



November 1, 2011

John Gregson
Sr. Inspector
SF PUC

Re: UCSF / Parnassus Campus – Response to 10/3/2011 Warning Notice

In response to the warning notice issued by your office, dated October 3, 2011, UCSF Environmental Health and Safety conducted an investigation to identify possible sources for zinc exceedences monitored on 7/12 and 7/13 at the Parnassus sampling point B. UCSF Medical Center Facilities Management identified the sample point as the main sanitary sewer line for Long Hospital and Sterile Processing Department located in Moffitt Hospital. See attached drawing.

The Facilities Director queried his staff for any information regarding cleaning, maintenance, construction or demolition that may result in unusual waste water discharge in July. No zinc containing processes were identified.

Additionally, EH&S conducted a survey of those areas within Long Hospital that have significant water throughput and/or large storage of chemicals. The areas surveyed are as follows:

1. *Sterile Processing Department* – SPD was under construction in July, having reopened in September 2011. No equipment was in service during the time of the violation.
2. *Moffitt Cafeteria* – Although the Cafeteria is in Moffitt Hospital, it represents the largest water user in the hospital by far. The Nutrition Director indicated that no changes in process within the last six months or any unusual maintenance / construction occurred during July. A review of the MSDS's on site revealed that reagents associated with the dishwashing system are based on sodium hydroxide. No zinc containing reagents were found.
3. *Clinical Labs* – No zinc containing compounds were found in large enough quantities to be responsible for the high levels monitored . Clinical Lab staff confirmed that all hazardous waste is collected and disposed of through the EH&S program.
4. *Material Services* – A survey of Material Services revealed no sinks or floor drains in the materials storage area. Staff for Material Services confirmed that all expired chemicals or material that is out of spec is collected and disposed of through EH&S.
5. *Radiation Receiving* – no material is actively discharged via sanitary sewer and chemical stocks revealed no zinc containing compounds.

Unfortunately, our investigation was inconclusive. Our current information and knowledge does not clearly point to a single department or process that could be responsible for high zinc effluent. Since only two samples in five demonstrated high levels of zinc, we may assume that the exceedence is the result of a non-routine event.

If your department monitors any additional exceedences, do not hesitate to contact me directly and we will redouble our efforts.

Sincerely,

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