



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

NOV 14 2008

Ron Hill, Vice President
Jackson-Madison County General Hospital
708 W. Forest Avenue
Jackson, TN 38301

Subject: An Invitation to Utilize EPA's Audit Policy

Dear Vice President Hill,

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 Jackson-Madison County General Hospital was identified as one of the larger hospitals in Tennessee. To help mitigate possible environmental impacts due to potential noncompliance, EPA Region 4 is inviting Jackson-Madison County General 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.*

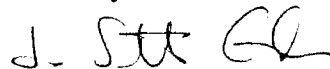
If you are interested in exploring collaboration with EPA for use of the Audit Policy at Jackson-Madison County General Hospital, please let us know by providing the following information within forty-five (45) calendar days from receipt of this letter:

- 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
Associate Director
Office of Environmental Accountability

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

cc: David Evans, Environmental Services Manager, Jackson-Madison County General Hospital
Chris Moran, Tennessee Department of Environment & Conservation



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Stephen C. Reynolds
President and CEO of Baptist Memorial Healthcare
Baptist Memorial Hospital - Memphis
6019 Walnut Grove Rd.
Memphis, TN 38120

Subject: An Invitation to Utilize EPA's Audit Policy

Dear President Reynolds,

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 Baptist Memorial Hospital - Memphis was identified as one of the larger hospitals in Tennessee. To help mitigate possible environmental impacts due to potential noncompliance, EPA Region 4 is inviting Baptist Memorial Hospital - Memphis 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.

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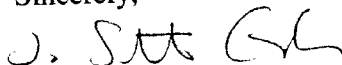
If you are interested in exploring collaboration with EPA for use of the Audit Policy at Baptist Memorial Hospital - Memphis, please let us know by providing the following information within forty-five (45) calendar days from receipt of this letter:

- 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).

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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
Associate Director
Office of Environmental Accountability

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

cc: Nicholas Lewis, Safety Officer, Baptist Memorial Hospital – Memphis
Chris Moran, Tennessee Department of Environment & Conservation



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NOV 14 2008

Kevin M. Spiegel, Chief Executive Officer
Methodist University Hospital
1265 Union Ave.
Memphis, TN 38104

Subject: An Invitation to Utilize EPA's Audit Policy

Dear Mr. Spiegel,

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 Methodist University Hospital was identified as one of the larger hospitals in Tennessee. To help mitigate possible environmental impacts due to potential noncompliance, EPA Region 4 is inviting Methodist University 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.

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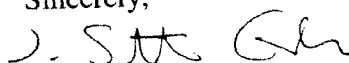
If you are interested in exploring collaboration with EPA for use of the Audit Policy at Methodist University Hospital, please let us know by providing the following information within forty-five (45) calendar days from receipt of this letter:

- 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).

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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
Associate Director
Office of Environmental Accountability

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

cc: Dana Dodson, Environmental Director, Methodist University Hospital
Chris Moran, Tennessee Department of Environment & Conservation