



Emergency Preparedness and Response Plan

PAGE: 1 of 10

Objective:

This Emergency Preparedness plan will describe SMT Corporation's procedures for responding to workplace emergencies that would include Spills, Fire, Workplace Accidents and Medical Emergencies.

Facility Address & Hours of Operation:

SMT Corporation
14 High Bridge Road
Sandy Hook, CT 06482

Business Hours: 8:00am – 5pm Monday – Friday

Facility Emergency Coordinators:

Kimberly Costa
SMT Ext 4740
(Cell) 203-470-8923

Jason Romano
SMT Ext. 4743
(Cell) 203-788-5789

Lester Taracena
SMT Ext. 4750
(Cell) 203-610-2525

Barbara Bonino
SMT Ext. 4710
(Cell) 203-788-9680

Printed versions of this document are for **reference purposes only**. Refer back to the Master List of Controlled Documents (F423-01) to assure the use of the latest revision document.

EP100
09/05/23
REV. 13



Emergency Preparedness and Response Plan

External Emergency Contact Information:

Newtown Police Department: 203-426-5841 or 911
 Newtown Health District: 203-270-4291 or 911
 Botsford Fire Department: 203-270-4388 or 911
 Eversource (Electric Company): 800-286-2000
 Mitchell (Propane/Oil Company): 203-744-0600
 Wind River Environmental (Septic): 800-499-1682
 Foley Pump Service (Well Water): 203-792-2236
 CT Dept of Environmental Protection: 860-424-3338 (Emergency Spill Reporting) or toll free 1-866-DEP-SPIL (1-866-337-7745), 24hrs/day. Should these numbers become unavailable for any reason, call 860-424-3333.

Facility Description / Operation:

SMT Corporation is located within a 71,640 square foot building was purpose built for the safe storage, test, distribution and light disassembly of both new and used electronic components and related electronic finished goods.

Hazardous / Corrosive Materials Storage:

The hazardous chemicals used in normal facility operations for testing of parts, such as, alcohol, dynasolve, acetone, and mineral spirits are stored in a locked flame-retardant cabinet. Corrosive chemicals, such as sulfuric acid and nitric acid, if not shipped in a sealed 5-gallon pail, are locked in an OSHA approved acid cabinet. Nitric acid that is shipped from the manufacturer in a double packed and sealed 5-gallon pail are stored on the loading dock. Other chemicals including cleaners, lubricants, general janitorial supplies, etc. are stored in the janitor’s closet. Chemicals are generally stored in containers of 5-gallon capacity or less. There are no large capacity above ground or underground storage tanks at the site for storage of hazardous chemicals. The facility is heated by propane, supplied by two underground tanks on the East and West side of the building.

Spill Preparedness and Response

Written Spill Response Procedure

For any spills, one or more persons on the Emergency Coordinator list must be notified. The Emergency Coordinator(s) will gather all information about the spill. A spill is defined as any oil or petroleum products, chemicals, wastes or other potentially dangerous materials that are released in any manner. The Emergency Coordinator(s) will determine whether in-house or an external contractor will be needed to clean up the spill and if the spill needs to be reported to

Printed versions of this document are for **reference purposes only**. Refer back to the Master List of Controlled Documents (F423-01) to assure the use of the latest revision document.

EP100
09/05/23
REV. 13

CT DEEP and local fire department. If there is an immediate danger to employees or other personnel, EVACUATE THE AREA FIRST.

