

U.S. Department of
Homeland Security

United States
Coast Guard



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MEMORANDUM

From: T. F. MANN *T. F. Mann*
CCGD8 (p)

Reply to
Attn of: CAPT Close
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To: D8 SECTORS WITH REGIONAL EXAMINATION CENTERS

Subj: LIMITED GEOGRAPHIC LICENSES FOR TOWING VESSELS ENGAGED
IN FLEETING OPERATIONS

Ref.: (a) 46 CFR 10.202 (h)

1. PURPOSE. To establish a consistent process to issue licenses to commercial mariners operating inland towing vessels involved in fleeting operations that are restricted to specified geographic areas.

2. BACKGROUND.

(a) Officers in Charge, Marine Inspection (OCMI's) with Regional Examination Centers (REC's) currently have the authority to modify service requirements and issue licenses with restrictions per ref (a).

(b) Numerous maritime businesses throughout the Eighth Coast Guard District are engaged in harbor services in support of and in conjunction with the inland towing industry that include fleeting, fueling and making tows.

(c) Operators of towing vessels in these harbor service businesses currently must possess a license that authorizes them to pilot towing vessels throughout the waterways.

(d) To be qualified for this license, the mariner must serve 18 months in the marine industry of which 12 must be on towing vessels. Typically the 18 months are served as a deckhand. After obtaining a license as an Apprentice Mate (Steersman) of towing vessels, the mariner must serve 18 months as a steersman on towing vessels.

(e) These time of service requirements can be excessive to ensure competency and satisfactory experience for a mariner that will only work on a substantially limited part of a river.

(f) A primary reason this effort was proposed was to address recent challenges in recruiting mariners into the towing industry and retaining qualified mariners.

(g) As a result, a group of harbor service companies and a team of Eighth District personnel formed an ad hoc committee to explore the feasibility of developing a program that would result in the issuance of a license as Master of Towing Vessels limited in terms of a geographic area for which the license would be valid.

(g) This opportunity would be consistent with current licensing requirements applicable to commercial towing vessels except that service requirements would be reduced and geographic restrictions would be placed on the license.

3. ASSUMPTIONS.

(a) The underlying assumption is the redundancy of operations performed and the redundancy of operating in the same area increases the equivalency timeframe while ensuring no reduction in mariner competency. A mariner does not need 18 months of service as a deckhand prior to moving to the pilothouse when serving on a towing vessel conducting harbor service operations where making and breaking tows is a very frequent activity and pertinent experience can be gained relatively quickly. For example, a mariner with a geographically limited license as Apprentice Mate (Steersman) of Towing Vessels would become competent within a 25 mile area within one port in a shorter timeframe than a mariner operating on a "line boat" working towards a license as Master of Towing Vessels applicable over several thousand miles of rivers and waterways.

(b) Assurance of competency would be provided through detailed records documenting successful acquisition of knowledge and successful completion of a specified number of specific towing operations and transits within that limited geographic area as verified by a Designated Examiner.

(c) The Towing Officer's Assessment Record (TOAR) would also be a key component documenting skills and competency.

(d) There remains no regulatory requirement for a mariner engaged in harbor services in limited geographic areas to hold a license as Mate (Pilot) of Towing Vessels prior to upgrading the license to Master of Towing Vessels (Limited) with geographic restrictions specified on that license.

4. POLICY.

(a) This opportunity would only apply to vessels engaged in harbor services in limited geographic areas in support of and in conjunction with the inland towing industry including fleeting, refueling and making tows. The limited license would not apply to service towing vessels commonly referred to as "line boats".

(a) Eighth District Sectors with REC's should: become familiar with and implement this limited geographic licensing program per this instruction.

(b) Time of Service for a license as Master of Towing Vessels (Limited) may be reduced for limited geographic routes as follows:

(1) 180 eight-hour days or 120 twelve-hour shifts as a deckhand AND 50% of those shifts must be at night if the company conducts nighttime operations. The exception is that where a company routinely works only 1 twelve-hour shift per day that includes 2-3 hours of darkness during winter, the mariner must work 60 shifts that include those 2-3 hours of darkness.

