



Trinity Consultants is a leading global environmental consulting firm that brings 50 years of experience providing services and solutions in the EHS Regulatory Compliance, Built Environment, Life Sciences, and Water & Ecology markets. Trinity has the technical expertise, industry depth, and specialized capabilities to help clients achieve their goals across the natural and built environments.

Trinity's Process Safety team works seamlessly with our environmental consulting services to offer expanded EHS expertise to our clients.

Background and Common Approach to MOCs

As part of the OSHA Process Safety Management (PSM) and EPA Risk Management Program (RMP) regulatory requirements, covered facilities "shall establish and implement procedures to manage changes..."

A successful Management of Change (MOC) program has many components and requires the right resources and commitment. This document outlines a frequent mistake – "the one size fits all" philosophy when really "one size fits none."

Adopting a singular MOC workflow may seem to make sense for ease-of-use, but it's a double-edged sword:

- **Too complex of an MOC workflow:** Completing a complex MOC format for a frequent or simple change causes employees to bypass your well thought out (but painful) process
 - Remember – the MOC process is not an opportunity to demonstrate how many steps you can fit into one workflow
- **Too simple of an MOC workflow:** A high-level only MOC format means the appropriate and necessary reviews are not triggered and may result in inadequate risk identification and prevention

There are better solutions to handle these situations.

The Better MOC Approach

When establishing Management of Change procedures, it is beneficial to evaluate the changes that occur at a facility and establish MOC processes for specific categories of changes. Creating tailored workflows allows the level of change complexity to be matched with equal levels of review, risk prevention, and employee notification.

How To Do It

Once the decision to tailor your MOC workflow to specific changes is decided, the "how-to" process is quite easy.



Step 1: Evaluate the previous two to three years of MOC activity and assign each change a category. This will identify the most frequent change categories for which you should establish specific workflows.

Tips for success:

- Excel is your friend. Download basic information - the MOC identifier (usually a number), MOC title or description, and the change basis is usually sufficient.
- Do not analyze each MOC – this is not an audit.
- Review a random set of the MOCs (start with 10% of them) and find common changes with the same (or similar) risk and approval requirements.
- As you review more MOCs, you will discover more categories. Not every MOC needs to be assigned a category, but the categories assigned to many MOCs would be candidates for a custom workflow.
- Focus on identifying frequent change categories to build custom workflows for these common changes.
- As you are performing this step – consider steps 2 and 3.

Step 2: Identify the changes that are simple and generally low risk and create specific workflows for them. Focus on who really needs to approve the change, what needs to be updated as a result of the change, and who needs to be informed about the change.

Common changes that fall into this category and deserve their own simple workflow include:

- Procedure changes
- Policy updates
- Personnel/organizational changes
- Re-ranging instruments

- Process Safety Information (PSI) updates to match “as-builts” or “as-found”
- Piping Clamps and Valve Packing Repairs. Note that this change is not risky, but the problem may be. Make sure the right people are reviewing these changes

Step 3: Identify changes that are high risk that occur somewhat frequently. These need more risk evaluation and good comprehensive reviews, but the changes should be managed with a workflow tailored to the type of change.

These changes are probably already going through an adequate review process. Acknowledge that the process already in place may be sufficient. Consider modifying it with required PSM/RMP components and place the MOC moniker on it.

Common changes that fall into this category and deserve their own workflow include:

- Re-rates to fixed equipment (vessels, exchangers, tanks, piping, etc.)
- Modification of any devices taken for risk reduction in your PHA or other risk identification process
- Feedstock changes
- Temporary Building Placement
- Changes to flares

Step 4: Define your normal MOC process in a manner to handle all the other changes. This is probably the MOC workflow you already have and can be used for changes that really need the full, detailed workflow.

Why Choose Trinity's Process Safety Team

Trinity's Process Safety service areas include all elements of the PSM regulation, with expanded expertise in pressure relief systems, mechanical integrity programs, process hazard analyses, and process safety information management.

In short, there's no better choice for your EHS, PSM and RMP needs. Our experience is multi-faceted and extensive. Our strategies are innovative, time saving, and cost-effective. Our staff and tools are the best in the business.

ISO 9001:2015 certified at our corporate office in Dallas, Texas

CONTACT OUR TEAM!

For more information about how we can help your organization, please contact us.

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