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MANAGEMENT OF CHANGE		

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SUBPART A - PURPOSE / SCOPE

The Management of Change (MOC) plan addresses temporary and/or permanent changes to organizations, personnel, systems, procedures, equipment, products, materials or substances, that are not “replacement in kind”, in Berry Bros.’ operations and capital projects. All temporary and/or permanent changes will be evaluated and managed to ensure that health, safety and environmental risks arising from these changes remain at acceptable levels.

The MOC process establishes the minimum procedures necessary to identify and control potential hazards or impacts associated with change. MOC ensures that the impacts of changes that affect the health and safety of personnel, or threatens the environment are properly recognized, reviewed, approved, communicated and documented.

Continual changes are present at most facilities, and descriptive guidelines shall be established in order to assist all employees in recognizing hazards and remediation efforts as a result of the change.

The first critical step in the MOC process is recognition of change. Some examples of changes that can occur that could initiate a MOC include the following:



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- Operations improvements.
 - Replacement “not in kind”
 - Replacement where specifications differ from the original
 - Addition, deletion, modification or bypass of equipment
 - Alternative use of existing equipment
- Project scope changes
- HS&E improvements (Policy Changes)
 - Regulatory
 - Company Policy
 - Local Policy
- Personnel improvements.
- Technological improvements (Software Changes)
 - Delete a database point
 - Delete a shutdown or an alarm
 - Delete a schematic or dialog, or modify functionally
 - Change PLC configuration or ladder logic
- Equipment improvements.
- Other improvements designed to promote further efficiency.

The MOC process should be initiated if one or more of the following is impacted:

- Health
- Safety
- Environment
- Regulatory Compliance
- Personnel Competency
- Policies and Procedures

Temporary changes may occur at the facilities / work site to support continual improvement efforts, of which may introduce new hazards and challenge the safeguards of the original processes, systems, or equipment. In these cases, a thorough Management of Change process shall be conducted of equal standard as a permanent change.

The two main principle groups of change that are identified in this policy as to which the MOC standard shall be applied include:

- Personnel Changes



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- Facility Change

SUBPART B - PERSONNEL CHANGES

Personnel changes can occur at the work site regarding supervision, operations, and or support activities with the exception of rotations. New personnel to the facility or work site, whether formally recognized as Short Service Employees (SSE) by Berry Bros. or the Client's standards, are considered as a change in the facility's or work site normal scope of activities. Critical roles in operations and / or supervision necessitate a higher level in addressing formal change processes, and all activities shall be addressed and documented appropriately.

Employees shall be included in the change processes that directly and indirectly affect their roles, responsibilities, and HS&E performance. Initial orientations and meetings that address any minor or significant changes to the facility shall be properly conducted and documented. Appropriate documentation shall be maintained through the duration of the change until formally understood and adopted as a normal facility activity.

Organizational changes, such as new divisions or operations, shall necessitate a thorough review of the facility's plans and programs. Personnel changes shall include the following:

- Change in job scope
- Change in professional responsibilities
- Change in employee compensation
- Change in company and/ or facility requirements
- Change in hours of operation and schedules
- Changes in supervision
- Changes in reporting

SUBPART C - FACILITY CHANGES

Facility changes normally occur to either improve or correct certain processes, procedures, design, and/ or equipment. Personnel shall be appropriately notified of the changes prior to engaging in activities that may be unfamiliar or conflict with normal company of host employer policies and procedures in order to ensure a



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safe, efficient transition and performance. Examples of facility change should include the following:

- Modifications to existing equipment and design.
- Construction / addition of new equipment and facilities.
- Significant changes in normal activity processes and procedures.
- Facility projects that create temporary change.

SUBPART D - MANAGING CHANGES

Both minor and major changes should be properly documented and addressed with all employees that may be directly or indirectly affected by temporary or permanent change at the facility. The processes for managing change at the facility will include the following minimum standards:

- Original processes, procedures, equipment and design of the facility prior to change.
- Scope, purpose, proposed duration, and all applicable information and documentation regarding the anticipated change.
- Formal plan for addressing change issues and remediation efforts to reduce related hazards.
- Personnel job scopes, responsibilities and specific roles prior to, during, and after change efforts are concluded.
- Employee training/ meeting/ orientation program that ensures the safe performance transition during the change.
- Communication protocol, frequency, and medium conducted during change activities.

SUBPART E - REVIEW

A proposed change must be evaluated for potential safety, health, and environmental implications. A review should be conducted to assess hazards associated with physically implementing a change as well as the hazardous effects that the change could have on processes and personnel. Reviewers must be knowledgeable, trained and experienced with the equipment, practices, and/or process changes under consideration and have a thorough understanding of the MOC process.



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SUBPART F - AUTHORIZATION

Appropriate line management must authorize the change before implementation. Authorization must be adequately documented. Approval of the proposed change is contingent upon the following pre-implementation actions:

- All necessary engineering and HS&E reviews have been completed.
- Hazards/consequences identified through the reviews have been addressed.
- Impacts to the HS&E Performance Agenda have been identified and addressed.
- Regulatory requirements / approvals have been satisfied.
- All affected personnel have been informed of the change and trained as necessary.
- Documentation of the change and reviews is complete.

SUBPART G - IMPLEMENTATION AND FOLLOW-UP

Prior to implementation, the change must be properly communicated to affected employees. This can be accomplished through the pre-job safety meeting process or directly by the supervisor. Any training requirements should be formally identified and completed prior to start-up.

After the change has been implemented, the MOC coordinator is responsible to verify that the change was performed as intended and that the proper documentation was prepared, drawings revised, procedures updated, regulatory notifications and filings completed, etc.

If the change is temporary, prescribed time limits must be set. The system must insure that these time limits and any others stipulations of the temporary change are not violated.

SUBPART H - EMERGENCY CHANGES

In an extreme emergency, it may be necessary to carry out a modification or procedural change before normal MOC procedures can be followed. In these cases, the change will be permitted only on the verbal authority of the Designated Person-In-Charge (DPIC) following a recognized risk analysis process.



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Emergency changes should be subjected to the normal MOC procedures at the earliest possible time.

SUBPART I - TEMPORARY CHANGES

Temporary changes shall be indicated on the form, including the date of initiation and date when the change will be returned to original condition. At the end of the approved time limit, the temporary change shall either be returned to its original condition or a permanent MOC shall be submitted and approved.

Temporary changes shall not be closed out unless the system has been returned to its pre-changed condition or a permanent MOC has been submitted and approved.

SUBPART J - RECORD RETENTION

At a minimum, the MOC documentation will be kept at the office of record for the site affected by the change for five (5) years unless stipulated otherwise by applicable legal, regulatory or compliance guidelines.

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