



## MANAGEMENT OF CHANGE

### Purpose

The purpose of this program is to meet client requirements for Safety and Environmental Management Systems (SEMS) as related to Management of Change.

### Scope

CDH Consulting does not own any facilities on the Outer Continental Shelf or any other area governed by the Bureau of Safety and Environmental Enforcement (BSEE) and this program is created to meet client requirements.

### General Requirements

- A pre-project review must be completed during the planning/development stage. Before a change to facilities, equipment, or work process has been initiated, a review shall be completed to ensure that health, safety, environmental and/or quality standards can be maintained while staying on budget.
- Prior to any change within the scope of this policy, a safety review is to be completed using the Management of Change Procedure Form.
- It is the responsibility of the individual or team proposing the change to follow this procedure and complete the safety review prior to making any changes.
- Once the review has been completed by the individual or team, it must be approved by the client, Project Manager, as well as senior overseeing CDH Consulting manager and CDH Consulting Safety Manager.
- At the completion of the change, the Project Manager and CDH Consulting Safety Manager shall audit the changes occurring against the approved MOC plan.

### Procedure

We must make sure that changes to the way we perform work do not create safety nor environmental hazards and that we have considered how changes in one area of work will affect other areas. Areas to be addressed in a Management of Change request include:

- the technical (process and mechanical design) basis for proposed changes
- impact of a change on safety, health, and the coastal and marine environments, including as appropriate a hazards analysis
- the effects of proposed changes on separate but unrelated upstream or downstream facilities and on area wide emergency plans
- necessary time period to implement changes
- management approval procedures for changes
- necessary revisions of the operating procedures, safe work practices, and training program
- communication of a proposed change and the consequences of that change to appropriate personnel?
- the necessary revisions of the safety and environmental information
- the duration of the change, if temporary

A pre-start up review must be approved and prior to the change being put into service. Before a change to facilities, equipment, or work process can be placed into service a pre-start up review must be completed to ensure that all requirements outlined in the pre-project review have been addressed, and to ensure that any other possible hazardous conditions are assessed.

### Communication of the Proposed Change and Consequences of that Change to Appropriate Personnel

Communication of proposed changes to appropriate personnel and training for appropriate personnel whose jobs are affected by changes may be accomplished in several ways, including face-to-face briefings, formal classroom or



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practical training sessions, e-mails or intranet postings to employees, posted hard-copy information, handouts, or agenda topics during safety meetings. The training or communication on the change would typically be provided prior to operating the changed equipment, which may occur before the actual start-up of the process.

All affected personnel/ stakeholders participate in the Management of Change process. Pre-project and pre-start up reviews will include all interested parties. This may include, but is not limited to, Operations, Engineering, Information Technology, Sales/ Marketing, Quality Assurance, and Environmental, Health and Safety.

### **Procedures to Analyze Safety, Health and Environmental Considerations Involved in Proposed Changes**

The MOC program must address procedures for safety and environmental considerations involved in proposed changes. These procedures include the completion of a safety, health and environmental hazard analysis of the proposed change, involvement of staff in the work, approval of client for hazard analysis of proposed change and training of any accepted change process before work begins.

### **MOC Procedures to be Used When Revising Operating Procedures, Safe Work Practices and Training Programs**

The program addresses the necessary MOC procedures for revisions in operating procedures, safe work practices and training programs. These include:

- Utility and Energy Requirements - electrical, hydraulic, compressed air, steam, etc., piping pressures and sizes for liquid and gas supplies, all means for de-energizing utilities provided and identified.
- Hazardous Materials - names and descriptions, MSDSs, concentrations, size and type of packaging, flash point, flammable limits, storage requirements, temperatures, etc.
- Waste Disposal - waste generated, containers to be used and locations, amounts, flammability, toxicity, reactivity, ingredients, associated wastes such as gloves and rags, disposal locations, etc.
- Personal Protective Equipment - types required for hazards present or anticipated.
- Training Required - hazard communication, waste disposal, PPE, work permits, confined space, moving vehicles, cranes, fire protection, lockout/tagout, new equipment, shifts to be involved, use of temporary employees, qualifications of operators, testing of operators.
- Material Handling - lifting devices required, cranes required, weights to be handled mechanically and manually, forklift requirements, rack storage requirements, access to racks by forklifts, power requirements for lifting aids.
- Fire Protection and Emergency Procedures - access to existing fire extinguishers and fire hoses, sprinklers protected and not being obstructed, emergency response procedures.
- Walking Surfaces - Access to aisles, aisles not used for working, aisles designated, clean and smooth surfaces, floor mats, trip hazards.
- Machinery and Equipment - guarding requirements, power transmission guarding, nip points, sharp edges, foot treadles, energy sources, new equipment and tools, maintenance requirements, equipment bolted to the floor, energy isolating requirements (lockout/tagout), special tools required, automatic start or intermittent operations.
- Ergonomics - illumination, noise, worker position and posture, vibration, floor space, machine controls, repetition, force, tool use, heat and cold, emergency stop location.
- Ventilation - airborne contaminants (vapor, gas, dusts, fumes, mists, smoke, vehicle exhaust, etc.), control, methods, amounts of emissions, local and general (dilution) ventilation, CFM, permits required.

