

Contents

EHS REVIEWS OF NEW & MODIFIED FACILITIES & EQUIPMENT 2

1. Purpose & Scope 2
2. Definitions - See Appendix D 2
3. Procedure 2
 - 3.1. EHS Review of Process and/or Operational Changes - Field Service Operations (Installations, Repair, New Service Offerings, etc.) 2
 - 3.2. EHS Review of Process and/or Operational Changes – All Operations..... 2
4. Recordkeeping..... 4
5. Responsibilities..... 4
6. Training - See **COMPANY NAME** Training Matrix..... 4
7. Auditing..... 4
8. References 4
9. Appendices 5

APPENDIX A - EHS SCREENING CHECKLIST 6

APPENDIX B – EHS MANAGEMENT OF CHANGE PROCESS FLOW CHART 8

APPENDIX C – Site-Specific Information 9

APPENDIX D – Definitions 10

EHS REVIEWS OF NEW & MODIFIED FACILITIES & EQUIPMENT

1. PURPOSE & SCOPE

- 1.1. This procedure outlines a process for all **Company Name** sites to aid in the management of process or operational changes which have the potential to adversely affect the health and safety of associates or the environment, defined as a 'potentially hazardous change'. This procedure does not apply when changes are considered to be 'replacement in kind'.
- 1.2. **Note: Any change that may affect the environmental "footprint" of the site (air emissions, water discharge, waste profile, storm water, etc.) or life safety may have significant regulatory requirements – regardless of whether the site currently is required to have permits or submit reports. Failure to account for such impact(s) at the earliest possible stage in planning a change can have significant enforcement consequences – including complete shutdown of all site operations until any noncompliances are corrected and **COMPANY NAME** EHS and the cognizant regulatory bodies have approved continuation of operations.**

2. DEFINITIONS - SEE APPENDIX D

3. PROCEDURE

- 3.1. EHS Review of Process and/or Operational Changes - Field Service Operations (Installations, Repair, New Service Offerings, etc.)
 - 3.1.1.1. Field Managers are responsible to evaluate customer-site work before the start of the job to determine if changes to scope, equipment or processes will occur requiring EHS evaluation. Examples include, but are not limited to:
 - 3.1.1.1.1. New material-handling equipment or techniques;
 - 3.1.1.1.2. New chemicals or chemical processes;
 - 3.1.1.1.3. New product or service offerings;
 - 3.1.1.1.4. New personnel movement processes or equipment (e.g., crane-suspended personnel platforms, fork-mounted personnel platforms, scissor-lifts, open-sided man-lifts rather than enclosed elevators, etc.).
 - 3.1.1.1.5. New fall-protection techniques.
 - 3.1.1.2. If such changes are contemplated, the responsibilities and requirements below must be applied before the change is implemented, i.e., completion of the Appendix A check list, and review with EHS.
- 3.2. EHS Review of Process and/or Operational Changes – All Operations
 - 3.2.1. All proposed process and/or operational changes that meet the definition (see Appendix D - Definitions) of a potentially hazardous change must be reviewed by the Site EHS Representative before implementation. Examples of these types of changes include rearranging workstations, building additions/modifications, new product/service offerings, new tools/equipment and bringing chemicals on-site.
 - 3.2.2. EHS reviews of changes to plant, equipment and processes shall begin at the earliest possible planning stage.

- 3.2.3. Changes that are ‘replacement in kind’ (see Appendix D Definitions) do not require an EHS review.
- 3.2.4. The responsible Project Leader must complete the ‘EHS Screening Checklist’ ([Appendix A](#)) and submit it to the Site EHS Representative for review.
- 3.2.5. The Project Leader will facilitate pre-installation or pre-implementation reviews, in order to anticipate and remedy any adverse EHS or regulatory impacts from the proposed change(s). This may include (but is not limited to):
- 3.2.5.1. securing supplier design documentation,
 - 3.2.5.2. chemical safety information,
 - 3.2.5.3. and preliminary installation work-scope documentation,
- 3.2.6. The Site EHS Representative will review the checklist with the Project Leader to determine and discuss potential EHS implications. Refer to the EHS Change Management flow chart for further guidance ([Appendix B](#)).
- 3.2.7. The responsible Project Leader and Site EHS Representative shall develop a summary of the potential hazards and regulatory impacts that may result from the change, and recommend feasible administrative or engineering controls, training, etc. to protect associates and the environment.
- 3.2.8. The summary may include a thorough hazard assessment (See Procedure EHSXX.XX – Job Safety Analysis), which, if required, must be completed prior to operation of the new or modified equipment or process.
- 3.2.9. If environmental permits are required or need modification, this may need to be completed prior to construction (which in some jurisdictions is interpreted to “delivery of equipment”) and operation. Business-specific criteria are included in [Appendix C](#).
- 3.2.9.1.1. Note: Any change that may affect the environmental “footprint” of the site (air emissions, water discharge, waste profile, storm water, etc.) or life safety may have significant regulatory requirements – regardless of whether the site currently is required to have permits or submit reports. Failure to account for such impact(s) at the earliest possible stage in planning a change can have significant enforcement consequences – including complete shutdown of all site operations until any noncompliances are corrected and COMPANY NAME EHS and the cognizant regulatory bodies have approved continuation of operations.**
- 3.2.10. All required actions, along with the responsible parties, will be documented and tracked to closure.
- 3.2.11. The Site EHS Representative and the responsible Project Leader will sign the checklist once they are satisfied with the review. If there are any open issues or questions of which the Site EHS Representative is unsure, they should contact the appropriate member of the EHS Headquarters (HQ) team to discuss.
- 3.2.12. The Site EHS Representative and the responsible Project Leader will present the completed ‘EHS Screening Checklist’ and any associated EHS action items to the Site Manager, or designee, for review and approval signature.

