

DEPARTMENT: FacilitiGroup	POLICY DESCRIPTION: Environmental and Waste Management Policy
PAGE: 1 of 3	REPLACES POLICY DATED: 1/12/99, 11/1/05 (DC.001), 05/1/07
EFFECTIVE DATE: March 1, 2011	REFERENCE NUMBER: ENV. 001
APPROVED BY: Ethics and Compliance Policy Committee	

SCOPE: All Company-affiliated facilities including hospitals, ambulatory surgery centers, outpatient imaging centers, medical office buildings, home health agencies, physician practices, and all Corporate Departments, Groups, Divisions and on-site subcontractors.

PURPOSE: To describe the policy framework for environmental compliance and provide the plan template for facilities to develop a specific Environmental and Waste Management Plan.

POLICY:

1. All employees, subcontractors, and vendors must carry out their roles and responsibilities in a manner that is protective of human health and the environment, to minimize environmental risks and the potential for health, safety, and environmental exposure to the facility and surrounding community. Concerns about or violations of this policy should be reported to one's supervisor, the Director of Facility Management, the Facility Ethics and Compliance Officer (ECO), another member of management or via the Ethics Line at 1-800-455-1996.
2. The environmental management policy demonstrates the Company's commitment to:
 - Adhere to applicable federal, state, and local environmental laws, regulations, and requirements;
 - Operate in a manner that protects human health and the environment and integrating pollution prevention into planning and decision-making;
 - Objectively and fully communicate environmental, compliance, protection and management information to staff, subcontractor personnel, our customers, applicable stakeholders, and the public; and
 - Continuously improve our processes, systems, and capabilities so that we can increase the value of our services.
3. The Environmental and Waste Management Policy will be implemented by the establishment of an Environmental and Waste Management Plan, (See Reference 1 for the Plan Template) as an integral part of the Environment of Care (EOC)/Safety & Security Program at each facility. The development, implementation, monitoring and improvement of plan performance is administered by The EOC/Safety and Security Committee, chaired by facility leadership and the Board of Trustees. The EOC/Safety and Security Committee and designees must develop and maintain the plan which includes the following components:
 - a. Hazardous (Resource Conservation and Recovery Act; RCRA) Waste Management;
 - b. Pharmaceutical Waste Management;
 - c. Universal Waste Management;
 - d. Waste Oil;
 - e. Radiological Waste Management;
 - f. Biohazardous Waste Management; and

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<p>g. Environmental Systems Management:</p> <ul style="list-style-type: none"> i. Boilers; ii. Heating, Ventilation and Air Conditioning (HVAC); iii. Storage Tanks; iv. Asbestos; v. Paint and Lead Based Paint; vi. Polychlorinated Biphenyl (PCBs); vii. Stormwater; viii. Wastewater; ix. Potable Water; x. Infection Control Risk Assessment (ICRA); and xi. Municipal Waste/Solid Waste Management. <p>4. The facility leadership must determine and assign a Responsible Manager who will be responsible for development and implementation of the Environmental & Waste Management Plan including:</p> <ul style="list-style-type: none"> a. Adapting plan templates and content to the facility's specific requirements as necessary. b. Managing the framework to measure, evaluate and correct Environmental & Waste Management Plan performance. c. Reporting all findings of investigation and plan assessment reports to the EOC/Safety and Security Committee. d. Being responsible for facility compliance with federal, state, and local environmental statutes, regulations, codes, and requirements. e. Holding daily operational responsibility for implementation of the environmental plan requirements, documentation & procedures. f. Reporting environmental issues, problems, or incidents to the Corporate Engineering and Facility Management Department within 24 hours of occurrence. Environmental issues must be reported to Quality Review System (QRS), utilizing the incident reporting process, pursuant to the Regulatory Compliance Notification Policy, CSG.QS.001. The Responsible Manager must also report environmental occurrences to the appropriate agencies within the time limits imposed by regulation. <p>PROCEDURE:</p> <p>1. Each facility will develop a specific Environmental and Waste Management Plan using the Environmental & Waste Management Plan template referenced below.</p>
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2. Each facility will post their Environmental and Waste Management Plan on the HCA Facility Infrastructure (HCAFI) website portal at their specific facility environmental page.
3. Corporate Engineering and Facilities Management will conduct periodic audits of the facility Environmental and Waste Management Plans.

REFERENCES:

1. [Environmental and Waste Management Plan Template](#)
2. U.S. Environmental Protection Agency: www.epa.gov
3. Occupational Safety and Health Administration: www.osha.gov
4. U.S. Department of Transportation: www.dot.gov
5. Federal Regulations 40 CFR 261 Identification and Listing of Hazardous Waste, 40 CFR 262 Standards Applicable to Generators of Hazardous Waste
6. Additional Federal Regulations 260, 263-266, 268, 270-272, Federal regulations for generators, transporters and treatment, storage and disposal facilities (TSDFs)
7. Regulatory Compliance Notification Policy, CSG.QS.001