

	<b>QUALITY PLAN</b> <b>SYSTEM LEVEL PROCEDURE</b> ISO 9001:2008 SOC NEVADA LLC	DOCUMENT NO.
		QP.EMS.HG.0007
	TITLE	REV. 10
<b>MANAGEMENT OF CHANGE- STANDARD PROCEDURE          FOR THE MERCURY STORAGE AND TRANSFER PROGRAM          TO COMPLY WITH THE NDEP- CAPP</b>		PAGE 1 OF 16

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APPROVAL SIGNATURES		
PREPARED/REVIEWED BY:	KARLI WILBUR SOC DCA, BASE OPERATIONS	DATE 5/19/16
PREPARED/REVIEWED BY:	KRISTI LAMELL-SCHILLING, SOC ASSISTANT MANAGER ENVIRONMENTAL SERVICES	DATE 5/17/16
REVIEWED & APPROVED BY:	DAVID LARSEN, DIRECTOR SOC BASE OPERATIONS	DATE 5/19/16
REVIEWED & APPROVED BY:	TOM ERICKSON, MANAGER SOC ENVIRONMENTAL SERVICES	DATE 5/17/16
REVIEWED & APPROVED BY:	ROB MATHIAS, MANAGER DLA STRATEGIC MATERIALS FACILITY	DATE 6/13/16
REVIEWED & APPROVED BY:	CHARLES KING, REPRESENTATIVE HWAD GOVERNMENT STAFF	DATE 6/27/16
<input type="checkbox"/> INITIAL RELEASE <input checked="" type="checkbox"/> REVIEW/NO REVISION REQUIRED <input checked="" type="checkbox"/> REVIEW - REVISION REQUIRED (SEE HISTORY BELOW)		

REVISION HISTORY			
REV	CHANGE DESCRIPTION	AUTHOR	DATE
10	Updated signatory authority to reflect current required signatures. Took out column for Hawthorne Site Supervisor as Rob Mathias will be reviewing and signing.	Cody Burke/Karli Wilbur	04/2016
9	Change description Crosswalk Between NDEP CAPP Review Comments (dated 2014-12-09, 2015-01-30 and 2015-02-26) and Mercury Storage and Transfer Program Document Contents March 10, 2015	Burton Packard and Renee Rodriguez	03/2015
8	Added a signature block in the Management of Change (MOC) Checklist (Page 1). NDEP wanted a signature for the persons that have the authority to approve and move the MOC forward.	Burton Packard, Assistant Manager Environmental Services and Jason Boynton, Defense Logistics Agency Program Manager	11/17/14
7	Reformatted document to comply with the QMS standard 9001. Changed wording document throughout to state Mercury Storage and Transfer Program. Added DLA personnel responsibilities of the CAPP Training Program procedure. Added administrative changes to the signature block. All Tier 1 documents are available on the G-drive: G:\Intranet\Environmental\environmental_programs\air\CAPP from Intranet	Robert Mathias, SOC FES/ Renee Little BOP's Secretary	09/2014

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<b>6</b>	<p>Added "SOC" under Responsibilities to Supervisors. Added Approval Signatures to this document. Added the following to the Approval Signatures, "By reviewing and approving this procedure, the approver understands and will comply with the state procedure. Your signature is proof that training has been provided. The approver also understands that he/she may withhold their signature if he/she has questions about the content and may contact SOC Environmental Services to resolve questions." MOC #0051 Meeting held 05-25-11/Added Biz Mgmt Office Dir, Storage Planner, Engineering Services Mgr, Installation Site Support Services Dire, Physical &amp; Industrial Security, &amp; M&amp;L Dir to signature lines and updated personnel titles. Updated personnel titles/Commander would like HWAD Representative to sign documents.</p>	<p>Yvonne Downs, SOC Env /Rob Mathias, SOC FES/Cheri Bryant, SOC Security/Melissa Waggoner, SOC QA/Jason Cardenas, SOC HR/Nancy Rutherford, SOC HR/ Wayne Larson, SOC Safety/Julie Moss, SOC Maintenance/Mark Jackson, SOC Eng/Leanne Cornell, SOC HR/Suzy Berry, SOC QA/Via email – Teresa McNally, SOC Traffic/Herman Millsap, DLA Tom Erickson, PMSG Dir</p>	06/14/11
<b>5</b>	<p>Name change from DZHC to SOC. Added Performance Management Support Group Director to signature line and changed Base Operations to Installation Site Support Services in the signature line. Under Implementation of MOC Changes, changed the following to read Performance Management Support Group Director from the following: "If conflicts are encountered, the SOC Director of Base Operations will be consulted."</p>	<p>Yvonne Downs, Env Svcs</p>	01/19/11
<b>4</b>	<p>Deleted MOC Checklist.PDF link in the references.</p>	<p>Yvonne Downs, Env Svcs</p>	10/19/10
<b>3</b>	<p>Added the following to the Criteria for Review &amp; Approval of Proposed Changes #1: "At the end of the approved time period for the temporary or emergency change, the process or procedures will either be returned to the original configuration or will be re-evaluated to determine whether the change will become a permanent change using the MOC SP." Modified formatting on checklist.</p>	<p>Yvonne Downs, Env Svcs Herman Millsap, DLA Rep Sandra Carroll, Tetra Tech CAPP Team at NDEP ORNL</p>	07/14/10

