

Management of Change Programs

Problem Statement

Unexpected releases of toxic, reactive, explosive, or flammable liquids and gases in process systems have been reported for many years. Incidents involving these highly hazardous chemicals continue to occur. These incidents often occur at facilities following implementation of changes to processes, technology, equipment, or procedures.

The federal government has established and implemented regulatory standards addressing these types of changes. For facilities that deal with highly hazardous chemicals, a Management of Change (MOC) Program is mandated by both of the following:

- OSHA 29 CFR 1910.119 (Process Safety Management)
- EPA 40 CFR Part 68 (Risk Management Plan)

Companies face a number of hurdles to successful MOC program implementation and maintenance. A one-size-fits-all approach is destined to fail because facilities - even those under the same corporate umbrella - operate in unique environments. Also, there is often unfamiliarity with or uncertainty about how to address the various components of the MOC regulation. A common sense and systematic approach to process safety and MOC is needed to maximize a program's effectiveness, given these barriers to success.

The GP Solution

The objective of a MOC program is to ensure that all changes to a covered process are properly reviewed and that hazards introduced by the change are identified, analyzed, and controlled before resuming facility operations. MOC often seems deceptively simple in concept but can be one of the most difficult elements of Process Safety Management to effectively and correctly implement.

GP develops comprehensive MOC programs to manage changes to process chemicals, technology, equipment, procedures, organization, and the facility itself. We identify the scope of the program, create forms and checklists, develop MOC tracking systems, and assist with program implementation.

- ▶ MOC Procedure
- ▶ Tracking System
- ▶ Forms and Checklists
- ▶ Implementation



Procedure

GP works with clients to design and develop an MOC procedure that works within the framework of the facility's unique requirements. The procedure often includes verification steps to ensure that the following are addressed:

- Technical basis for the change
- Impact of the change on safety and health of facility employees
- Required modifications to operating procedures
- Required changes to process safety information
- Training requirements related to the change

The procedure often includes "Yes/No" questions that guide the user through the MOC requirements, ensuring that all aspects of the regulation are addressed.

Tracking System

As part of the MOC procedure development process, GP often develops tracking systems for clients to ensure that MOC items are correctly addressed, implemented, and closed upon completion. A properly implemented MOC program effectively tracks and documents changes to a facility's processes, technology, equipment, and procedures.

Forms and Checklists

As part of the MOC procedure development process, GP helps a facility design and develop forms and checklists required to properly implement an effective MOC process. For example, a properly implemented MOC program may require the development of a Pre-Startup Safety Review (PSSR) checklist, another of the Process Safety Management sections.



Please Quote Ref. Code: Management of Change Programs Flysheet 8.10.06.pmd

Implementation

GP works with clients to help implement facilities' MOC programs. In addition to the design and development of the MOC procedure and checklists, activities often include training sessions with facility employees. Training sessions cover the MOC section from the Process Safety Management Regulation, the importance of having an effective MOC program, the consequences of *not* properly implementing an effective MOC program, and the newly developed MOC procedure itself.

About GP

For 40 years, GP has been a leading provider of engineering, workforce development, technical training, and regulatory services to organizations worldwide. Our background includes long-term involvement with federal and local governments and with risk-sensitive facilities in the nuclear power, chemical, food and beverage, pharmaceutical, metals, refining, and defense industries.

Since the inception of Process Safety Management and Risk Management Plan regulations, GP has provided Process Safety Services at more than 100 client sites. GP offers a proven, systematic, value-added approach to regulatory compliance. Our programs are aimed at maximizing performance and safety gains while achieving compliance standards at reasonable costs. To learn more, visit www.gpworldwide.com.



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