

COMPLIANCE BRIEF

Management of Change (MOC)

MANAGEMENT OF CHANGE – How is it that these three words, when put together, create such an adverse reaction from so many people? If you are not one of these people, great! But seriously, if you like change, then you're in the minority. For many people, hearing the words "management of change" sends them into frenzy. Let's talk about why.

Process Safety Management, PSM, is an OSHA regulation that requires, what most believe are overly burdensome requirements for facilities subject to this regulation. Keep in mind, however, that these rules are in place to help safely manage large facilities that store, process and manufacture the most hazardous chemicals we use. If something unexpected happens at these facilities, the results can be catastrophic. These rules are intended to reduce the chance of an incident occurring and have been in place for a long time. And likely these rules have prevented some catastrophes from occurring. Significant incidents including the Macondo oil spill and the Texas City Refinery explosion were "process safety events" that may have been avoided if PSM rules were adhered to.

When followed strictly, these rules can ensure the safe operation of the most complex and potentially dangerous facilities. Among other things, they require written operating procedures, employee training and participation, pre-startup safety reviews, evaluation of the mechanical integrity of critical equipment, contractor requirements and written **procedures for managing change**. There's that word again!

Management of change or MOC programs are a critical component of any process safety program. Managing change is managing risk, it's that simple. All operational change should be managed, but activities that involve moving or removing equipment, changing components, adjusting volumes, replacing type of material, etc., present special risks that need to be properly assessed and managed.

Most of these changes occur in the field, on-the-fly and need to happen very quickly. A burdensome process for review and approval of (perceived minor) changes may impede field level execution of operations. However, critical mistakes can happen when a change is not properly assessed. Mistakes, even in seemingly routine tasks, can result in costly schedule delays, expensive corrections or even severe injury or death.

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Having workers that truly understand the need to manage all the things associated with these change words, even the small stuff, will lead to a better MOC program, or whatever you decide to call it to avoid the frenzy.

Of interest...the Colorado Oil & Gas Conservation Commission's draft new rules (specifically series 600) have added a requirement for companies to have an MOC program in place (among other process safety program components mentioned above). This is a big first step in applying this requirement more broadly to industry, not just to the largest facilities, refineries and chemical manufacturers.

Before you mention this requirement to any of your leaders or engineers and get them into a frenzy, call us! We can help you develop and implement an MOC program that makes sense for your company.

Not operating in Colorado? A solid MOC program is still a good idea.

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