

Introduction to SEMS II

30 CFR 250.1900-1933

This course is a source of information and practical training tool for offshore rig safety personnel and workers to develop and maintain an effective Safety and Environmental Management System specifically for off-shore drilling rigs. The course covers each of the sections within the SEMS II rule as they appear in the regulation.

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OSHAcademy Course 907 Study Guide

Introduction to SEMS II

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Special thanks goes out to the U.S. Department of the Interior, Bureau of Safety and Environmental Enforcement (BSEE) for providing the basic document for this training: 30 CFR, Part 250, Subpart S, Safety and Environmental Management Systems (SEMS II) Final Rule.

This study guide is designed to be reviewed off-line as a tool for preparation to successfully complete OSHAcademy Online Course 907.

We hope you enjoy the course and if you have any questions, feel free to email or call:

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Course Introduction

The Bureau of Safety and Environmental Enforcement (BSEE), 30 CFR Part 250 Subpart S, Safety and Environmental Management Systems (SEMS II) program became effective on June 4, 2013. The Deepwater Horizon explosion and resulting oil spill highlighted potential faults in the existing OCS safety culture and the need for an improved SEMS.

Take a look at this [BSEE Video introduction](#).

The BSEE SEMS II rule is primarily a performance-based standard that details requirements and provides guidance for offshore operators to reduce the likelihood of another event like the Deepwater Horizon explosion and oil spill. The rule also exists to make sure that operations on the Outer Continental Shelf (OCS) are conducted:

- safely by well-trained personnel
- using technology, precautions, and techniques sufficient to prevent or minimize the likelihood of:
 - a. blowouts, loss of well control, fires, or spillage, physical obstruction to other users of the waters or subsoil and seabed
 - b. occurrences that may cause damage to the environment or to property
 - c. occurrences that endanger life or health

This course was developed as a source of information and practical training tool for offshore rig safety personnel and workers to develop and maintain an effective Safety and Environmental Management System specifically for off-shore drilling rigs. The course covers each of the sections within the SEMS II rule as they appear in the regulation. Additional guidance related to each of the topics is also included in the course.

Note: The use of the term “must” in the source document for this training has been replaced with the term “should” because the content of this training is guidance only and does not replace or serve as a substitute for the mandatory regulatory requirements of the source document.

Module 1 – SEMS II Goals and Objectives

A Tool for Achieving Safety Excellence

The SEMS II is a tool for integrating and managing operations. By developing a management system based on API RP 75, owners and operators are required to formulate policy and objectives concerning significant safety hazards and environmental impacts over which they had control and could be expected to have an influence.

Ultimately, a SEMS II program is intended to:

- focus attention on the role of human error and poor organization in accidents,
- drive continuous improvement in the offshore industry's safety and environmental records,
- encourage the use of performance-based operating practices
- encourage collaboration between industry to promote the interests of offshore worker safety and environmental protection

New and Improved SEMS II Rule

SEMS II regulations are the basic ground rules – the minimum standards which BSEE expect to be exceeded.

SEMS II builds on and enhances the original SEMS II rule by calling for:

- greater employee participation
- empowering field level personnel with safety management decisions
- strengthening oversight with audits by accredited third parties

The final rule expands, revises, and adds several new requirements to the existing 30 CFR part 250, 1900-1933, subpart S, regulations for SEMS. The additional safety requirements contained in SEMS II that were not covered in previous regulations include:

- Developing and implementing a stop work authority that creates procedures and authorizes any and all offshore industry personnel who witness an imminent risk or dangerous activity to stop work.
- Developing and implementing an ultimate work authority that requires offshore industry operators to clearly define who has the ultimate work authority on a facility for operational safety and decision-making at any given time.
- Requiring an employee participation plan that provides an environment that promotes participation by offshore industry employees as well as their management to eliminate or mitigate safety hazards.
- Establishing guidelines for reporting unsafe working conditions that enable offshore industry personnel to report possible violations of safety, environmental regulations requirements, and threats of danger directly to BSEE.
- Establishing additional requirements for conducting a job safety analysis.
- Requiring that the team lead for an audit be independent and represent an accredited audit service provider.

The SEMS II Rule becomes effective on June 4, 2013. Operators have until June 4, 2014 to comply with the provisions of the SEMS II Rule, except for the auditing requirements. All SEMS II audits should be in compliance with the SEMS II Rule by June 4, 2015.

“Operators must apply these tools to their management processes.” BSEE will not dictate how that is accomplished – it is up to the operators to determine how to best apply the tools to their management systems and processes.” (Brian Salerno, Director, BSEE)

Should I have a SEMS II program?

Yes! If the SEMS II rule applies to the company, you should develop, implement, and maintain a safety and environmental management system (SEMS) program.

The SEMS II program should address the 17 elements of an effective SEMS II (see below), American Petroleum Institute's Recommended Practice for Development of a Safety and Environmental Management Program for Offshore Operations and Facilities (API RP 75), and other requirements as identified in the rule.

- If there are any conflicts between the requirements of the SEMS II rule 30 CFR 250.900-933 Subpart S and, American Petroleum Institute (API), Center for Offshore Safety Center (COS), or the International Organization for Standardization (ISO)/International Electrotechnical Commission (IEC) standard, you should follow the requirements of the BSEE SEMS II rule.
- Nothing in the SEMS II rule affects safety or other matters under the jurisdiction of the U.S. Coast Guard.

The SEMS II Rule became effective on June 4, 2013. Operators have until June 4, 2014 to comply with the provisions of the SEMS II Rule, except for the auditing requirements. All SEMS II audits should be in compliance with the SEMS II Rule by June 4, 2015.

SEMS II Program Goals

The goal of the SEMS II program is to promote safety and environmental protection by ensuring all personnel aboard an offshore facility on the Outer Continental Shelf (OCS) are complying with the policies and procedures identified in the SEMS II.

To accomplish this goal, management should ensure that the SEMS II program identifies, addresses, and manages safety, environmental hazards, and impacts during:

- the design, construction, start-up, operation (including, but not limited to, drilling and decommissioning), and inspection
- maintenance of all new and existing facilities, including mobile offshore drilling units (MODUs) when attached to the seabed and Department of the Interior (DOI) regulated pipelines

All personnel involved with the SEMS II program should be trained to have the skills and knowledge to perform their assigned duties.

SEMS II Program Components

You should have a written and properly documented SEMS II program in place.

The SEMS II regulation should be applied in a risk-based, fit-for-purpose manner that differentiates between facilities. The operator currently has the ability to adjust the content of the program based on the hazard analysis of specific facilities.

You should also make it available to the BSEE upon request.

[Check out this video on BSEE Hurricane Procedures](#)

Glossary of Terms

Acronyms used frequently in the SEMS II rule have the following meanings:

AB means Accreditation Body

ASP means Audit Service Provider

BAST means best available and safest technologies

CAP means Corrective Action Plan

COS means Center for Offshore Safety

EPP means Employee Participation Plan

ISO means International Organization for Standardization

JSA means Job Safety Analysis, (Also called a Job Hazard Analysis)

MODU means Mobile Offshore Drilling Unit

OCS means Outer Continental Shelf

SEMS means Safety and Environmental Management Systems

SWA means Stop Work Authority

USCG means United States Coast Guard

UWA means Ultimate Work Authority

Terms used in the SEMS II rule are listed alphabetically as follows:

Accreditation body (AB) means a BSEE-approved independent third-party organization that assesses and accredits ASPs.

