



Management of Change Form

Title	Secure Access Control Systems - Policy & Document Updates	MoC #	US FREE 24 02662 P
-------	---	-------	------------------------------------

Type	Permanent	Submitted by	Cortney Miranda
Division	EH&S	Site/Business Unit	Freeport
Plant/Facility	Freeport EH&S	Used Time Critical Process	No
		PSM/RMP covered within	No
Created	10/28/2024	In Service Date	12/18/2024

Affected Locations		
Division	Site/Business Unit	Plant/Facility
Chlor-Alkali & Vinyl	Freeport	CAV Logistics
Chlor-Alkali & Vinyl	Freeport	Chlorine 3
Chlor-Alkali & Vinyl	Freeport	Chlorine 5
Chlor-Alkali & Vinyl	Freeport	Chlorine 7
Chlor-Alkali & Vinyl	Freeport	DCP_A-1430 Analytical Labs
Chlor-Alkali & Vinyl	Freeport	Freeport Site Analytical Group
Chlor-Alkali & Vinyl	Freeport	Jumbo EDC/NPA
Chlor-Alkali & Vinyl	Freeport	Liquefaction and Distribution
Chlor-Alkali & Vinyl	Freeport	Marine (Caustic)
Chlor-Alkali & Vinyl	Freeport	Stratton Ridge Operations
Chlor-Alkali & Vinyl	Freeport	Texas Cell Services
Chlor-Alkali & Vinyl	Freeport	Unit 5
Chlorinated Organics	Freeport	CEMP
Chlorinated Organics	Freeport	Trichlor
EH&S	Freeport	Freeport EH&S
Epoxy	Freeport	B-23 Epoxy Intermediates
Epoxy	Freeport	B-68 Epoxy Intermediates
Epoxy	Freeport	Epoxy 1 & 5
Epoxy	Freeport	Epoxy 2
Epoxy	Freeport	Unit 3
Global	Freeport	Site Operations
Maintenance and Reliability	Freeport	Freeport Maintenance and Reliability
Maintenance and Reliability	Freeport	Freeport Maintenance and Reliability - MRO
Maintenance and Reliability	Freeport	Freeport Maintenance and Reliability - MTC/Turnaround

Maintenance and Reliability	Freeport	Freeport Maintenance and Reliability - Oyster Creek
Maintenance and Reliability	Freeport	Freeport Maintenance and Reliability - Plant A
Maintenance and Reliability	Freeport	Freeport Maintenance and Reliability - Plant B
Maintenance and Reliability	Freeport	Site Pipelines
Power	Freeport	Power 3 & 6

Description and purpose of the change

This MOC is to update documentation, policies and work processes revolving Secure Access Control Systems. Updates are needed to reflect current work processes, role alignments and provide clarity where it was unclear.

Management systems and documents to be revised by this eMOC are as follows.

- Badging systems
- Waiver process
- Lock and Key
- Cameras
- TAC Security

Olin Freeport Badging Work Process-

1. Updated header to remove /Dow I – Park Facilities
2. Updated Table of contents to remove Definitions, as they are defined within the Appendix, moved revision history and updated page numbers.
3. Removed development and implementation from the purpose section of the process. Updated to just state badging process, review and maintenance.
4. Removed the differentiation of Olin Employees and Contractors throughout the document where the process does not / will not change depending on employee type.
5. Updated the roles and responsibilities section to reflect how they apply to this policy. Included Security in the initial role of facility focal point. This is a clarification to the role. For leadership, the wording “Employees in leadership roles”.
6. Updated training to remove H&S Techs will support block security focal points. This is not a current expectation or training requirement.
7. Updates to work process include the following:
 - a. Badge office locations and hours of operation
 - b. Expectation that employees must be present.
 - c. Removed in initial Implementation as this has been completed for several years.
 - d. Requesting a badge section was updated to reflect more information than follow the appendix.
 - e. De-activation a badge process had been updated to reflect more current information for the process. Including information needed and where to send the request.
 - f. Lost/ Stolen badges section updated who to contact
 - g. Updating badging access section was updated to clarify who was responsible for initiating the request and what form to use.
 - h. Changing badge access door times section was updated to clarify the current process and information needed to update.
 - i. Maintenance / troubleshooting updated to show the current work process and remove any direct contact the individual facilities would have with the service company
8. Measurements updated to reflect a work process that should be implemented to ensure the requirement of maintaining a current and accurate list of badged employees to the facility.
9. Appendices updated to remove Appendix B, updated Olin Freeport Facility Badge Request Form.
10. Appendix A updates:
 - a. Clarified throughout the Appendix Employees vs various types of employees / contractors where the process was not affected by employee type.

