

Safety and Environmental Management Systems (SEMS) Potential Incident of Noncompliance List

GENERAL

- S-100** **HAS A SEMS PROGRAM BEEN DEVELOPED, IMPLEMENTED, AND MAINTAINED IN ACCORDANCE WITH API RP 75?**
Authority: 30 CFR 250.1900, **Enforcement Actions:** W/S
30 CFR 250.1916
INSPECTION PROCEDURE:
Physically review lessee's SEMS program and verify that all thirteen elements are addressed, implemented and maintained for each facility under BSEE jurisdiction.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC if all elements described in 250.1902 are not addressed.
Issue one facility shut-in (S) INC for an inspection of a lessee's SEMS program if the lessee has failed to develop, implement, and maintain a SEMS program.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per SEMS program audited
- S-101** **HAS FORM MMS-131 (AS REQUIRED IN 250.1929 BEEN SUBMITTED TO BSEE ON AN ANNUAL BASIS BEGINNING MARCH 31, 2011?**
Authority: 30 CFR 250. 1900(a) **Enforcement Action:** W
30 CFR 250. 1900(b)
30 CFR 250. 1929
INSPECTION PROCEDURE:
1. Verify that form BSEE-0131 has been submitted and that the lessee has documentation of the form being submitted.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has no documentation of form BSEE-0131 being submitted annually as required.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per SEMS program audited.
- S-102** **HAS MANAGEMENT ENSURED THAT GOALS AND PERFORMANCE MEASURES ARE ESTABLISHED FOR THEIR SEMS PROGRAM?**
Authority: 30 CFR 250. 1909(a) **Enforcement Action:** W
INSPECTION PROCEDURE:
1. Verify that management has a written program that provides leadership in establishing goals and performance measures, demands accountability for implementation, and provides necessary resources for carrying out an effective program.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has no program in place to establish goals and performance measures.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per SEMS program audited

SAFETY AND ENVIRONMENTAL INFORMATION

SAFETY

S-200

DOES THE SEMS PROGRAM REQUIRE THAT A COMPILATION OF SAFETY AND ENVIRONMENTAL INFORMATION BE DEVELOPED AND MAINTAINED FOR THE FACILITY?

Authority: 30 CFR 250.1910(a)
API RP 75 SECTION 2.1

Enforcement Action: W

INSPECTION PROCEDURE:

1. Verify that management has developed and maintained a compilation of safety and environmental information that provides the basis for implementing succeeding program elements

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per SEMS program audited.

S-201

DOES THE SEMS PROGRAM SAFETY AND ENVIRONMENTAL INFORMATION INCLUDE ALL API RP 75 PROGRAM ELEMENTS?

Authority: 30 CFR 250.1910(b) (1)
API RP 75 SECTION 2.1

Enforcement Action: W

INSPECTION PROCEDURE:

1. Verify that management has developed and maintains the safety and environmental information for all of its facilities under BSEE jurisdiction.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per SEMS program audited

S-202

DOES THE MECHANICAL AND FACILITIES DESIGN INFORMATION INCLUDE AS APPROPRIATE THE P&ID DIAGRAM, ELECTRICAL AREA CLASSIFICATIONS, EQUIPMENT ARRANGEMENT DRAWINGS, DESIGN BASIS FOR THE RELIEF SYSTEM, DESCRIPTION FOR THE ALARM SYSTEM, DESCRIPTION OF THE SHUTDOWN SYSTEM, THE INTERLOCK SYSTEMS FOR FIRED EQUIPMENT, WELL CONTROL SYSTEMS, PASSIVE AND ACTIVE FIRE PROTECTION SYSTEM, EMERGENCY EVACUATION PROCEDURES, AND THE CATHODIC SYSTEM FOR CORROSION ISSUES ?