REFERENCE DOCUMENTS	
DOCUMENT NUMBER	DOCUMENT TITLE

DOCUMENTS REFERENCED IN THIS PROCEDURE ARE APPLICABLE TO THE EXTENT SPECIFIED HEREIN.

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## 1. PURPOSE

1.1 The purpose of the Hawthorne Army Depot (HWAD) Management of Change (MOC) Standard Procedure (SP) is to establish a systematic approach for evaluating proposed process changes and documenting that evaluation before changes are implemented in order to comply with Nevada Administrative Code (NAC) 459.95423. Thorough review and documentation of such changes assures that safety and health considerations are incorporated into the operating procedures and the process. The regulated process at HWAD is the Mercury Storage and Transfer Program, including the carbon dioxide (CO<sub>2</sub>) fire suppression system. This procedure supports the HWAD Environmental Policy and serves to minimize the risk of unintentionally releasing mercury and CO<sub>2</sub>.

MOC must be prompted by: (1) changes in chemicals, technology, equipment (other than a replacement in kind), and procedures used in the Mercury Storage and Transfer Program, (2) changes to buildings, structures, and equipment that affect the Mercury Storage and Transfer Program, or (3) changes in HWAD staffing for the Chemical Accident Prevention Program (CAPP) implementation and for emergency response. This procedure operates in concert with the Standard Operating Procedure (SOP) Program and the existing Control of Standard Procedures and Documents implemented under the International Organization for Standardization (ISO) 14001 Environmental Management System.

## 2. ACRONYMS

- 2.1
- **CAPP** - Chemical Accident Prevention Program
  - **CO<sub>2</sub>** - Carbon dioxide
  - **FES** – Fire & Emergency Services
  - **Hg** – Mercury
  - **HWAD** – Hawthorne Army Depot
  - **ISO** - International Organization for Standardization
  - **JSA** - Job Safety Analysis
  - **MOC** - Management of Change
  - **NAC** - Nevada Administrative Code
  - **NDEP** - Nevada Division of Environmental Protection
  - **NRS** - Nevada Revised Statutes
  - **P&ID** - Piping and Instrumentation Diagram
  - **PHA** - Process Hazard Analysis
  - **PSI** - Process Safety Information
  - **PSI** - Process Safety Information
  - **SOC** – SOC Nevada LLC
  - **SP** - Standard Procedure
  - **SWP** - Safe Work Practices
  - **Change:** Includes (1) temporary or permanent (long-term) modifications to technology, process equipment, procedures, chemicals or processing conditions that are not a replacement in kind; (2) changes to buildings, structures, or equipment that affect the regulated process (Mercury Storage and Transfer Program or CO<sub>2</sub>)

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fire suppression system) and that are not a replacement in kind; or (3) modifications to organizational structure or staffing levels that impact the prevention program and the emergency response program.

## 2. ACRONYMS (CONTINUED)

- **Equipment:** Includes changes in materials of construction, equipment specifications, piping arrangements, computer programs, alarms or interlocks.
- **Replacement in kind:** Replacing something with the exact same thing (based on review of design specifications) or a replacement that is equivalent to or that satisfies the design specification of the item to be replaced or performs the same role of that part or procedure. Changes that are replacements in kind are documented per the MOC process for equipment changes and procedure changes. Procedural replacements in kind include editorial, administrative or nontechnical changes that do not materially affect the way staff perform their work, which include change of contacts, clarification and correction of spelling, grammar and punctuation. Editorial and administrative changes to procedures and plans within the Mercury Storage and Transfer Program will be documented according to the HWAD ISO 14001 Standard Procedures and Document Control Program.

