



November 22, 2011

Dr. John Gregson
Senior Chemist, SF PUC
3801 Third St., Suite 600
San Francisco, CA 94124

Re: Response to Warning letter, dated 10/5/2011 – Mt. Zion Campus (SIC/ID 8731/0314)

A Warning letter (dated October 5, 2011) was issued by your office to the UCSF Mt Zion Campus for elevated levels of lead at sampling point D (on Post St. ~ 100 ft west of Scott St). In response to this Warning letter, UCSF Environmental Health and Safety (EH&S) initiated an investigation to determine possible sources of contamination and identify potential mitigation measures.

Working with Mt. Zion Medical Center Facilities Management, EH&S personnel reviewed building plans to identify sampling point D and its contributing sources. According to drawings on file, sampling point D represents a vent line for the main sewer at Mt. Zion Building A. The sewer line in question services floors 1-7 for the east side of the building, as well as surface water from the south side of the loading dock behind the building.

Building A on the Mt. Zion campus is a hospital building with in patient services and medical offices. The investigation team walked each floor of the building and the loading dock looking for potential sources of lead and corrosives that may cause high or low pH in the wastewater effluent, liberating lead already contained in the piping system. The floor functions are as follows:

- Floor 1 – Library, medical records
- Floor 2 – Radiology, nuclear medicine
- Floor 3 – Pre-Op
- Floor 4-5 – In-patient care
- Floor 6-7 – Medical offices

No chemicals containing lead or corrosive reagents were observed during the walk through. Hospital functions typically do not lend themselves to processes involving heavy metals, such as lead.

With routine processes ruled out, the investigation team reviewed non-routine sources. According to UCSF Medical Center Facilities Management, no construction or maintenance activities involved plumbing work, demolition, or significant water discharge occurred during the monitoring period.

Additionally, UCSF EH&S personnel reviewed relevant records for September 27 through October 6 and reported:

- No lead or asbestos abatement projects were conducted where construction materials may have been left uncovered in the loading dock area.
- No Emergency Response Team responses or chemical spills involving copper, lead or corrosives were reported in the investigation area.

Although construction and spill responses did not occur in target area during Sept-Oct, rain was reported on October 3-6 (www.nws.noaa.gov), which may have washed accumulated contamination from the loading dock area via the loading dock storm drain. No rain events were recorded in September 2011.

In compliance with UCSF's response letter dated Jan 28, 2009, UCSF Medical Center has continued to police the loading dock area and require all construction projects to protect construction materials from rain fall and perform daily clean up during the project period.

At this time, our investigation is inconclusive. If the PUC monitors any additional violations, do not hesitate to contact me directly and UCSF will investigate further.

Sincerely,

Travis Clark
Environmental Health and Safety Specialist
UCSF Environmental Health and Safety
415.476.5506
Donald.clark@ucsf.edu