### **Change in Supervisory Personnel**

The Management of Change (MOC) policies and procedures are utilized whenever there is a change in supervisory personnel by ensuring they completely understand their duties, the owner client is notified of the changed



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supervisory personnel's qualification, arrival dates, orientation and training requirements for their position and staff under their supervision, etc. Routine personnel vacancies and replacements, rotation and shift changes should not require additional MOC action.

### **Training**

CDH Consulting shall inform and train those employees whose job tasks are affected by a change in operations. The program must address training and informing employees affected by operational changes prior to startup.

Training may be formal classroom, CBT, or hands-on format, or may be in the form of reading and signing off on pertinent MOC information.

All training shall be documented and made available to the client, governmental agencies or as required by law.



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### MANAGEMENT OF CHANGE PROCEDURE FORM

**Purpose of Form:** To verify the orderly and comprehensive review of any new or change to operations, processes, primary personnel, equipment or safety and health aspects prior to the actual change taking place. We must make sure that changes to the way we perform work do not create safety nor environmental hazards and that we have considered how changes in one area of work will affect other areas. Areas to be addressed in a change request include:

- the technical (process and mechanical design) basis for proposed changes
- impact of a change on safety, health, and the coastal and marine environments, including as appropriate a hazards analysis
- the effects of proposed changes on separate but unrelated upstream or downstream facilities and on area wide emergency plans
- necessary time period to implement changes
- management approval procedures for changes
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- communication of a proposed change and the consequences of that change to appropriate personnel?
- the necessary revisions of the safety and environmental information
- the duration of the change, if temporary

**Project Location:** \_\_\_\_\_ **Requestor:** \_\_\_\_\_

Are Changes Required in These Areas?	YES	NO
Equipment		
Operating Procedures		
Materials		
Operating Conditions		
Personnel Changes		
Safe Work Practices (Samples) and Related Training <ul style="list-style-type: none"> <li>• General work permit</li> <li>• Opening of pressurized or energized equipment or piping</li> <li>• Lockout and tagout of electrical and mechanical energy sources</li> <li>• Hot work and other work involving ignition sources</li> <li>• Confined space entry</li> <li>• Crane operations</li> <li>• Bypass or removal from service of a safety feature.</li> <li>• Electrical/high voltage safety.</li> <li>• Use of pressurized gas cylinders</li> <li>• Fire protection system impairment</li> <li>• Elevated work/fall protection including over or near water</li> <li>• Hot tapping of lines and equipment</li> <li>• Hydroblasting</li> <li>• Mobile work platforms</li> </ul>		



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Are Changes Required in These Areas?	YES	NO
<ul style="list-style-type: none"> <li>• Scaffold use</li> <li>• Underwater maintenance or construction</li> </ul>		
Other (Describe)		
<p>If you answered 'Yes' to any of the issues above, explain the proposed changes, effect and implementation process before the change is made below:</p>		

Submitted by: \_\_\_\_\_

Date: \_\_\_\_\_

**Review/Approval:**

Supervisor: \_\_\_\_\_

Date: \_\_\_\_\_

Project Manager: \_\_\_\_\_

Date: \_\_\_\_\_

Safety Manager: \_\_\_\_\_

Date: \_\_\_\_\_

Client (If Needed): \_\_\_\_\_

Date: \_\_\_\_\_

**Audits:**

Project Manager: \_\_\_\_\_

Date: \_\_\_\_\_

Safety Manager: \_\_\_\_\_

Date: \_\_\_\_\_