

# Management of Change Pre-startup Safety Review



March 2009

US EPA Region 10

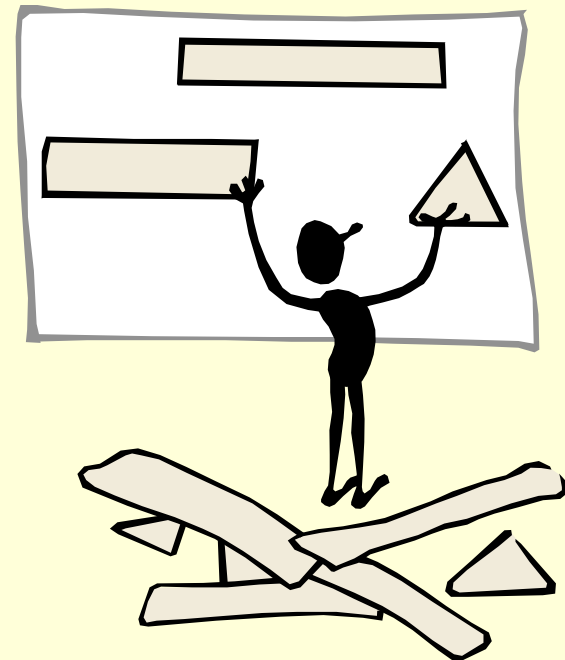
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# Management of Change § 68.75

- **Owner/Operator**  
**Shall**

- Establish and Implement written procedures to manage changes

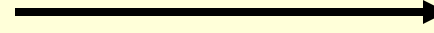
- Except for “replacements in kind”



# Except for “replacements in kind”



“In Kind”



**MOC NOT  
Req.**



“NOT  
In Kind”