State of CT Spill Reporting Requirements:

Spills that need to be reported to CT DEEP are, but are not limited to:

- Spills of any quantity of oil or petroleum
- Spill amount is unknown
- Spills into a waterway, wetland, storm drain, sewer or catch basin
- Spill from a PCB containing item
- Spill that can create a hazard, fire, explosion, or poses an immediate or potential threat to human health, public safety or environment
- Spill of any materials of special concern listed in 22a-450-6 Appendix A

****See CT DEEP most current spill reporting requirements at <https://portal.ct.gov/DEEP/Emergency-Response-and-Spill-Prevention/Spill-Reporting/Reporting-Requirements-for-Spill-Incidents>****

For spills that need to be reported to CT DEEP their Emergency Response Unit must be called: (860) 424-3338 or toll free 1-866-DEP-SPIL (1-866-337-7745), 24 hours/day. Should these numbers become unavailable for any reason, call (860)424-3333. The Emergency Coordinator(s) are required to report spill location, quantity and type of substance, material or waste, date and cause of spill, name and address of the facility owner and name, address of the person making the spill report and their relationship to the owner.

In-house Cleanup Procedures

Spills that can be cleaned up in-house should be cleaned up immediately by the direction of the Emergency Coordinator(s) only by personnel who have received applicable training to do so. The spill should be brought under control and cleaned up using the approved spill response supplies provided, acid and base neutralizer, spill pads, chemically resistant gloves and safety goggles. Recovered spilled material and used spill cleanup materials should be containerized in a sturdy, leak proof, covered container(s) (such as a pail or drum) that is compatible with the waste materials, and then labeled, stored, and managed for disposal in accordance with applicable local, state and federal legal requirements. Never spill, dump, or discard oil or chemicals to sinks, toilets, floor drains, or the ground surface.

External Contractor Needed for Spill Clean Up

Clean up must be performed by a permitted spill contractor. SMT Corp does not currently maintain a standing contract with a spill response contractor for spill cleanup services. Below is

a list of suggested spill cleanup contractors who can be utilized to handle spills and additional contractors can be found on CT DEEP Licensed Spill Clean-Up Contractors List. The Emergency Coordinator(s) will arrange for external contractors to respond to and clean-up the spill.

Suggested Spill Cleanup Contractors:

- Moran Environmental Recovery: (781) 815-1100
- Clean Harbors Environmental Services: (781) 792-5787
- McVac Environmental Services: (203) 498-1427
- Environmental Services Inc (ESI): (860) 528-9500

Equipment for Spill Response and Personal Protection

Spill response kits are maintained at the facility in the following locations; Blue Side Loading Dock, old Blue Side Decapsulation Room, Red Side Decapsulation Room, outside Red Side Decapsulation Room and on top of the Red Side Chemical Cabinet. At a minimum the following shall be included in the spill response kits or in the close vicinity of the spill kits:

- Acid and base chemical neutralizer
- Spill pads
- Chemically resistant gloves
- Safety goggles

Signs are posted noting that spill response materials are located in the immediate vicinity. Such signage assists with minimizing the response time in the event of a release.

The condition and inventory of spill response equipment will be inspected periodically to ensure that all materials necessary for proper response are present and in good working condition.

Federal Oil Spill Reporting Requirements

On the federal level, spill reporting is required by the Oil Pollution Prevention and Preparedness regulations, as well as by CERCLA, RCRA and other federal programs that cover releases of materials in addition to oil. The federal reporting requirements for releases of oil are summarized below.

Who should report:

Any person in charge of a vessel or of an onshore or offshore facility (40 CFR Part 110), or of non-transportation related onshore or offshore facilities (40 CFR Part 112). Anyone who



Emergency Preparedness and Response Plan

PAGE: 5 of 10

discovers a oil spill is encouraged to contact the federal government, regardless of whether they are the responsible party.

Report to Whom:

Immediately provide verbal notification to the National Response Center (800) 424-8802. If written reporting to the EPA is required the written notification and summary report must be submitted to the EPA within the timeframe that they request.

Threshold Amounts for Reporting:

Discharges of oil in quantities that may be harmful to the public health or welfare or the environment of the United States, including discharges that violate applicable water quality standards, or cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

Federal Hazardous Substance Spill Reporting Requirements:

For releases of hazardous substances, the federal government has established Superfund Reportable Quantities (RQs). Under the Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986, the federal government has designated several hundred substances as "extremely hazardous substances" based on their acute lethal toxicity. Under the law, releases of these extremely hazardous substances trigger reporting requirements to state and local authorities, as well as the federal authorities.