- 3.2.13. The Site Manager, or designee, must review and approve the completed 'EHS Screening Checklist' for changes before the work is started. All modifications required for operating or emergency procedures must be completed and employees must be trained, as required, prior to the change.
- 3.2.14. Prior to operation, the Site EHS Representative and Responsible Project Leader will meet again to review all EHS concerns and action items. Both will again sign off on the 'EHS Screening Checklist'.
- 3.2.15. Refer to the Preventive Maintenance Program for any changes that may result in the addition of checklists, changes to current inspection checklists, etc. (See **COMPANY NAME** Procedure EHS-XX.XX – Housekeeping and Inspections)

4. RECORDKEEPING

- 4.1. All documentation associated with this procedure will be maintained in a central location and identified on the business-specific information form, [Appendix C](#).

5. RESPONSIBILITIES

5.1. The Site Manager shall:

- 5.1.1. Ensure that this EHS Management of Change program is implemented at their Site, and
- 5.1.2. Review and approve all 'EHS Screening Checklists' for Site changes or assign a designee to do so.

5.2. Site EHS Representative, with Region EHS Manager assistance, shall:

- 5.2.1. Review and approve all 'EHS Screening Checklists' for Site changes,
- 5.2.2. Ensure that all affected associates are made aware of changes, and
- 5.2.3. Complete and annually update the business-specific information in [Appendix C](#).

5.3. The Project Leader shall:

- 5.3.1. Complete the 'EHS Screening Checklist' ([Appendix A](#)) for their project,
- 5.3.2. Facilitate pre-installation or pre-implementation reviews, in order to anticipate and remedy any adverse EHS or regulatory impacts from the proposed change(s)
- 5.3.3. Review this checklist with the Site EHS Representative prior to project implementation and operation.

5.4. All Associates shall:

- 5.4.1. Obtain the necessary approvals for potentially hazardous changes prior to implementing that change.
- 5.4.2. Participate in pre-start reviews planned for their work areas.

