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	Function: Ecology, Health & Safety		
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Preparer: EHS Team Member Tom Ozimek	Owner: EHS Team Leader Tom Ozimek	Approver: OHMICAN Hub Manager Peter Dulik	

Revision History

Revision Date	Revision Number	Nature of Change
12/01/11	New	New procedure to establish Wyandotte Site EHS MOC Process.
6/3/16	1	Procedure revised based on input from MOC workgroup as well as Changes made with Corporate Database in June 2015. Additional tools provided along with defined roles and responsibilities. Revisions to site standard align with changes to Change Manager Database as well as identified areas for improvement based on gap analysis.

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1. **PURPOSE**

The Management of Change (MOC) system is intended to ensure that the safety, health, and environmental impact of all modifications to processes, equipment, chemicals, 3.1.to the implementation of the change.

2. **SCOPE**

This procedure applies to all changes as defined in Section 3.0 undertaken at the Wyandotte Site.

3. **DEFINITIONS**


3.1. **Change** – A change in the technology of manufacturing, chemicals, and process equipment, or a change in the procedures of operating the process and related equipment, or in the organization of the department that can affect safety, the environment, quality, or efficiency. This definition applies to manufacturing and pilot plant operations, as well as application and research laboratories. Examples of changes are:

3.1.1 **Chemical/Technology changes** – include modification of operating conditions to outside of predefined safe operating limits, alarm or interlock set point revisions, PLC software revisions, interlock logic revisions, introduction of new chemicals, chemical substitution, and chemical re-introduction.

3.1.2 **Equipment changes** – include new piping/equipment, piping rearrangements, and equipment revisions, new materials of construction, or design parameters, impairment of fire water systems, impairment of alarm systems.

3.1.3 **Procedural changes** – include standard operating procedures, emergency procedures, safe work procedures, temporary operating procedures, maintenance/inspection procedures, temporary operating procedures, maintenance/inspection procedures or development of a new procedure for new equipment installations.

Note that for changes that are procedural clarifications, formatting and/or procedure grammar corrections ONLY, each unit can optionally use a document control method of their choice to review and track these changes. Further, at the discretion of the Unit Production Manager, for Mandatory Use Operating Procedures, where personnel must use a procedure and initial each step upon completion, a document control method of the unit's choice may be used when changes do not involve adding new steps that an operator nor any other employee expected to use the procedure would need training on (essentially, the operator/employee has already been trained and is competent in all aspects of the procedure requirements). Changes to these procedures are still subject to a

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hazard review, should be approved by management, and should comply with regulatory requirements.

3.1.4 Personnel/Organizational changes – include a change in the number of people, structure of an organization, development of a new role in an organization, instrument/electrical or maintenance support, or contractor for the site or unit, and absence from job for extended period. Organizational changes should also include a transition plan where appropriate.


3.1.5 Temporary change – planned for a limited duration; such as, a trial or evaluation or by-pass of a safety system for maintenance. Planned operation of a process outside its normal operating range or transfer of a product from its normal process train to another.

3.1.6 Emergency change – immediate actions used to avoid; or control a spontaneous emergency situation.

3.1.7 Facility change – includes buildings, utilities, containers, process/emergency equipment location and other non-production related areas.

3.1.8 Replacement-in-kind – an item, equipment, chemical, procedure etc. that meets the design specification of the item it is replacing. Management of Change is not required. Examples are:

- Equipment (vessels, agitators, heat exchangers, etc.) fabricated exactly to the original design and specification or existing approved design and located in the same position as the original.
- Equipment and materials that are manufactured by an approved supplier to a standard specification, such as bolts, gaskets, flanges, steam traps, piping, insulation, structural steel.
- Instrumentation (transmitters, pressure and temperature gages, etc.) of the same specification and range, and purchased from an approved supplier. A change in instrument type e.g. RTD to thermo-couple does not constitute a replacement in kind.
- Electric motors, fuses and circuit breakers of the same specification from an approved supplier.
- Replacement of piping with the same size, material, flange make-up and routing as the existing.