Who should report:

The owner or operator of a facility that releases an extremely hazardous substance in an amount greater than its established reportable quantities must follow requirements on how to report to the appropriate authorities. Anyone who discovers a hazardous substance spill is encouraged to contact the federal government, regardless of whether they are the responsible party.

Report to Whom:

Immediately provide verbal notification to the National Response Center (800) 424-8802. If written reporting to the EPA is required the written notification and summary report must be submitted to the EPA within the timeframe that they request.

Printed versions of this document are for **reference purposes only**. Refer back to the Master List of Controlled Documents (F423-01) to assure the use of the latest revision document.

EP100
09/05/23
REV. 13

Threshold Amounts for Reporting:

If a hazardous substance is released to the environment in an amount that equals or exceeds its Superfund Reportable Quantities, the release must be reported to federal authorities.

Related Emergencies

Emergencies (Fire, Hazardous Fumes, etc.): CALL 911

Always be aware of locations of the nearest fire exits. Never block fire exits.

Fire Procedures

- 1) At the sound of the facility fire alarm, all employees must exit the building at the nearest marked exit door.
- 2) Employees shall gather at the specified Gathering Point shown on Figure 1 (Pg. 9) as long as it is safe to do so. If the presence of a hazard renders the Gathering Point unsafe, employees should proceed a safe distance from the building to gather at a safe location and then check in with their Area Supervisor. All employees and visitors will be accounted for by Area Supervisors and visitors' attendants, who will then update the Emergency Coordinator(s) regarding any personnel who remain unaccounted for. The Emergency Coordinator(s) will communicate to Fire Department Responders as much information as possible regarding unaccounted for personnel.
- 3) If the fire alarm has not been activated, any employee who observes a fire condition shall activate the facility fire alarm at one of the pull boxes throughout the facility. Facility employees go through annual training for the portable fire extinguishers but are not trained in the use of any other fire suppression equipment. Response to fires will be done by the local Fire Department.
- 4) Employees may not re-enter the building until the Fire Department has indicated that it is safe to do so.

Fire Suppression Equipment

Portable fire extinguishers are mounted throughout the facility as required by applicable building codes. Portable fire extinguishers are checked monthly and serviced/maintained annually by an external service provider and replaced as needed. Fire Extinguisher training is completed annually.

The facility is fully protected with automatic sprinkler systems, and fire detection and alarm systems that are serviced and maintained on an annual basis and tested quarterly.



Emergency Preparedness and Response Plan

PAGE: 7 of 10

Fire Drills

There will be a fire drill at least once a year at an unannounced time during office hours.

Procedures for Workplace Accidents and Medical Emergencies

- 1) Any employee or visitor experiencing or observing a workplace accident or medical emergency shall report the incident immediately to the Area Supervisor.
- 2) The Supervisor will determine the appropriate response, in consultation with the Emergency Coordinator(s), if necessary. Responses can include the following:
 - a. No action needed
 - b. The person involved can self-administer First Aid with on-site supplies
 - c. The person involved can be directed or driven to a local non-emergency medical clinic
 - d. Emergency Medical and/or Fire Department personnel are summoned to the site by calling 911.
- 3) Facility employees are not required to be trained in First Aid or required to administer First Aid or other medical services. Response to serious incidents (e.g. any incident where the person involved cannot self-administer First Aid with on-site supplies) will be done by the local Emergency Medical personnel. In the future, the facility may offer First Aid and CPR training to interested employees; however the response to first aid incidents by such employees would be on a voluntary basis in accordance with prevailing "Good Samaritan Laws".

