



SEMS Compliance

The SEMS (Safety & Environmental Management System) requirements are outlined to fulfill the requirements of U.S. Code of Federal Regulations Title 30 Part 250 (30 CFR 250), Subpart S (30 CFR 250 §§1900-1929) (Regulations), including the requirement that Operators who conduct oil, gas and sulphur-related activities regulated by the United States Bureau of Safety and Environmental Enforcement (BSEE) in the Outer Continental Shelf (OCS) must develop, implement and maintain a Safety and Environmental Management System (SEMS) for such activities. As part of these Regulations, the entirety of the American Petroleum Institute's Recommended Practice 75 (API RP75) has been made mandatory, except where specifically superseded in 30 CFR 250, Subpart S1. Crescent Safety Services provides highly trained and qualified consultants that will assist in all phases of implementation and verification of compliance within SEMS. Our services encompass both SEMS 1 and SEMS 2 requirements and updates.

The initial SEMS rule is made up of 13 elements:

1. **General provisions: for implementation, planning and management review and approval of the SEMS program.**
2. **Safety and environmental information: safety and environmental information needed for any facility, e.g. design data; facility process such as flow diagrams; mechanical components such as piping and instrument diagrams; etc.**
3. **Hazards analysis: a facility-level risk assessment.**
4. **Management of change: program for addressing any facility or operational changes including management changes, shift changes, contractor changes, etc.**
5. **Operating procedures: evaluation of operations and written procedures.**
6. **Safe work practices: manuals, standards, rules of conduct, etc.**
7. **Training: safe work practices, technical training – includes contractors.**
8. **Mechanical integrity: preventive maintenance programs, quality control.**
9. **Pre-startup review: review of all systems.**
10. **Emergency response and control: emergency evacuation plans, oil spill contingency plans, etc.; in place and validated by drills.**
11. **Investigation of Incidents: procedures for investigating incidents, corrective action and follow-up.**
12. **Audits: rule strengthens RP 75 provisions by requiring an initial audit within the first two years of implementation and additional audits in three year intervals.**
13. **Records and documentation: documentation required that describes all elements of the SEMS program.**

The Workplace Safety Rule became effective on November 15, 2010. Operators were required to implement a SEMS program by November 15, 2011 and must still submit their first completed SEMS audit to BSEE by November 15, 2013. 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 audits must be in compliance with the SEMS II Rule by June 4, 2015.

The SEMS II updates added several new elements

- 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.