## **SEMS Hazard Analysis**

1. **Purpose**

The purpose of this policy is to identify, evaluate, and reduce the likelihood and/ or minimize the consequences of uncontrolled releases and other safety or environmental incidents.

1. **Procedure**

* A hazards analysis (facility level) and a JSA (operations/task level) shall be developed and implemented for all facilities and activities identified in the SEMS program.
* All hazard analysis shall be conducted following the Company’s Hazard Identification and JSA written procedures.

1. **Facility Level Hazard Analysis**

* A current hazard analysis must be documented and maintained for the life of each operation at the facility.
* The hazard analysis must be appropriate for the complexity of the operation and must identify, evaluate, and manage the hazards involved in the operation.
* The hazard analysis must be performed by a person(s) with experience in the operations being evaluated and in the hazards analysis methodologies being employed.
* The recommendations in the hazards analysis must be resolved and the resolution documented.
* A single hazards analysis can be performed to fulfill the requirements for simple and nearly identical facilities.
* The hazard analysis must address the following:

1. Hazards of the operation to include human factors.
2. Previous incidents related to the operation being evaluated.
3. Control technology applicable to the operation.
4. A qualitative evaluation of the possible safety and health effects on employees and potential impacts to human and marine environments, which may result if the control technology fails.
5. All recommendations from the hazard analysis shall be documented and assigned to personnel for resolution.

* The hazard analysis shall be reviewed and updated through the MOC process:
  1. At regular intervals or at least every five years.
  2. When there is a change to the facility.
  3. When an internal audit is conducted.

1. **JSA**

* A JSA is required for all activities governed by the SEMS rule.
* The JSA must identify, analyze and document all steps of a job, the hazards associated with these steps, and ways to manage and reduce the risk of each hazard.
* The JSA shall include all personnel involved with the job activity being analyzed.
* The immediate supervisor of the crew performing the job must conduct and 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 must approve and sign all JSAs before personnel start the job.
* A copy of the most recent JSA must be kept at the jobsite for 30 days and made readily available to employees.
* Stop Work Authority (SWA) procedures and expectations shall be a standard statement on all JSAs.

1. **Training**

All employees shall receive instruction on JSAs, hazard recognition, and Stop Work Authority (SWA) as part of New Employee Orientation upon hire. JSAs, hazard recognition, and Stop Work Authority shall be reviewed during all meetings focusing on safety on the facilities subject. Additional training shall be provided:

* + when there are any changes to the task, plan and/or facility;
  + when an employee’s responsibilities change; and
  + annually as refresher training.