PURPOSE

The direct and underlying cause of many accidents and injuries is the failure to properly recognize, identify and/or manage change. The Company has established a systematic process to identify and control hazards associated with change as well as maintain the accuracy of safety information. On occasion, temporary repairs to equipment or changes in personnel may be made out of operating necessity. Any onsite changes to “Standard Operating Procedures” can introduce new hazards or compromise Company safety standards. Although some changes may be minor with little likelihood of compromising safety or environmental protection, all changes may have the potential to cause harm to personnel or damage to the environment.

1. APPLICABILITY

The “MOC” program applies to all safety sensitive functions conducted by Company personnel including changes in mechanical equipment and Supervisory personnel.

1. “MOC” PROCESS

The following “MOC” procedures shall be used during any job scope changes and/or changes in Supervisory personnel:

1. Defined Proposed Change: Screen each change to make sure it is desirable and justified. If the change does not meet this criteria, it MUST be canceled or denied.
2. Evaluate Proposed Change: If the “MOC” meets the defined criteria, then revisions must be made for the purpose of clarity and completeness of the request. Seek clarifications on ambiguous or vague words that seem doubtful as to the intended change. The reviewers should:

* Be knowledgeable in the particular field or area.
* Include a representative from Operations management as well as the Company safety department.
* Ensure that the proposed change consist of written procedures for safety and environmental considerations.
* Ensure that the proposed change consist of written procedures to be used when revising operating procedures, safe work practices and/or training program.

1. Authorize Proposed Change(s): Once the form has been submitted for change and it has been determined that all HSE concerns have been met, then the document is sent in for approval. The approval must be agreed upon by the Operations Manager and the Company Safety Manager.
2. Implement & Communicate the Proposed Change(s): The authorized “MOC” Form will then be submitted back to the originator of the form, who MUST communicate the revised proposed change(s) with his/her crew and all appropriate personnel. The revised proposed change(s) is now authorized for “**Start-Up**”. The authorized “MOC” must be monitored and immediately canceled if found not suitable. Notification of a canceled “MOC” must be made to the reviewers.
3. Closure of Change: Once the work activity is completed, then the “MOC” document will be kept in the job file. In addition, a copy of the completed “MOC” will be kept on file at the Safety Manager’s office.
4. EMPLOYEE TRAINING

The Company shall provide “Management of Change” training to inform all employees, including onsite Contractors whose job tasks may be affected by a change in operations prior to startup.

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| **Reviewed and Approved** |
| Quality Manager or President |  |  |
|  | Date |