6. TRAINING - SEE COMPANY NAME TRAINING MATRIX

7. AUDITING

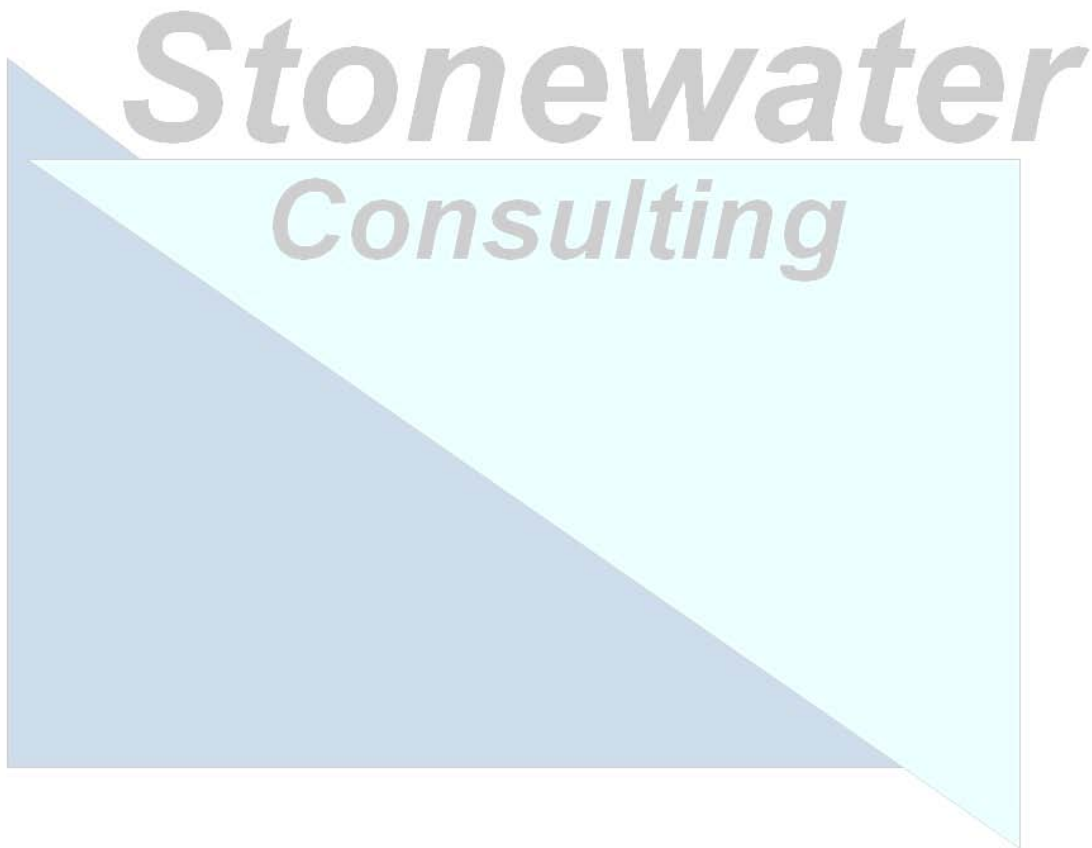
- 7.1. The Site will conduct an annual audit of the Site's EHS Management of Change program by completing the Procedure Implementation Checklist.

8. REFERENCES

- 8.1. EHS-XX.XX Housekeeping and Inspections
- 8.2. EHS-XX.XX Job Safety Analysis

9. APPENDICES

- 9.1. [Appendix A](#) EHS Screening Checklist
- 9.2. [Appendix B](#) EHS Change Management Flow Chart
- 9.3. [Appendix C](#) Site-Specific Information



APPENDIX A - EHS SCREENING CHECKLIST

Date: _____ **Areas Affected:** _____
Project Leader(s): _____

Describe the Equipment/Material/Chemical/Process that is to be introduced, modified, or changed:

This document is intended to identify potential EHS issues associated with related product/process changes. Each project/program shall be reviewed against the following checklists. Projects/programs that have a **yes** or **unsure (?)** answer to any of these questions need to be reviewed with appropriate EHS personnel.

Environmental Compliance (Does the project/program. . . ?)		Yes	No	???
1	Require the use of a toxic, hazardous or ozone depleting chemical?			
2	Add new or modify ¹ existing equipment that exhausts to the outside? (e.g. paint booth, heater, dust collector, boiler, furnace, autoclave, oven)			
3	Modify ¹ production output rates or emission constituents for existing air sources?			
4	Add or modify ¹ a discharge to the sanitary or process sewer?			
5	Result in a discharge of liquid to the outside (storm drain system)?			
6	Generate a new type or greater volume of a solid waste ¹ ?			
7	Move an existing satellite accumulation area or hazardous waste ² storage area?			
8	Introduce a new chemical, significantly increase volume of usage or storage, or cause a change in use of an existing chemical?			
9	Involve alteration of or installation of a pressure vessel or tank to store new product, process intermediates or wastes?			
10	Involve adding a preventative maintenance item to either the EHS PM Log or Manufacturing's PM Log?			

List any EHS regulatory issues and/or Best Management Practices (BMPs) that need to be addressed prior to initial start-up or use:

¹ Modification includes any physical, chemical, or production changes.

² Waste includes any solids, liquids, gases, sludges, metals, etc. that are destined for either disposal or recycling.

APPENDIX A – Cont.