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3.1.9 Batch Plant Operations change – re-configuring a process to produce a different product does not require an MOC provided that:

- The different product has previously been produced in the recent past and the process for that product has undergone an EHS review such as a PHA or PSSR and maintains the basis of safety for that process.
- The re-configuration does not introduce new raw materials.
- The Standard Operation Procedure and training is in place for how to manufacture the different product.
- A Standard Operating Procedure is in place, including appropriate documentation requirements, to outline the steps necessary to rearrange the equipment to produce the different product.


3.1.10 Procurement Initiated Changes - Covered changes that will affect specific units or will have site wide implications must follow Change Management procedures. This includes changes in suppliers, raw materials (specifications, concentrations, etc.), equipment specification changes (materials of construction, pump seal type changes, pressure/electrical ratings differences, etc.), modes of delivery, etc. The Procurement Department is responsible for communicating the change with the affected unit(s) prior to the change being implemented. Where appropriate, the affected unit(s) is responsible for entering a MOC into change manager.

3.2 Change Administrator - Person responsible to close out the change and ensure changes meet requirements. The individual assigned to a particular change, responsible for coordinating all aspects of the change. The Change Coordinator ensures that each component of the MOC and PSSR is adequately addressed, maintains appropriate documentation, obtains necessary approvals and training sign-offs prior to the change, and tracks all related action items to completion. The Change Coordinator is also responsible for ensuring that the startup date and time are accurate and that affected employees are notified upon actual startup (and termination if temporary) of the change. Change Coordinators must be knowledgeable in the requirements of this procedure, WYN032.075.

Normally, an engineer, can be EHS or other.


- Identified in the Unit Setup
- Should be the person that oversees the MOC program.
- This person can see the “Close” out button in Tab 9

3.3 Change Coordinator - Person who is assigned to manage the change.

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- The program will initially add the person who initiates the change as Change Coordinator
- Can be changed on TAB 1 or TAB 2 in pop up box when the Unit Approver approves.

- 3.4 Change initiator/Requestor** - Person who fills out Tab 1 and submits the change request. Normally, a person already assigned a task by unit manager.
- 3.5 Change Unit Approver** - Person the change request is sent to for approval to proceed with the change request. **Normally Unit Manager.**
- 3.6 Formal Safety Review** – The process of conducting a formal Step Review for the purposes of identifying a proposed change is safe to operate according to BASF procedures and processes.
- 3.7 Informal Safety Review** – An informal safety review may constitute any of the following processes: a Step Review not mandated by BASF Corporate requirements based on project dollar value, a key word checklist review, a PHA or other unit procedure used to ensure a proposed change can be safely implemented.
- 3.8 Pre-Start Up Safety Review (PSSR)** – Formal process for reviewing the readiness to operate safely for an installed change.
- 3.9 PSM – Process Safety management** – Standard defines requirements for highly hazardous chemicals for preventing or minimizing the consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals. OSHA’s 29 CFR 1910.119 was developed to minimize the effects of process incidents on employees.

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4. PROCEDURE


- 4.1. The Lotus Notes Change Manager database shall be used to review and document all changes and PSSRs defined under 3.1 (See Exceptions under 5.3).
- 4.2. The approval process for changes must be followed and documented using the Change Manager DB.
- 4.3. **Exceptions:**
 - 4.3.1. Emergency type changes can be verbally authorized (approved) by supervision and then, documented, reviewed and formally approved after the situation has stabilized. An "Emergency Change" form is available and can be printed out from the Change Manager DB by accessing the database and clicking on "?" Help In the menu bar.
 - 4.3.2. Replacement-in-Kind
 - 4.3.3. A minor change is made to a Standard or Procedure that does not affect the contents (i.e. updates to phone numbers).
 - 4.3.4. A Batch Operation as meets the provisions outlined in 3.1.9
 - 4.3.5. Temporary Fire System Impairment, lasting less than 24-hours, can be documented and communicated by contacting the Site Utilities Group prior to the impairment.

