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Static Control Evolves with Hardware and Process Changes
Kelly Robinson, PE, PhD  
Electrostatic Answers  
15 Piping Rock Run  
Rochester, NY 14450  
kelly.robinson@electrostaticanswers.com  
585-425-8158

Abstract

Static sparks can ignite solvent vapors and shock operators. Achieving good static control pays dividends in reduced risk and improved product quality. Manufacturing operations are constantly evolving to improve operations, reduce costs, increase throughput, or perhaps to produce a new product on a line designed for something quite different. OSHA Process Safety Management prevents or minimizes the consequences of system failures.

Our static control system should evolve along with these changes to our hardware and process set-points. In this presentation, I will discuss how to complete a static survey to identify sources of static charging and document the current performance of our static control system. The impact of proposed changes on static control should be assessed. For example, high impact changes may be adding a new classified area (C1/2, D1/2) or adding a new static charging source such as corona treater or a tacky roller web cleaner. Given our assessment, our Management of Change procedures should trigger the appropriate response. Perhaps a “dry” (no solvents) static survey should completed to assess the static control for a new C1D2 classified area. Finally, we should update our machine drawings, operating procedures and training materials to include changed to our static control system.
Purpose. This section contains requirements for preventing or minimizing the consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals. These releases may result in toxic, fire or explosion hazards.

910.119(l) Management of change.

(1) The employer shall establish and implement written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, equipment, and procedures; and, changes to facilities that affect a covered process.

(2) The procedures shall assure that the following considerations are addressed prior to any change:

(i) The technical basis for the proposed change;
(ii) Impact of change on safety and health;
(iii) Modifications to operating procedures;
(iv) Necessary time period for the change; and,
(v) Authorization requirements for the proposed change.

(3) Employees involved in operating a process and maintenance and contract employees whose job tasks will be affected by a change in the process shall be informed of, and trained in, the change prior to start-

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<th>Description</th>
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<tbody>
<tr>
<td>Part Number:</td>
<td>1910</td>
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<td>Part Title:</td>
<td>Occupational Safety and Health Standards</td>
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<td>Title:</td>
<td>Process safety management of highly hazardous chemicals.</td>
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<td>Appendix:</td>
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up of the process or affected part of the process.

(4) If a change covered by this paragraph results in a change in the process safety information required by paragraph (d) of this section, such information shall be updated accordingly.

(5) If a change covered by this paragraph results in a change in the operating procedures or practices required by paragraph (f) of this section, such procedures or practices shall be updated accordingly.