UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

NOV 14 2008

Dr. Greg Simone, Director of Facilities
WellStar Kennestone Hospital
677 Church Street
Marietta, Georgia 30060

Subject: An Invitation to Utilize EPA's Audit Policy

Dear Dr. Simone,

Since 2005, the United States Environmental Protection Agency (EPA) Region 4 has partnered with state environmental agencies to provide seven Compliance Assistance Workshops for Hospitals and Healthcare facilities throughout the Southeast. This effort was undertaken to assist these facilities in addressing potential environmental impacts from their operations (e.g., the wide range of toxic chemicals used and wastes generated, the large amounts of energy and water consumed, etc.).

EPA Region 4 recently screened the healthcare sector to identify the largest hospitals in each of the eight Region 4 states, and WellStar Kennestone Hospital was identified as one of the larger hospitals in Georgia. To help mitigate possible environmental impacts due to potential noncompliance, EPA Region 4 is inviting WellStar Kennestone Hospital to enter into a time-sensitive partnership with Region 4 to take advantage of the EPA's Audit Policy.[1] As you may already know, this EPA Policy encourages regulated facilities to voluntarily discover, promptly disclose, expeditiously correct, and prevent violations of environmental requirements.

EPA Region 4 proposes the following reporting time frames as a precursor for participation in this initiative:

- Deliverable 1: an initial Progress Report by March 20, 2009.
- Deliverable 2: a second Progress Report May 20, 2009; and
- Deliverable 3: final Disclosure Report by June 20, 2009.

By taking advantage of this self-auditing and self-reporting opportunity, you have the potential to not only make your institution cleaner and safer, but also to lessen funds needed to offset any penalties which might result from future enforcement action. For more information on the Audit Policy and application of the Policy to hospitals agreeing to participate in this regional initiative, please see Enclosure 1.

[1] The Audit Policy is technically known as *Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations Final Policy Statement, Notice, 65 F.R..19617, April 11, 2000.*

If you are interested in exploring collaboration with EPA for use of the Audit Policy at WellStar Kennestone Hospital, please let us know by providing the following information within forty-five (45) calendar days from receipt of this letter:

- Name and location of the hospital to be covered by the audit;
- Summary listing of the statutes to be covered by the audit (see Enclosure 2 for an example);
- A statement outlining how Condition 1 of the Audit Policy ("Systematic Discovery") will be addressed;
- A primary contact;
- Confirmation of the schedule for submission of deliverables (e.g., Progress Reports, Disclosure Report).

If you choose to expand to a corporate-wide audit and the above time frames are unworkable for such an expanded program, the Region is available to negotiate an audit agreement. These agreements are an optimal compliance tool for companies with facilities located in more than one location and provide for advanced understanding between the company and EPA regarding schedules for conducting the audit and disclosing the violations.

If you wish to discuss this matter further, please do not hesitate to contact me by phone at (404) 562-9741 or by email at Gordon.scott@epa.gov. In addition, Wesley Hardegree ((404) 562-9629, Hardegree.wes@epa.gov)) of my staff is available to take technical questions you may have on the Audit Policy. Legal questions on the Policy should be directed to Kevin Smith ((404) 562-9525, Smith.kevin@epa.gov)).

Sincerely,

J. Scott Gordon

J. Scott Gordon
Associate Director
Office of Environmental Accountability

Enclosures:
1. Introduction to the Audit Policy
2. Example List of Statutes for Audit

cc: Bruce Poell, Safety Director, WellStar Kennestone Hospital
Jim Ussery, Georgia Environmental Protection Division

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NOV 14 2008

A. Don Faulk, President and CEO
Medical Center of Central Georgia
777 Hemlock Street
Macon, Georgia 31201-2155

Subject: An Invitation to Utilize EPA's Audit Policy

Dear President Faulk,

Since 2005, the United States Environmental Protection Agency (EPA) Region 4 has partnered with state environmental agencies to provide seven Compliance Assistance Workshops for Hospitals and Healthcare facilities throughout the Southeast. This effort was undertaken to assist these facilities in addressing potential environmental impacts from their operations (e.g., the wide range of toxic chemicals used and wastes generated, the large amounts of energy and water consumed, etc.).

EPA Region 4 recently screened the healthcare sector to identify the largest hospitals in each of the eight Region 4 states, and the Medical Center of Central Georgia was identified as one of the larger hospitals in Georgia. To help mitigate possible environmental impacts due to potential noncompliance, EPA Region 4 is inviting the Medical Center of Central Georgia to enter into a time-sensitive partnership with Region 4 to take advantage of the EPA's Audit Policy.[1] As you may already know, this EPA Policy encourages regulated facilities to voluntarily discover, promptly disclose, expeditiously correct, and prevent violations of environmental requirements.

EPA Region 4 proposes the following reporting time frames as a precursor for participation in this initiative:

- Deliverable 1: an initial Progress Report by March 20, 2009.
- Deliverable 2: a second Progress Report May 20, 2009; and
- Deliverable 3: final Disclosure Report by June 20, 2009.

By taking advantage of this self-auditing and self-reporting opportunity, you have the potential to not only make your institution cleaner and safer, but also to lessen funds needed to offset any penalties which might result from future enforcement action. For more information on the Audit Policy and application of the Policy to hospitals agreeing to participate in this regional initiative, please see Enclosure 1.