(2) 360 eight-hour shifts or 240 twelve-hour shifts as an Apprentice Mate (Steersman) for limited geographic routes less than 25 miles; or

(3) 540 eight-hour shifts or 360 twelve-hour shifts as an Apprentice Mate (Steersman) for limited geographic routes that total between 26-50 miles.

(c) Companies shall implement the following processes:

(1) Harbor service companies operating in support of and in conjunction with the inland towing industry that are interested in initiating the provisions of this policy within their companies must first contact the nearest Eighth District Regional Examination Center (REC) and meet with Coast Guard personnel to discuss documentation requirements, identify Designated Examiners, identify internal company controls to ensure provisions of this policy are complied with, and identify specific geographic limitations for licenses based on the specific locations of their operations.

(2) After meeting with Coast Guard REC personnel, companies may start personnel in the program that meet entry requirements as deckhands, or, companies may initially start personnel in the program who qualify for a limited geographic license as Apprentice Mate (Steersman) of Towing Vessels provided they meet all requirements for that license per this program and have successfully obtained their license as Apprentice Mate (Steersman) of Towing Vessels.

(3) Companies entering into this program are subject to audits by the Coast Guard to verify compliance with this policy. Companies participating in the Responsible Carrier Program (RCP) or similar safety management system must include this program as part of their RCP or safety management system and must also make this program available for third party audit.

(d) Mariners in this program will:

(1) Maintain a log book that will specify training obtained. As specified in the enclosure, only a licensed mariner or a Designated Examiner will sign-off demonstrated competencies and the specified numbers of towing operations. The Designated Examiner must also provide a letter of competency along with a TOAR checklist signed off in all categories except those not applicable that are outside of the limited geographic area.

(e) There are limits to the geographic distance that will be considered for a limited license. No single geographic distance will be greater than 25 river/waterway miles. Multiple geographic areas may be included on one license not to exceed three geographic areas and not to exceed an aggregate of 50 river/waterway miles. Note that for geographic limits between 26-50 miles, the service time requirements are greater.

(f) Mariners seeking to upgrade a limited geographic license will be required to comply with all existing regulatory requirements for the upgraded license. The time served while operating under a limited license as Master of Towing Vessels (Limited) will be credited to the mariner when seeking to lift the geographic limitations. A mariner with a limited geographic license as Master of Towing Vessels (Limited) should expect to upgrade only to a license as Mate (Pilot) of Towing Vessels and not directly to a license as Master of Towing Vessels without limited geographic restrictions.

(g) The limited license text should generally read as shown in the following examples:

(1) "Apprentice Mate (Steersman) of Towing Vessels limited to the Lower Mississippi River between mile markers 730 and 749."

(2) "Master of Towing Vessels (Limited) on the Upper Mississippi River between mile markers 175 and 190, and the Missouri River between mile markers 0 and 12."

(3) "Master of Towing Vessels (Limited) on the Ohio River between mile markers 305.5 and 315.3, the Ohio River between mile markers 260 and 268.5, and Kanawha River between mile markers 55.5 and 80."

(4) "Master of Towing Vessels (Limited) on the Ohio River between mile markers 305.5 and 315.3 limited to day light only."

(h) Questions about the application of this program should be addressed to The Prevention Department, Eighth Coast Guard District.

