

Letter from our President

Hello SESHA Community,

It's hard for me to believe it's already March! What a year it's been thus far. With all of the crazy winter weather and icy sidewalks, I know that I'm ready for it to be spring!

However, there are a lot of amazing opportunities available within SESHA at this time of year! We are going to be having our "Spring Training" event in a couple of weeks, and we would like to invite you to be a part of it! It is going to be held at Intel – a first for us! We will have a tour of the facilities by some of our members, as well as some Intel system owners, and then will have speakers who can share with us some exciting regulatory changes and opportunities to keep improving at our companies. If you are interested in helping us plan, please reach out! We will be sending out a link with registration information soon!

What: Spring Training – SESHA Pacific Northwest

When: Thursday, March 23rd 2017
2:00 PM - 6:00 PM

Where: Intel Corporation. Hillsboro, Oregon

The other major event happening soon is the SESHA National Conference! It will be held in Scottsdale, Arizona. It is an outstanding way for you to meet other members of the semiconductor EHS community, share stories and best practices, and get to learn some additional technical information about environmental, health and safety matters. I strongly encourage you to consider attending!

<http://www.seshaonline.org/regions/pnw/index>

I look forward to seeing each one of you at the Spring Training! Feel free to call or email me in the meantime if you would like to get more involved or share any ideas.

Sincerely,

Joy Marsalla

Semiconductor Environmental, Safety and Health Association (SESHA)

Pacific Northwest Chapter President

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TOPIC OF THE MONTH

The Risk Management Program Rule: Final Amendments

The EPA published its final rule on revisions to the CAA's Risk Management Program (RMP) requirements in January 2017.

The final rule, published in the Federal Register (82 FR 4594), revises the RMP's provisions on accidental release investigations, third-party audit assessments, emergency preparedness and response procedures, and chemical hazard information availability to the public.

The time required to comply with these new requirements vary from one to five years. More information is available in the attached document from CH2M.

SESHA ESH SYMPOSIUM AND EXHIBITION

April 2017 Conference

The SESHA 39th Annual International High Technology ESH Symposium and Exhibition will be returning to Scottsdale, Arizona!

This will be a perfect platform to participate in discussions related to cutting edge high technology ESH topics, foster collaborations and network with top industry professionals, while experiencing a favorite location for SESHA meetings.

Scottsdale is annually rated among the nation's most desirable communities to visit and Scottsdale's vibrant downtown is considered the finest urban center in Arizona.

<http://www.seshaonline.org/meetings/2017/index.php>

CALENDAR OF EVENTS

1. Spring Training – SESHA Pacific Northwest

When: Thursday, March 23rd 2017

Where: Intel Corporation
Hillsboro, Oregon

2. SESHA 39th Annual International High Technology ESH Symposium and Exhibition

When: April 17-21, 2017

Where: Embassy Suites by Hilton
Scottsdale Resort
Scottsdale, Arizona

<http://www.seshaonline.org/meetings/2017/index.php>

3. Submit SESHA-related hot topics or career development articles for inclusion in a future monthly newsletter

When: March 15, 2017 for April Newsletter

Where: Submit articles to SESHA PNW Communications Directors

CONTACT US:

Email:
sesha.pnw@gmail.com

Website:
www.seshaonline.org/regions/pnw/index

Communication Directors:

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REGULATORY CHANGES

2017 Global EHS Regulatory Forecast Enhesa Webinar Series

With a rapidly transforming political climate, it is likely that the EHS regulatory landscape will undergo several changes and challenges in 2017. As part of their webinar series, Enhesa presented a forecast for the most relevant EHS regulatory trends for the United States.

At the federal level, highlights include:

- Air emissions and energy: deregulation and scaling back of enforcement efforts for climate change initiatives

- Water: heightened investigation and remediation enforcement, especially regarding drinking water
- Waste: efforts to reduce food waste
- Chemicals, Hazardous Substances and Products: TSCA reform, additional restriction to plastic materials
- Health and Safety: revisit occupational health and safety rules (reporting), reduced OSHA budget, and increased penalties fees.

States might choose different approaches.