4.4 **Wyandotte CARES Management of Change Procedure**

The Wyandotte CARES group has established a process to determine whether or not a potential change needs to be entered into Change Manager. If an MOC is required the necessary supplemental PSSR checklists appear on subsequent tables. If an MOC is applicable then the Change Requestor will enter an MOC into the Change Manager (CM) system and submit to the unit approver. At this point the Wyandotte MOC process will be followed.

4.5 **MOC ORIGINATION: INITIATING A CHANGE**

Any person can initiate or recommend that a change be made. Minimal information, specifically, a description of the proposed change, the technical basis of the proposed change, expected impact on the safety and health of the employees affected by the proposed change, and the duration of the change should be provided. Any change will require completion of Tab 1, the "Definition" section of the Management of Change Form.


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- 4.5.1 MOC INITIATION, APPROVAL TO PROCEED AND RISK ASSESSMENT (TABS 1, 2, &3)
- 4.5.2 The MOC Initiator and the Change Coordinator are responsible for implementing the entire MOC procedure. The Initiator or Change Coordinator evaluates the proposed change and identifies information that must be collected for the particular change.
- 4.5.3 Initiator assigns the Change Coordinator (can be the MOC Initiator) and describes the change; the justification for the change, if temporary sets the expiration date and submits the MOC to the Approver (Tab 1).
- 4.5.4 The Approver determines the level of review required for the MOC and if necessary assigns the appropriate personnel to conduct and participate in the review (Tab 2).
- 4.5.5 The EHS reviewers are assigned at this point. All MOC's should have the Individual Approvers radio button marked "YES". This will automatically populate the EHS reviewers in the reviewers table.
- 4.5.6 To help determine if an air permit is needed or an existing permit must be amended because of a change in the unit an Environmental Change Checklist has been developed (See Attachment A). The completed form should be attached to the MOC.
- 4.5.7 To assist with the evaluation for addition and use of new chemical a New Chemical Environmental Review Instructions and Environmental Review Form have been developed (See Attachment B). The completed review forms should be attached to the MOC.

4.6 Initial Review Capital and Non-Capital Projects

A Management of Change (MOC) is required to be completed for all capital projects. For non-capital projects, it should also be determined in the initial review, based on the impact of the change, whether additional technical or specialized reviews (HAZOP, Environmental, Occupational Safety and Industrial Hygiene, Legal, Customer Notification, etc.) are necessary to evaluate the feasibility of the proposed change.


- 4.6.1 The following information should be evaluated during the Initial Review:
- 4.6.2 Technical feasibility of the proposed change
- 4.6.3 Justification and necessity of the change

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- 4.6.4 Adequate design information/specifications to perform a valid review (based on group judgment and knowledge of the process).
- 4.6.5 Whether modifications to written procedures are required (including time limit for temporary changes).
- 4.6.7 The expected duration of the change for temporary changes.
- 4.6.8 Review of relevant Process Hazard Analysis (PHA) to verify proposed change does not violate existing safeguards or create a potential hazard.
- 4.6.9 A risk level assessment is used to determine the potential impact of the change on safety and health. A risk assessment is used for all MOC's including capital projects. This is done in the Change Manger DB, Tab 3 Risk, where the appropriate assessment method can be selected.
- 4.6.10 Documentation of the Initial Review should be maintained with the MOC. If a formal meeting is held, minutes from this meeting can document the topics discussed, the decisions reached and the names of the reviewers (Tab 2).
- 4.6.11 The Approver then either "Approves" to proceed with the change, "Denies" the change, or puts the change on "Hold" due to a concern. If the Approver has a concern the "Concern Page" is completed detailing the concern and responsible person is assigned. If the concern is satisfied the Approver approves to proceed. At this time the Approver can change the MOC Coordinator if necessary (Tab 2).

4.7 Risk Level Determination Tab 3 – Risk Assessment - Risk Method: Either Mode of Failure or PHA/Step Review/Other is now required on Tab 3 (risk level assessment must also be selected). On tab 3, we must complete the risk level assessment and mode of failure if no other safety review is performed (e.g., Step Review, R&D Safety Review, etc.)