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Enclosure: Master – Limited Geographic License Program

Copy: CGD EIGHT (dw)
All D8 Sectors

MASTER - LIMITED GEOGRAPHIC LICENSE PROGRAM

I. DECKHAND TRAINING

A. PRE-EMPLOYMENT PROCESSING

1. Application
 - a. Written; and
 - b. Obtain Identification;
2. Pre-employment Drug Test (*USCG*)
3. Pre-employment Physical (Per Company Policy)
4. Background Check
 - a. Employment;
 - b. Department of Transportation Drug Testing Information (Part 40); and (*USCG*)
 - c. Criminal. (Per Company Policy)

B. ORIENTATION TRAINING – RCP STANDARDS OR EQUIVALENT TRAINING PRIOR TO GOING ON DECK

The training listed in Section I.B shall be a one-day orientation that utilizes Company Policies and Procedures, films, handouts, demonstrations, vessel tours, discussions or equivalent instructional materials. The training shall be conducted by a Management Designee. Where required by Coast Guard regulations or Company Policies and Procedures, the trainees shall pass a written test demonstrating their understanding and proficiency.

1. Provide In-House Training on the following topics
 - a. Deckhand Job Description;
 - b. Deckhand Orientation;
 - c. Drug and Alcohol Awareness; (*USCG*)
 - d. Maritime Security Awareness for Inland and Coastal Towing Companies; (*USCG/MTSA*)

- e. Threat Awareness – Maritime Security;
(USCG/MTSA)
 - f. Confined Space Entry;
 - g. Operating Electric Winches;
 - h. Operating Ratchets; and
 - i. Facing and Unfacing Boats.
2. Review Company Safety Rules and Operating Policies
 - a. Read; and
 - b. Provide Written Documentation of Proficiency.
 3. Environmental
 - a. Review Company Environmental Policies;
(USCG) and
 - b. Provide Written Documentation of Proficiency.
 4. Security Training (Where required by the Department of Homeland Security)
(USCG/MTSA)
 - a. Execute SSI Confidentiality Agreement;
(USCG/MTSA) and
 - b. Provide Written Documentation of Proficiency.
 5. Communications Training (Where required by Company Policy or USCG)
 - a. Use of Radios;
 - b. Use of Hand Signals;
 - c. Use of Public Address System; and
 - d. Use of General Alarm.

C. GENERAL DECK TRAINING – ON-DECK

Following the Orientation Training listed in Section I.B, trainees shall receive additional training on the topics listed in Section I.C. The training listed in Section I.C shall utilize Company Policies and Procedures, films, demonstrations and trainees' supervised performance of each task. Trainees will engage in the tasks listed in Section C on a very frequent basis. Many tasks will be performed multiple times daily. Other tasks will be performed when operational or emergency situations arise. The

training listed in Section I.C shall be conducted by designated company employees. Trainees shall be required to demonstrate proficiency to a Designated Examiner for each item a minimum of five times before completing the training listed in Section I.

1. Line Handling
 - a. Safety;
 - b. Tying;
 - c. Making/Splicing; and
 - d. Carrying on Deck.
2. Winches and Face Wire Handling
 - a. Safety;
 - b. Use;
 - c. Rolling Eyes; and
 - d. Changing Out Face Wires on Winch.
3. Safety Equipment – Use, location, and regulatory requirements for each item
 - a. Life rings;
 - b. First aid kits;
 - c. Life jackets;
 - d. Hearing protection;
 - e. Eye protection;
 - f. Firefighting equipment;
 - g. Pumps; and
 - h. All other Applicable Personal Protective Equipment.
4. Engine Room
 - a. Checking Main Engines and Generators
 - Starting/Shutting Down;
 - Oil Levels;
 - Oil/Water Leaks; and
 - Changing Oil, Fuel and Air Filters
 - b. Gears
 - Oil Levels; and
 - Valves.
 - c. Use of Gauges;
 - d. Bilges
 - Alarms; (Where Applicable)
 - Policies and Regulations for Pumping; and (USCG)
 - Procedures for Pumping.
 - e. Use of Electrical Systems;
 - f. Use of Firefighting Equipment;