<u>Health and Safety Compliance</u> (Does the project/program. . . ?)		Y	N	?
1	Add or modify processes or systems involving energy sources (e.g. gravitational, hydraulic, electrical)?			
2	Modify ¹ or change existing emergency exit routes, muster areas, etc.?			
3	Involve an excavation or trenching operation?			
4	Create a new or modify ¹ an existing confined space?			
5	Modify ¹ or change existing fire protection systems?			
6	Result in new or increased physical or chemical exposures?			
7	Add or modify ¹ equipment or machinery requiring machine guarding?			
8	Introduce hazards requiring changes in existing or new safety equipment (e.g. eyewash, PPE, ventilation)?			
9	Create a new position or a job transfer of an employee that requires additional training?			
10	Negatively alter storage space necessary to maintain good housekeeping?			
11	Increase the force, repetition or create an awkward posture for tasks performed (ergonomic impact)? <i>new tool introduction, worker position, work area, lighting, material handling</i>			
12	Modify the security of a facility or project?			
13	Add or modify warning or alarm systems, or set points for safety systems (e.g. interlocks)?			
14	Require 'breaking' a line that previously contained a hazardous or potentially hazardous material? (e.g. hydrogen, natural gas, oxygen)			
15	Necessitate revising any LOTO procedures or JSAs?			
16	Add or change any transportation requirements (i.e. fleet change, shipping by air or water, container changes, shipping new chemicals, import or export to other countries)?			
17	Add or change work at heights?			
18	Require changes in material handling (e.g. cranes, forklifts)?			

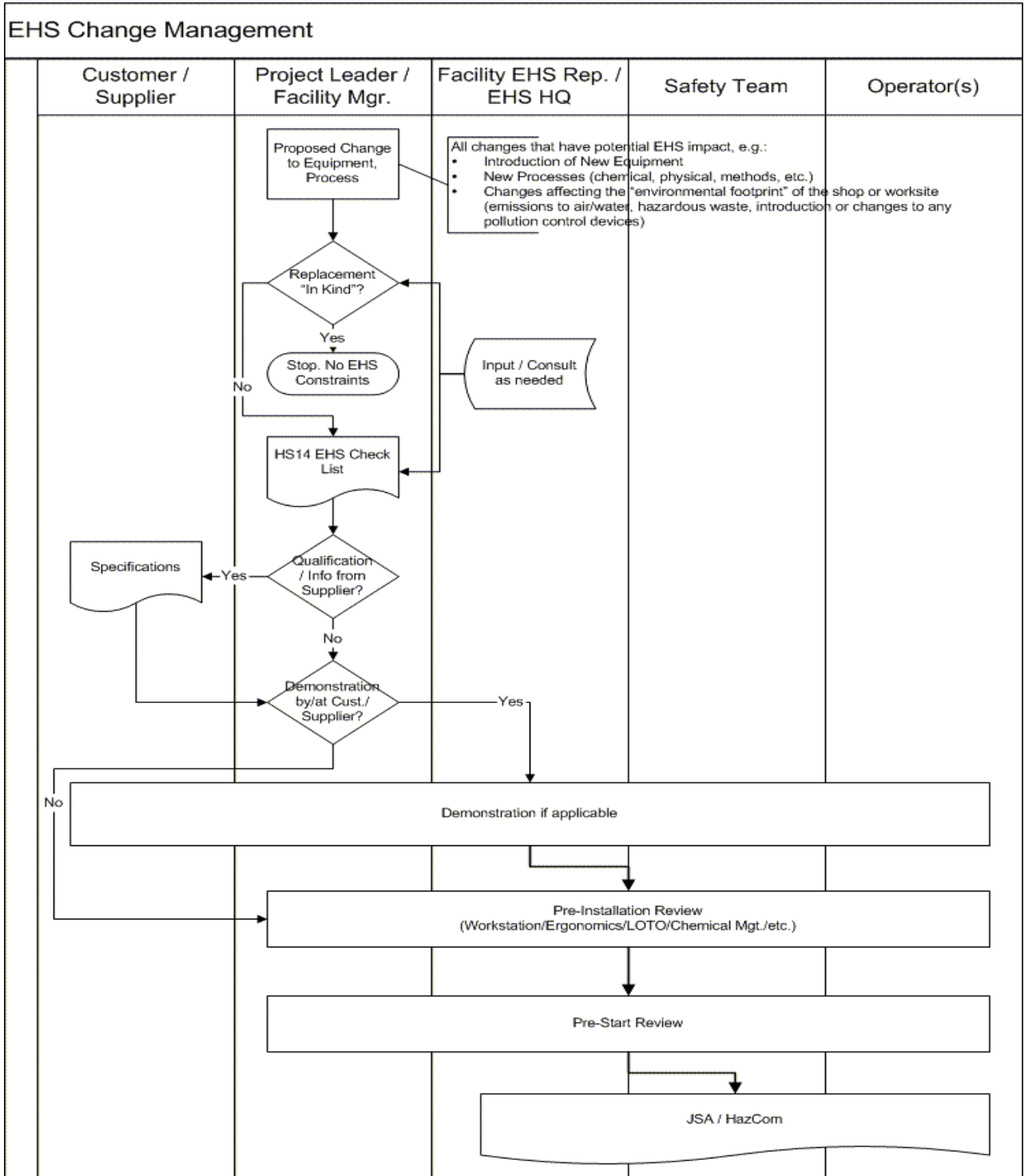
Pre-Project Review

<input type="checkbox"/>	Project has no EHS impact
<input type="checkbox"/>	Project has EHS impact and has been reviewed with Region EHS Manager
Reg. EHS Mgr. Signature: _____ Print Name: _____ Date: _____	
Project Leader Signature: _____ Print Name: _____ Date: _____	
Site Manager Signature: _____ Print Name: _____ Date: _____	