Authority: API RP 75 SECTION 2.3.1
30 CFR 250.1916

Enforcement Action: W/C/S

INSPECTION PROCEDURE:

1. Verify that the SEMS program has been developed and maintained, and includes written procedures that provide instructions to ensure the mechanical integrity and safe operation of equipment through inspection, testing, and quality assurance

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

Issue one component shut-in (C) INC if a particular piece of process equipment does not have supporting documentation.

Issue a facility shut-in (S) INC when the unsafe situation poses an immediate danger to the entire facility or personnel and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per SEMS program audited

ENVIRONMENTAL

S-320 DOES THE SEMS PROGRAM ADDRESS ALL PHASES OF SEMS PROGRAM DEVELOPMENT INCLUDING: (1) SAFETY AND ENVIRONMENTAL POLICY, (2) PLANNING, (3) IMPLEMENTATION AND OPERATION, (4) VERIFICATION AND CORRECTIVE ACTION, (5) MANAGEMENT REVIEW, AND (6) CONTINUAL IMPROVEMENT?

Authority: 30 CFR 250. 1909(e)

Enforcement Action: W

API RP 75 SECTION 1

1. Verify that the SEMS program addresses each phase of the SEMS program development.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has no program in place to establish each of the phases of their SEMS program.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per SEMS program audited.

S-321 DOES THE SEMS PROGRAM ACHEIVE THE OPERATOR'S ESTABLISHED ENVIRONMENTAL GOALS AND PERFORMANCE MEASURES?

Authority: 30 CFR 250. 1910

Enforcement Action: W

API RP 75 SECTION 1

1. Verify that the SEMS program establishes environmental goals and performance measures.

2. Verify that the SEMS program has achieved the established environmental goals and performance measures within the specified time frame.

3. Verify documentation exists, as appropriate, and is up-to-date.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per SEMS program audited.

S-323 HAS MANAGEMENT ENSURED THAT ESTABLISHED ENVIRONMENTAL GOALS AND PERFORMANCE MEASURES HAVE BEEN COMMUNICATED TO ALL PERSONNEL?

Authority: 30 CFR 250. 1910

Enforcement Action: W

API RP 75 SECTION 1

1. Verify that the management has communicated the established environmental goals and performance measures to all personnel, as appropriate.

2. Verify documentation exists, as appropriate, and is up-to-date.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per SEMS program audited.

S-324 REGULARLY ASSIGNED PERSONNEL TRAINED AS APPROPRIATE IN ENVIRONEMTNAL PROTECTION AND POLLUTION CONTROL?

Authority: API RP 75 SECTION 7.7.2.2(f)

Enforcement Action: W

1. Verify the operator's SEMS Program has procedures in place for training all regularly assigned personnel in environmental protection and pollution control.

2. Verify the training has been conducted on a regular basis and extended to new personnel.

3. To demonstrate compliance, verify training documentation exists, as appropriate, and is up-to-date.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per SEMS program audited.

S-324

DOES THE SEMS PROGRAM ADDRESS ALL APPLICABLE ENVIRONMENTAL REQUIREMENTS AS SET FORTH IN EXISTING REGULATIONS AND CLARIFYING NTLs THROUGHOUT ALL PHASES OF THE SEMS PROGRAM?

Authority: 30 CFR 250. 1910

Enforcement Action: W

API RP 75 SECTION 1 AND 5.2

1. Verify that all requirements aimed at preventing environmental impacts as set forth in regulations and clarifying NTLs are addressed throughout all phases of the operator's SEMS program including planning; implementation and operation; verification and corrective actions; management review; and continual improvement.
2. Verify documentation exists to demonstrate compliance and performance, as appropriate, and is up-to-date.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per SEMS program audited.

S-325

IS THE SEMS PROGRAM IN COMPLIANCE WITH ALL APPLICABLE ENVIRONMENTAL REQUIREMENTS AS SET FORTH IN EXISTING REGULATIONS AND CLARIFYING NTLs THROUGHOUT ALL PHASES OF THE SEMS PROGRAM?