- g. Maintenance of Onboard Lighting;
(USCG)
 - h. Alarm Systems (Where Applicable)
 - Water;
 - Oil Pressure;
 - Bilge;
 - General; and
 - Smoke/Heat. (USCG)
 - i. Emergency Shut Downs (Where Applicable) (USCG)
 - Location; and
 - Use.
 - j. Steering Systems
 - Location of Pumps;
 - Maintenance and Reset Switches; and
 - Breakers.
 - k. Air Compressors
 - Locations;
 - Gauges and Reset Switches; and
 - Breakers.
 - l. Fuel Systems
 - Location and Use of Fueling Stations;
(USCG)
 - Transfer Procedures (transfer from one tank to another aboard the vessel);
 - Maintenance of Fuel Tanks;
 - Emergency Procedures; and
 - Fueling Procedures (fueling the vessel). (USCG)
 - m. Void Tanks
 - Checking for Water.
 - n. Marine Sanitation Devices; (Where Vessels are equipped with an MSD) (USCG)
 - Use and operation; and
 - Maintenance.
 - o. Navigation Lighting. (USCG)
5. Fleet Maintenance
- a. Tying Barges Off in Fleets;
 - b. Maintenance and Handling Shore wires (where applicable);
 - c. Fleet Lighting – As Required;

- d. Fleet Operations – Rising/Falling River Stages;
 - e. Inspecting and Pumping Barges for Water; and
 - f. Inspecting Barges for Damages.
6. Servicing Docks
- a. Procedures for Switching Docks;
 - b. Communication Procedures; (USCG)
 - Radio Procedures with Master and Dock; and
 - Hand Signals.
 - c. Hazards Present at all Docks Within Geographical Area of Operations; and
 - d. High/Low Water Procedures for Spotting Docks.
7. Tow Work
- a. Procedures for Tow Work;
 - b. Locations Where Tow Work Performed Within Geographical Area of Operations;
 - c. Procedures for Handling Rigging and Lines;
 - d. Communications Procedures;
 - Radio Procedures With Master, Line Boat Master and Mate; (USCG) and
 - Hand Signals.
 - e. Hazards Associated With Tow Work; and
 - f. High/Low Water Procedures.

D. GENERAL IN-HOUSE CLASSROOM/ON-DECK TRAINING AND DRILLS

The training listed in Section I.D shall be in addition to the training listed in Sections B and C. The training shall utilize Company Policies and Procedures, USCG Regulations, films, handouts, discussions, charts, river maps, diagrams, demonstrations, drills or their equivalents. Except as noted below, trainees shall receive the training listed in Section I.D at least once by a Management Designee before they shall be allowed to proceed to the training listed in Section II. Some of the training duplicates that which is previously listed and shall

***be designed to expand the trainees' knowledge,
understanding and mastery of the topics:***

1. Firefighting and Fire Prevention;
(USCG)(Quarterly)
2. Use of Fire Extinguishers and Fire Pumps
(Where Applicable); (USCG) (Quarterly)
3. Fire Drill; (USCG) (Monthly)
4. Man Overboard Prevention and Procedures;
(Quarterly)
5. Man Overboard Drill; (Quarterly)
6. Pump Handling and Use;
7. Lock Out/Tag Out Procedures;
8. Hot/Cold Weather Procedures; (Prior to
Seasonal Changes)
 - a. Heat Exhaustion/-strokes; and
 - b. Hypothermia.
9. First Responder/Spill Mitigation Training;
10. Pollution Training on Regulations;
11. Oil Spill Drill; (Semi-Annually)
12. Hazardous Communications/Right To Know
Procedures;
13. Cargo Knowledge and Hazard Awareness;
(USCG)
14. Procedures for Working On or Around Red-
Flagged Barges; (USCG)
15. Confined Space Awareness;
16. Injured Pilot Contingency Plans;
17. Bridge Transit Procedures; (Where Applicable)
18. Benzene Awareness; (Where Applicable)
(USCG)
19. Safe Handling of Rigging (this would include all
measures to ensure safe handling of rigging);
20. Drug and Alcohol Awareness; (USCG)
21. Injury Prevention and Back Protection
Training;
22. Line Handling;
23. Rigging Use & Procedures (how to);
24. Face Wire Handling;
25. Shore wire Handling (where applicable);
26. CPR/First Aid Awareness; (Semi-Annually)
27. Blood Born Pathogens; (Semi-Annually)
28. High/Low Water Operating Procedures;
(Annually and at onset of high or low water

