

<b>Safety and Environmental Management Systems (SEMS)</b>	Revision Number:	<b>1</b>
	Revision Date:	2/16/14

**(API RP 75 Element 6) § 250.1914 Safe Work Practices and Contractor Selection**

This SEMS program establishes and implements safe work practices designed to minimize the risks associated with operating, maintenance, and modification activities and the handling of materials and substances that could affect safety or the environment. This SEMS program also requires a documented contractor selection criteria. When selecting a contractor, management must obtain and evaluate information regarding the contractor’s safety and environmental performance. Management must also ensure that contractors have their own written safe work practices. Agreement must be documented on appropriate contractor safety and environmental policies and practices before the contractor begins work at any OCS facility (refer to the company Master Service Agreement (MSA) and/or Contractor Auditing Protocol required of all field contractors).

Contracted employees must be knowledgeable and experienced in the work practices necessary to perform their job in a safe and environmentally sound manner. Documentation of each contracted employee’s expertise to perform his/her job and a copy of the contractor’s safety policies, procedures and training records must be made available to the company and BSEE upon request.

**At a minimum, all contract employees must show current OSHA/Regulatory or equivalent training prior to working at an OCS facility. Examples of this training may include:**

Hazard Communication	Hydrogen Sulfide	Lockout/Tagout/Blockout
Confined Space Entry	Hot Work Permits	Fire Extinguishers
Rigger Training	Fall Protection	Personal Protective Equipment
Job Safety Analysis	Stop Work Authority	Ultimate Work Authority

Additional trade or craft skill training applicable to the job must be verified on site. Examples of trade/craft skill training include crane operator, welding and rigger training per API RP 2D, safety system and well control training per API and applicable subpart O requirements.

**Contractor Selection Criteria**

A major step in achieving acceptable contractor performance is selecting a safe and environmentally responsible contractor. Therefore, it is appropriate for management to request that contractors submit specific performance information in their contract response proposals.

The following criteria may make a contractor ineligible for work on OCS facilities:

- 1. Failing to maintain proper insurance coverage, MSA documentation, and/or applicable contractor license.**
- 2. Being cited by OSHA or other agency for a significant violation within the last three (3) years.**
- 3. Experience modification rating (EMR) in excess of 1.0 for the previous three (3) year average.**

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**4. Total Recordable Incident Rate (TRIR) or Lost Time Incident Rate (LTIR) for a contractor is in excess of 4.0.**

Results of the verification for selecting contractors must be made available to BSEE upon request.

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

1. Installation, maintenance, or repair of equipment;
2. construction, startup, and operation of OCS facilities;
3. turnaround operations;
4. major renovation; or
5. specialty work.

Management must:

1. Perform periodic evaluations of the performance of contract employees that verifies they are fulfilling their obligations, i.e. (site evaluation, incident tracking and/or BBS observation), and
2. 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-131.

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

Site supervisors must also develop and implement safe work practices to control the presence, entrance, and exit of contract employees in operation areas.

**Safe Conduct of Work Activities**

Safe work practices for all personnel, including contractors, should provide for the safe conduct of operating, maintenance, and modification activities, including simultaneous operations. Specifically, safe work practices, at a minimum, should cover:

- a) Opening of equipment or piping
- b) Lockout and tagout of electrical and mechanical energy sources
- c) Hot work and other work involving ignition sources
- d) Confined space entry, and
- e) Crane operations,
- f) Including any other regulatory required written program.

A work authorization system must be implemented for tasks involving items a, b, c, or d. This system includes provisions for adequate communication of work activities, including unfinished work, to shift

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change and replacement personnel. Contractors must be included in all communication, if they will be affected by, or perform related work.

This is not an inclusive list. Safe work practices should meet the most current provisions of any applicable federal, state, or local regulations. Company safety manuals clearly illustrate applicable safe work practices required at each OCS facility. The company safety manual (or equivalent) must be kept up to date and made readily available at each location.