

# HEALTH & SAFETY PROGRAM OVERVIEW



**Clark**  
ENVIRONMENTAL.COM

**FDEP Permitted Facilities**  
**Thermal Treatment & Waste Solidification**

**Solids • Liquids • Sludges**  
**Bulk • Drum**

**Cleaning Earth One Ton at a Time**



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## Management Commitment

Management is committed to safety. At CLARK, we know that safety doesn't happen by itself. It must be fostered from the top down, constantly instilled, and then reinforced through training. All levels of management have undergone intensive safety training to demonstrate our sincere commitment and the company's dedication to safety

CLARK is committed to providing a safe working environment for all of our employees, whether on our own site or on the job site.



## Training

Training is provided to **ALL** CLARK employees. CLARK management is responsible for ensuring the proper training of new employees, and on-going training for employees in accordance with state and federal regulations.

Training may be formal or informal. Formal training includes third party Classroom Training (University of South Florida), Lunch 'n Learns, and On-Site Training by a certified trainer. Informal training includes On-The-Job Training, Toolbox Safety Meeting, and Tailgate Safety Meeting.

## 40-Hour OSHA Training

All employees working in the Thermal Treatment Facility or the Waste Processing Facility will have their 40-hour OSHA training within six months of beginning the job. Further classroom training includes subsequent 8-hour annual Refresher courses. Training may be taught by CLARK or other certified instructors, or taught at training schools such as University of South Florida Sunshine ERC.

## Permit Compliance and Operations Plan Training

All employees that work in the Thermal Treatment Facility or the Waste Processing Facility, or who are involved with the inspecting, handling, loading, transporting or sampling of solid waste will be trained to perform their duties in a manner that will ensure CLARK's compliance with state and federal regulations. All plant employees will be familiar with their respective Thermal Treatment Operations Plan, and Waste Processing Operations Plan.

Facility personnel are taught general operating procedures and safety procedures for the Thermal Treatment Facility and the Waste Processing Facility in the first week of hiring. Training includes employee obligations for safety, an overview of the operations, and regulations governing the operation of the facility.

Training also includes the operation and understanding of the equipment utilized, and the employee's responsibilities for preventative maintenance and for loader operations. Further instruction includes housekeeping responsibilities, communications, spill prevention, and safety procedures.

In addition, these employees are taught solid waste management procedures, and material acceptable to the CLARK Thermal Treatment Facility and the Waste Processing Facility.

Special emphasis will be given to the following items:

- ◆ During the Unloading and Processing procedures, the loader operator will ensure that no material is spilled outside of the containment walls or berms.
- ◆ The loader operator must ensure that material is not stacked to the height of the wall, but is stacked at least one foot below the wall height to minimize the potential for spills outside the containment area.
- ◆ When the maximum capacity of contaminated soil has been reached, the Facility Operations Manager or Control Board Operator must inform the General Manager to no longer accept incoming waste.
- ◆ All plant personnel will be trained on how to inspect each load of incoming material.
  - The loader operator must correlate the material being unloaded to the information provided to him on the Generator Information Form or the Profile, such as quantity of soil, type of contaminate, and the expected physical state of the soil.
  - The loader operator must make a visual inspection of the physical state of each load of incoming material, and note on the weight ticket any discrepancies.

### **Contingency Plan Implementation Training**

Facility personnel are trained for implementation of the CLARK Contingency Plan in the event of a spill outside the containment area that discharges to the environment, in the event of a fire, or in the event of an explosion.

Training is designed to ensure that facility personnel are able to respond effectively to emergency situations. Training includes, but not limited to, spill response, spill containment, shutdown procedures, emergency equipment, evacuation procedures, fire response procedures, and explosion response procedures.