- Stages – where applicable)
29. Severe Weather Operating Procedures;
 30. High Flow Operations; (Where Applicable)
 31. Fuel Procedures; and (USCG)
 32. Quarterly Security Training and Drills. (Where required by the Department of Homeland Security) Examples: (USCG/MTSA) (Quarterly when drills required)
 - a. Bomb Threat;
 - b. Breach of Security;
 - c. Watchstanding MARSEC II; and
 - d. Watchstanding MARSEC III.

E. FINAL REQUIREMENTS FOR OBTAINING A LIMITED LICENSE AS APPRENTICE MATE (STEERSMAN) OF TOWING VESSELS

1. First Aid/CPR Certified Training; (eight-hour course. Trainee will become American Red Cross Certified)
2. Person-In-Charge Training; (Where Required by USCG Regulations – eight-hour course taught by third-party or certified trainers) (USCG)
3. Worked a minimum of 180 eight-hour days or 120 12-hour days before qualifying to sit for the Apprentice Mate Exam;
4. Deckhands must serve 50 percent of their shifts (90 eight-hour days or 60 12-hour days) working at night where company has nighttime operations (if company performs nighttime operations) Exception to above hours: If the company routinely works only one 12-hour shift that may include 2-3 hours of darkness during the winter time, the company will provide logbook documentation of 60 shifts of work that includes hours of nighttime work);
5. Deckhand must be evaluated by Management (i.e. Designated Examiner, Port Captain, Vice President of Operations or equivalent);
6. Pursuant to the Performance Evaluation, Deckhand must be recommended by a

7. Designated Examiner and two Licensed Masters;
8. Obtain and pass all medical testing required by USCG for licensed mariners; (USCG)
9. Rules of the Road and Radar Training (Third-Party Classroom training);
10. Pass full exams for Limited License and radar endorsement. (USCG)

At the completion of Section I, the company will direct the trainee to file for the Limited License as Apprentice Mate (Steersman) of Towing Vessels. The company will facilitate the application with information on how to file for the Limited License as Apprentice Mate (Steersman) of Towing Vessels. The trainee will submit the following to confirm the training has been completed: a letter from the Designated Examiner stating that all training of Phase I has been completed, a physical, radar school endorsement and any other document required by Coast Guard regulations.

II. APPRENTICE MATE (STEERSMAN) TRAINING (LIMITED LICENSE)

A. PRELIMINARY TRAINING

Section II.5-9 shall include a minimum of one to two days training each.

1. Attend and complete training for Vessel Security Officers (Where Required by the Department of Homeland Security); (USCG/MTSA)
2. Responsibility and Authority of the Master Training- Company Policy and Procedures, Industry Standards and Federal Regulations;
3. Casualty Reporting Requirement Training; (USCG)
4. Environmental Reporting Requirement Training; (USCG)

5. Corps of Engineers Locking Regulations; (Where Applicable) (USACE)
6. Review All Company Safety and Operations Policy and Procedures;
7. Study river charts for the geographical area of operations (review of charts during operations);
8. Review recent Notice to Mariners; and (geographical area of operations) (USCG)
9. USACE Navigation Circulars. (where applicable) (USCG)

B. GENERAL TRAINING

1. Repeat and complete the Classroom Training and Drills listed in Section I. D.1-32 and E.1-2 above (regularly scheduled training as described in the Responsible Carrier Program or equivalent safety management program;
2. Supervisors Drug and Alcohol Training; (EAP) (60 Minute) (USCG)
3. Hazards of downstreaming and review of company policy (films, handouts, discussions, demonstrations, company policies or their equivalent shall be used in this training if downstreaming is permitted by company policy) minimum of half-day of training; and
4. Effects of current, water flows and wind on operations. See item 3 above for training methods (on-the-job training until the Designated Examiner is prepared to sign-off on the competency of the individual to operate in the range expected variables).