- b. Updated Purpose and Scope to clarify.
- c. Removed Policy sections as this was not applicable.
- d. Updated Definitions to remove Non-I-Park Facility Contractor VS Non-Resident Employee contractor. Not applicable. Added Facility Security Focal point. Removed definition of Waiver Process, as this is not applicable within this policy.
- e. Updated types of Badges Sections to remove contractor badging and visitor badge without scanning.
- f. Updated Non-Industrial Park Facilities process to clarify applicability and process for obtaining.
- g. Dow I-park badging process and scope defined to reflect current expectations and process.
- h. Waiver process removed from document; this will be a stand-alone document.
- i. Updated the Olin facilities, inside Dow I-park badge process and expectations. Clarified this is only for access updates made to existing badges. The initial Olin badge will be requested through HR.
- j. Removal of all language revolving employee Dow I-park badge used for identification purposes, as this is not applicable.
- k. Removal of all language revolving availability to call security if time does not permit.
- 11. Appendix B – Badge request form was removed from document. This was a stand-alone document and both documents were not being updated adequately. Request form should be a stand-alone document for ease of access to the requestor.

Olin Freeport Facility Badge Request Form

- 1. Added a check box to include if badge is being reported lost or stolen.
- 2. Removed EX from Building / Block number
- 3. Removed Additional notes
- 4. Removed EX from Reason for Request
- 5. Combined Name and Employee ID
- 6. Removed Date Issued
- 7. Added if applicable to TWIC Expiration date
- 8. Added TAC and MRO as locations to request access to

Texas Operations Waiver Procedure:

- 1. Updated the header and footer to remove “Dow” verbiage
- 2. Scope section updated to reflect all Olin facilities are applicable.
- 3. Background section updated to remove Delivery Leader verbiage and replace with Group Leader, also removed references to I-park and safety manager.
- 4. Other documents section removed Dow linked documents and updated Olin Texas Operations Waiver Form link to D2.
- 5. Definitions section removed Dow reference and replaced with site safety training.
- 6. Waiver escort section updated to replace Dow with Olin escort, replaced badge & file with badging location.
- 7. Procedure section updated to re-arrange steps making production leader approvals first step. Removed all references to delivery leader, i-park and safety manager and replaced with Group leader. Added separate steps for normal business hours vs off-hours. Added verbiage regarding printing and delivering waivers to the guard shack for afterhours process. Updated badging office to reference OC-1120.

Texas Operations Waiver Form:

- 1. Updated header and footer to remove Dow from document owner.
- 2. Removed all references to delivery leader and replaced with Group leader.
- 3. Removed Dow and replaced with Olin responsible person.
- 4. Removed notification requirement to Production leader and replaced with approval required.

Olin TXO Lock & Key Policy:

- 1. Name of document changed to reflect the combination of i-park and non-i-park procedures in one document.
- 2. Introduction section changed to Scope and Purpose.
- 3. Expectations section changed to define i-park and non-i-park procedures into document.
- 4. Guidelines section updated with verbiage regarding roles and responsibilities.
- 5. Applicability section updated to include i-park and non-i-park verbiage.
- 6. General requirements section updated to include designated focal point, lost key notifications, keys issued by designated persons, verbiage requiring a documented audit of keys annually.
- 7. Exceptions section updated to designate Site Security Leader as approver.
- 8. Investigation section added for a documented process step for lost keys.