Pre-Operation Review

All EHS issues and concerns have been addressed prior to the operation of the new equipment.		
Reg. EHS Mgr. Signature: _____ Print Name: _____ Date: _____		
Project Leader Signature: _____ Print Name: _____ Date: _____		

APPENDIX B – EHS MANAGEMENT OF CHANGE PROCESS FLOW CHART



APPENDIX C – SITE-SPECIFIC INFORMATION

1. Name and Location of Site: _____
2. Name of Site Manager: _____
3. Name of Site EHS Representative: _____
4. List location of all process and operational change documentation at your site: _____
5. The following air permitting steps must take place prior to receipt of new equipment on site that will impact air emissions (check all that apply):

<input type="checkbox"/> <input type="checkbox"/> None	<input type="checkbox"/> Air Permit Application Submitted
<input type="checkbox"/> Air Permit to Construct Received	<input type="checkbox"/> <input type="checkbox"/> Exemption from Air Permitting Documented
<input type="checkbox"/> Other: _____	
6. The following air permitting steps must take place prior to the construction of new equipment on site that will impact air emissions (check all that apply):

<input type="checkbox"/> <input type="checkbox"/> None	<input type="checkbox"/> Air Permit Application Submitted
<input type="checkbox"/> Air Permit to Construct Received	<input type="checkbox"/> Exemption from Air Permitting Documented
<input type="checkbox"/> Other: _____	
7. The following air permitting steps must take place prior to the operation of new equipment on site that will impact air emissions (check all that apply):

<input type="checkbox"/> <input type="checkbox"/> None	<input type="checkbox"/> Air Permit Application Submitted
<input type="checkbox"/> Air Permit to Operate Received	<input type="checkbox"/> Certification of Construction per submitted plan
<input type="checkbox"/> Review by permit granting agency	<input type="checkbox"/> Exemption from Air Permitting Documented
<input type="checkbox"/> <input type="checkbox"/> Other: _____	
8. The following water permitting steps must take place prior to the construction of new equipment on site that will impact water emissions (check all that apply):

<input type="checkbox"/> <input type="checkbox"/> None	<input type="checkbox"/> <input type="checkbox"/> Water Permit Application Submitted
<input type="checkbox"/> <input type="checkbox"/> Regulatory Body Inspection	<input type="checkbox"/> Other: _____

Information Completed By: _____

Date: _____

Approved By: _____

Site Manager Signature

Date: _____

APPENDIX D – DEFINITIONS

1. **Potentially Hazardous Change** – Any change, other than a ‘replacement in kind’ but including equipment relocation, which involves one or more of the following:
 - 1.1. Any addition of or change in a hazardous material, the manner or environment in which a hazardous material is used or stored, or increases the volume of a hazardous material stored on site.
 - 1.2. Any change which has the potential to circumvent an existing engineering control (such as local exhaust ventilation).
 - 1.3. Any change which could increase the amount of noise in the work area.
 - 1.4. Any change that could increase the amount of repetitive motion an operator must perform.
 - 1.5. The acquisition and/or installation of any capital equipment used for production or testing.
 - 1.6. Any change that adversely impacts health and safety or the environment.
 - 1.7. Any change that adds a new source or alters existing water or air emissions.
 - 1.8. Any change that adds a new solid waste stream, alters the constituents or increases the amount of an existing solid waste stream.
 - 1.9. Modification of any plumbing or piping system that contains a hazardous or potentially hazardous material (i.e. natural gas, hydrogen, oxygen, etc.).
 - 1.10. Modification of any electrical distribution system over 100 volts.
 - 1.11. Any change that impacts emergency, operating or maintenance procedures or equipment.
 - 1.12. Any change that modifies and existing or creates a new confined space.
 - 1.13. Any change that involves trenching or excavation.
2. **Project Leader** – Person(s) responsible for leading a project, from proposal to implementation.
3. **Replacement in Kind** – The replacement of equipment or materials with equipment or materials having the same technical specifications, or establishing operating procedures that are in agreement with past operating practices.

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