## Severe Weather

In the event of an imminent severe weather emergency such as a hurricane, the Emergency Coordinator will initiate the following:

- ◆ Notify facility of imminent danger.
- ◆ Meet with Facility Operations Manager, to establish a time frame for preparation, shut down, and evacuation of the facility.
- ◆ Implement the preparation and shut down of both plants/facilities.
- ◆ Inform clients when we are shutting down and will no longer be accepting material.
- ◆ Identify equipment, tools, empty drums or other items that could become airborne and move them to a safe and secure location.
  - Complete the processing of liquids and sludges. Move processed solids as far away from walls as able; to prevent vertical rains from impacting material and causing spills outside of the containment areas.
- ◆ Implement the preparation and shut down of the offices:
  - Inform clients when we are shutting down and will no longer be accepting material.
  - Implement the Mulberry IT Disaster Recovery Plan. Store the most recent backup tape in the bank lockbox.
  - Unplug all electronic equipment and cover with visqueen. Where possible store away from windows.
- ◆ Close the plants/facilities and offices in sufficient time to allow employees to secure their homes, obtain needed supplies, and/or evacuate if necessary.
- ◆ After the severe weather has passed, re-enter the facility with caution. Make an assessment of damage. When safe, call in needed personnel. Begin implementation of Section 3.4, Procedure Following an Emergency.

### **Safety Newsletter**

A Safety Newsletter is issued each month focusing on a Safety topic or a section from the CLARK Health & Safety Plan. Topics covered include PPE, Confined Space Entry, Lockout/Tagout (LOTO), Hearing Conservation, Accident Prevention & Assessment, Housekeeping, Equipment Operation Safety (Forklift & Payloader), Fall Protection, Fire Prevention, Driver Safety Training, etc.

### **Payroll Stuffers**

The Safety Topic is further reinforced through payroll stuffers.

### **Safety Bucks - A Safety Incentive Program**

CLARK has also implemented an incentive program called Safety Bucks to keep safety foremost in everyone's mind. Safety Bucks are earned by attendance at safety meetings, performing job functions safely, correcting workplace hazards, etc. A drawing is held annually using Safety Bucks to win items such as gift certificates, cd players, radios, tickets to theme parks or events, etc.

### **Safety Bingo**

The Safety Topic is even further reinforced through Safety Bingo. A game is played each month with the Safety Topic on the back of the Bingo card. Numbers are drawn each day, and announced by email along with a Safety Tip or Factoid.

### **Lunch `n Learns**

A safety luncheon or Lunch `n Learn is held monthly and includes training to reinforce the Safety topic of the month.



### **Risk Management Online Training**

And finally, we have been chosen by our insurance carrier to test a new online safety training program. It has a library of Videos, PowerPoint Programs for instructor-led training, Training Shorts-Toolbox Talks, and Policies and Procedures. Most of the courses include a certificate of completion once a quiz or test has been passed with a score of at least 80%.

### **Other Annual Training**

OSHA Hazard Communication/Right-to-Know is taught to all CLARK personnel annually.

USDOT (49 CFR) Training for Hazmat employees is taught to all CLARK drivers and operations personnel annually.



## **Other Training**

Additional training is provided when classes become available, such as Forklift Training and Payloader Operator Training, First Aid Training, Defensive Driving, etc. All Drivers and many of the plant personnel have a CDL.

Tail-gate safety meetings and/or toolbox safety meetings are also held prior to the start of a new job or task that may require special precautions or unique hazards. Other Safety Training is done monthly with a "Lunch and Learn."

## **On-going Training and Annual Updates**

All CLARK employees that work in the Thermal Treatment Facility and the Waste Processing Facility; or who are involved with the inspecting, handling, loading, transporting or sampling of solid waste will be involved in on-going training.

Annual updates include 8-hour annual Refresher courses, a review of the general operating procedures and safety procedures for the Thermal Treatment Facility and the Waste Processing Facility, Right-To-Know, Hazmat Training and a review of Contingency Plan Implementation Training.

All CLARK office personnel take part in an annual review of the Contingency Plan procedures.