[1] The Audit Policy is technically known as *Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations Final Policy Statement, Notice, 65 F.R.,19617, April 11, 2000.*

If you are interested in exploring collaboration with EPA for use of the Audit Policy at the Medical Center of Central Georgia, please let us know by providing the following information within forty-five (45) calendar days from receipt of this letter:

- Name and location of the hospital to be covered by the audit;
- Summary listing of the statutes to be covered by the audit (see Enclosure 2 for an example);
- A statement outlining how Condition 1 of the Audit Policy ("Systematic Discovery") will be addressed;
- A primary contact;
- Confirmation of the schedule for submission of deliverables (e.g., Progress Reports, Disclosure Report).

If you choose to expand to a corporate-wide audit and the above time frames are unworkable for such an expanded program, the Region is available to negotiate an audit agreement. These agreements are an optimal compliance tool for companies with facilities located in more than one location and provide for advanced understanding between the company and EPA regarding schedules for conducting the audit and disclosing the violations.

If you wish to discuss this matter further, please do not hesitate to contact me by phone at (404) 562-9741 or by email at Gordon.scott@epa.gov. In addition, Wesley Hardegree ((404) 562-9629, Hardegree.wes@epa.gov)) of my staff is available to take technical questions you may have on the Audit Policy. Legal questions on the Policy should be directed to Kevin Smith ((404) 562-9525, Smith.kevin@epa.gov)).

Sincerely,

J. Scott Gordon

J. Scott Gordon
Associate Director
Office of Environmental Accountability

Enclosures:
1. Introduction to the Audit Policy
2. Example List of Statutes for Audit

cc: Don Metcalse, Safety Manager, Medical Center of Central Georgia
Jim Ussery, Georgia Environmental Protection Division

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
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61 FORSYTH STREET
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NOV 14 2008

Pamela Stephenson, President
Grady Memorial Hospital
80 Jesse Hill Jr. Drive
SE, Atlanta, Georgia 30303

Subject: An Invitation to Utilize EPA's Audit Policy

Dear President Stephenson,

Since 2005, the United States Environmental Protection Agency (EPA) Region 4 has partnered with state environmental agencies to provide seven Compliance Assistance Workshops for Hospitals and Healthcare facilities throughout the Southeast. This effort was undertaken to assist these facilities in addressing potential environmental impacts from their operations (e.g., the wide range of toxic chemicals used and wastes generated, the large amounts of energy and water consumed, etc.).

EPA Region 4 recently screened the healthcare sector to identify the largest hospitals in each of the eight Region 4 states, and Grady Memorial Hospital was identified as one of the larger hospitals in Georgia. To help mitigate possible environmental impacts due to potential noncompliance, EPA Region 4 is inviting Grady Memorial Hospital to enter into a time-sensitive partnership with Region 4 to take advantage of the EPA's Audit Policy.[1] As you may already know, this EPA Policy encourages regulated facilities to voluntarily discover, promptly disclose, expeditiously correct, and prevent violations of environmental requirements.

EPA Region 4 proposes the following reporting time frames as a precursor for participation in this initiative:

- Deliverable 1: an initial Progress Report by March 20, 2009.
- Deliverable 2: a second Progress Report May 20, 2009; and
- Deliverable 3: final Disclosure Report by June 20, 2009.

By taking advantage of this self-auditing and self-reporting opportunity, you have the potential to not only make your institution cleaner and safer, but also to lessen funds needed to offset any penalties which might result from future enforcement action. For more information on the Audit Policy and application of the Policy to hospitals agreeing to participate in this regional initiative, please see Enclosure 1.

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[1] The Audit Policy is technically known as *Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations Final Policy Statement, Notice, 65 F.R..19617, April 11, 2000.*

If you are interested in exploring collaboration with EPA for use of the Audit Policy at Grady Memorial Hospital, please let us know by providing the following information within forty-five (45) calendar days from receipt of this letter:

- Name and location of the hospital to be covered by the audit;
- Summary listing of the statutes to be covered by the audit (see Enclosure 2 for an example);
- A statement outlining how Condition 1 of the Audit Policy ("Systematic Discovery") will be addressed;
- A primary contact;
- Confirmation of the schedule for submission of deliverables (e.g., Progress Reports, Disclosure Report).

If you choose to expand to a corporate-wide audit and the above time frames are unworkable for such an expanded program, the Region is available to negotiate an audit agreement. These agreements are an optimal compliance tool for companies with facilities located in more than one location and provide for advanced understanding between the company and EPA regarding schedules for conducting the audit and disclosing the violations.

If you wish to discuss this matter further, please do not hesitate to contact me by phone at (404) 562-9741 or by email at Gordon.scott@epa.gov. In addition, Wesley Hardegree ((404) 562-9629, Hardegree.wes@epa.gov)) of my staff is available to take technical questions you may have on the Audit Policy. Legal questions on the Policy should be directed to Kevin Smith ((404) 562-9525, Smith.kevin@epa.gov)).

Sincerely,

J. Scott Gordon

J. Scott Gordon
Associate Director
Office of Environmental Accountability

Enclosures:
1. Introduction to the Audit Policy
2. Example List of Statutes for Audit

cc: Gloria Andrews, Environmental Director, Grady Memorial Hospital
Jim Ussery, Georgia Environmental Protection Division