Authority: 30 CFR 250. 1910

Enforcement Action: W

API RP 75 SECTION 1 AND 5.2

1. Verify compliance with all environmental requirements aimed at preventing environmental impacts as set forth in regulations and clarifying NTLs throughout all phases of the operator's SEMS program including planning; implementation and operation; verification and corrective actions; management review; and continual improvement.
2. Verify documentation exists to demonstrate compliance and performance, as appropriate, and is up-to-date

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/issue one INC per SEMS program audited.

S-326

DOES THE SEMS PROGRAM ADDRESS ALL APPLICABLE ENVIRONMENTAL REQUIREMENTS APPLIED THROUGH LEASE STIPULATIONS, MITIGATIONS, OR CONDITIONS OF APPROVAL THROUGHOUT ALL PHASES OF THE SEMS PROGRAM?

Authority: 30 CFR 250. 1910

Enforcement Action: W

API RP 75 SECTION 1 AND 5.2

1. Verify that all environmental requirements aimed at preventing environmental impacts applied through lease stipulations, mitigations, or conditions of approval are addressed throughout all phases of the operator's SEMS program including planning; implementation and operation; verification and corrective actions; management review; and continual improvement.
2. Verify documentation exists to demonstrate compliance and performance, as appropriate, and is up-to-date.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per SEMS program audited.



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S-327

IS THE SEMS PROGRAM IN COMPLIANCE WITH ALL APPLICABLE ENVIRONMENTAL REQUIREMENTS APPLIED THROUGH LEASE STIPULATIONS, MITIGATIONS, OR CONDITIONS OF APPROVAL THROUGHOUT ALL PHASES OF THE SEMS PROGRAM?

Authority: 30 CFR 250. 1910

Enforcement Action: W

API RP 75 SECTION 1 AND 5.2

3. Verify compliance with all environmental requirements aimed at preventing environmental impacts applied through lease stipulations, mitigations, or conditions of approval are addressed throughout all phases of the operator's SEMS program including planning; implementation and operation; verification and corrective actions; management review; and continual improvement..
4. Verify documentation exists to demonstrate compliance and performance, as appropriate, and is up-to-date.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per SEMS program audited.

S-328

DOES THE SEMS PROGRAM ADDRESS ALL APPLICABLE ENVIRONMENTAL REQUIREMENTS REGARDING WATER QUALITY THROUGHOUT ALL PHASES OF THE SEMS PROGRAM?

Authority: 30 CFR 250. 1910

Enforcement Action: W

1. Verify that all requirements regarding aimed at preventing environmental impacts to water quality are addressed throughout all phases of the operator's SEMS program including planning; implementation and operation; verification and corrective actions; management review; and continual improvement.
2. Verify documentation exists to demonstrate compliance and performance, as appropriate, and is up-to-date.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per SEMS program audited.

S-329

DOES THE SEMS PROGRAM ADDRESS ALL APPLICABLE ENVIRONMENTAL REQUIREMENTS REGARDING AIR QUALITY THROUGHOUT ALL PHASES OF THE SEMS PROGRAM?

Authority: 30 CFR 250. 1910

Enforcement Action: W

1. Verify that all requirements regarding aimed at preventing environmental impacts to air quality are addressed throughout all phases of the operator's SEMS program including planning; implementation and operation; verification and corrective actions; management review; and continual improvement.
2. Verify documentation exists to demonstrate compliance and performance, as appropriate, and is up-to-date.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per SEMS program audited.



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S-330

DOES THE SEMS PROGRAM ADDRESS ALL APPLICABLE ENVIRONMENTAL REQUIREMENTS REGARDING BIOLOGICAL RESOURCES INCLUDING PROTECTED SPECIES AND CHEMOSYNTHETIC AND BENTHIC COMMUNITIES THROUGHOUT ALL PHASES OF THE SEMS PROGRAM?

