

# *Managing Change: Common Problems*



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# Introduction

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## 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?

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- 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

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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

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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

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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

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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

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- ❑ 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

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- ❑ 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

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- ❑ 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

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- ❑ 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

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- 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

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- ❑ 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

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- 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

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- ❑ 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

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- ❑ 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

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- ❑ 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)



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Questions?