Management of Process Change/Project Reviews

MANAGEMENT OF CHANGE

REFERENCES: U.S. Area Standard No. 2, OSHA 1910.119 (l)

A 1. Yes [X] No [] Does your plant's program for Management of Change include a written procedure which complies with Dow's U.S. Area Standard No. 2? See Attachment.

A 2. When was your last audit for compliance with the Management of Change Standard? (Date) 10-20-94.

Yes [X] No [] Have all recommendations from your last audit been closed?

Please furnish documentation of your last audit findings.

B 3. What is the involvement of your operation and maintenance personnel in the Management of Change process? They have been trained and are part of the CA II plant checklist.

A 4. Please provide documentation of several completed checklists used for process changes during the pre-audit.

A 5. Yes [X] No [] Are all employees, Dow as well as contractor, informed of and trained for process changes that affect them prior to the initiation of the change?
How? Formal training sessions, tailgates, safety meetings, and communiqué book and yellow notes.

Management of Process Change/Project Reviews

PROJECT REVIEWS

REFERENCES: Minimum Requirements, U.S. Area Standard No. 2

A 1. Yes [X] No [] Does your department have Engineering Project Reviews or other Project Review Processes?

Who is involved? Project team members, operations, maintenance, safety, environmental, etc...

B 2. Describe your process for handling recommendations from the project reviews. No formal process - have meeting with Engineering, operations plant staff, etc. discuss recommendations and change as needed.

Please furnish documentation for the follow-up from these recommendations.

B 3. Describe how new projects are integrated into the plant's operating discipline. Training, tailgates, updating plant resources, new/modified procedures, P&ID updates, control programs, operating discipline updates, etc.

E. Pre-Startup Safety Review

REFERENCES: Site Specific Standards, Dow Minimum Requirements, June 1989, OSHA 1910.119 (i)

A 1. Yes [X] No [] Do you have a Pre-startup Safety Review for all new facilities or changes to existing facilities?
Plans: Safety & Loss Prevention Standard C-6.

A 2. Do the pre-startup reviews address the following:

a. Yes [X] No [] Construction and equipment in accordance with design specifications?
Plans: ______

b. Yes [X] No [] Safety, operating, maintenance and emergency procedures are in place and are adequate?
Plans: ______

c. Yes [X] No [] Have the recommendations from the project review process been completed or considered?
Plans: ______

d. Yes [] No [X] Recommendations from the plant Process Hazard Analysis have been resolved and implemented prior to startup?
Plans: No HAZOP reviews.

Please provide documentation for 2.a.b.c.d.

A 3. Yes [X] No [] Do you verify that training for all employees involved in operating the process has been completed prior to start up?

Plans: ____

____

Please provide documentation.

CHLOR-ALKALI II
MANAGEMENT OF CHANGE
NOTIFICATION OF PROCESS CHANGE CHECKLIST

ıype: ☐ LEVEL 1 (minor) ☐ LEVEL 2 (moderate) ☐ LEVEL 3 (major)

Originator:__________ Date of Origination:__________

Proposed Date of Change:__________ Area:__________

PERMANENT ☐ TEMPORARY ☐ From:__________ To:__________

Description and Location of Change (Scope):

Technical Basis for Change:

Impact on: ☐ Safety ☐ Loss Prevention ☐ Environment ☐ Health ☐ Quality ☐ Other:__________

Type of Change:

☐ Alarm	☐ Process Computer Control	☐ Equip./Material Modification	☐ Process Setpoint Change
☐ Shutdown Point	☐ Addition/Removal of Equip.	☐ Chemical Addition	☐ Product Specification Change
☐ Instrument	☐ Piping Modification	☐ Job Procedure RL #______	☐ Other:__________