Watch the full complimentary webinar here:

<http://www.enhesa.com/webinars/2017-global-ehs-regulatory-forecast>



CAREER DEVELOPMENT

Do you ever feel like an imposter?

You're in a large conference room, sitting in a fancy office chair at one of those big, rectangular tables among 20 of your closest peer-managers. Yes, managers. How do you feel? Invigorated? Excited to make your presentation? Are you nervous? Or is it worse than that – you feel like you might be “found out” for being different, for not having the answers, for not being prepared, for not actually BEING one of managers. But in fact, you are. You are a manager, a leader, a colleague, and a trusted member of your team. So, why do you feel these insecurities?

If this scenario sounds familiar, or if you can change the location and people and make it seem familiar – you may have imposter syndrome. Now, don't worry – it's not a disease, and it's not something scary. It could be one of those personal discoveries which may actually enable you to combat this feeling head-on and to share your experience with others.

Imposter Syndrome was first named in 1978 by two psychologists: Pauline Clance and Suzanne Imes*. In their

work, they noticed that many successful, high achieving people are unable to fully internalize their success, and instead, often discount their own work. They will often cite luck or other people for their own successes, and may be afraid that they will be found out for not actually being as qualified or capable as their accomplishments may illustrate. This is where the “imposter” title comes into play.

Have you ever felt this way? If so, you're not alone! There are some things that you can do to combat this anxiety and stress. First of all, try to realize that your feelings are acceptable and allowed. In other words, acknowledge them, and then realize what they are: feelings, and they can change over time. Nobody is flawless! Secondly, try to recognize your own expertise – while you will not know everything, you are probably in the room because you can offer some unique viewpoint which is beneficial to the team. And finally, don't be afraid to seek help and share stories with friends, family, or even a counselor. Everyone deserves to feel heard – there's no reason to do life alone!

*Reference:

<http://www.apa.org/gradpsych/2013/11/fraud.aspx>



LEARNING OPPORTUNITIES

SESHA Webinar Series

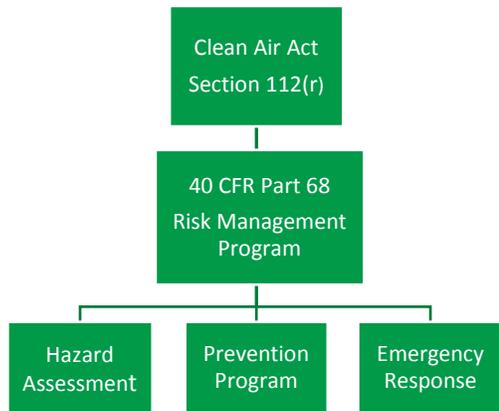
SESHA runs a Wednesday webinar live every second Wednesday of every month at 4pm EST. The topics cover a wide variety of topics including most recently laser maintenance safety, GHG reporting rule, and exhaust management. They are open to all SESH members (remember membership is free to all!) and accessible online at any time if you miss the live webinar:

<http://seshonline.org/meetings/webinars.php>

These seminars provide a good opportunity to obtain an introduction to new emerging issues such as REACH or regulatory rule changes but in other cases can be a fairly in-depth overview such as the recent exhaust management webinar by Edwards Abatement.

This was one I recently attended and for the nerdy engineers started with the periodic table. They went through a wide variety of emission compound types and risks associated with them for all EHS including discussions of the types of exhaust management used. I encourage for anyone interested to check out this valuable resource to learn more about EHS semiconductor issues.

Final Amendments to the Risk Management Program Rule



Risk Management Program Structure

The basic structure of the RMP does not change with the final rule. The purpose of the final rule is to enhance the existing rule to improve safety at facilities that use and distribute hazardous chemicals.

Compliance Dates

- Comply with emergency response coordination activities within 1 year of the effective date of the final rule.
- Comply with new provisions, unless otherwise stated, 4 years after the effective date of the final rule.
- Provide regulated sources one additional year to correct or resubmit risk management plans to reflect new and revised data elements.
- Provide up to 3 years for the owner or operator of a stationary source to develop an emergency response program. The compliance with emergency response requirements is directed to nonresponding facilities (that is, facilities that rely on local responders and not onsite response teams).