- As required per PSM/RMP regulations and BASF Responsible Care Requirements, MOCs must contain a review of the impact to safety and health.
- The risk level assessment is only an assessment of the level of risk, and is not the safety review. A safety review must document the impact to safety and health and needed safeguards.

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Risk Level Assessment

Risk Level Assessment - Is a list of questions that will determine the minimum safety reviews needed for this change.

Risk Assessment

[View Risk Matrix](#)

Section I - Degree of Hazard **

1. <input type="radio"/> Yes <input type="radio"/> No	Does the change introduce or substantially affect a significant source of chemical, mechanical, Examples: Installation / modification of 100 hp motor Increasing steam supply pressure to a vessel
2. <input type="radio"/> Yes <input type="radio"/> No	Does the change result in any increase in inventory of toxic, flammable, or reactive (equivalent t

After all questions are answered, the “View Risk Matrix” button above the section will show the required level of safety reviews.


Risk Matrix

Risk Levels	
Level 1	MOC & PSSR checklist and PSSR short form required.
Level 2	MOC & PSSR checklist, PSSR short form and safety review at Operation's discretion.
Level 3	MOC & PSSR checklist, informal Safety Review and PSSR long form at Operation's discretion.
Level 4	MOC & PSSR checklist, formal Safety Review (PHA) and PSSR long form required.

Informal Review – A hazard review that may be done with two or more individuals and involves a review of the hazards and documentation of them via the mode of failure method or by adding them to the PHA at a minimum

Formal Initial Hazard Review – A hazard review that follows the same guidelines as a Process Hazard Analysis (PHA) or BASF capital project review. All capital projects should have a formal hazard review regardless of the Risk Level as per BASF Corporate procedure.

If this is a capital project, then the step review process may be followed in

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lieu of doing the mode of failure method/formal PHA. However, any supporting hazard/safety review documentation should be attached in Tab 3, including the meeting minutes for capital projects and open action items should be documented in Tab 4.

Mode of Failure

- ✓ What-If type safety review
- ✓ Describe the potential mode of failure
- ✓ Describe the hazard to personnel
- ✓ Determine if control measures are existing or needed.
 - If needed, create an action item in Tab 4.

Under Mode of Failure a risk level of assessment must be assigned. See guidance below:


Tab 3			
Mode of Failure			
Level	Degree of Risk -- Failure of Proposed Change may result in	Type of Hazard Evaluation	Approval
Low Risk	Onsite potential for minor injuries	DST - MOC Coord. & Assigned Technical Reviewers (minimum of 2, MOC Coord. & one Technical Reviewer, which can be the OM)	OM or designee
Medium Risk	Onsite potential (or likely hood) for lost time or serious injuries	DST – Formal Hazard evaluation - EHS, Technician, Instr. &/or Mech. Eng. (as needed) and Process Eng. (or equivalent). Other Technical persons as needed. Daily Production meetings could be adequate depending on attendance.	OM
High Risk	Potential for one or more Fatalities	Full Hazard evaluation. Same as above but may include Site EHS, or other outside experts. OM to decide with DST or TES Technical Personnel.	OM
Critical Process	Major process safety incident	Full Hazard evaluation. Same as above but may include Site EHS, Corporate others. OD and OM to decide needed involvement.	OD

Upon completion of the Risk Assessment Tab a Pre-Start Up Safety Review (PSSR) must be competed as follows:

- ✓ Tab 3 risk levels 1 & 2 = PSSR Short Form
- ✓ Tab 3 risk levels 3 & 4 = PSSR Long Form

Complete tab 4 of the MOC (PSSR Checklist & Action Items).

If you answered yes to any of the questions under the Items to Complete Prior to Startup section:

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- ◆ For each yes answer, complete the required categories.
- ◆ Identify your change under the Short Form Change Type, and complete the required categories.

Tab 3 – Risk Assessment - Also due to the same PSM/RMP requirements, the box at the bottom, “Reviewers for Impact on Safety and Health” is now a required field. The field is now red with a double (**) asterisk, indicating it is a required field

Reviewers for Impact on Safety & Health**

This change was the result of Internal PSM/RMP/RC compliance audit findings which have been written in regards to the impacts to safety and health not being addressed prior to a change. Therefore, these updates to change manager will promote compliance.