## **Documentation**

CLARK maintains training certificates and training records. Documentation includes the type of training received and the date of training. Training records are maintained and kept until closure of the facility, or for three years from termination of employment.

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## **Safety Committee**

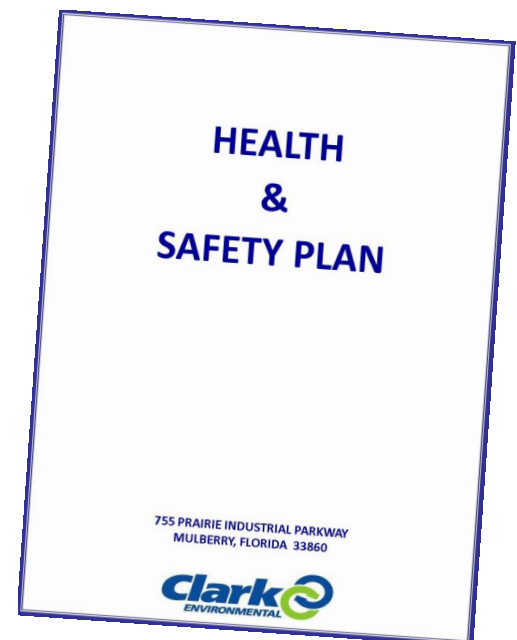
CLARK has formed a Safety Committee to oversee implementation of this Safety Program. Quarterly Meetings include topics such as review of the OSHA 300 Logs, review of the Health & Safety Plan, review of band-aid injuries and near misses to institute prevention strategies, alternating employees to perform weekly inspection reports at the facility for a fresh perspective, and other pertinent safety issues of concern during that quarter.

## Health & Safety Plan

CLARK has a comprehensive Health and Safety Plan developed a number of years ago. A major revision to the Health & Safety Plan was done in 2005, 2010 and 2013 with minor revisions/updates done annually. Training is provided to all employees.

### The Health & Safety Plan includes:

- ◆ RESPONSIBILITIES AND PROCEDURES
- ◆ ACCIDENT PREVENTION PROGRAM AND SAFE WORK RULES
- ◆ INJURY & ILLNESS PREVENTION PROGRAM
- ◆ DRUG FREE WORKPLACE PROGRAM
- ◆ DISCIPLINARY PROGRAM
- ◆ BEHAVIOR BASED SAFETY PROGRAM
- ◆ FIT FOR DUTY PROGRAM
- ◆ SHORT SERVICE EMPLOYEE (SSE)
- ◆ HOUSEKEEPING
- ◆ HAND AND POWER TOOLS
- ◆ HOT WORKS - WELDING PROGRAM
- ◆ PERSONAL PROTECTIVE EQUIPMENT (PPE)
- ◆ RESPIRATOR PROTECTION PROGRAM
- ◆ CONFINED SPACE ENTRY
- ◆ ENERGY CONTROL (LOCKOUT/TAGOUT)
- ◆ BASIC ELECTRICAL SAFETY AWARENESS
- ◆ FALL PROTECTION & LADDER SAFETY
- ◆ HEARING CONSERVATION PROGRAM
- ◆ HEAVY EQUIPMENT OPERATION
- ◆ DRIVER SAFETY PROGRAM
- ◆ TRANSPORTATION SPILL RESPONSE PLAN
- ◆ GENERAL WASTE MANAGEMENT PLAN
- ◆ HAZARDOUS COMMUNICATION
- ◆ AMMONIA AWARENESS
- ◆ BENZENE AWARENESS
- ◆ BLOOD-BORNE PATHOGENS
- ◆ HYDROGEN SULFIDE - H<sub>2</sub>S SAFETY PROGRAM
- ◆ CONTINGENCY PLAN
- ◆ PROCESS SAFETY MANAGEMENT
- ◆ FIRE PREVENTION AND EMERGENCY RESPONSE PROCEDURES
- ◆ FIRE PROTECTION & PREVENTION
- ◆ FIRE PROTECTION - EXTINGUISHERS
- ◆ FIRST AID
- ◆ HEAT ILLNESS PREVENTION
- ◆ ERGONOMICS & MATERIAL HANDLING PROGRAM
- ◆ SUB-CONTRACTOR MANAGEMENT PLAN



## Customer Requested/Required Safety Training

Training is provided to all job specific employees.