Audit service provider (ASP) means an independent third-party organization that demonstrates competence to conduct SEMS II audits in accordance with the requirements of the SEMS II rule.

Corrective action plan (CAP) means a scheduled plan to correct deficiencies identified during an audit and that is developed by an operator following the issuance of an audit report.

Personnel means direct employee(s) of the operator and contracted workers.

Ultimate Work Authority (UWA) means the authority assigned to an individual or position to make final decisions relating to activities and operations on the facility.

Other definitions:

BOEM means **Bureau of Ocean Energy Management** and is responsible for managing environmentally and economically responsible development of the nation's offshore resources. BOEM functions include leasing, plan administration, environmental studies, National Environmental Policy Act (NEPA) analysis, resource evaluation, economic analysis and the renewable energy program. For more information see www.boem.gov.

BOEMRE means the **Bureau of Ocean Energy Management, Regulation and Enforcement**. Note: On October 1, 2011, the Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE), formerly the Minerals Management Service (MMS), was replaced by the Bureau of Ocean Energy Management (BOEM) and the Bureau of Safety and Environmental Enforcement (BSEE) as part of a major reorganization. For more information see www.boemre.gov.

BSEE means **Bureau of Safety and Environmental Enforcement** and is responsible for safety and environmental oversight of offshore oil and gas operations, including permitting and inspections, of offshore oil and gas operations.

BSEE is involved in the approval of oil and gas plans, facilities, and operations. The process includes reviews where there is much emphasis on design, operations, and maintenance.

While BSEE monitors compliance with the regulations throughout the permitting process and operations, nothing compares to having BSEE personnel in the field to ensure operators are complying with the regulations.

Throughout the drilling and production phases, the BSEE inspects the operations to ensure compliance with regulations, lease terms and statutes. This further ensures operational safety and pollution prevention. It also requires that drilling personnel be trained in well control.

On average in recent years on the Federal OCS, the BSEE has conducted between 20,000 and 25,000 inspections annually. For more information see www.bsee.gov.

COS means **Center for Offshore Safety**. The Center for Offshore Safety (COS) is an industry sponsored organization focused exclusively on offshore safety in the deep water (water depths > 1000 ft.) Gulf of Mexico. The Center serves the US offshore oil & gas industry with the purpose of adopting standards of excellence to ensure continuous improvement in safety and offshore operational integrity. For more information see <http://www.centerforoffshoresafety.org/>.

Imminent risk or danger means any condition, activity, or practice in the workplace that could reasonably be expected to cause, death or serious physical harm; or significant environmental harm to land, air, mineral deposits, marine or coastal environment, or human environment.

Incident of Noncompliance (INC) – If an inspector finds a violation of BSEE regulations as they are outlined in the PINC checklists, the Bureau Inspector issues an Incident of Noncompliance (INC) citation to the operator. Depending on the severity of the violation, the inspector can declare either a *Warning or Shut-In* INC.

Potential Incident of Noncompliance (PINC) – Checklist items which BSEE inspects to pursue safe operations on the Outer Continental Shelf. This list of inspection items is derived from all regulations for safety and environmental standards.

Stop Work Authority (SWA) means the authority given to all workers to immediately stop work that is creating imminent risk or danger to worker safety or the environment.

Ultimate Work Authority (UWA) means the authority assigned to an individual on the facility to make the final or ultimate decision to stop work or take action taking into account all applicable regulations.

Module 1 Quiz

1. The SEMS II program should address each of the following subjects, except _____.

other requirements as identified

the 17 SEMS II elements

the API RP 75

OSHA's 19 CFR 1200

2. The goal of the SEMS II program is to promote safety and environmental protection by ensuring all personnel _____ are complying with the policies and procedures identified in the SEMS II rule.

- a. working on an onshore drilling rig
- b. aboard an offshore OCS facility
- c. working in a refinery or drilling site
- d. attached to a vessel or platform

3. The _____ is responsible for managing environmentally and economically responsible development of the nation's offshore resources.

- a. Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE)
- b. Bureau of Safety and Environmental Enforcement (BSEE)
- c. Bureau of Ocean Energy Management (BOEM)
- d. Center for Offshore Safety (COS)

4. The _____ is an industry sponsored organization focused exclusively on offshore safety in the deepwater Gulf of Mexico.

- a. Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE)
- b. Bureau of Safety and Environmental Enforcement (BSEE)
- c. Bureau of Ocean Energy Management (BOEM)
- d. Center for Offshore Safety (COS)

- 5. Which of the following means the authority assigned to an individual or position to make final decisions relating to activities and operations on the facility?**
- a. Audit Work Authority (AWA)
 - b. Ultimate Work Authority (UWA)
 - c. Stop Work Authority (SWA)
 - d. Incident Command Authority (ICA)

Module 2 - SEMS II Management, Culture and Program Elements

Management's General Responsibilities

Management should ensure that the program elements discussed in API RP 75 and in the SEMS II rule are properly documented and are available at field and office locations, as appropriate for each program element. See [BSEE-0131 Performance Measurement Data form](#)

Management should development, support, and continually improve the overall success of the SEMS II program by doing the following:

Establish goals, objectives and performance measures, demand accountability for implementation, and provide necessary resources for carrying out an effective SEMS II program. Be sure that the following information is included:

- **a commitment** to continuous improvement
- **assigned responsibilities** for achieving stated goals and objectives at each level of the company
- the means and timelines for achieving **goals and objectives**
- the means and methods to communicate goals, objectives and performance measures
- **performance measures** to evaluate the results

Appoint management representatives who are responsible for establishing, implementing and maintaining an effective SEMS II program.

Designate specific management representatives who are responsible for establishing, implementing, maintaining, and reporting to management on the performance of the SEMS II program.

Review the SEMS II program at specified intervals and at least annually, to determine if it continues to be suitable, adequate and effective by addressing:

- the possible need for changes to policy, objectives, and other elements of the program in light of program audit results, changing circumstances
- the commitment to continual improvement

- formally document the observations, conclusions and recommendations of that review

Develop and endorse written safety and environmental policies and organizational structure that define responsibilities, authorities, and lines of communication required to implement the SEMS II program.

Use personnel with expertise in:

- identifying safety hazards
- environmental impacts
- optimizing operations
- developing safe work practices
- developing training programs, and
- investigating incidents

Ensure that facilities are designed, constructed, maintained, monitored, and operated in a manner compatible with applicable industry codes, consensus standards, and generally accepted practice as well as in compliance with all applicable governmental regulations.

Ensure that management of safety hazards and environmental impacts is an integral part of the design, construction, maintenance, operation, and monitoring of each facility.

Ensure that suitably trained and qualified personnel are employed to carry out all aspects of the SEMS II program.

Ensure that the SEMS II program is maintained and kept up to date by means of periodic audits to ensure effective performance.