Administrative Changes

For Administrative Changes or When there are no anticipated Failure Modes (Negative Declaration)

Mode of Failure Review

Potential Mode of Failure **	Hazard to Personnel / Other **	Existing / Needed? **	Control Measure **
<input type="text" value="There is no potential mode of failure."/>	<input type="text" value="There is no hazard to personnel or other."/>	<input checked="" type="radio"/> E <input type="radio"/> N	<input type="text" value="No control measures are required."/>


RISK LEVEL ASSESSMENT **: Low Medium High Critical Process

Assign By: Cara L Madzy on 03/30/2014 06:34 PM

4.8 MOC CHECKLIST (TAB 4)

- 4.8.1 All questions in the Pre-Startup and Post Startup sections will be answered YES or NO. Addition Action Items can be added.
- 4.8.2 YES answers will be assigned as an Action Item. Final Approval for startup cannot be submitted until the Pre-Startup Action Items are complete. All Pre-Startup Action Items shall be completed prior to startup of the change.

The Electronic Document is Controlled.
Printed Copies are Uncontrolled.

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4.9 MOC TRAINING (TAB 5)

- 4.9.1 Training documentation is automatically maintained in the Lotus Notes Change Manager system when the electronic signoff feature of the Change Manager system is used.
- 4.9.2 In the event that another means of training is used, evidence that those affected by the change have been informed/trained **MUST** be maintained. A sign-up sheet may be used and attached on the MOC Training Page.
- 4.9.3 NOTE: All signatures do NOT have to be signed off in order to start up. Sign-off prior to startup may not be possible due to shift schedules. Employees are required to be informed/trained and signed off before operating or working on equipment or processes that have been changed.

Within the Lotus Notes MOC Database

Tab 5 - Training - Language has been reworded as requested by several sites and operations personnel. It now allows them to acknowledge that they were either informed OR trained on the change.

Reminder: Sites must make sure they train and/or inform as appropriate depending on the change and the impact it has to an individual's job task.

4.10 PSSR PRE-STARTUP SAFETY REVIEW (TAB 6)


The PSSR team should review the status of any action items/open issues from the MOC, Step 3, PHA, or EHS reviews with the team. In addition, the status of PSSR action items should be reviewed.

- 4.3.6. A PSSR must be completed or waived before approval is given to startup a change.
- 4.3.7. PSSR procedure and the Long Form Pre-Startup Project Safety Review Checklists can be found in Appendix D of this procedure.

4.11 MOC APPROVAL TO STARTUP (TAB 7)

Approval to startup must be obtained from the Unit/Department approver before the change can be implemented. In addition, the Final Approver can require additional approvers as necessary.

- 4.11.1 Determine the start-up approvers required for the change and send a request for approval to the personnel specified.

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4.11.2 All Pre-Startup Action Items must be completed before the request for start-up approval can be submitted.

4.12 MOC TEMPORARY CHANGE (TAB 8)

Temporary changes must follow the full management of change procedure. If a change is "Temporary", the duration of the change shall not exceed 90 days without additional review. Temporary change must follow one of the following three completion options:

- 4.12.1 "Change Removed" – all affected personnel notified by email or other appropriate means.
- 4.12.2 "Extend expiration date" - all affected personnel notified by email, or other appropriate means, of the new expiration date.
- 4.12.3 "Make Permanent" - A new Change will be created & certain information copied into the new document.

4.13 MOC CLOSE-OUT

After approval is obtained to startup the change, the Change Coordinator or other designated person will sign off the change as complete.


4.14 TRAINING

Is required:

- 4.14.1 Initially when employee is assigned responsibilities for recognizing changes, including a General MOC awareness in Success Factors.
- 4.14.2 Both site and unit specific training is required to ensure all employee understand the MOC process within their respective groups.
- 4.14.3 Whenever changes are made to the standard,
- 4.14.4 Whenever deviations to the requirements are identified.
- 4.14.5 Additional training materials are available in Change Manager by selecting the on "?" "Help" button and choosing links titled "Link to Training Materials on Change Manager" and "Frequently Asked Questions". The online help section for Change Manager is a good resource for questions concerning the Lotus Notes Change Manager database.

