

Safety Policy & Procedure Manual		Section: 1.0	Date: 2-25-2016
		Revision: 0	
Subject: Management of Change			

Purpose

The purpose of this policy is to assure appropriate review occurs before process and structural changes are made to LTR facilities, processes and equipment.

A thorough review of the change should improve the operability and reliability of the change, control the introduction of hazards into the workplace, improve decision-making through collaboration, promote effective communications and teamwork, and ensure conformance with policy, standards, codes and regulations as they apply to LTR operations.

Scope

This document is applicable to all employees. This policy applies to all changes to LTR facilities, processes, standard operating procedures, maintenance procedures and equipment procedures.

General Requirements

- Prior to any change within the scope of this policy, a safety review is to be completed using the Management of Change Review Form. (Appendix A)
- It is the responsibility of the individual or team proposing the change to follow this procedure and complete the review prior to making any changes.
- Once the review has been completed by the individual or team, it must be approved by either Sr. Maintenance Manager or Sr. Equipment Manager and Sr. Safety/DOT Manager.
- If any individual refuses to approve the change, the originator MUST return the Management of Change Review to their Manager to be resolved at a higher level
- Upon approval of the change, all requirements of the implementation process including updating operating procedures and communicating and training to all affected employees must be completed prior to implementation of the change.
- At the completion of the change, the Sr. Maintenance Manager or Sr. Equipment Manager and Sr. Safety Manager shall audit the changes against the approved plan.

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Procedure

Describe in detail all proposed changes to the following areas on the Management of Change Review Form. Examples 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, MSDS, 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.
- Personnel: types of training required for hazard communication, waste disposal, PPE, work permits, confined space, moving vehicles, cranes, fire protection, lockout/tagout, new equipment, use of temporary employees, qualifications of operators, and testing of operators.
- Materials Handling: lifting devices required, power transmission guarding, weight to be handled mechanically and manually, forklift requirements, storage requirements, and power requirements for lifting aids.
- Fire Protection: access to existing fire extinguishers, need for additional fire- fighting equipment, and emergency response procedures.
- Walking Surfaces: access to aisles, aisles designated, clean and smooth surfaces, floor mats, and trip hazards.
- Machinery and Equipment: guarding requirements, power transmission guarding, nip points, sharp edges, energy sources, new equipment and tools, maintenance requirements, equipment bolted to the floor, energy isolation requirements (lockout/tagout), special tools requirements, and automatic start or intermittent operations.
- Ergonomics: illumination, noise, worker position and posture, vibration, floor space, machine controls, repetition, force, tool use, heat and cold, and emergency stop locations.
- Ventilation: airborne contaminants (vapor, gas, dusts, fumes, mists, smoke, vehicle exhaust, etc.), control methods, local and general (dilution) ventilation, CFM, and permits required.
- Radiation Sources: ultra-violet radiation from arc welding, laser, light energy from cutting, plasma, microwave, radio frequency, etc.

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Communication of Change and Training

All changes to LTR facilities, processes, equipment, standard operating procedures, maintenance procedures and equipment procedures shall be communicated to all affected employees involved in operating a process and maintenance and contract employees or customer employees whose job tasks will be affected by a change in the process shall be informed of, and trained in, the change prior to start-up of the process or affected part of the process.

If changes to LTR facilities, processes or equipment results in a change in the operating procedures or practices, such procedures or practices shall be updated accordingly.

Documentation

All documentation associated with the Management of Change Process will be maintained in the LTR Safety Department.