Applicable	N/A	Initials	
Pre-Modification Checklist:			
☐ Applicable	☐ N/A	______	Consult piping and equipment specifications.
☐ Applicable	☐ N/A	______	Perform Reactive Chemicals testing. ☐ Yes ☐ No In Process? ☐ Yes ☐ No
☐ Applicable	☐ N/A	______	Add materials involved to Toxic Substance Control Act (TSCA) inventory.
☐ Applicable	☐ N/A	______	Calculate ımpact on F&EI and CEI.
☐ Applicable	☐ N/A	______	Comply with Engineering Practices.
☐ Applicable	☐ N/A	______	Comply with Technology Center guidelines.
☐ Applicable	☐ N/A	______	Comply with Dow "Environmental Protection Guideline for Operations".
☐ Applicable	☐ N/A	______	Comply with Safety & Loss Prevention and block requirements.
☐ Applicable	☐ N/A	______	Consult maintenance. (Name)__________
☐ Applicable	☐ N/A	______	Consult I&E supervisors/block contact. (Names)__________
☐ Applicable	☐ N/A	______	Consult Computer/Programming Support. (Name)__________
☐ Applicable	☐ N/A	______	Consult parts supervisor. (Name)__________
☐ Applicable	☐ N/A	______	Consult Operations. (Names)__________
☐ Applicable	☐ N/A	______	Evaluate and modify relief system. (Name)__________
☐ Applicable	☐ N/A	______	Contact Industrial Hygiene/Environmental. (Name)__________
☐ Applicable	☐ N/A	______	Contact Process Engineering. (Name)__________
☐ Applicable	☐ N/A	______	Complete required reviews. (Name Them)__________
☐ Applicable	☐ N/A	______	CHAMPS - EMTS / P/PM Systems Updated. (List Them)__________
☐ Applicable	☐ N/A	______	ISO-9002 change - see ISO contact. (Name)__________
☐ Applicable	☐ N/A	______	GMP change - see GMP contact. (Name)__________
☐ Applicable	☐ N/A	______	Other. (Name Them)__________
Post-Modification Checklist: (Before Startup)			
☐ Applicable	☐ N/A	______	Perform pre-startup audit (C-6).
☐ Applicable	☐ N/A	______	Complete or update training program.
☐ Applicable	☐ N/A	______	Job/Emergency procedures written and approved (see RL #604).
☐ Applicable	☐ N/A	______	Complete or update Reference Library (See Policy for Reviewing, Updating, and/or Creating Procedures - RL #585).
☐ Applicable	☐ N/A	______	P&ID's, process flowsheet, and plot plans updated.
☐ Applicable	☐ N/A	______	Personnel trained on the change.
☐ Applicable	☐ N/A	______	Computer code and documentation changed.

APPROVALS:	NAME:	DATE:
Originator:	__________	__________
ˈst Reviewer:	__________	__________
┌inal Reviewer:	__________	__________
	Completion Date:	__________

CHLOR-ALKALI II
MANAGEMENT OF CHANGE
INTERNAL DOCUMENTATION CHECKLIST

Check if Applicable:

CATEGORY	INITIALS
☐ Heat and Material Balance	______
☐ Production Report / Calculations	______
☐ Freeze Protection	______
☐ Heat Tracing List	______
☐ PSV Design Basis & Documentation	______
☐ Air Permit Documentation	______
☐ Log Sheets / Controlled Forms	______
☐ State Fire Marshal's Approval	______
☐ Mod5 Flow Diagram	______
☐ SQC Charts / Input	______
☐ Equipment Access / Congestion	______
☐ Mod5 Program Change Checklist	______
☐ Plant Files Updated	______
☐ Block Electrical Diagram	______
☐ Instrument & Electrical Loop Sheets (B6 & B7)	______
☐ Electrical Equipment Tests	______
☐ Field Switches / MCC Starters / Equipment Labels	______
☐ Critical Instrument Checklist Updated	______
☐ LAD Environmental Project Checklist Reviewed	______

First Reviewer: ______________________ Date: ______________________