Note: Additional training material is also available through the Wyandotte EHS group that will utilize site training material in addition to what is provided in the Change Manager Help section.

- 4.14.6 Training should incorporate both the requirements of this procedure as well as any unit specific requirements above and beyond those listed in this standard.

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4.14.7 Operating/Lab Units are responsible for ensuring training of personnel is completed as required.

5. RESPONSIBILITIES

5.1. **All employees** have the responsibility to:


- 5.1.1. Recognize a change before initiating
- 5.1.2. Initiate the MOC, per this policy
- 5.1.3. Assist in making changes
- 5.1.4. Participate in training
- 5.1.5. Provide input in maintaining a safe working environment

5.2. **Change Requestor/ Initiator**- has the responsibility to:


- 5.2.1. Initiate the MOC and PSSR by defining the change and reason for the change
- 5.2.2. Assigns Change Coordinator and PSSR Coordinator (can be the requestor)
- 5.2.3. Forwards to the appropriate person (Operations Manager, Site Manager or designee) for approval to proceed
- 5.2.4. Documents the technical basis on Tab 1 and as necessary participates in Technical Review if required
- 5.2.5. May assist with the completion of the hazards analyses or risk assessment
- 5.2.6. As appropriate may participate in PSSR
- 5.2.7. May assist Change Coordinator with the completion of the pre and post start-up safety review checklists' items and assigns action items

5.3. **Operations/ Service Manager/Change Unit Approver** - has the overall responsibility to:


- 5.3.1. Approves the initial request of the change, helps identify if customer notification is required and specifies if and what technical approval is necessary.
- 5.3.2. Solicit employees participation by getting their input on changes
- 5.3.3. Determines if Technical Review is required and assigns Technical Reviewers.
- 5.3.4. Ensure all items on the MOC and PSSR checklists have been completed as required, prior to implementation of the change
- 5.3.5. Give final approval to implement the change
- 5.3.6. Ensure affected personnel are trained in the MOC requirements and changes

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- 5.4. MOC Coordinator** - has the responsibility to:
- 5.4.1. The individual with overall responsibility for coordinating all aspects of the change, implementing the change and ensuring compliance is met with WYN032.075 when making changes.
 - 5.4.2. Receives appropriate approvals on Tabs 2 and 7 prior to the change and assigns and tracks all related action items to completion.
 - 5.4.3. Fills out the Risk Assessment (with other personnel as necessary) and assembles the required team for the appropriate Hazard Review according to the Risk Level.
 - 5.4.4. Ensure the appropriate personnel (including the Production Engineer for the area) are on the distribution list for the MOC in Tab 2.
 - 5.4.5. Ensures EHS review and approval personnel are identified in tab 2.
 - 5.4.6. Where appropriate consults with the Learning and Developmental (LDC) Coordinator about the change so that the LDC knows how to understand their role in the training process. As needed an action item in Tab 4 for the LDC to work on any training that may be identified as an action item.
 - 5.4.7 Responsible for organizing the Pre-Start up Safety Review (PSSR) prior to startup and documenting the PSSR on Tab 6 as identified during the Hazard review.
 - 5.4.8 Ensures that the startup date and time are accurate on Tab 6 (may need to adjust to reflect accurate time following final approval) and that affected employees are notified upon the actual start up (and termination if a temporary change). This should also be checked before submitting the MOC to the final approver.
 - 5.4.9 Tracks temporary changes to ensure the expiration dates are met or the MOC is altered as appropriate.
 - 5.4.10 For groups that do not have an LDC, the Change Coordinator is responsible for filling out the Training Tab (Tab 5) of the Change Manager MOC and should follow the same requirements as an LDC outlined in this procedure.
- 5.5. MOC Administrator** - has the responsibility to:
- 5.5.1. Manage the Operating, Applications and or Research Unit's overall MOC program
 - 5.5.2. Establish KPI's to ensure MOC's are being initiated, completed and closed in a timely manner.
 - 5.5.3 Works with the MOC Coordinator to make sure the MOC is closed out in a timely manner.
- 5.6. Technical Reviewers** – have the responsibility to:
- 5.6.1. Review change request and sign (if signature is required) the form acknowledging the review is completed and the change accepted.