The SEMS II Safety Culture

The following are the nine characteristics of a robust SEMS II safety culture:

1. **Leadership Safety Values and Actions**—Leaders demonstrate a commitment to safety in their decisions and behaviors.
2. **Problem Identification and Resolution**—Issues potentially impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance.
3. **Personal Accountability**—All individuals take personal responsibility for safety.
4. **Work Processes**—The process of planning and controlling work activities is implemented so that safety is maintained.
5. **Continuous Learning**—Opportunities to learn about ways to ensure safety are sought out and implemented.
6. **Environment for Raising Concerns**—A safety conscious work environment is maintained where personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment, or discrimination.
7. **Effective Safety Communication**—Communications maintain a focus on safety.
8. **Respectful Work Environment**—Trust and respect permeate the organization.
9. **Inquiring Attitude**—Individuals avoid complacency and continuously consider and review existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action.

BSEE Feedback

BSEE believes that an effective SEMS II Safety Culture Policy Statement is at the core of an offshore operations safety culture, at all times, because every offshore operation – no matter when or where it is performed – carries with it some degree of risk. (BSEE Director Jim Watson)

So, what do we mean by “safety culture” and how should we measure “safety?” Is it merely the absence of accidents? Is it compliance with regulations? Is it how you approach complex activities? I believe it is how you approach risk. How do you balance risk to the employees and the environment with the need to stay on schedule, to complete the well, or to start production? It goes far beyond management decisions. How do the people approach risk? Are they afraid to speak up when they see something wrong? Will they immediately halt operations if their colleagues are in danger? Or, do they only pay attention to the missing handrail when they see the helicopter with a BSEE inspector approaching their facility? How much risk – to themselves – are they willing to accept? (Brian Salerno, Director, BSEE)

Safety and Environmental Information

You should require that SEMS II program safety and environmental information be developed and maintained for any facility that is subject to the SEMS II program.

SEMS II program safety and environmental information should include:

- **program information** that provides the basis for implementing all SEMS II program elements, including the requirements of hazard analysis (§ 250.1911)
- **process design information** including, as appropriate, a simplified process flow diagram and acceptable upper and lower limits, where applicable, for items such as temperature, pressure, flow and composition
- **mechanical design information** including, as appropriate, piping and instrument diagrams; electrical area classifications; equipment arrangement drawings; design basis of the relief system; description of alarm, shutdown, and interlock systems; description

of well control systems; and design basis for passive and active fire protection features and systems and emergency evacuation procedures

SEMS II Program Elements

The SEMS II program should meet the minimum criteria outlined in the SEMS II rule, including the following SEMS II program elements:

1. General (see 250.1909)
2. Safety and Environmental Information (see 250.1910)
3. Hazards Analysis (see 250.1911)
4. Management of Change (see 250.1912)
5. Operating Procedures (see 250.1913)
6. Safe Work Practices (see 250.1914)
7. Training (see 250.1915)
8. Mechanical Integrity (Assurance of Quality and Mechanical Integrity of Critical Equipment) (see 250.1916)
9. Pre-startup Review (see 250.1917)
10. Emergency Response and Control (see 250.1918)
11. Investigation of Incidents (see 250.1919)
12. Auditing (Audit of Safety and Environmental Management Program Elements) (see 250.1920)
13. Recordkeeping (Records and Documentation) and additional BSEE requirements (see 250.1928)
14. Stop Work Authority (SWA) (see 250.1930)

15. Ultimate Work Authority (UWA) (see 250.1931)
16. Employee Participation Plan (EPP) (see 250.1932)
17. Reporting Unsafe Working Conditions (see 250.1933)

We will cover each of the above program elements in this course.

Make sure you include a job safety analysis (JSA) for OCS activities identified or discussed in the SEMS II program (see 250.1911).

Finally, the SEMS II program should meet or exceed the standards of safety and environmental protection of API RP 75.

SEMS II Program Flexibility

The overarching mechanism used by an operator to develop and implement its SEMS II program provides avenues of flexibility, including the following:

1. operator may apply the job safety analysis (JSA) to recurring events
2. operator has the freedom to select the individual with ultimate work authority (UWA)
3. operator can determine training frequency, training methodology, and the training vendor, except in specific cases where certain training requirements are specified in Section 7 of API RP 75

BSEE believes there is no need to prescribe each aspect of an operator's SEMS II training program or how frequently an operator must conduct periodic training. The final regulatory text in 30 CFR 250.1915 is sufficient to cover the detailed training requirements for an operator's SEMS II programs. The introductory language establishes that all personnel must be trained to perform work safely. These changes allow operators to take responsibility for implementing their training in accordance with the regulations.

Also, SEMS II maintains performance flexibility as evidenced by the discretion the rule grants to operators to design, develop, and deploy their employee participation plan and stop work authority programs.

Safety is an element that is easier to measure when it is absent. When an accident occurs, it is easy to point to that and say, "they were not safe," and you can then peel back the contributing factors and identify things that should have been visible before the accident. That is why we must proactively identify, quantify, and mitigate risk based on new, relevant data streams. (Brian Salerno, Director, BSEE)

Module 2 Quiz

- 1. Management can development, support, and continually improve the overall success of the SEMS program by doing all the following, except ____.**
 - a. designating a BSEE representative
 - b. appointing management representatives
 - c. using experts to identify hazards
 - d. reviewing the SEMS II regularly

- 2. Each of the following are one of the nine characteristics of a robust SEMS II safety culture, except ____.**
 - a. continuous learning
 - b. environment for raising concerns
 - c. respectful work environment
 - d. zero tolerance for accidents

- 3. Each of the following are one of the 17 SEMS II program elements, except ____.**
 - a. hazard analysis
 - b. management of change
 - c. safety committees
 - d. operating procedures

- 4. Make sure you include a ____ for OCS activities identified or discussed in the SEMS II program.**
 - e. safety committees
 - f. job safety analysis (JSA)
 - g. BSEE partnership
 - h. forceful oversight

5. BSEE believes there _____ an operator's SEMS training program or how frequently an operator must conduct periodic training.
- a. is no need to prescribe each aspect of
 - b. is a need to prescribe each aspect of
 - c. is a requirement to state each topic of
 - d. is a demand for forceful oversight of

Module 3 - Analysis and Management of Change (MOC)

Criteria for Hazards Analyses

You should ensure that a facility-level hazards analysis and a task-level Job Safety Analysis (JSA) is developed and implemented for all the facilities and activities identified or discussed in the SEMS II.

You should document and maintain a current JSA for each identified or discussed operation for the life of the operation at the facility.

You should update the analysis when an internal audit is conducted to ensure that it is consistent with the facility's current operations.

Excerpt from BSEE Safety Alert No. 22 - February 28, 2014

Hydrogen Sulfide (H₂S) Gas Release from Piping Corrosion Failure Near a Weld

A hydrogen sulfide (H₂S) gas release occurred from a piping corrosion failure near a weld, on the 8-inch side of an 8-inch by 4-inch reducer on the blowdown line for a third-stage section compression scrubber. Multiple H₂S sensors detected the release and initiated a platform shutdown. Platform personnel were directed to muster to the safe briefing areas. Response personnel using breathing apparatus isolated the leak. No injuries to any personnel occurred from the incident. Prior to the platform being restarted, the failed spool was removed and saved for testing, and a new spool was installed. The H₂S concentration at the release point was estimated to be 40,000 ppm.

See more [BSEE Safety Alerts](#)

Facility-Level Hazard Analysis

For a facility-level hazards analysis, the analysis should be appropriate for the complexity of the operation and should identify, evaluate, and manage the hazards involved in the operation.

