



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

NOV 14 2008

Gary L. Gause, President/CEO  
Brookwood Medical Center  
2010 Brookwood Medical Ctr Dr.  
Birmingham, AL 35209

Subject: An Invitation to Utilize EPA's Audit Policy

Dear President Gause,

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 Brookwood Medical Center was identified as one of the larger hospitals in Alabama. To help mitigate possible environmental impacts due to potential noncompliance, EPA Region 4 is inviting Brookwood Medical Center to enter into a time-sensitive partnership with Region 4 to take advantage of the EPA's Audit Policy.<sup>1</sup> 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.

<sup>1</sup> 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.*

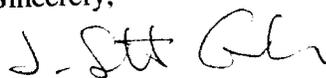
If you are interested in exploring collaboration with EPA for use of the Audit Policy at Brookwood Medical Center, please let us know by providing the following information within forty-five (45) calendar days from receipt of this letter:

- 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](mailto:Gordon.scott@epa.gov). In addition, Wesley Hardegree ((404) 562-9629, [Hardegree.wes@epa.gov](mailto: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](mailto: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: Joe Stough, Chief Operating Officer, Brookwood Medical Center  
Marilyn Elliot, Alabama Department of Environmental Management



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Chandler Bramlett, President  
Mobile Infirmiry Medical Center  
5 Mobile Infirmiry Circle  
Mobile, AL 36607

Subject: An Invitation to Utilize EPA's Audit Policy

Dear President Bramlett,

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 Mobile Infirmiry Medical Center was identified as one of the larger hospitals in Alabama. To help mitigate possible environmental impacts due to potential noncompliance, EPA Region 4 is inviting Mobile Infirmiry Medical Center to enter into a time-sensitive partnership with Region 4 to take advantage of the EPA's Audit Policy.<sup>1</sup> 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:

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- Deliverable 3: final Disclosure Report by June 20, 2009.

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<sup>1</sup> 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 Mobile Infirmary Medical Center, 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](mailto:Gordon.scott@epa.gov). In addition, Wesley Hardegree ((404) 562-9629, [Hardegree.wes@epa.gov](mailto: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](mailto:Smith.kevin@epa.gov)).

Sincerely,



J. Scott Gordon  
Associate Director  
Office of Environmental Accountability

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2. Example List of Statutes for Audit

cc: Ender Waltman, Mobile Infirmary Medical Center  
Marilyn Elliot, Alabama Department of Environmental Management



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David Spillers, Chief Executive Officer  
Huntsville Hospital  
101 Sivley Road  
Huntsville, AL 35801

Subject: An Invitation to Utilize EPA's Audit Policy

Dear Mr. Spillers,

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 Huntsville Hospital was identified as one of the larger hospitals in Alabama. To help mitigate possible environmental impacts due to potential noncompliance, EPA Region 4 is inviting Huntsville Hospital to enter into a time-sensitive partnership with Region 4 to take advantage of the EPA's Audit Policy.<sup>1</sup> 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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<sup>1</sup> 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 Huntsville 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);
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Sincerely,



J. Scott Gordon  
Associate Director  
Office of Environmental Accountability

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2. Example List of Statutes for Audit

cc: David Crump, Huntsville Hospital  
Marilyn Elliot, Alabama Department of Environmental Management