## 3. REGULATORY REQUIREMENTS

- 3.1 The Management of Change Standard Procedure for the Mercury Storage and Transfer Program is designed to meet the criteria of Nevada Division of Environmental Protection (NDEP) CAPP. Specifically, HWAD must comply with:
- 3.1.1 **NAC 459.95423** Procedures for management of certain changes. (Nevada Revised Statutes (NRS) 459.3818, 459.3833). The owner or operator of a facility with a process that is subject to CAPP shall:
  - 3.1.2 Establish and implement written procedures to manage changes, other than a replacement in kind, to:
    - (a) Chemicals, technology, equipment and procedures that are used in a process; and
    - (b) Buildings, structures and equipment that affect a process;
  - 3.1.3 Evaluate the impact of changes to organizational structure or staffing levels on the implementation of the prevention program and the emergency response program;
  - 3.1.4 Ensure that the procedures established pursuant to subsection 1 require that the following considerations are addressed before one of the changes described in subsection 1 occur and that the procedures specify the criteria for review and approval of each of the following considerations:
    - (a) The technical basis for the proposed change;
    - (b) The impact of change on safety and health;
    - (c) Whether any modifications to operating procedures will be necessary;
    - (d) The time necessary to make the proposed change; and
    - (e) The requirements for authorization for the elements of the proposed change;

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3.1.5 Inform and train for the change any employee who is involved in the operation of the process that is affected by the change and any maintenance or contract employee whose job tasks will be affected by the change before the start-up of the process or of the affected part of the process; and

3.1.6 Update:

(a) The process safety information required pursuant to NAC 459.95412; and

**3. REGULATORY REQUIREMENTS (CONTINUED)**

(b) The operating procedures or practices required pursuant to NAC 459.95416.

**4. RESPONSIBILITIES**

4.1 **SOC and DLA Strategic Materials Personnel Initiating Proposed Change** - are responsible for notifying their supervisor and DLA Strategic Materials Facility Manager of the need for any proposed changes to the Mercury Storage and Transfer Program before implementing such a change. If the proposed change triggers the MOC SP, then the staff member or their supervisor may complete the initiating section of the MOC Checklist. Prior to any changes, the SOC Environmental Services Manager, and DLA Manager will be notified. Ensuring the document being used is the latest revision available, when appropriate. Each Tier 1 and all Tier 2 documents formatted in accordance with the SOC Quality Plan contain the following statement: It is the user's responsibility to ensure, prior to use, the revision of this document is the latest available. Check the master list, if unsure of document status, prior to use. Downloaded, printed or copied document, unless supplied and so indicated by a DCA as being a controlled document are uncontrolled. Each MMTS Operating Procedure contains the following statement:

***NOTE:** Hard copies of this document may not be the current version. Refer to the "I Am The Key" to verify the current version."*

4.2 **Supervisor(s) and DLA Strategic Materials Facility Manager** - is responsible for ensuring the MOC process is initiated for changes to the Mercury Storage and Transfer Program that are proposed by their staff. The Supervisor or Manager contacts the SOC Environmental Services Manager to obtain an assigned MOC number for a proposed change. The Supervisor documents the proposed change on the MOC checklist. Note: Other SOC Managers will review and/or approve the MOC documentation per this procedure.

4.3 **SOC Environmental Services Manager and DLA Strategic Materials Facility Manager** - have overall responsibility for the technical administration and requirements of the MOC SP. The SOC Environmental Services Manager implements a system to assign tracking numbers to MOCs.

4.4 **SOC Fire & Emergency Services (FES) Chief** - has responsibility for management of the mercury (Hg) monitoring and response program elements that include ensuring that MOC is performed in accordance with this procedure for monitoring and response elements. Also has responsibility for the testing, inspection, and maintenance of the low pressure CO<sub>2</sub> fire suppression systems in the Hg storage warehouses, Hg monitoring and testing, and safe work practices (SWP) for FES personnel.