The facility-level hazards analysis should address the following:

- hazards of facility-level operations
- previous incidents related to the operation you are evaluating, including any incident in which you were issued an Incident of noncompliance or a civil or criminal penalty

- control technology applicable to the operation the hazards analysis is evaluating
- a qualitative evaluation of the possible safety and health effects on employees, and potential impacts to the human and marine environments, which may result if the control technology fails

The hazards analysis should be performed by a person(s) with experience in the operations being evaluated. These individuals also need to be experienced in the hazards analysis methodologies being employed.

You should assure that the recommendations in the hazards analysis are resolved and that the resolution is documented.

A single facility-level hazards analysis can be performed to fulfill the requirements for simple and nearly identical facilities, such as well jackets and single well caissons. You can apply this single hazards analysis to simple and nearly identical facilities after you verify that any site-specific deviations are addressed in each of the SEMS II program elements.

Job Safety Analysis (JSA)

You should ensure a JSA is prepared, conducted, and approved for OCS activities that are identified or discussed in the SEMS II program.

The JSA is a technique used to identify risks to personnel associated with their job activities. They are also used to determine the appropriate mitigation measures needed to reduce job risks to personnel. The JSA should include all personnel involved with the job activity.

You should keep a copy of the most recent JSA at the job site and it should be readily accessible to employees.

You should ensure that the JSA identifies, analyzes, and records:

- the steps involved in performing a specific job
- the existing or potential safety, health, and environmental hazards associated with each step
- the recommended action(s) and/ or procedure(s) that will eliminate or reduce these hazards, the risk of a workplace injury or illness, or environmental impacts

The immediate supervisor of the crew performing the job onsite should conduct the JSA, sign the JSA, and ensure that all personnel participating in the job understand and sign the JSA.

The individual designated as being in charge of the facility should approve and sign all JSAs before personnel start the job.

If a particular job is conducted on a recurring basis, and if the parameters of these recurring jobs do not change, then the person in charge of the job may decide that a JSA for each individual job is not required. The parameters you should consider in making this determination include, but are not limited to, changes in personnel, procedures, equipment, and environmental conditions associated with the job.

All personnel, which includes contractors, should be trained in accordance with the requirements of 250.1915.

You should also verify (in writing) that contractors are trained in accordance with 250.1915 prior to performing a job.

Criteria for Management of Change (MOC)

Management of Change (MOC) is a best practice used to ensure that safety, health and environmental risks are controlled when a company makes changes in their facilities, documentation, personnel, or operations.

When decisions and changes are made rapidly, safety and health risks can increase resulting in disasters. There are many examples of how even simple changes at a worksite have led to tragedy.

You should develop and implement written management of change procedures for modifications associated with the following:

- equipment
- operating procedures
- personnel changes (including contractors)
- materials
- operating conditions

Management of change procedures do not apply to situations involving replacement in kind (such as, replacement of one component by another component with the same performance capabilities).

You should review all changes prior to their implementation.

The following items should be included in the management of change procedures:

- the technical basis for the change
- impact of the change on safety, health, and the coastal and marine environments
- necessary time period to implement the change
- management approval procedures for the change
- employees, including contractors whose job tasks will be affected by a change in the operation, should be informed of, and trained in, the change prior to startup of the process or affected part of the operation
- if a management of change results in a change in the operating procedures of the SEMS II program, such changes should be documented and dated

Module 3 Quiz

- 1. You should ensure that a facility-level _____ is developed and implemented for all the facilities and activities identified or discussed in the SEMS II.**
 - a. hazards analysis
 - b. Job Safety Analysis (JSA)
 - c. safety audit
 - d. safety and environmental inspection

- 2. You should document and maintain a current JSA for each identified or discussed operation _____ at the facility.**
 - a. for five years
 - b. for the life of identified hazards
 - c. for at least two years
 - d. for the life of the operation

- 3. For a facility-level hazards analysis, the analysis should _____ the hazards involved in the operation.**
 - a. immediately remove
 - b. report findings to BOEM
 - c. identify, evaluate, and manage
 - d. mitigate

- 4. You should update the JSA when _____ to ensure that it is consistent with the facility's current operations.**
 - a. a BSEE audit is conducted
 - b. an internal audit is conducted
 - c. an OSHA audit is conducted
 - d. a BOEM audit is conducted

5. The facility-level hazards analysis should address each of the following, except _____.
- a. hazards of operations
 - b. hazards of the tasks
 - c. previous incidents
 - d. a qualitative evaluation

Module 4 - SEMS II Program Criteria

Operating Procedures

You should develop and implement written operating procedures that provide instructions for conducting safe and environmentally sound activities involved in each operation addressed in the SEMS II program.

The SEMS II program should establish and implement safe work practices designed to minimize the risks associated with:

1. operations
2. maintenance
3. modification activities
4. handling hazardous materials and substances

Operating Procedure Elements

SEMS II operating procedures should include the job title and reporting relationship of the person or persons responsible for each of the facility's operating areas and address the following:

- initial startup
- normal operations
- all emergency operations (including but not limited to medical evacuations, weather-related evacuations and emergency shutdown operations)
- normal shutdown
- startup following a turnaround, or after an emergency shutdown
- bypassing and flagging out-of-service equipment

- safety and environmental consequences of deviating from the equipment operating limits and steps required to correct or avoid this deviation
- properties of, and hazards presented by, the chemicals used in the operations
- precautions you will take to prevent the exposure of chemicals used in the operations to personnel and the environment (including control technology, personal protective equipment, and measures to be taken if physical contact or airborne exposure occurs)
- raw materials used in the operations and the quality control procedures you used in purchasing these raw materials
- control of hazardous chemical inventory
- impacts to the human and marine environment identified through the hazards analysis

Operating procedures should be accessible to all employees involved in the operations. They should be reviewed at the conclusion of specified periods and as often as necessary to assure they reflect current and actual operating practices, including any changes made to the operations.

You should develop and implement safe and environmentally sound work practices for identified hazards during operations and the degree of hazard presented.

The reviewing and changing procedures should be documented and communicated to responsible personnel.

Contractor Selection

The SEMS II program should document contractor selection criteria. When selecting a contractor, you should obtain and evaluate information regarding the contractor's safety record and environmental performance.

Ensure that contractors have their own written safe work practices. Contractors may adopt appropriate sections of the SEMS II program.

You and the contractor should document an agreement on appropriate contractor safety and environmental policies and practices before the contractor begins work at the facilities.

A contractor is anyone performing work for you. However, these requirements do not apply to contractors providing domestic services to you or other contractors. Domestic services include:

- janitorial work
- food and beverage service
- laundry service
- housekeeping
- similar activities

Document Contractor Qualifications

Document, in writing, that the contracted employees are knowledgeable and experienced in the work practices necessary to perform their job in a safe and environmentally sound manner.

- Document, in writing, each contracted employee's expertise to perform his/her job.
- Provide a copy of the contractor's safety policies and procedures to the operator and BSEE upon request.

Contractor Selection Procedures

Include SEMS II procedures for selecting and verifying the following:

- contractors have the skills and knowledge to perform their assigned duties
- contractors are conducting activities in accordance with the requirements in the SEMS II program
- making the results of the selection and verification of contractors available to BSEE upon request

The SEMS II program should include procedures and verification that contractor personnel understand and can perform their assigned duties for activities such as, but not limited to:

- installation, maintenance, or repair of equipment
- construction, startup, and operation of the facilities
- turnaround operations
- major renovation
- specialty work

You should perform periodic evaluations of the performance of contract employees that verifies they are fulfilling their obligations.