- Duke Energy Subcontractor Online Safety Training (7 Modules - 5.75 hours)
- Mosaic Florida Phosphate Producers Contractor Safety Basic Class (16 hours)
- Mosaic Florida Phosphate Producers Contractor Safety Refresher Class (10 hours)
- TECO Supply Contractor Safety Training
- Groundwater Environmental Services, (GES)
  - Toolbox Talk/Sharps Injuries Safety Training
  - Incidents Needle Stick & Incidents
  - Using Cell Phones while Driving
- LPS Training (8 hours initial and 4 hours biennial)
- CSX Contractor Safety Training
- ExxonMobil
  - Slips Trips & Falls Safety Training
  - Stand-Down Training
- URS/ConocoPhillips
  - Risk Management Remediation Safety Training
  - BP – Fatigue Management Safety Training
- Shell 12 Life Saving Rules Training
- ATC/Conoco Phillips
  - Personal Protective Equipment - Glove Requirement & Safety Training
 

<ol style="list-style-type: none"> <li>1. Safety Introduction</li> <li>2. General Knowledge</li> <li>3. Personal Protective Equipment (PPE)</li> <li>4. Tool Selection—Hand, Pneumatic, Power</li> <li>5. Driving Safety</li> <li>6. Hazardous Communications</li> <li>7. Working at Heights</li> </ol>	<ol style="list-style-type: none"> <li>8. Barricading</li> <li>9. Excavation</li> <li>10. Rigging, Hoisting, Lifting</li> <li>11,. Confined Spaces</li> <li>12. Lockout/Tagout LOTO</li> <li>13. Hot Work</li> <li>14. Underground Storage Tanks</li> </ol>
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- 14 Online Modules Safety Training with Tests and Certificates (total 3 hours)



## Drivers Safety Training



Training is provided to all drivers

- Straight Rails & Rolloff Truck Safety Protocol Training
- XL Insurance Drivers Training
- Smith Systems Defensive Driver Training
- Tampa Area Safety Council Defensive Driver Course
- Driver Safety Policy
- Transportation Spill Response Plan



## Workplace Safety Program Premium Credit

CLARK has qualified for the worker's compensation Workplace Safety Program Premium Credit. By applying for this credit we are subjecting ourselves to Florida Statutes with stiff penalties for non-compliance.

The safety program components include:

1. Management Commitment and Involvement
2. Development of a Safety Committee
3. Safety and Health Training
4. First Aid Procedures
5. Accident Investigation
6. Record Keeping Procedures
7. Safety Rules, Policies and Procedures



## Medical Monitoring

All CLARK field employees participate in a medical monitoring program for baseline determinations. These employees will continue to undergo yearly physicals to monitor any changes in their personal physical state.

## Experience Modification Rates

2018	0.85
2017	1.00
2016	1.00

Duke Mills of WorkComp Solutions, stated that "CLARK is extremely committed to a safe workplace... many of the safety and training procedures that are in place for the company and their employees... far surpasses industry standards and/or OSHA requirements." To confirm this statement, Duke Mills may be reached at 863-646-4642.

CLARK utilizes the services of Ashley Shive of American Compliance Technologies who provides guidance and training for any and all OSHA required safety programs. Ashley has performed an assessment of CLARK's Mulberry operations; and has performed training to our personnel.

An inspection by our workers compensation carrier's Loss Control Consultant stated "...there were no recommendations developed. All of the employees were observed to be performing their jobs in a safe manner and no unsafe conditions were observed. The crew and supervisor should be commended for their effort in regards to promoting safety and providing for a safe work environment."