Background:

On January 13, 2017, the U.S. Environmental Protection Agency (EPA) published the final version of the agency's *Accidental Release Prevention Requirements: Risk Management Programs (RMP) under the Clean Air Act* in the Federal Register ([82 FR 4594](#)), as part of a broader effort to implement Executive Order 13650, *Improving Chemical Facility Safety and Security*. The final changes revise the RMP regulations, specifically Title 40, Part 68 of the Code of Federal Regulations (CFR) to include additional accident prevention requirements, enhancements to the emergency preparedness requirements, and increased public availability of chemical hazardous information. The effective date of the final rule is March 14, 2017.

Accident Prevention Program Revisions

The final rule is generally similar to the agency's proposed version issued last March and finalizes the following revisions to the Accident Prevention Program:

1. Requires facilities (under Program 2 or 3 processes) to conduct a root cause analysis as part of an incident investigation of a catastrophic release or a near-miss that could have resulted in a catastrophic release.
2. Requires facilities (under Program 2 or 3 processes) to contract with an independent third-party to perform a compliance audit after the facility has a reportable release.
3. Requires facilities with Program 3 processes and specific North American Industrial Classification System codes in paper manufacturing, petroleum and coal products manufacturing, and chemical manufacturing to conduct a safer technology and alternatives analysis as part of their process hazard analysis, which is updated every 5 years, and to evaluate the feasibility of any inherently safer technology identified.

It is important to note that incident investigations are required, even if the process involving the regulated substance is destroyed or decommissioned following, or as the result of, an incident.

How We Can Help:

CH2M HILL, Inc. provides full-service RMP support, including:

- Hazard assessment
- Prevention program analysis and procedures
- Emergency response preparedness planning
- RMP Plan development
- RMP compliance audits

Contact Us

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EHS Compliance Lead
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Emergency Response Program Revisions

The final rule modifies the emergency response plan to:

- inform the public, local, state, and Federal emergency response agencies about accidental releases.
- ensure employees are informed of any changes to the plan.
- require updates to the plan only when changes at the source, or new information obtained from coordination or other activities make it appropriate.

Enhancements to Emergency Response

The current RMP rule has no requirement for facilities to conduct exercises of their emergency response program or plan. Under the final rule, facilities under Program 2 or 3 levels must coordinate with local emergency response agencies at least once a year, and conduct an annual notification exercise to ensure their emergency contact information is accurate and complete. Increasing coordination between emergency responders and establishing procedures is expected to help reduce the effects of accidents.

All facilities (or responding facilities) subject to the emergency response program requirements (Subpart E of the rule) are to conduct an annual tabletop exercise and a full field exercise. The timeline for these exercises will be established in consultation with local emergency response officials, but should be at least once every 10 years for full field exercises and at least once every 3 years for tabletop exercises. A responding facility can satisfy the exercise requirements by documenting response activities in an after-action report resulting from a comparable RMP reportable accident.

Enhanced Availability of Information

The final rule requires facilities to:

- provide certain basic information to the public, upon request
- provide ongoing notification of availability of information through the company website, social media platforms, or other publicly accessible means
- hold a public meeting for the local community within 90 days of an RMP-reportable accident

Instead of Local Emergency Planning Committees requesting information, EPA is requiring the facility to share information that is relevant to emergency response planning as part of the annual coordination activities.

About CH2M

CH2M leads the professional services industry delivering sustainable solutions benefiting societal, environmental and economic outcomes with the development of infrastructure and industry. In this way, CH2Mers make a positive difference providing consulting, design, engineering and management services for clients in water; environment and nuclear; transportation; energy and industrial markets, from iconic infrastructure to global programs like the Olympic Games. Ranked among the World's Most Ethical Companies and top firms in environmental consulting and program management, CH2M in 2016 became the first professional services firm honored with the World Environment Center Gold Medal Award for efforts advancing sustainable development. Connect with CH2M at www.ch2m.com, LinkedIn, Twitter, and Facebook.