You should also maintain a contractor employee injury and illness log for 2 years related to the contractor's work in the operation area, and include this information on Form BSEE-0131.

You should inform the contractors of any known hazards at the facility they are working on including, but not limited to fires, explosions, slips, trips, falls, other injuries, and hazards associated with lifting operations.

You should develop and implement safe work practices to control the presence, entrance, and exit of contract employees in operation areas.

Training Criteria

The SEMS II program should establish and implement a training program so that all personnel are trained in accordance with their duties and responsibilities to work safely and are aware of potential environmental impacts.

Training should address at least the following topics:

- operating procedures (250.1913)
- safe work practices (250.1914)
- emergency response and control measures (250.1918)
- SWA (250.1930)
- UWA (250.1931)

- EPP (250.1932)
- reporting unsafe working conditions (250.1933)
- how to recognize and identify hazards and how to construct and implement JSAs (250.1911)

You should also document the instructors' training qualifications.

The SEMS II training program should include each of the following elements:

- Initial orientation and training for the basic well-being of personnel and protection of the environment, and ensure that persons assigned to operate and maintain the facility possess the required knowledge and skills to carry out their duties and responsibilities, including startup and shutdown.
- Periodic training to maintain understanding of, and adherence to, the current operating procedures, using periodic drills, to verify adequate retention of the required knowledge and skills.
- Communication requirements to ensure that personnel will be informed of and trained as outlined in this section whenever a change is made in any of the areas in the SEMS II program that impacts their ability to properly understand and perform their duties and responsibilities. Training and/or notice of the change should be given before personnel are expected to operate the facility.
- How you will verify that the contractors are trained in the work practices necessary to understand and perform their jobs in a safe and environmentally sound manner in accordance with all provisions of this section.

Module 4 Quiz

- 1. SEMS II operating procedures should include job title, reporting relationships and address each of the following elements, except ____.**
 - a. BSEE reporting
 - b. initial startup
 - c. normal operations
 - d. emergency operations

- 2. SEMS II operating procedures should include job title, reporting relationships and address each of the following elements, except ____.**
 - a. normal shutdown
 - b. startup following a turnaround
 - c. bypassing or flagging out-of-service equipment
 - d. OSHA reporting procedures

- 3. SEMS II contractor selection requirements applies to all the following classifications of contractors, except ____.**
 - a. maintenance contractors
 - b. construction contractors
 - c. contractors providing domestic service
 - d. contractors providing electrical services

- 4. Include all the following SEMS II procedures for selecting and verifying contractors, except ____.**
 - a. contractors have adequate knowledge and skills
 - b. contractors providing domestic service are selected and verified
 - c. contractors are in compliance with SEMS II requirements
 - d. results of selection and verification are made available to BSEE

- 5. The SEMS II program, you should maintain a contractor employee injury and illness log for _____ related to the contractor's work in the operation area.**
- a. 2 years
 - b. at least 1 year
 - c. 5 years
 - d. for the life of the contract

Module 5- Program Criteria (Continued)

Mechanical Integrity Criteria

The purpose of mechanical integrity is to ensure that equipment is fit for service.

The mechanical integrity program should encompass all equipment and systems used to prevent or mitigate uncontrolled releases of:

- hydrocarbons
- toxic substances
- other materials that may cause environmental or safety consequences

You should develop and implement written procedures that provide instructions to ensure the mechanical integrity and safe operation of equipment through:

- inspection
- testing
- quality assurance

These procedures should address the following:

- The design, procurement, fabrication, installation, calibration, and maintenance of the equipment and systems in accordance with the manufacturer's design and material specifications.
- The training of each employee involved in maintaining the equipment and systems so that the employees can implement the mechanical integrity program.
- The frequency of inspections and tests of the equipment and systems. The frequency of inspections and tests should be in accordance with BSEE regulations and meet the manufacturer's recommendations. Inspections and tests can be performed more frequently if determined to be necessary by prior operating experience.

- The documentation of each inspection and test that has been performed on the equipment and systems. This documentation should identify the date of the inspection or test; include the name and position, and the signature of the person who performed the inspection or test; include the serial number or other identifier of the equipment on which the inspection or test was performed; include a description of the inspection or test performed; and the results of the inspection test.
- The correction of deficiencies associated with equipment and systems that are outside the manufacturer's recommended limits. Such corrections should be made before further use of the equipment and system.
- The installation of new equipment and constructing systems. The procedures should address the application for which they will be used.
- The modification of existing equipment and systems. The procedures should ensure that they are modified for the application for which they will be used.
- The verification that inspections and tests are being performed. The procedures should be appropriate to ensure that equipment and systems are installed consistent with design specifications and the manufacturer's instructions.
- The assurance that maintenance materials, spare parts, and equipment are suitable for the applications for which they will be used.

Pre-startup Review Criteria

The SEMS II program should require that the commissioning process include a pre-startup safety and environmental review for new and significantly modified facilities that are subject to the SEMS II rule to confirm that the following criteria are met:

- Construction and equipment are in accordance with applicable specifications.
- Safety, environmental, operating, maintenance, and emergency procedures are in place and are adequate.
- Safety and environmental information is current.
- Hazards analysis recommendations have been implemented as appropriate.

- Training of operating personnel has been completed.
- Programs to address management of change and other elements of the SEMS II rule are in place.
- Safe work practices are in place.

Emergency Response and Control Criteria

The SEMS II program should require that emergency response and control plans are in place and are ready for immediate implementation.

These plans should be validated by drills carried out in accordance with a schedule defined by the SEMS II training program (250.1915). The SEMS II emergency response and control plan should include:

1. **Emergency Action Plan (EAP)** that assigns authority and responsibility to the appropriate qualified person(s) at a facility for:
 - initiating effective emergency response and control
 - addressing emergency reporting and response requirements
 - complying with all applicable governmental regulations
2. **Emergency Control Center (ECC)** designated for each facility with access to the Emergency Action Plans, oil spill contingency plan, and other safety and environmental information (250.1910)
3. **Training** incorporating emergency response and evacuation procedures conducted periodically for all personnel (including contractor's personnel), as required by the SEMS II training program (250.1915)
4. **Drills** should be based on realistic scenarios conducted periodically to exercise elements contained in the facility or area emergency action plan. An analysis and critique of each drill should be conducted to identify and correct weaknesses.

Investigating Incidents Criteria

To learn from both non-injury incidents (near misses) as well as injury incidents, and help prevent similar incidents, the SEMS II program should establish procedures for investigation of all incidents with serious safety or environmental consequences.

It should require investigation of incidents that are determined by facility management or BSEE to have possessed the potential for serious safety or environmental consequences.

Incident investigations should be initiated as promptly as possible, with due regard for the necessity of securing the incident scene and protecting people and the environment.

Incident investigations should be conducted by personnel knowledgeable in the process involved, investigation techniques, and other specialties that are relevant or necessary.

