

Managing Change: Common Problems



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Introduction

Grimmway Farms

- ❑ 7,000+ employees and contract employees
- ❑ 38 locations (2 states, 8 counties)
- ❑ 8 PSM facilities
- ❑ 2 covered processes (Ammonia & Chlorine)
- ❑ 34 HMBPs

What is Management of Change?

- Management of Change (MOC) is one of two principal procedural mechanisms for assuring the continuing safety of a PSM program.
 1. **Process Hazard Analysis (PHA)** evaluates initial hazards and controls
 2. **Management of Change (MOC)** adjusts program to adapt to modifications or alterations in design, operation, procedures, or personnel

Management of Change

Title 8, Section 5189(I)(1-5)

(1) The employer shall establish and implement written procedures to manage changes (except for “replacement in kind”) to process chemicals, technology, and equipment, and changes to facilities.

Management of Change

Title 8, Section 5189(I)(1-5)

(2) The procedures shall assure that the following are addressed prior to any change:

- A. The technical basis for the proposed change;
- B. Impact of change on safety and health;
- C. Modifications to operating procedures;
- D. Necessary time period for the change;
- E. Authorization requirements for the proposed change

Management of Change

Title 8, Section 5189(I)(1-5)

- (3) Employees involved in the process shall be informed of, and trained in, the change in the process as early as practicable prior to its start up.
- (4) If a change covered by this subsection results in a change to the process safety information, such information shall be appended and/or updated in accordance with subsection (d).

Management of Change

Title 8, Section 5189(l)(1-5)

(5) If a change covered by this subsection results in a change to the operating procedures, such procedures shall be appended and/or updated in accordance with subsection (f).

Common MOC Problems

- ❑ Failure to identify a qualifying change
- ❑ Permanent *“temporary”* changes
- ❑ Permanent *“emergency”* changes
- ❑ Failure to evaluate the impact of procedural changes
- ❑ Failure to track and close action items
- ❑ Failure to *“communicate”* the change
- ❑ Failure to complete PSSR
- ❑ Failure to update the PSI
- ❑ Improper or nonexistent PHA/MOC interface

Identifying a Qualifying Change

- ❑ Many PSM programs fail to capture all qualifying changes
- ❑ “Replacement in kind” is the only codified exception to MOC provisions
- ❑ Possible changes requiring an MOC include:
 - Changes in facility structure (building, storage containers, etc.)
 - Changing set points or operating pressures
 - Changing operating procedures (?)
 - Changing maintenance procedures
 - Changes in inspection/testing procedures
 - Changes in key personnel

Permanent “*Temporary*” Changes

- ❑ Temporary changes must either be closed or made permanent.
- ❑ Temporary change still needs to be documented, communicated and closed.
- ❑ Potential problems include:
 - Expiration of allotted timeframe
 - Change becomes permanent but not reflected in PSI
 - Equipment/procedures not returned to original state after closure of temporary change

Permanent “*Emergency*” Changes

- ❑ Law allows for significant latitude for “emergency” operations (requires development and implementation of written procedures).
- ❑ Once emergency over, system must be returned to original operational state.
- ❑ If emergency operation leads to permanent change, it becomes subject to MOC guidelines

Evaluating Procedural Changes

- Procedural changes may require formalized MOC
 - Maintenance procedures
 - Equipment inspection and testing procedures
- Modifications to operating procedures specifically included as MOC “requirement” but not specifically mentioned in 5189(I)(1)---*process chemicals, technology, and equipment, and changes to facilities*--- as **requiring** MOC.

Tracking/Closing Action Items

- ❑ Failure to track and close action items is common audit finding
- ❑ Action items may have been completed, but not properly documented
- ❑ Over time, depending on size of operation, open action item backlog can become extreme
- ❑ Recommend:
 - Appropriate assignment of responsibility
 - Closure meeting scheduled at reasonable time after project completed

“Communicating” the Change

- Communication = Training
- Two common failures:
 - Lack of documentation concerning training date and/or participants
 - Training date occurs after date of system start-up
- Completion of training also a specific requirement of the PSSR (if PSSR required)

Completing the PSSR

- ❑ PSSR not required to be completed on every MOC (unless your written policy so specifies)
- ❑ No PSI changes = No PSSR
- ❑ Lack of completion of PSSR prior to system start-up usually indicates inadequate assignment of responsibility
- ❑ Failure to complete PSSR may qualify as a serious violation (depending on risk)

Updating the PSI

- ❑ Incomplete or non-updated PSI is a critical failure of MOC (failure to update PSI defeats purpose of MOC)
- ❑ PSI includes:
 - P&IDs
 - PFDs
 - MSDS
 - Updates to various written descriptions (safety systems, control systems, chemical process, etc.)
- ❑ Project Book

PHA/MOC Interface

- ❑ If PHA required, identify need early (part of initial MOC assessment).
- ❑ Complete PHA before construction begins (or run concurrently).
- ❑ Tie PHA recommendations to MOC action sheet system.
- ❑ Resolve or implement all PHA recommendations prior to start up (new facility – PSSR requirement)



Questions?