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4.5 **SOC Equipment Management Supervisor** - has responsibility for the refrigeration components of the CO<sub>2</sub> systems, ensuring that a maintenance program and procedures are in place, and that MOC is performed in accordance with this procedure for equipment under their control.

4.6 **SOC Engineering Services Division Manager** - has responsibility for providing engineering technical support to the FES Chief and Equipment Manager.

**4. RESPONSIBILITIES (CONTINUED)**

4.7 **SOC Safety Office Manager and DLA Strategic Materials Safety Manager** - have responsibility for ensuring that MOC is performed in accordance with this procedure for process safety aspects of the Hg storage operations.

4.8 **SOC Quality Assurance Manager** - has responsibility for ensuring that MOC is performed in accordance with this procedure for quality assurance/quality control aspects of the Hg storage operations, including visual inspections of mercury storage buildings and containers and calibration/operation of monitoring equipment.

4.9 **SOC General Manager and HWAD Commander** - have administrative responsibility for this MOC Standard Procedure.

**5. PROCEDURE FOR MANAGING PROCESS CHANGES**

1. This MOC Standard Procedure shall be used for all proposed changes to the Mercury Storage and Transfer Program, including the CO<sub>2</sub> fire suppression system, as detailed in the MOC Checklist. Proposed changes must be evaluated for impacts to health, safety and/or the environment, and a signed document shall be available before the change (whether temporary or permanent) can be implemented. The document shall be signed a second time before the change becomes operational as verification that the MOC process was completed. Criteria and prompts for conducting this evaluation and designating responsible individuals by position are included in the MOC Checklist.
2. This document is written specifically to meet the NDEP requirements under the CAPP that requires documentation for changes (including replacements in kind) in chemicals, technology, equipment, and procedures used in the Mercury Storage and Transfer Program process. Changes to mercury storage warehouses, structures, equipment, and replacements in kind that affect the Mercury Storage and Transfer Program are also subject to CAPP documentation requirements.

**6. PROCEDURE FOR EVALUATING ORGANIZATIONAL OR STAFFING LEVEL CHANGES ON PROCESS SAFETY**

1. This procedure requires evaluation and documentation of the impact of organizational or staffing level changes on the implementation of prevention and emergency response programs. Criteria and prompts for conducting this evaluation and designating responsible individuals by position are included in the MOC Checklist.

**7. CRITERIA FOR REVIEW AND APPROVAL OF PROPOSED CHANGES**

1. The technical basis for a proposed change will be reviewed and approved. The persons(s) responsible for the approval are the Assistant Manager Environmental Services and the Defense Logistics Agency

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Mercury Program Manager. The basis must include the reason the change is being proposed. An MOC tracking number will be assigned and documented on the MOC Checklist. For temporary changes, the time limit for the change and how it will be implemented shall be documented. Please refer to the MOC Checklist for evaluation criteria and prompts. At the end of the approved time period for the temporary or emergency change, the process or procedures will either be returned to the original configuration or will be re-evaluated to determine whether the change will become a permanent change using the MOC procedure.

**7. CRITERIA FOR REVIEW AND APPROVAL OF PROPOSED CHANGES (CONTINUED)**

2. A detailed description of the proposed change will be provided by the responsible Supervisor or Manager, including as applicable: design concept, engineering studies, associated process safety information (PSI), including plot plans, marked up piping and instrumentation diagrams (P&IDs), specifications, and/or calculations.
3. This technical basis must be detailed, as it supports the comprehensive review of the impact of the change on safety, environment, and/or health (including personnel impacts resulting from exposure to the change). This review may identify additional information needed for decision making.
4. The technical basis is used to evaluate which Managers are affected and which Managers should review and approve the proposed change, and then begin the process to review and update any affected CAPP documents.
5. If SOPs require changes, the affected Managers must conduct and document safety impact reviews of the proposed changes. The SOC Safety Manager and the DLA Strategic Materials Mercury Program Manager must review and approve any changes to SOPs for safety and health impacts.
6. Review of the safe work practices (SWP), job safety analyses (JSAs), PSI, process hazard analysis (PHA) and emergency response training must be completed by affected Managers to determine if revisions are necessary as a result of the proposed change. If SWPs and JSAs require changes, the affected Managers must conduct and document safety impact reviews of the proposed change. The SOC Safety Manager and DLA Strategic Materials Safety Manager must review and approve any changes to SWPs, PSI and PHA for safety or health impacts.