Authority: 30 CFR 250. 1910

Enforcement Action: W

1. Verify that all requirements regarding aimed at preventing environmental impacts to biological resources including protected species and chemosynthetic and benthic communities are addressed throughout all phases of the operator's SEMS program including planning; implementation and operation; verification and corrective actions; management review; and continual improvement.
2. Verify documentation exists to demonstrate compliance and performance, as appropriate, and is up-to-date.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per SEMS program audited.

S-331

DOES THE SEMS PROGRAM ADDRESS ALL APPLICABLE ENVIRONMENTAL REQUIREMENTS REGARDING ARCHAEOLOGICAL AND CULTURAL RESOURCES THROUGHOUT ALL PHASES OF THE SEMS PROGRAM?

Authority: 30 CFR 250. 1910

Enforcement Action: W

1. Verify that all requirements regarding aimed at preventing environmental impacts to archaeological and cultural resources are addressed throughout all phases of the operator's SEMS program including planning; implementation and operation; verification and corrective actions; management review; and continual improvement.
2. Verify documentation exists to demonstrate compliance and performance, as appropriate, and is up-to-date.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per SEMS program audited.



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HAZARDS ANALYSIS

S-400

DOES THE SEMS PROGRAM REQUIRE THAT A HAZARDS ANALYSIS BE PERFORMED FOR THE FACILITY, IN ORDER TO IDENTIFY AND EVALUATE THE LIKLIHOOD AND CONSEQUENCES OF UNCONTROLLED RELEASES AND OTHER SAFETY OR ENVIRONMENTAL INCIDENTS?

Authority: API RP 75 SECTION 3.1
CFR 250.1911, 1911(a)

Enforcement Action: W

INSPECTION PROCEDURE:

1. Verify that the management program requires that a hazards analysis be performed for any facility subject to this recommended practice and that human factors are considered in the analysis.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per SEMS program audited

S-401

HAVE HAZARDS ANALYSES (FACILITY LEVEL) BEEN PERFORMED FOR ALL TYPES OF OFFSHORE STRUCTURES PERMANENTLY OR TEMPORARILY ATTACHED TO THE SEABED (I.E. MOBILE OFFSHORE DRILLING UNITS; FLOATING PRODUCTION SYSTEMS; FLOATING PRODUCTION, STORAGE AND OFFLOADING FACILITIES; TENSION-LEG PLATFORMS; SPARS; AND DOI REGULATED PIPELINES) USED FOR EXPLORATION, DEVELOPMENT, PRODUCTION, AND TRANSPORTATION ACTIVITIES FOR OIL GAS, OR SULPHUR FROM AREAS LEASED IN THE OCS?

Authority: API RP 75 SECTION 3.1
30 CFR 250. 1911

Enforcement Action: S

INSPECTION PROCEDURE:

1. Verify that the development and implementation of a hazards analysis has been conducted for each offshore facility.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (S) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per SEMS program audited

S-402

HAVE THE FINDINGS OF A CURRENT (INITIAL OR PERIODIC) HAZARDS ANALYSIS BEEN PRESENTED IN A WRITTEN REPORT THAT DESCRIBES THE HAZARDS IDENTIFIED AND THE RECOMMENDED MITIGATION ACTIONS?

Authority: API RP 75 SECTION 3.6

Enforcement Action: W

INSPECTION PROCEDURE:

1. Verify that the lessee has identified the findings of a hazards analysis in a written report and that they have identified the recommended mitigating actions taken to correct the deficiency.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per SEMS program audited

S-403

HAVE JOB SAFETY ANALYSES (JSAs) BEEN DEVELOPED AND IMPLIMENTED FOR ALL OCS ACTIVITIES IDENTIFIED OR DISCUSSED IN THE SEMS PROGRAM?

Authority: 30 CFR 250.1911 (b)

Enforcement Action: W

INSPECTION PROCEDURE:

1. Verify that the management program requires lessee to develop and implement a JSA for all OCS activities.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per SEMS program audited.



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