Reporting Actual Safety Incidents/Injuries

The OSH Act requires employers to keep records of certain injuries and illnesses, and to report certain workplace incidents to OSHA within specific time periods. Specifically, all employers must report:

- Any work-related fatality within eight hours
- Any of the following, if it results from a work-related incident, within 24 hours:
 - Inpatient hospitalization
 - Amputation

Printed versions of this document are for **reference purposes only**. Refer back to the Master List of Controlled Documents (F423-01) to assure the use of the latest revision document.

EP100
09/05/23
REV. 13

- Loss of an eye

OSHA requires SMT Corp to submit injury and illness information electronically to OSHA. SMT Corp must also prepare and maintain records of serious occupational injuries and illnesses using OSHA Forms 300, 300A and 301.

- Form 300 (Log of Work-related Injuries and Illnesses): Used to classify work-related injuries and illnesses and to note the extent and severity of each case. When an incident occurs, employers must use Form 300 to record specific details about what happened and how it happened.
- Form 300A (Summary of Work-related Injuries and Illnesses): Shows the total number of work-related injuries and illnesses for the year in each category. At the end of the year, employers must post the Form 300A in a visible location so that employees are aware of the injuries and illnesses occurring in their workplace. Employers must keep a log for each establishment or site. When an employer has more than one establishment, a separate log and summary must be kept at each physical location that is expected to be in operation for one year or longer.
- Form 301 (Injury and Illness Incident Report): Must be filled out within seven calendar days after an employer receives information that a recordable work-related injury or illness occurred. This report includes information about the employee and the treating physician, and detailed information about the case. Employers must keep this report on file for five years following the year it pertains to.

First Aid Supplies and Equipment

First Aid Kits for minor incidents are readily available in the kitchen and in the red warehouse, near the bathrooms. The first aid supplies are maintained by an external supply company every three months. The emergency eyewash equipment is checked weekly. Emergency eyewash stations are located in the old Blue Decapsulation Room and Red Decapsulation Room.

Flood and Adverse Weather Preparedness and Response

Evacuation Procedures

- 1) In the event of adverse weather conditions such as floods, tornados, or other adverse conditions, the Emergency Coordinator(s) MAY decide to direct employees to seek shelter in interior locations such as the blue warehouse center isle. An announcement would be made via the facility intercom system.
- 2) All employees and visitors will be accounted for by the Area Supervisor and visitors' attendants, who will then update the Emergency Coordinator(s) regarding any

Printed versions of this document are for reference purposes only. Refer back to the Master List of Controlled Documents (F423-01) to assure the use of the latest revision document.

EP100
09/05/23
REV. 13



Emergency Preparedness and Response Plan

personnel who remain unaccounted for. The Emergency Coordinator(s) will communicate to the Fire Department Responders as much information as possible regarding unaccounted personnel. Employees may not return to their desks until Management has indicated that it is safe to do so.