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- 5.7 EHS Approver**- have responsibility to:
- 5.7.1 Reviews the change request in Tab 1 and determines if any significant EHS issues are identified prior to approval.
 - 5.7.2 Based on the review approves the change allowing it to move forward.
- 5.8 Maintenance Department/EHS Department/Other**
 Has responsibility for recognizing changes that are covered under WYN032.075 and for initiating and completing MOCs for all changes initiated by their department.
- 5.9 Procurement Department**
 Has the responsibility of communicating any change they initiate with the affected unit(s) to allow them to fully evaluate the change in accordance with this procedure prior to this change being implemented.
- 5.10 Shift Supervisor**
- 5.10.1 Typically fills out Tab 1 when an emergency change occurs (must be filled out within 24 hours after the change) and assigns a Change Coordinator.
 - 5.10.2 May be asked to play a role in the training process to help ensure all shifts are trained prior to returning to work on the affected equipment/in affected areas.
- 5.11 Hazard Review Team**
- 5.11.1 Team formed based on the Risk Level Assessment results to document the hazards of the change, perform risk ranking using Corporate Risk Matrix and confirms/determines the needed control measures.
 - 5.11.2 May use the Keyword Checklist (used during Capital Project Reviews) to help identify hazards.
 - 5.11.3 As required by Table 1, the team should follow the informal or formal review type depending on the outcome of the Risk Assessment and the corporate results.
 - 5.11.4 Verifies that the proposed change does not violate existing safeguards in the relevant PHA nor creates a potential hazard scenario.
 - 5.11.5. Reviews technical feasibility and justification for the change (and updates on Tab 1 as necessary); determines and adds any additional technical reviewers to Tab 2.
 - 5.11.6 If controls are needed, assigns action items it Tab 4.
 - 5.11.7 Determines whether Process Safety Information needs updating and whether modifications of written procedures are needed.
 - 5.11.8 Determines PSSR team (may be same individuals as Hazard Review Team) and those required for walk through (if changes results in observable or tangible changes).
 - 5.11.9 Begins assigning action items on Tab 4 (checklist and action items) and may assist the Change Coordinator with implementation phase of the MOC.

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5.12 Learning and Development Coordinator (LDC)

5.12.1 The LDC is responsible for completing/overseeing the completion of the training tab within change manager for all production driven MOCs (and maintenance driven for the maintenance LDC).

5.12.2 The LDC is responsible for coordinating the appropriate training/communication to the personnel whose job task will be affected by the change (including maintenance, contractors, and those employees involved in operating the process) and assuring that this is completed **prior** to the change or **prior** to the employee returning to work on the area/equipment affected by the change.

5.12.3 It is the LDC's responsibility to determine when the appropriate time is to do the Communication/training. Notifying and communicating the change too early may present a hazard in itself.

5.12.4 The LDC is responsible for determining whether communication is acceptable or if training is necessary and in what capacity depending on the type of change, the risk, and regulatory requirements. Note that training may include a type of competency test (demonstration, observation, written test, oral test, computer based test, and/or other).

5.12.5 The LDC is responsible for documenting and coordination a plan of action to ensure that the necessary employees who are not present at work are trained/informed prior to returning to work in the affected area/on the affected equipment.

5.12.6 Helps the Change Coordinator in assuring that all employees are made aware of the actual startup time of the change (verbally/or electronically). Utilizing the shift supervisor is often key in achieving this task.

5.12.7 Responsible for training all new employees within the production units on WYN032.075 (or the maintenance department for the Maintenance LDC) that are expected to have a role in Change Manager as identified in WYN032.075.