Incident investigations should address the following:

- a. nature of the incident
- b. factors (human or other) that contributed to the initiation of the incident and its escalation/control
- c. recommended corrective actions identified as a result of the investigation

A corrective action program should be established based on the findings of the investigation in order to analyze incidents for common root causes. The corrective action program should:

- a. Retain the findings of investigations for use in the next hazard analysis update or audit.
- b. Determine and document the response to each finding to ensure that corrective actions are completed.
- c. Implement a system whereby conclusions of investigations are distributed to similar facilities and appropriate personnel within their organization.

Module 5 Quiz

- 1. The purpose of _____ is to ensure that equipment is fit for service.**
 - a. mechanical integrity
 - b. lockout/tagout
 - c. job safety analysis
 - d. recordkeeping

- 2. Procedures in an effective mechanical integrity program should address all the following, except _____.**
 - a. design of equipment and systems
 - b. procurement of equipment and systems
 - c. fabrication of equipment and systems
 - d. liquidation of equipment and systems

- 3. The SEMS II program should require that the commissioning process include a _____ for new and significantly modified facilities that are subject to the SEMS II rule.**
 - a. preview of all programs
 - b. safety committee meeting
 - c. pre-startup safety and environmental review
 - d. BSEE review

- 4. The SEMS II program emergency response and control plans should be validated by _____.**
 - a. BSEE review
 - b. scheduled drills
 - c. SEMS II analysis
 - d. training evaluation

- 5. Incident investigations should address all the following, except ____.**
- a. the nature of the incident
 - b. identification of personnel at fault
 - c. the contributing factors
 - d. recommended corrective actions

Module 6 - SEMS II Auditing Requirements

Auditing Requirements

The SEMS II program should be audited by an accredited Audit Service Provider (ASP) according to the requirements of the SEMS II rule and API RP 75, Section 12.

The audit process should also meet or exceed the criteria in Sections 9.1 through 9.8 of [Requirements for Third-party SEMS Auditing and Certification of Deepwater Operations COS-2-03](#) or its equivalent.

The audit team leader should be an employee, representative, or agent of the ASP, and should not have any affiliation with the operator. The remaining team members may be chosen from the personnel and those of the ASP.

The audit should be comprehensive and include all elements of the SEMS II program. It should also identify safety and environmental performance deficiencies.

Audit Plan and Procedures

The audit plan and procedures should meet or exceed all the recommendations included in API RP 75 section 12 and include information on how you addressed those recommendations.

You should specifically address the following items:

1. Section 12.1 General
2. Section 12.2 Scope
3. Section 12.3 Audit Coverage
4. Section 12.4 Audit Plan: You should submit the written Audit Plan to BSEE at least 30 days before the audit. BSEE reserves the right to modify the list of facilities that you propose to audit.
5. Section 12.5 Audit Frequency, except the audit interval, should not exceed 3 years after the 2-year time period for the first audit. The 3-year auditing cycle begins on the start date of each comprehensive audit (including the initial implementation audit) and ends on the start date of the next comprehensive audit.

6. Section 12.6 Audit Team. The audits should be performed by an ASP as described in 250.1921. You should include the ASP's qualifications in the audit plan.

You should submit an audit report of the audit findings, observations, deficiencies identified, and conclusions to BSEE within 60 days of the audit completion date.

Corrective Action Plan (CAP)

You should provide BSEE with a copy of the Corrective Action Plan (CAP) for addressing the deficiencies identified in the audit within 60 days of the audit completion date.

The CAP should include the name and job title of the personnel responsible for correcting the identified deficiency(ies).

The BSEE will notify you as soon as practicable after receipt of the CAP if the proposed schedule is not acceptable or if the CAP does not effectively address the audit findings.

Audit Service Provider (ASP) Qualifications

The ASP should meet or exceed the qualifications, competency, and training criteria contained in Section 3 and Sections 6 through 10 of Qualification and Competence Requirements for Audit Teams and Auditors Performing Third-party SEMS II Audits of Deepwater Operations, COS-2-01, or its equivalent.

- The ASP should be accredited by a BSEE-approved AB (See COS information below)
- The ASP should perform an audit in accordance with 250.1920(a).

[More information on becoming an ASP](#)

Accreditation Body (AB) Qualifications

In order for BSEE to approve an Accreditation Body (AB), the organization should satisfy the requirements of the International Organization for Standardization's (ISO/ IEC 17011) Conformity assessment— *General requirements for accreditation bodies accrediting conformity assessment bodies*, or equivalent.

The AB should have an accreditation process that meets or exceeds the requirements contained in Section 6 of the Requirements for Accreditation of Audit Service Providers Performing SEMS

II Audits and Certification of Deepwater Operations, COS–2–04 or its equivalent, and other requirements specified in the SEMS II rule.

- Organizations requesting approval should submit documentation to BSEE describing the process for assessing an ASP for accreditation and approving, maintaining, and withdrawing the accreditation of an ASP.
- An AB may be subject to BSEE audits and other requirements deemed necessary to verify compliance with the accreditation requirements.

An AB should have procedures in place to avoid conflicts of interest with the ASP and make such information available to BSEE upon request.

The Center for Offshore Safety (COS) is an AB. The COS is an industry sponsored organization focused exclusively on offshore safety in the deepwater (water depths >1000 ft.) Gulf of Mexico. The Center serves the US offshore oil & gas industry with the purpose of adopting standards of excellence to ensure continuous improvement in safety and offshore operational integrity.

[More information on the COS...](#)

Module 6 Quiz

- 1. The SEMS II program should be audited by ____.**
 - a. a COS Auditor (COSA)
 - b. an accredited Audit Service Provider (ASP)
 - c. a BSEE representative
 - d. a BOEM representative

- 2. The audit should be comprehensive and include ____ the SEMS II program.**
 - a. those responsible for
 - b. creators of
 - c. previous versions of
 - d. all elements of

- 3. The SEMS II audit plan should be submitted to BSEE at least ____ days before the audit.**
 - a. 30
 - b. 20
 - c. 45
 - d. 60

- 4. The SEMS II audit report sent to BSEE should include each of the following components, except ____.**
 - a. findings
 - b. liable parties
 - c. deficiencies identified
 - d. conclusions

- 5. Which of the following is an accreditation body which is an industry sponsored organization focused exclusively on offshore safety in the deepwater (water depths>1000 ft.) Gulf of Mexico?**
- a. Occupational Safety and Health Administration (OSHA)
 - b. Center for Offshore Safety (COS)
 - c. Bureau of Safety and Environmental Enforcement (BSEE)
 - d. American National Standards Institute (ANSI)

Module 7- SEMS II BSEE Evaluation

How BSEE Enforcement Works

BSEE exercises safety and environmental enforcement functions in the following areas:

- OCS operations
- permitting
- inspections and investigations
- enforcement
- penalties
- research

BSEE Evaluation of the SEMS

The BSEE, or its authorized representative, may evaluate or visit the facility to determine whether the SEMS II program is in place, addresses all elements and is effective in doing all the following:

- protecting worker safety and health
- protecting the environment
- preventing incidents

The BSEE, or its authorized representative, may evaluate any and all aspects of the SEMS II program as outlined in the SEMS II rule. These evaluations or visits may be random and may be based upon the operator's performance or that of the contractors.