**7. IMPLEMENTATION OF MOC CHANGES**

Affected Managers will make the necessary changes to SOPs, SWPs, job hazard analysis (JHAs), training, PSI and PSSR and document that those changes were made on the MOC Checklist.

The responsible Manager or Supervisor will follow-up on the changes and when all are complete, that Manager or Supervisor will notify the SOC Environmental Assistant Manager, who will verify that all necessary changes have been made. If conflicts are encountered, the SOC Director of BOP's will be consulted.

After the SOC Environmental Assistant Manager verifies the MOC process has been followed, then the change is released for use. In addition, the SOC Environmental Assistant Manager will report to the DCA that changes have been made to a Site Specific process. The DCA will coordinate training to ensure all process operators, maintenance or contract employees whose job tasks will be affected.

**8. TRAINING FOR EMPLOYEES AFFECTED BY PROPOSED CHANGES**

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The Supervisor of the Site Specific process must review and train all process operators, maintenance or contract employees whose job tasks that will be affected by the proposed change prior to the implementation of the change. The DCA receives monthly “Employee Baseline” updates to ensure Site Specific employees are not left out.

The training program affected by changes to the Mercury Storage and Transfer Program is SOC.QP.EMP.HG.0002.

### 8. TRAINING FOR EMPLOYEES AFFECTED BY PROPOSED CHANGES (CONTINUED)

All Mercury Storage and Transfer Program staff will be trained to comply with this MOC procedure.

### 9. DOCUMENTATION UPDATES

Mercury Storage and Transfer Program documents follow the SOC.QP.QMS.01, R16 “Control of Documents” standard operating procedure.

For any changes, including new equipment, instruments, and controls are checked to ensure suitability with the process by following the MOC, PSI, PHA, and PSSR procedures.

This includes equipment, instruments, and controls being checked to ensure installation is per design specifications and manufacturers instruction. The MOC process also ensures that maintenance materials, spare parts, and equipment are suitable for the process for which they will be used.

### 10. MANAGEMENT PLAN AND DOCUMENT CONTROL

SOC Environmental Services Manager is responsible for the development, implementation and technical integration of this procedure. The following organizations will participate in the development, implementation and integration of this procedure and its contents:

- SOC Fire and Emergency Services – Hg Storage Buildings, CO<sub>2</sub> System, and Monitoring Equipment
- SOC Engineering, Facilities, & Planning – CO<sub>2</sub> System Testing
- SOC Equipment Maintenance – CO<sub>2</sub> System Refrigeration Equipment Maintenance
- SOC Maintenance and Utilities – Electronics Shop Facilities Maintenance
- SOC Grounds – Building Pest Control and Brush Clearing around CO<sub>2</sub> Tanks
- SOC MAXIMO System for Managing and Tracking Preventive Maintenance
- SOC Contract Administration and Purchasing
- SOC Security
- SOC Guard Operations
- SOC Environmental Services
- SOC Quality Assurance
- SOC Human Resources – Training Records
- DLA Strategic Materials – Mercury Mobile Transfer System

This procedure and its contents will be reviewed at least annually or at any time it is determined that a change to the MOC process (steps defined herein) is required. The review will be documented in the signature area located at the bottom of this page.

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**11. MANAGEMENT OF CHANGE IMPLEMENTATION**

1. The MOC Standard Procedure is available to Mercury Storage and Transfer Program personnel (DLA Strategic Materials, FES, Maintenance, Logistics, Quality, Environmental, Engineering personnel, etc.).

**11. MANAGEMENT OF CHANGE IMPLEMENTATION (CONTINUED)**

2. Signatures on this procedure indicate training of personnel is documented and being provided. The Training Plan for the Mercury Storage Program addresses required training for staff with regards to this MOC SP. In addition, random audits are conducted under ISO 14001 Internal Audit Standard Procedure.
3. The Compliance Audit Program will be followed while conducting CAPP audits.
4. Internal Audits are conducted at least every three years under the CAPP Compliance Audit Program to assure compliance with the MOC procedure.
5. Scheduled MOC activities can be verified by contacting the SOC Environmental Services Manager.
6. This procedure is controlled under the ISO 14001 Document Control Standard Procedure and the Standard Operating Procedure Program.

