations with a limitation to non-self-propelled vessels to qualify for an endorsement for basic oil and chemical or basic liquefied gas tanker operations without a limitation to non-self-propelled vessels.
2. ACTION. The Coast Guard will use this policy to evaluate whether mariners are qualified to hold national endorsements as Tankerman-Assistant and STCW endorsements for basic oil and chemical tanker operations or basic liquefied gas tanker operations.
3. DIRECTIVES AFFECTED. None.
4. BACKGROUND. At its Fall 2022 meeting, the National Merchant Marine Personnel Advisory Committee (NMERPAC) recommended changes to how mariners may qualify for endorsements as Tankerman-Assistant to increase the ability of mariners to obtain employment on tank ships and to advance their careers. NMERPAC noted that otherwise qualified mariners who are authorized to serve as the person in charge of transfers of dangerous liquids or liquefied gases aboard tank barges are not authorized to assist with cargo transfers aboard tank ships.
5. DISCUSSION.

National Endorsements

- a. The Coast Guard has determined that the training required to qualify for a national endorsement as Tankerman-PIC (Barge) meets the training required for an endorsement as Tankerman-Assistant for the same cargoes. The course content specified in 46 CFR 13.121

for Tankerman-PIC (Barge) is more comprehensive than that required for an endorsement as Tankerman-Assistant valid for the same cargoes.

- b. A mariner who applies for and is issued an endorsement for Tankerman-PIC (Barge) will also be issued an endorsement for Tankerman-Assistant valid for the same cargoes without meeting additional requirements. The mariner is not required to add the Tankerman-Assistant endorsement on their application for the Tankerman-PIC (Barge) endorsement.
- c. Mariners who already hold a Tankerman-PIC (Barge) endorsement who wish to add an endorsement as Tankerman-Assistant for the same cargoes should submit a CG-719B, *Application for a Merchant Mariner Credential*, to the National Maritime Center (NMC) to add the endorsement. Alternatively, the Tankerman-Assistant endorsement will be added to their MMC at the next MMC renewal if they meet the requirements to renew the Tankerman-PIC (Barge) endorsement.

STCW Endorsements

- d. Mariners meeting the requirements for an STCW endorsement for Advanced Oil Tanker Operations or Advanced Chemical Tanker Operations with a limitation to non-self-propelled vessels may also be issued an endorsement for Basic Oil and Chemical Tanker Operations without a limitation to non-self-propelled vessels. The mariner is not required to include the basic endorsement on their application for the advanced endorsement.
- e. Mariners meeting the requirements for an STCW endorsement for Advanced Liquefied Gas Tanker Operations with a limitation to non-self-propelled vessels may also be issued an endorsement for Basic Liquefied Gas Tanker Operations without a limitation to non-self-propelled vessels. The mariner is not required to include the basic endorsement on their application for the advanced endorsement.

Renewal of Endorsements

- f. Mariners who hold national endorsements for both Tankerman-PIC (Barge) and Tankerman-Assistant will meet the requirements for renewal of their Tankerman-Assistant endorsement if they meet the requirements for renewal of a Tankerman-PIC (Barge) endorsement for the same cargoes.
- g. Mariners who meet the requirements to renew their endorsement as Tankerman-PIC (Barge) will have an endorsement as Tankerman-Assistant for the same cargoes added to their MMC at the time they renew their Merchant Mariner Credential (MMC). The mariner is not required to add the Tankerman-Assistant endorsement on their application for renewal of the Tankerman-PIC (Barge) endorsement.
- h. Mariners who hold STCW endorsements for both Basic Oil and Chemical Tanker Operations and Advanced Oil Tanker Operations and/or Advanced Chemical Tanker Operations with a limitation to non-self-propelled vessels will meet the requirements for

renewal of their basic endorsement if they meet the requirements for renewal of their advanced endorsement.

- i. Mariners who hold STCW endorsements for both Basic Liquefied Tanker Operations and Advanced Liquefied Gas Tanker Operations with a limitation to non-self-propelled vessels will meet the requirements for renewal of their basic endorsement if they meet the requirements for renewal of their advanced endorsement.
- j. Mariners who meet the requirements to renew their STCW endorsement for advanced tanker operations with a limitation to non-self-propelled vessels will have an endorsement for basic tanker operations for the same cargoes without a limitation to non-self-propelled vessels added to their MMC at the time they renew their Merchant Mariner Credential (MMC). The mariner is not required to add the basic tanker operations endorsement on their application to renew their advanced endorsement.

Service as Tankerman-Assistant

- a. On vessels that are not subject to STCW, and those on a domestic voyage, mariners holding an endorsement Tankerman-PIC (Barge) that do not have a Tankerman-Assistant endorsement in their MMC may serve as Tankerman-Assistant for the same cargoes as their Tankerman-PIC (Barge) endorsement if they also carry a copy of this policy letter.
- b. On international voyages on vessels subject to STCW, mariners will need to have their MMCs contain both a national endorsement for Tankerman-Assistant, and an STCW endorsement for basic tanker operations appropriate for the cargo of the vessel.

Course Approval

- k. The National Maritime Center (NMC) will include in the approval of Tank Barge Dangerous Liquids and Tank Barge Liquefied Gases courses that the course also meet the training requirements of 46 CFR 13.401(e)(1) for a Tankerman-Assistant endorsement for the same cargoes. Existing approved courses will have this added to the course approval at the next course renewal.
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.