For the evaluations, you need to make the following available to BSEE upon request:

- written SEMS II program
- audit team's qualifications

- SEMS II audits conducted of the program
- documents or information relevant to whether you have addressed and corrected the deficiencies of the audit
- other relevant documents or information

During the site visit BSEE may verify the following

- personnel are following the SEMS II program
- you can explain and demonstrate the procedures and policies included in the SEMS II program
- you can produce evidence to support the implementation of the SEMS II program

BSEE Cites Offshore Operators for Failure to Complete Safety and Environmental Management System Audits

WASHINGTON - Bureau of Safety and Environmental Enforcement (BSEE) Director Brian Salerno cited 12 offshore operators for their failure to demonstrate compliance with the Safety and Environmental Management Systems (SEMS) requirements of the Workplace Safety Rule, 30 CFR Subpart S. The SEMS requirements were put in place in October 2010, following the Deepwater Horizon oil spill. Per the regulations, offshore operators were required to complete an initial SEMS audit by November 15, 2013.

"An effective, fully implemented SEMS program is essential to reducing risks across offshore operations," said Director Salerno. "BSEE must be assured that companies are addressing the key elements of SEMS and that they are not needlessly putting their workers and the environment at risk. We will vigorously enforce compliance with this fundamental requirement."

Types of BSEE Inspections

BSEE inspectors travel offshore every day conducting all types of inspections to promote safety and ensure compliance with federal regulations covering oil and gas operations. The table below provides an example of the types of inspections conducted by BSEE.

Additional BSEE Evaluations

In addition to regular audits, the BSEE may direct you to have an ASP audit of the SEMS II program if BSEE identifies safety or non-compliance concerns based on:

- results of their inspections and evaluations
- result of an event
- BSEE may conduct an audit

If BSEE directs you to have an ASP audit:

- You are responsible for all the costs associated with the audit.
- The ASP should meet the requirements of 250.1920 and 250.1921 of the SEMS II rule.

You should submit an audit report of the audit findings, observations, deficiencies identified, and conclusions to BSEE within 60 days of the audit completion date.

If BSEE conducts the audit, BSEE will provide you with a report of the audit findings, observations, deficiencies identified, and conclusions as soon as practicable.

BSEE Review

If BSEE determines that the SEMS II program is not in compliance with the SEMS II rule we may initiate one or more of the following enforcement actions:

- issue an Incident(s) of Noncompliance (INC)
- assess civil penalties
- initiate probationary or disqualification procedures from serving as an OCS operator

BSEE Inspections

The OCS Lands Act authorizes and requires the Bureau to provide for both an annual scheduled inspection and a periodic unscheduled (unannounced) inspection of all oil and gas operations

on the outer continental shelf. The annual inspection examines all safety equipment designed to prevent blowouts, fires, spills, or other major accidents.

Potential Incident of Noncompliance (PINC) – Checklist items which BSEE inspects to pursue safe operations on the Outer Continental Shelf. This list of inspection items is derived from all regulations for safety and environmental standards. Categorized [Lists may be viewed here](#).

Incident of Noncompliance (INC) – If an inspector finds a violation of BSEE regulations as they are outlined in the PINC checklists, the Bureau Inspector issues an Incident of Noncompliance (INC) citation to the operator.

Depending on the severity of the violation, the inspector can declare either a *Warning or Shut-In* INC.

- **Warning:** A warning INC is issued if the violation is not considered to be severe or threatening. The violation must be corrected within a reasonable amount of time as specified on the INC.
- **Component Shut-in:** A component shut-in INC is issued when a violation is considered severe or threatening. The operator must shut-in the component or piece of equipment that is in violation. The violation must be corrected before the operator is allowed to continue the activity in question.
- **Facility Shut-in:** A facility shut-in INC is issued when a violation is considered severe or threatening to the safety of personnel or the environment. The operator must shut-in the entire facility. The violation must be corrected before the operator is allowed to re-start facility operations.

Reviewing officers always review the following for potential civil penalties:

- violations not corrected within the period of time BSEE identifies
- violations that cause or may pose a threat of serious, irreparable, or immediate harm or damage to life, property, or the environment

Once a letter is issued to a violator assessing a proposed civil penalty, the violator has 30 days from receipt of the letter to schedule a meeting and submit information, or pay the penalty.

At the end of 30 days, the BSEE Reviewing Officer issues a decision on the amount of any final civil penalty. This decision can be appealed to the Interior Board of Land Appeals.

Currently, the maximum civil penalty rate for Outer Continental Shelf Lands Act (OCSLA) violations is \$40,000 per violation per day. The rate is adjusted at least once every three years by the Interior Secretary to reflect any increase in the Consumer Price Index prepared by the U.S. Department of Labor. It was most recently increased in June 2011.

BSEE Issues Incident of Non-Compliance for Lack of Adequate Supervision and Allowing Hazardous Work Areas

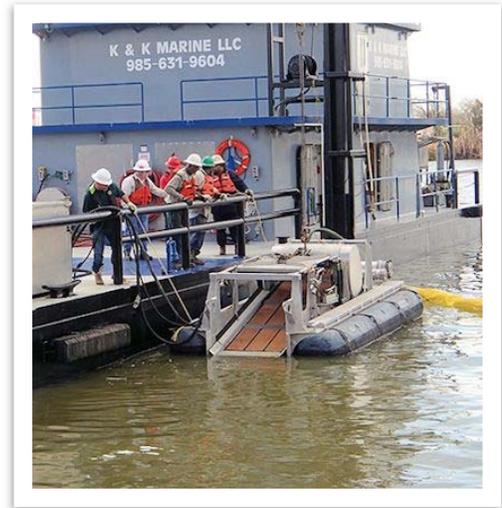
BSEE inspectors recently completed a District Investigation that examined a crane incident which took place in late February 2012 during drilling operations. From the investigation, the BSEE inspectors determined that a blocked walkway in the vicinity of the operation and an inexperienced rigger whose job it was to guide and secure the casing as it was being moved by the crane were contributing causes of the accident. (BSEE Enforcement Newsletter, 2nd Qtr., FY 2012)

Real-Life Scenario

BSEE Completes Unannounced Spill Drill Testing Gulf of Mexico Operator

On February 19, 2014, the Bureau of Safety and Environmental Enforcement (BSEE) completed an unannounced oil spill response exercise. The exercise occurred in BSEE's Gulf of Mexico Region and included the deployment of response equipment. The purpose of BSEE's spill exercises is to determine if an operator can effectively respond to an emergency using its Oil Spill Response Plan.

BSEE Oil Spill Response Division Chief David Moore commented, "this exercise allowed us to test preparedness to implement key components of the response plan as well as provide an opportunity for our Federal and State partner agencies to participate and observe."



Module 7 Quiz

- 1. The Bureau of Safety and Environmental Enforcement (BSEE) exercises enforcement functions in all the following areas, except ____.**
 - a. training
 - b. investigations
 - c. penalties
 - d. research

- 2. When BSEE arrives for a site visit, they may verify all the following, except ____.**
 - a. personnel are following the SEMS II program
 - b. procedures and policies can be explained and demonstrated
 - c. evidence that the SEMS II program has been implemented
 - d. names and positions of safety committee members

- 3. When BSEE issues a facility shut-in INC, the operator must shut-in the entire facility and the violation must be corrected ____.**
 - a. or red-tagged prior to BSEE approval
 - b. in accordance with applicable OSHA rules
 - c. before the operator is allowed to re-start facility operations
 - d. before the operator is allowed to continue the activity in question

- 4. When BSEE issues a component shut-in INC, the violation must be corrected ____.**
 - a. before the operator is allowed to restart facility operations
 - b. or red-tagged prior to BSEE approval
 - c. in accordance with applicable OSHA rules
 - d. before the operator is allowed to continue the activity in question

- 5. Currently, the maximum civil penalty rate for Outer Continental Shelf Lands Act (OCSLA) violations is _____ per violation per day.**
- a. \$10,000
 - b. \$40,000
 - c. \$5,000
 - d. \$30,000

Module 8 - Recordkeeping, Authority and Participation

Recordkeeping Requirements

The SEMS II program procedures should ensure that records and documents are maintained for a period of 6 years, except as provided below. You should document and keep all SEMS II audits for 6 years and make them available to BSEE upon request. You should maintain a copy of all SEMS II program documents at an onshore location.