**Records** - (including the checklist, training records, and changes made to procedures, plans and documentation) supporting this MOC are retained for a minimum of five years. The responsible manager maintains records during the time that a MOC is being evaluated and approved for implementation. The completed MOC documentation checklist is kept on file by the SOC Environmental Services Manager.

**12. REFERENCES**

- NDEP Provided MOC / PSSR Flowchart
- NDEP/CAPP Management of Change Element Audit Checklist
- MOC Checklist
- Process Safety Information (PSI) Procedure and supporting documentation
- Process Hazard Analysis (PHA) Procedure and supporting documentation
- Pre-Start Up Safety Review (PSSR) Procedure and supporting documentation
- Standard Operating Procedure Program
- Compliance Audit Program
- Training Plan for the Mercury Storage and Transfer Program

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## Management of Change (MOC) Checklist

to comply with the NDEP CAPP

### PART 1: Proposed Change including Replacements in Kind

MOC #:	Initiation Date:	Name of Initiator:
	Approval Date:	
	Date Implemented:	

Name of Process:

Name of Responsible person(s) that have the authority to approve this MOC. By the signature(s) below, the Responsible person(s) acknowledge that the submitted technical basis has been reviewed and approved:

Assistant Manager Environmental Services: \_\_\_\_\_ Date: \_\_\_\_\_

Defense Logistics Agency Safety and Health (CSP) Manager: \_\_\_\_\_ Date: \_\_\_\_\_

Technical Basis: Reason for the change: Please provide a detailed description that supports the review of health, safety or environmental impacts. Before proceeding to Part 2: Evaluation Criteria, submit the technical basis to the Assistant Manager Environmental Services and the Defense Logistics Agency Mercury Program Manager for review and approval.

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DOCUMENT NO.

QP.EMS.HG.0007

TITLE

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Is the proposed change a replacement in kind?  If yes, skip the rest of this form, obtain required signatures and implement the replacement.	Yes / No / NA
What are the proposed design changes, and how are they documented?	Yes / No / NA
Was the design or concept taken into consideration?	Yes / No / NA
Were Engineering Studies Used? If yes, then list.	Yes / No / NA
Were Plot Plans used? If yes, then list.	Yes / No / NA
Were P&IDs used? If yes, then list.	Yes / No / NA
Were any calculations used? If yes, then attach a copy.	Yes / No / NA
<b>PART 2: Evaluation Criteria</b>	

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Would the proposed change impact safety or human health (including but not limited to increases in pressure, higher exposure to harmful chemicals, increased possibility of a release of hazardous chemicals, interrupt or change alarms or instrumentation, interfere with safety or emergency equipment, change operating process parameters, etc.)? If yes, must be approved by SOC Assistant Manager Environmental Services & DLA Safety and Health (CSP) Manager and review new PHA and PSI.

Yes / No

Assistant Manager Environmental Services: \_\_\_\_\_ Date: \_\_\_\_\_

Defense Logistics Agency Safety and Health (CSP) Manager: \_\_\_\_\_ Date: \_\_\_\_\_

Would the proposed change impact the environment, including but not limited to increased possibility of spills to the environment or increased discharges (air emissions, water emissions, increased energy consumption, etc.)? If yes, consult the SOC Environmental Services Manager.

Yes / No

Does the proposed change potentially impact other HWAD organizations? If yes, consult the SOC Safety Officer. If no, consult SOC Environmental Services Manager and skip Part 3.

Yes / No

Is the proposed change major, complex (involving multiple systems), or significant? Consultation with all affected SOC managers is required.

Yes / No

Does the change affect staffing of the CAPP implementation or Emergency Response? If yes, complete Parts 3, 4 and 5.

Yes / No

**PART 3: Organizations Consulted**

Was the following organization consulted: DLA Strategic Materials

Yes / No / NA

Was the following organization consulted: SOC Human Resources?

Yes / No / NA

Was the following organization consulted: SOC Contract Administration or Purchasing?

Yes / No / NA

Was the following organization consulted: SOC Fire & Emergency Services?