C. APPRENTICE MATE TRAINING - LEVEL I

The training listed in Section II. C. shall be conducted by licensed mariners. Trainees shall be required to perform and provide proof in a log book with a licensed mariner's signature of completing

each operation a minimum of twenty times and also demonstrate proficiency to a Designated Examiner on each item a minimum of five times before being allowed to proceed to the training outlined in Section II. D.

1. Lite boat operations;
2. Facing/Unfacing Boat;
 - a. Use of winches;
 - b. Use of rudders; and
 - c. Use of throttles.
3. Use of communications equipment. (Where Applicable)
 - a. Obtain FCC license; (USCG/FCC)
 - b. Use of marine radios; (USCG/FCC)
 - c. Use of PA system;
 - d. Use of fax machines; (Where Applicable)
 - e. Use of computers; (Where Applicable) and
 - f. Communications with dispatchers and deckhands.
4. Use of electronics
 - a. Radar;
 - b. GPS (Where Applicable); (USCG)
 - c. Swing meters (Where Applicable); (USCG)
 - d. AIS; (Where Applicable) (USCG)
 - e. Sounders (Where Applicable); (USCG)
 - f. Wind gauges (Where Applicable); (USCG)
 - g. Alarm systems; (USCG)
 - h. Search lights; (USCG) and
 - i. Navigation lights. (USCG)
5. Observe while Working Geographical Area of Operations
 - a. Location of all docks;
 - b. Location of all fleets;
 - c. Location of all known obstructions to navigation;
 - d. Location of all dikes, bridges, locks, dams, sandbars and lights;
 - e. Location of all areas where tow work generally performed; and
 - f. Observation of currents at docks, fleets and tow work areas within the geographical area of operation.

6. Obtain approval of Designated Examiner to proceed to Level 2 of the Apprentice Mate (Limited License) Training Program. (USCG)

**D. APPRENTICE MATE (STEERSMAN) TRAINING-
LEVEL 2**

The training listed in Section II. D shall be conducted by licensed mariners. Trainees shall be required to perform and provide proof in a log book with a licensed mariner's signature of completing each operation a minimum of twenty times and also demonstrate proficiency to a Designated Examiner on Items two and three a minimum of five times before proceeding to the training listed in Section II. E.

1. Continue training listed in Section II.C.1-6;
2. Perform Fleet Maintenance;
 - a. Inspection of fleets;
 - b. Securing fleets; (pulling/removing slack)
 - Slack water;
 - Anchor; (Where Applicable) and
 - River.
 - c. Fleet lights; (USCG) and
 - d. Pumping barges.
3. Set up docks, cranes and fleets determined by the company to be low risk;
4. Obtain approval of Designated Examiner to proceed to Level 3 of the Apprentice Mate (Limited License) Training Program.

**E. APPRENTICE MATE (STEERSMAN) TRAINING -
LEVEL 3**

The training listed in Section II.E shall be conducted by licensed mariners. Trainees shall be required to perform and provide proof in a log book with a licensed mariner's signature of completing each

operation a minimum of twenty times and also demonstrate proficiency to a Designated Examiner on items 2, 3, 4, and 7 a minimum of five times before proceeding to the training listed in Section II.F.

1. Continue training listed in Section II.C and D above;
2. Begin standing watch at night if company provides services after dark; (under supervision)
3. Set up docks requiring higher skill level; (applies to docks having difficult current/water conditions, spotting instructions etc.)
4. Start building/breaking down tows;
5. Shift Certain Dangerous Cargos (CDC) barges; (Where Applicable)
6. High/Low water training session; (films, handouts, discussions, demonstrations, river maps or their equivalent shall be used in the training- classroom training expected to last 2-4 hours);
7. Transit all areas within geographical area of operations, while under the supervision of a licensed mariner;
8. Obtain approval of Designated Examiner to proceed to Level 4 of the Apprentice Mate (Limited License) Training Program.

