

MANAGEMENT OF CHANGE/PRE-STARTUP SAFETY REVIEW TRAINING

- CLASS OUTLINE -

I. INTRODUCTION (2 min)

II. BACKGROUND (10 min)

A. CFR.1910.119, Process Safety Management of Highly Hazardous Chemicals

1. The regulation applies to all processes which involve:

- a. One or more of the chemicals listed in Appendix "A" of the regulation that are present in quantities at or above the thresholds listed therein.
- b. Flammable liquids or gases present in quantities or 10,000 pounds or more, except for hydrocarbon fuels used solely as fuels and flammable liquids stored in atmospheric tanks or transferred in a way as to keep them below their normal boiling points without cooling.
- c. Aberdeen Materials Subject to the Regulation
 - (1) Vinyl Chloride Monomer (VCM)
 - (2) Peroxide Initiators
 - (3) Liquid Propane Gas (LPG)
 - (4) Chlorine

2. Major Requirements of the Regulation

- a. Employee Participation
- b. Process Safety Information
- c. Process Hazards Analysis
- d. Operating Procedures
- e. Training
- f. Contractors
- g. Pre-Startup Safety Review
- h. Mechanical Integrity
- i. Hot Work Permit
- j. Management of Change
- k. Incident Investigation
- l. Emergency Planning and Response

B. Compliance Work To Date (10 min)

1. Corporate Team

- a. Eric Meyer, Dan Miller
- b. Process Safety Management Guidelines

2. Aberdeen Team

- a. WSC, SAT, ACW, JVU, RAC, MLH
- b. Process Safety Management Implementation Plan
- c. Document Approval and Control Policy

- d. Process Safety Management Manual
- e. Process Safety Training

III. MANAGEMENT OF CHANGE (MOC)

A. Definitions (10 min)

1) Management of Change (MOC) - Management of Change is a procedure which ensures all changes to plant equipment, procedures, or systems is analyzed for potential safety hazards before making the change.

2) Change

3) Replacement in Kind

4) Emergency Change

5) Initiator

B. Responsibility (2 min)

C. Application - Plant-wide (5 min)

1) Improved Safety

2) Business Benefits

3) Decreased Liability

D. Procedures (20 min)

1) MOCA Form

2) MOC Flow Chart

E. Examples (25 min)

1) Permanent Change

i. Misc. Capital Project

ii. Work Order Change

2) Emergency Change

3) Temporary Change

IV. PRE-STARTUP SAFETY REVIEW (PSSR)

A. Scope (2 min)

1) All new facilities (projects)

2) All physical (non-procedural) changes

B. Purpose (2 min)

To ensure hazards have been reviewed, identified, and addressed prior to introducing chemicals into a process.

C. Application - Plant-wide (1 min)

D. Procedure (20 min)

- 1) PSSR Team formed
- 2) What does the PSSR Team do?
 - i. Construction checklist
 - ii. Physical hazard review
 - iii. Operating, maintenance, and emergency procedures
 - iv. Process Hazard Analysis and MOC
 - v. Training verification
- 3) Recommendations
- 4) PSSR Report
- 5) Start-up Authorization Statement
- 6) Documentation

V. SUMMARY (10 min)