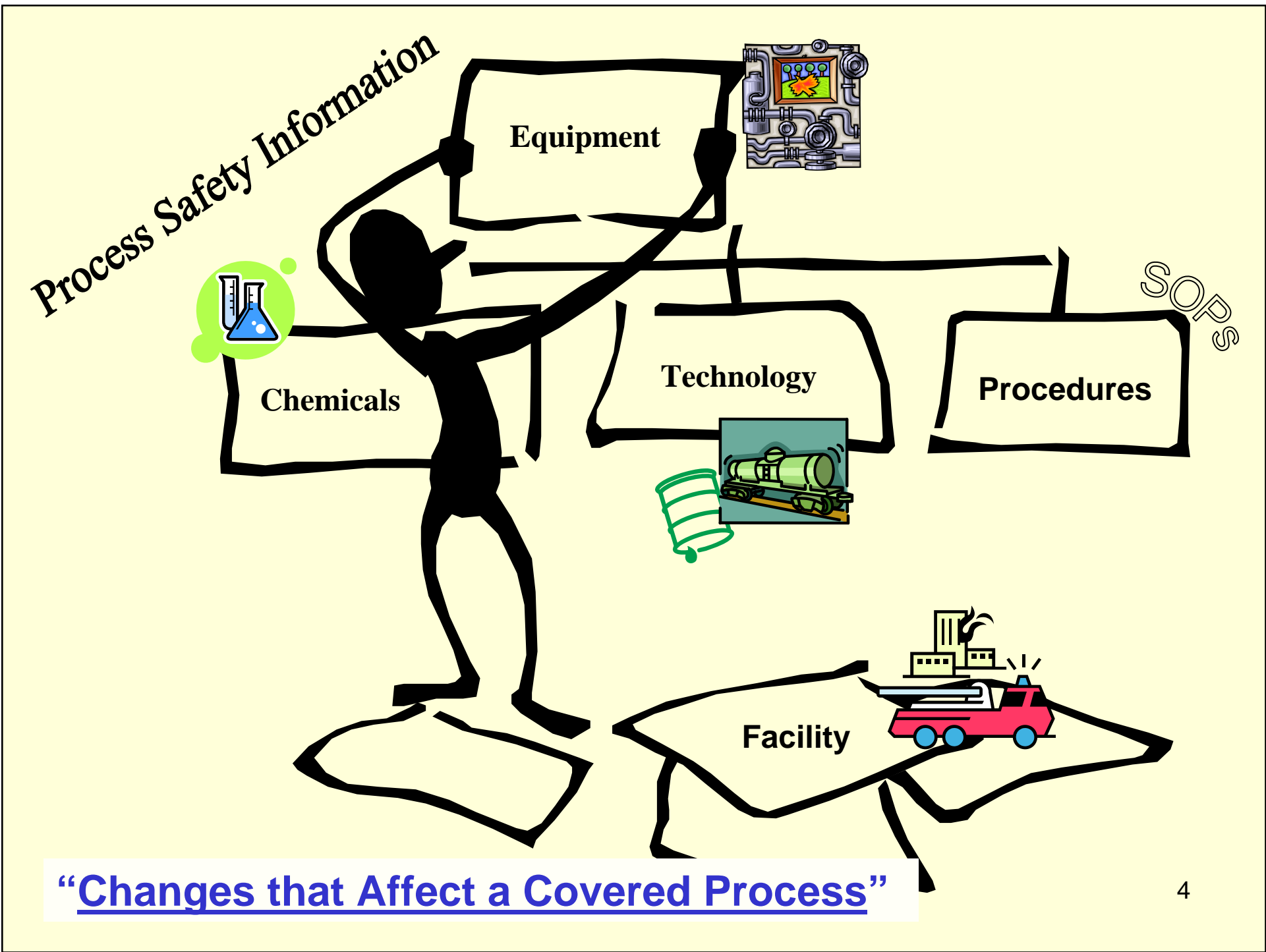


**MOC  
Req.**



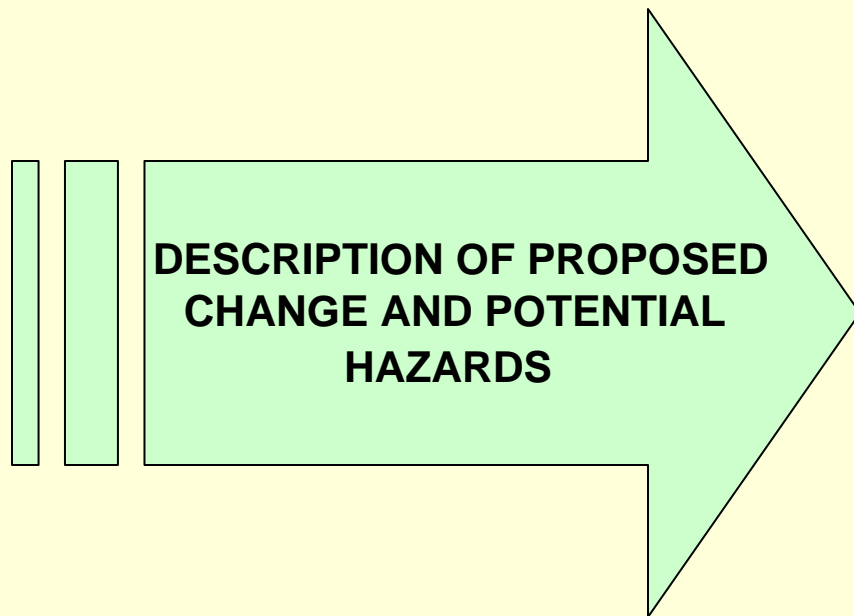
## **Different Procedures**

- Installation & Testing
- Operating
  - Training
- Maintenance
  - Training








“Changes that Affect a Covered Process”

# DESCRIPTION OF PROPOSED CHANGE AND POTENTIAL HAZARDS



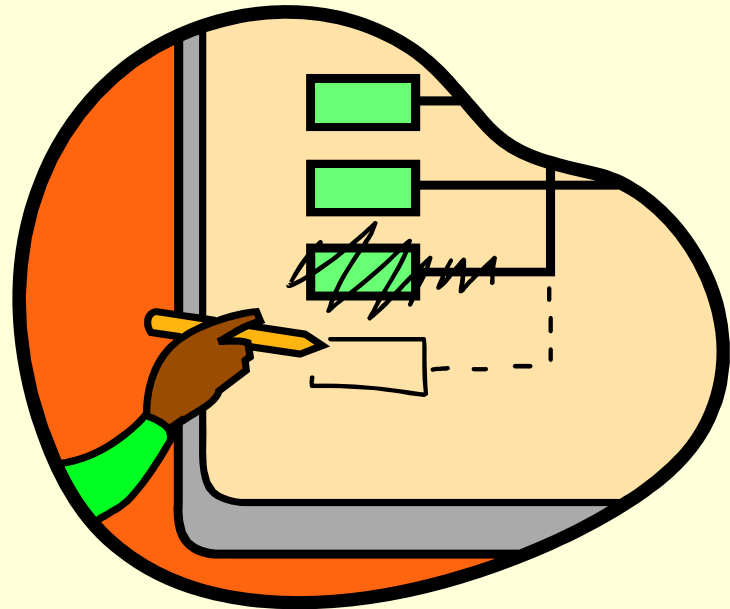
- Technical basis
- Impact on safety and health
- Impact on operating procedures
- Time period for the change
- Authorization requirements
- Affected employees informed/trained *prior to start-up*
- Updated process safety information

## Most Common Deficiency: *Not Implementing MOC*

PSM/RMP PROGRAM DOCUMENTATION	Common Deficiencies
Have affected <b>personnel</b> (i.e., operations, maintenance, and contract) been <b>informed</b> of <b>and trained</b> in this change?	
Are <b>operating procedures</b> or <b>maintenance procedures</b> required to be <b>updated</b> as a result of this change?	
<b>If yes</b> , have <b>affected personnel</b> been <b>trained</b> in the updated operating procedures?	 
Is the <b>PHA</b> , <b>Offsite Consequence Analysis</b> , or RMP <b>applicability</b> affected by this change?	
<b>If yes</b> , has a <b>hazard assessment update</b> been performed (if needed) and has the <b>revised RMPlan</b> been <b>submitted</b> ?	
Is <b>process safety information</b> required to be <b>updated</b> as a result of this change?	
<b>If yes</b> , has a <b>Prestartup Safety Review</b> been performed?	

# Pre-startup Safety Review

- For modified facilities where a change is needed to the *process safety information*
- For new facilities



# Pre-startup Safety Review



Before you push



- Construction & equipment is in accordance w/ design specs
- Safety, operating, maintenance, & emergency procedures are in place & adequate
- PHA has been performed and recommendations resolved for new facilities
- Modified facilities meet the requirements contained in MOC
- Training has been completed for employees involved in operating the new process