Yes / No / NA

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Was the following organization consulted: SOC Safety Office?	Yes / No / NA
Was the following organization consulted: SOC Health Office?	Yes / No / NA
Was the following organization consulted: SOC Environmental Services?	Yes / No / NA
Was the following organization consulted: SOC Quality Assurance?	Yes / No / NA
Was the following organization consulted: SOC Maintenance Planning and Housing?	Yes / No / NA
Was the following organization consulted: SOC Engineering, Facilities, & Planning?	Yes / No / NA
Was the following organization consulted: SOC Maintenance & Utilities?	Yes / No / NA
Was the following organization consulted: SOC Equipment Maintenance, Electric Shop?	Yes / No / NA

**PART 4: Documentation of Impact Reviews and Changes**

**Standard Operating Procedures (SOPs)**

Were procedures reviewed? If no, state basis for decision and skip balance of section.	Yes / No / NA
Do any procedures need to be modified or created? If yes, a) list the procedures and proposed changes; b) review the proposed changes for safety and health impacts; c) document the review; and provide date(s).	Yes / No / NA

**Safe Working Practices (SWPs) / Job Safety Analysis (JSAs)**

Were SWPs / JSAs reviewed? If no, state basis for decision and skip balance of section.	Yes / No / NA
Were there any changes to or were SWPs/JSAs required? If yes, a) list the SWPs/JSAs and proposed changes; b) review the proposed changes for safety and health impacts; c) document the review; and provide date(s).	Yes / No / NA

**Process Safety Information (PSI)**

Was the current PSI reviewed? If no, state basis for decision and skip balance of section.	Yes / No / NA
Did the current PSI require changes? If yes, amend changes, review, document and provide date completed.	Yes / No / NA

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Was a new PSI created? If yes, list and provide date completed.	Yes / No / NA
<b>Process Hazard Analysis (PHA)</b>	
Was the current PHA reviewed? If no, state basis for decision and skip balance of section.	Yes / No / NA
Did the current PHA require changes? If yes, describe changes needed and provide date completed.	Yes / No / NA
Was a new PHA required? If yes, list and provide date completed.	Yes / No / NA
<b>Temporary or Emergency Changes</b>	
Is a temporary or emergency change to CAPP procedures required? If yes, then describe temporary/emergency change, including length of time temporary change would be in effect and how it would be implemented (e.g., redlined procedure). If no or NA, then skip balance of this section.	Yes / No / NA
Supervisor: Should other manager's be consulted? If yes, then list and obtain approvals.	Yes / No
Temporary/Emergency change approval signature(s)	Date:
Approved time limit <sup>1</sup> :	
Have affected employees been provided training on or informed of the temporary / emergency change? If yes, then attach list of persons trained/informed and date.	Yes / No
<b>Training</b>	
Were current training modules reviewed for the need for changes?	Yes / No / NA
Do any modules need to be modified or new modules created? If yes, then list or attach a list and provide date module change(s) was / were completed. If no or NA, then skip the rest of this section.	Yes / No / NA

<sup>1</sup> If additional time is needed, the initiator must obtain their manager's approval to extend the temporary authorization or must initiate the MOC process as a permanent change. Otherwise, the temporary change automatically expires on the date set by the approver.

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Were process operators, maintenance, or contract employees informed of any changes prior to the change taking affect?	Yes / No / NA
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How will training be documented? Describe.  When refresher/new training is completed, Attach documentation (syllabus, names and completion dates).	Yes / No / NA
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**Part 5: Staffing Level Changes**

Will staffing levels for implementation of CAPP or Emergency Response change? If no or NA, skip rest of this section.	Yes / No / NA
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Is there CAPP implementation or Emergency Response impacts to the staffing level changes? If yes, describe and provide information on any program changes needed to accommodate the staffing changes, such as reassignment of job duties; review of Emergency Response Plans and Procedures; changes in chemicals, technology, equipment, operating procedures; or the buildings, structures or equipment used in the Mercury Storage Program?	Yes / No / NA
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**INITIAL CHANGE APPROVAL SIGNATURES**

Name & Organization with signature	
	Date:

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	Date:
	Date:
	Date:
	Date:

**MOC VERIFICATION SIGNATURE**

Reviewed By: SOC Environmental Services, Manager	Date:
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**DOCUMENT CHANGE HISTORY**

- Review Period- This document will be reviewed at least annually to ensure its suitability.

Revision Date	Nature of Revision	Document Review Participants
01/19/11	Name change from DZHC to SOC.	Yvonne Downs, SOC Env
08/24/10	Formatting so there is more room for written data.	Yvonne Downs, SOC Env

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