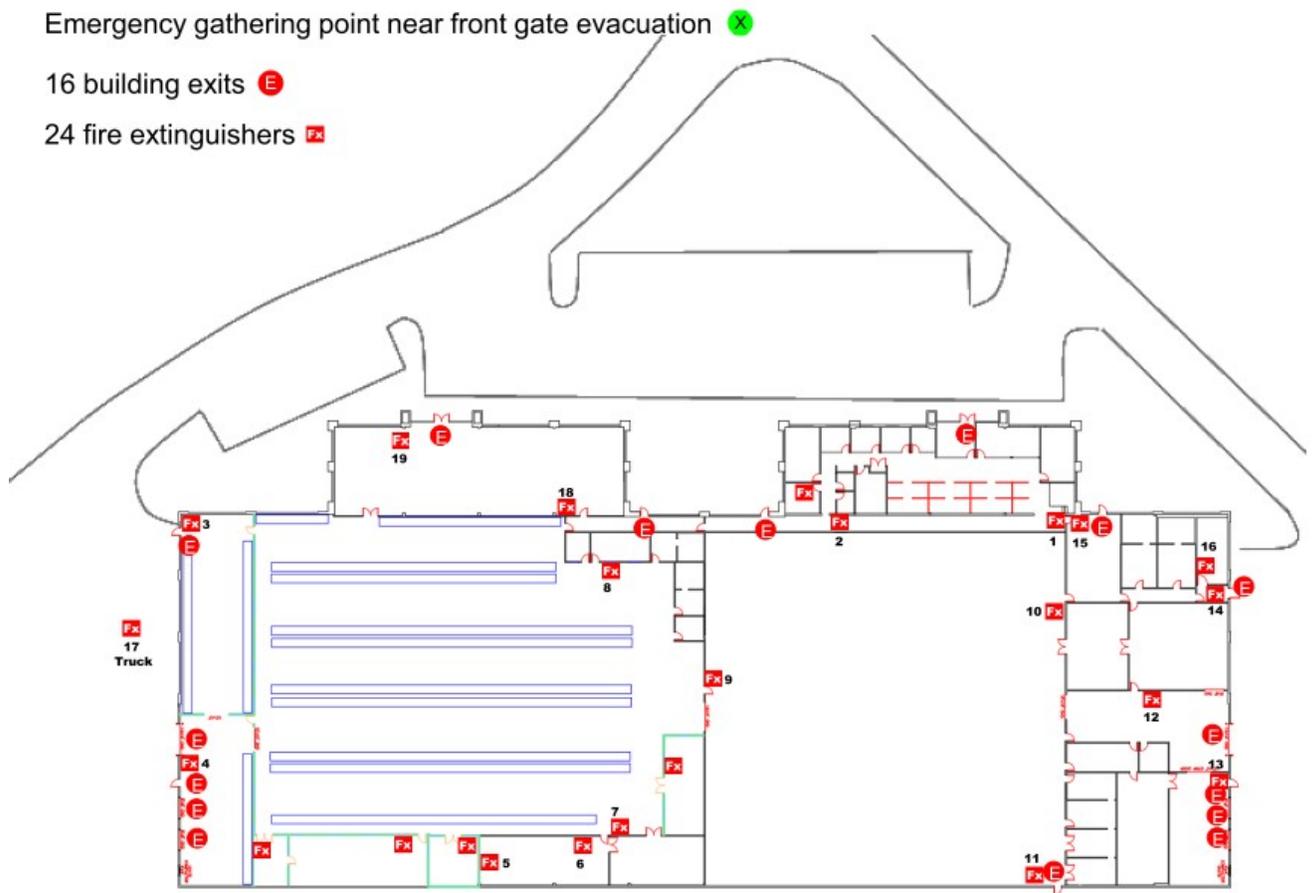
- 3) The facility will resume normal operations when directed by the Emergency Coordinator.

Figure 1:

Emergency gathering point near front gate evacuation 

16 building exits 

24 fire extinguishers 





Emergency Preparedness and Response Plan

REVISION LOG

REVISION LEVEL	REVISION DATE	DESCRIPTION OF CHANGE	APPROVED BY
6	7/15/16	Added revision log – Removed Keith Gotthardt from the Emergency Responders list.	KCosta
7	10/25/16	Revised the Certified CPR/First Aid responder information, revised locations of the emergency eyewash stations and drench hose and revised spill kit information and locations. Revised Electric Company name to Eversource	KCosta
8	11/02/17	Revised Fire Extinguisher location in Figure 1 on Pg. 10	KCosta
9	2/28/19	Revised Alternate Emergency Coordinators List	KCosta
10	8/28/19	Revised Figure 1 on Pg. 10, revised revision log to include approved by column	KCosta
11	01/18/23	Updated Facility Emergency Coordinators list	KCosta
12	06/29/23	Revised the entire document	KCosta, MDiBenedetto, JRomano
13	09/05/23	Added “Reporting Actual Safety Incidents/Injuries” section, updated facility emergency coordinators list and updated formatting	KCosta

*Printed versions of this document are for **reference purposes only**. Refer back to the Master List of Controlled Documents (F423-01) to assure the use of the latest revision document.*

EP100
09/05/23
REV. 13