5.13 Pre-start up Safety Review (PSSR) Team

5.13.1 Ensures that construction and equipment is in accordance with design specifications (meets what design team intended)

5.13.2 Ensures that safety, operating, maintenance, and emergency procedures are in place and accurate

5.13.3 Ensures that for new facilities/stationary sources (see definition in procedure), a process hazard analysis (which meets PSM/RMP regulatory expectations for regulated facilities) has been performed and recommendations have been resolved or implemented before startup; and modified stationary sources meet the requirements contained in management of change;

5.14.4 Ensures that training of each employee involved in operating a process has been completed and documented in Tab 5 (and ensures documentation is made for those employees that are not present at work and that a plan is discussed for their training)

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5.14.5 Verifies that all items marked as “before startup” items in Tab 4 has been completed and reviews the status of any action items/open issues from the MOC, any final punch list items, Step 2/3 meeting minutes, PHA, or hazard review to ensure that everything that must be done prior to startup is complete (plus they ensure that these items are identified in the MOC or exist in an attachment to it)

5.14.6 Verifies that the technical basis on Tab 1 adequately describes the reason for the change.

5.14.7 Verifies that the modifications to operating procedures and P&ID redlines have been completed

5.14.8 Performs a walk through for all changes that result in physical modifications to the unit and documents any deficiencies or open items. These items should be documented and tracked to completion in the MOC. Document or attach proof of the walk-through.

5.14.9 Attaches completed PSSR long forms when required or any unit specific PSSR forms to Tab 6.

5.14.10 Ensures the team members are listed in Tab 6 or are on an attachment in Tab 6.

5.14.11 Assists the Change Coordinator in completing Tab 6 and the startup time and date.

5.14.12 Note that if the change goes through the capital project review steps, Step 4 must be attached to the PSSR Tab in Change Manager to serve as documentation of the PSSR and BC032.013 should be followed for Capital Project Reviews, including Step 4 procedures. Items left over from Capital Project Reviews should be entered as Action Items on Tab 4.

5.15 **Unit Final Approver (Tab 7 approver)**

5.15.1 Can't be the same individual as the Change Coordinator

5.15.2 Provides final approval before startup after ensuring that compliance has been met with WYN032.075, (checks Tabs 1-6 to ensure completeness and compliance with WYN032.075)


5.15.3 Verify that a walk-through was done and documented for all changes resulting in observable changes

5.15.4 Verifies that the startup date and time listed in Tab 6 and 7 is after the present date on which they plan to provide Final Approval. If it isn't, consult with Change Coordinator prior to providing Final Approval.

5.15.5 Verifies that LDC has fulfilled their role in the training piece of the MOC and has already provided their Final Approval on Tab 7.


5.15.6 Verifies that the PSSR was done correctly, documented properly, and that all before startup items are complete.

5.15.7 (For production units) Checks that the OSIH team member was a reviewer on Tab 2 and provided his/her approval.

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5.16 EHS Approver (OSIH Team Member)

- 5.16.1 Responsible for ensuring that the hazard review is done in accordance with WYN032.074, that the impacts of the change have been addressed and documented properly in Tab 3
- 5.16.2 Responsible for providing approval for the change to move forward on Tab 2 after ensuring that the hazard review was done and documented properly
- 5.16.3 A required participant in the hazard review when at least a Level 2 or D risk
- 5.16.4 Responsible for ensuring that the box for reviewers for impacts to safety and health is filled in on the bottom of Tab 3
- 5.16.5 If Environmental impacts are identified, the OSIH team member is responsible for adding the Environmental team member as an additional approver on Tab 2
- 5.16.6 Responsible for participating in the PSSR when EHS expertise is needed
- 5.16.7 Periodically check to ensure action items are being done on time and that MOCs are being closed out in a timely manner

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6 RELATED DOCUMENTS

Description of Procedure/Document	Corporate No.	Wyandotte No.
Environmental Change Notification Checklist		WYN032.075A
Environmental Change Review Checklist		WYN032.075B
MOC Screening Checklist OSIH		WYN032.075C
Pre Start Up Safety Review (PSSR) From Table		WYN032.075D
Wyandotte MOC Process Flow		WYN032.075E
Management of Change (MOC) in the Operational Phase of Facilities – Global Process Safety		
Ecology & Safety Project Reviews	BC032.013	



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