For JSAs, the person in charge of the job should document the results of the JSA in writing and should ensure that records are kept onsite for 30 days. In the case of a Mobile Offshore Drilling Unit (MODU), records should be kept onsite for 30 days or until you release the MODU, whichever comes first. You should retain these records for 2 years and make them available to BSEE upon request.

You should document and date all management of change provisions as specified in 250.1912. You should retain these records for 2 years and make them available to BSEE upon request.

You should keep the injury/illness log for 2 years and make them available to BSEE upon request.

You should keep all evaluations completed on contractor's safety policies and procedures for 2 years and make them available to BSEE upon request.

For Stop Work Authority (SWA), you should document all training and reviews required by § 250.1930(e). You should ensure that these records are kept onsite for 30 days. In the case of a MODU, records should be kept onsite for 30 days or until you release the MODU, whichever comes first. You should retain these records for 2 years and make them available to BSEE upon request.

For Employee Participation Plans (EPP), you should document the employees' participation in the development and implementation of the SEMS II program. You should retain these records for 2 years and make them available to BSEE upon request.

Submitting Outer Continental Shelf (OCS) Performance Measure

You should submit Form BSEE-0131 on an annual basis by March 31st.

On the BSEE Form 0131, you should indicate the following:

- total number of hours worked by company and contractor employees during the 4 quarters of the calendar year
- total number of company and contractor employee recordable injuries and illnesses and Days Away or Restricted Transferred (DART) injuries and illnesses for each of the 4 quarters of the calendar year

The injury and illness data should be recorded for each of the following categories:

- company/contractor employee production operations
- company/contractor employee drilling operations
- company/contractor employee construction operations

The form should be broken down quarterly, reporting the previous calendar year's data.

Stop Work Authority (SWA) Procedures

The **Stop Work Authority (SWA)** procedures should ensure the capability to immediately stop work that is creating imminent risk or danger.

These procedures should grant all personnel the responsibility and authority, without fear of reprisal, to stop work or decline to perform an assigned task when an imminent risk or danger exists.

Imminent risk or danger means any condition, activity, or practice in the workplace that could reasonably be expected to cause:

- death or serious physical harm
- significant environmental harm to:
 - land
 - air
 - mineral deposits
 - marine or coastal environment

- human environment

The person in charge of the conducted work is responsible for ensuring the work is stopped in an orderly and safe manner. Individuals who receive a notification to stop work should comply with that direction immediately.

Work may be resumed when the individual on the facility with Ultimate Work Authority (UWA) determines that the imminent risk or danger does not exist or no longer exists.

The decision to resume activities should be documented in writing as soon as practicable.

You should include SWA procedures and expectations as a standard statement in all JSAs.

You should conduct training on the SWA procedures as part of orientations for all new personnel who perform activities on the Outer Continental Shelf (OCS).

Additionally, the SWA procedures should be reviewed during all meetings focusing on safety on facilities subject to the SEMS II rule.

Ultimate Work Authority Requirements

Ultimate Work Authority (UWA) means the authority assigned to an individual on the facility to make the final or ultimate decision to stop work or take action taking into account all applicable regulations.

The SEMS II program should have a process to identify the individual with the UWA on the facility. You should designate this individual taking into account all applicable USCG regulations that deal with designating a person in charge of an OCS facility.

The SEMS II program should clearly define who is in charge at all times.

In the event that multiple facilities, including a MODU, are attached and working together or in close proximity to one another to perform an OCS operation, the SEMS II program should identify the individual with the UWA over the entire operation, including all facilities.

You should ensure that all personnel clearly know who has UWA and who is in charge of a specific operation or activity at all times, including when that responsibility shifts to a different individual.

Emergency Procedures

The SEMS II program should provide that if an emergency occurs that creates an imminent risk or danger to the health or safety of an individual, the public, or to the environment, the individual with the UWA is authorized to pursue the most effective action necessary in that individual's judgment for mitigating and abating the conditions or practices causing the emergency.

Employee Participation Requirements

The management should consult with their employees on the development, implementation, and modification of the SEMS II program.

The management should develop a written plan of action regarding how the appropriate employees, in both the offices and those working on offshore facilities, will participate in the SEMS II program development and implementation.

The management should ensure that employees have access to sections of the SEMS II program that are relevant to their jobs.

Reporting Unsafe Working Conditions

The SEMS II program should include procedures for all personnel to report unsafe working conditions in accordance with 250.193. These procedures should take into account applicable USCG reporting requirements for unsafe working conditions.

You should post a notice at the place of employment in a visible location frequently visited by personnel that contains the reporting information in 250.193.

Civil Penalties Highlight BSEE's Commitment to Personnel Safety

Regulatory violations that pose a threat of serious, irreparable, or immediate harm or damage to life are always reviewed for potential civil penalties by a BSEE Reviewing Officer. One such violation was the subject of a civil penalty case that was closed and paid during the 2nd Quarter. In July 2011 during the course of an inspection, bureau inspectors discovered two open holes or fall hazards which posed a threat to the safety of personnel on the rig. The operator paid civil penalties in the amount of \$50,000.

(BSEE Enforcement Newsletter, 2nd Qtr., FY 2012)

Module 8 Quiz

1. You should maintain a copy of all SEMS II program documents _____.
 - a. at an onshore location
 - b. in a locked location
 - c. in a secure location on the platform
 - d. any location other than the facility

2. **Injury/Illness logs should be kept for _____ years and made available to BSEE upon request.**
 - a. 5
 - b. 4
 - c. 3
 - d. 2

3. **Who should document the results of the JSA in writing?**
 - a. The safety officer
 - b. The person who actually does the job
 - c. The person in charge of the job
 - d. The BSEE representative upon review

4. **Which of the following grants to all personnel the responsibility and authority, without fear of reprisal, to stop work or decline to perform an assigned task when an imminent risk or danger exists?**
 - a. Ultimate Work Authority
 - b. Stop Work Authority
 - c. Imminent Danger Authority
 - d. Whistleblower Rule

- 5. You should post a notice at the place of employment _____ that contains the unsafe working conditions reporting information.**
- a. and issue cards
 - b. in a visible location frequently visited by personnel
 - c. at each manager or supervisor desk
 - d. in all primary languages

Endnotes

1. Health and Safety Executive. (2014). Offshore Oil and Gas. Retrieved from: www.hse.gov.uk/offshore/index.htm
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5. Occupational Safety and Health Administration (2014). Oil and Gas Extraction. Retrieved from: www.osha.gov/SLTC/oilgaswelldrilling/otherresources.html
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