F. APPRENTICE MATE (STEERSMAN) TRAINING - LEVEL 4

The training listed in Section II.F. shall be conducted by licensed mariners. Trainees shall be required to perform and provide proof in a log book with a licensed mariner's signature of completing each operation a minimum of twenty times and demonstrate proficiency to a Designated Examiner on items 2-3 a minimum of five times before proceeding to the training listed in Section II.G.

1. Continue training listed in Section II.C-E above;
2. Begin basic tow work (pulling/pulling single barges requiring no down streaming under the direct supervision of a licensed Master or Mate);
3. Setting up docks and/or terminals (20 times total not 20 times per dock and/or terminal);
4. Obtain approval of Designated Examiner to proceed to Level 5 of the Apprentice Mate (Limited License) Training Program.

**G. APPRENTICE MATE (STEERSMAN) TRAINING-
LEVEL 5**

The training listed in Section II.G.3-8 shall be conducted by a Designated Examiner. The Designated Examiner must approve trainee's performance and completion of the USCG Towing Officer Assessment Record (TOAR) prior to trainee receiving a Limited License as Master of Towing Vessels.

1. Continue training listed in Section II.C-F above;
2. Leadership Training (as designated by the individual company);
3. Review requirements for USCG TOAR; (Limited License)
4. Begin work on the USCG TOAR; (Limited License)
5. Shift all primary docks within the geographical area provide proof in a log book with a licensed mariner's signature of completing each operation a minimum of ten times (ten times total not ten times per dock) and also at least once under the supervision of a Designated Examiner;
6. Shift all types of barges that typically work in the geographical area of operations (boxes, rakes, hopper barges, tank barges a minimum

7. of ten times noted in a log book with a licensed mariner's signature and five times under the supervision of a Designated Examiner; (Where Applicable to the Operations)
8. Perform tow work, including down streaming where safe and not in violation of company policy, a minimum of ten times noted in a log book with a licensed mariner's signature and five times under the supervision of a Designated Examiner;
9. Where applicable, transiting locks and bridges must be performed ten times noted in a log book with a licensed mariner's signature and five times under the supervision of a Designated Examiner (if the company operates at night, 30% of the times will be during night operations and noted as such); and
10. Complete TOAR and approval of Designated Examiner.

III. FINAL REQUIREMENTS FOR OBTAINING LICENSE AS MASTER OF TOWING VESSELS (LIMITED)

The company will provide to the REC a copy of the log book with licensed mariner signatures and a check-off sheet signed by the Designated Examiner that all training above has been completed.

- A. Mariner, as operator, must become proficient in setting up all primary docks within the geographical area(s) where the mariner is requesting to operate; (said proficiency to be determined by the Designated Examiner);
- B. Mariner must become proficient in performing basic tow work within the geographical area(s) where the mariner is requesting to operate; (said proficiency to be determined by the Designated Examiner)
- C. Mariner must become proficient in transiting lock and bridges located within the geographical area(s) where the mariner is requesting to operate; (said proficiency to be determined by the Designated Examiner)

- D. Mariner must operate a minimum of 90 eight-hour shifts or 60 12-hour night shifts (this is included as part of the total hours mentioned below in E.) where employer has nighttime operations; and
- E. Mariner must operate a minimum of 360 eight-hour shifts or 240 12-hour shifts as an Apprentice Mate (Steersman) before obtaining a Limited License as Master of Towing Vessels for a geographical area of 25 miles or less or a minimum of 540 eight-hour shifts or 360 12-hour shifts for a geographic area of 26 to 50 miles. Said geographical area does not have to be contiguous (total river mileage shall not exceed the before mentioned classification of either 25 or 50 river miles in aggregate), but Mariner must be trained and approved as required in Sections II A-G above for all areas of operation. For licenses that include non-contiguous areas, service times will be divided between each non-contiguous areas; and
- F. The license is transferable to other geographic locations with completion of Section II A-G for each new geographic location.