9. Roles and responsibilities section updated to include changing security manager to Security Leader, building manager changed to security manager or MRO Leader. Security Manager or MRO Leader to issue keys, approve replacement keys, assign keys, and ensure keys are returned upon separation. Security Focal Point verbiage added with building administrator role, HR role to return keys to Security Manager.
10. Separated two sections for i-park and non-i-park process, identified role to request keys in both sections.
11. Non-i-park section added process to contact Norrell in "Action" for necessary materials, added Security Manager will approve and send communication to Contract Management teams for Olin and Dow, added steps for Contract Management to forward key requests to Dow Lock & Key, added Norrell to provide requested cylinders and deliver to Dow Lock & Key and then install in block when completed, added Olin requestors are required to utilize Norrell for material specifications for all cylinders, added Olin block administrators will retrieve completed key requests from Dow Lock & Key.
12. Returning key section updated to include keys are returned to Security Manager or MRO Leader.
13. Updated links in document.

Olin Freeport Camera Policy:

1. Updated and added section for Security System install or maintenance to align with Division policy 06.10.29.

TAC Security Plan - This document will not be shared within this MOC as it is a secure document. This document and its changes have been reviewed by appropriate leadership levels.

1. Updated link to the TAC Emergency Action Plan
2. Removed redundancy of listing all division aligned policies and stated that this policy aligns with all corporate 06.01 Security Policies.
3. Updated the titles and statements from the Freeport specific policies that are being updated in this MOC.
4. Updated Point of Contact as the Site Security Group.
5. Roles and Responsibilities updated to include Site Security Group that encompasses the Site Security Manager, the Site Security Focal Point and the Non-I Park Facility Security Focal Point. Updates to the expectations of the H&S tech.
6. Updated process for obtaining security information to match current work process.

Documents to be archived per this MOC-

Olin Badging Process- Listed in Freeport Site ORC D2. This document is already combined within the Olin Freeport Badging Work Process Document.

Any other badge processes within D2 facility libraries other than Freeport Site, and Freeport Site ORC.

TXO ES&S Badge Deactivation Form-Olin Freeport Badging Work process has been updated to include process for deactivation

Non- I-park Lock and Key Policy - This is being combined as a Site level document with expectations listed in the Olin TXO Lock & Key Policy. This is for consistency and clarifications of expectations.

TAC & MRO Lock and Key Management Process - This is being combined as a Site level document with expectations listed in the Olin TXO Lock & Key Policy. This is for consistency and clarifications of expectations.

TAC Key Management Form -

Implementation Task

- Review Facility Camera Policy, harmonize with site or ensure site changes are incorporated.
- Review any facility badging policies are archived
- Implement Facility Lock and Key Management, utilizing template outlined in MOC
- Submit a facility master copy of the lock and key spreadsheet to the Site focal point
- Review and update Facility Security Plan
- Assign Shift connector task for annual Lock and Key Audit
- Assign Shift Connector task for annual badge access audit

Additional Action Items to follow this MOC -

Communicate expectations and changes to contracting partners

Review / Rename the "Non-I-park Facilities Badge Request Form" to ensure clarity that this is for Contractors only

Review & update Contractor Badging Policies and work process document to ensure alignment with this MOC.

Create shift connector tasks for Freeport for Annual Facility Lock and Key Audit and Badge Access Audit

The change is to

Facilities \ Security \ Facility security systems (per site security plan)

Operating Discipline \ System procedure and documents \ Policy/Program (Business, Site, Department, RC14001 Level I and Level II, site RC14001etc.)

Technical basis for the change

The Basis for this Change is to clarify current requirements and work processes. This will align with expectations from Division and Dows work processes. Clarifying the process and expectations will restrict unnecessary spending on secure access systems. This will also enforce all the necessary reviews to ensure all company requirements are being met. Implementing management systems will ensure traceability and accountability for all assets aligned with Secure Access to our site and facilities.

Reviews

Review	Reviewer	Status
Business Planning	Miranda, Cortney FPLJ	Granted
Documentation Review	Miranda, Cortney FPLJ	Granted
Environmental	Abney, Gretchen FPLJ	Granted
Health & Industrial Hygiene	Zemen, Lori FPLJ	Granted
Operations / Operability	Neff, Matthew FPLJ	Granted
Process Safety & Loss Prevention	Miranda, Cortney FPLJ	Granted
Safety	Chidester, William FPLJ	Granted
Security Review	Blanchard, Brian FPLJ	Granted
Significance Review	Miranda, Cortney FPLJ	Granted
Training Review	Miranda, Cortney FPLJ	Granted

Significance Level Determination

Significance of Change

1



Management of Change Form

Tasks

Pre startup safety review type	None-no field change			
Task	Responsible	Start Date	Due	Status
Address comments in attached documents per M. Neff	Miranda, Cortney FPLJ	Before In-Service		Complete
Address comments in attached documents per M. Neff	Blanchard, Brian FPLJ	Before In-Service		Complete
Assign Shift Connector Task - Annual Badge Access Audit	Implementation Coordinator			Pending MOC Approval
Assign Shift Connector Task - Annual Lock and Key Audit	Implementation Coordinator			Pending MOC Approval
Communicate updates to contracting partners	Abrego, Theresa FPLJ	12/18/2024	1/31/2025	Open
Create a Freeport Specific Shift Connector Task - Annual Badge Access Audit	Woodall, Tracy FPLJ	Before In-Service		Complete
Create a Freeport specific Shift Connector Task - Annual Facility Lock and Key Audit	Woodall, Tracy FPLJ	Before In-Service		Complete
Create a Master Log of all lock and keys within each facility	Implementation Coordinator			Pending MOC Approval
Full implementation of Lock and Key Record Keeping	Implementation Coordinator			Pending MOC Approval
Relocation of Master Key lock box	Blanchard, Brian FPLJ	12/18/2024	1/31/2025	Open
Review and Update as needed Contractor Badging Process	Blanchard, Brian FPLJ	12/18/2024	3/31/2025	Open
Review Facility aligned badging policies or processes	Implementation Coordinator			Pending MOC Approval
Review Facility Specific Camera Policy	Implementation Coordinator			Pending MOC Approval
Update all Documents within D2	Miranda, Cortney FPLJ	Before In-Service		Complete
Update Facility Security Plan	Implementation Coordinator			Pending MOC Approval

In Service Communication

Subject	Secure Access Control Systems - Policy & Document Updates		
Distribution Lists			
Acknowledgment Required	Yes	Sent Date	12/18/2024

Approval

Approved By	Title	Response Date
Garza III, Timoteo FPLJ	Health Safety & Security Ldr	12/16/2024



Management of Change Form

Attachments

Name	Attached
Olin Freeport Badging Work Process - CM Response 12-4-24.docx	12/4/2024
Olin Freeport Badging Work Process - Final.docx	12/12/2024
Olin Freeport Badging Work Process.docx	12/18/2024
Olin Freeport Camera Policy.docx	12/18/2024
Olin Freeport Facility Badge Request Form - CM Comments 12-4-24.docx	12/4/2024
Olin Freeport Facility Badge Request Form - Final.docx	12/12/2024
Olin Freeport Facility Badge Request Form (1).docx	11/25/2024
Olin Freeport Facility Badge Request Form.docx	12/18/2024
Olin Lock and Key Request Form.docx	12/18/2024
Olin TXO Facility Key Log.xlsx	11/27/2024
Olin TXO Lock and Key Policy.doc	12/18/2024
Texas Operations Waiver Form.docx	12/18/2024
Texas Operations Waiver Procedure.docx	12/18/2024

NOTICE - This document is the property of Olin Corporation and is not intended for publication outside of the company.

Printed copies of this document are uncontrolled. Please contact Division EH&S for the most current controlled version.