



ALAMEDA COUNTY  
**HEALTH CARE SERVICES AGENCY**

DEPARTMENT OF ENVIRONMENTAL HEALTH  
 LOCAL OVERSIGHT PROGRAM (LOP)  
 For Hazardous Materials Releases  
 1131 Harbor Bay Parkway  
 Alameda, CA 94502-6577

OAKLAND  
 CA 946  
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Rose M. Hubler  
 915 Broadway  
 Oakland, CA 94611-5710

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ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
REBECCA GEBHART, Interim Director

DEPARTMENT OF ENVIRONMENTAL HEALTH  
LOCAL OVERSIGHT PROGRAM (LOP)  
For Hazardous Materials Releases  
1131 HARBOR BAY PARKWAY, SUITE 250  
ALAMEDA, CA 94502  
(510) 567-6700  
FAX (510) 337-9335



April 17, 2017

Mercedes Benz of Oakland/  
Euro Motors Oakland, Inc.  
Attn: Ash Zaki  
2915 Broadway  
Oakland, CA 94611  
(Sent via email to [ash.zaki@euromotosca.com](mailto:ash.zaki@euromotosca.com))

GAB Associates LLC  
5 W Shore Road  
Belvedere, CA 94920-2461

Geraldine A. Barsotti, Trustee  
5 W Shore Road  
Belvedere, CA 94920

Shirley H. Guthrie  
340 29<sup>th</sup> Street  
Oakland, CA 94609-3401

Jules Barsotti  
2915 Broadway  
Oakland, CA 94611-5710

David Barsotti  
2915 Broadway  
Oakland, CA 94611-5710

Jules M. and Geraldine A Barsotti, Trustees  
2915 Broadway  
Oakland, CA 94611-5710

Jules M. Barsotti  
2915 Broadway  
Oakland, CA 94611-5710

Jules Barsotti and Alfred S. And Margaret G. Hooper  
2915 Broadway  
Oakland, CA 94611-5710

Rose M. Hubler  
340 29<sup>th</sup> Street  
Oakland, CA 94611

Subject: Conditional Work Plan Approval; for Fuel Leak Case No. RO0003220 and GeoTracker Global ID T10000009111, Mercedes Benz of Oakland, 340 29<sup>th</sup> Street, Oakland, CA 94609

Dear Responsible Parties:

Thank you for the *Site Investigation Work Plan* (work plan), dated March 17, 2017, which was submitted on the behalf of Mercedes Benz of Oakland by Wheeler Group Environmental, LLC. The work plan presents plans for collecting soil and groundwater samples from five borings and a soil gas sample from one soil vapor probe to evaluate the lateral extent of the soil and groundwater contamination at the site to determine whether the site is eligible for closure under the State Water Resources Control Board Low-Threat Closure Policy (LTCP). In addition, the work plan includes a preferential pathway analysis, proposes groundwater sampling at the basement of the 2901 Broadway building, and proposes contingency step-out borings for grab-groundwater sampling.

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file for this site, including the work plan. The proposed scope of work is conditionally approved and may be implemented provided that the technical comment below is addressed and incorporated during the proposed site investigation activities. Submittal of a revised work plan is not required unless an alternate scope of work outside that described in the work plan and technical comments below is proposed.

**TECHNICAL COMMENT**

**Laboratory Analyses of Soil Gas.** ACDEH requests that volatile organic compounds (VOCs) in soil gas be analyzed using both EPA methods TO-15 and TO-17, as DTSC guidance recommends the use of Method TO-15 for naphthalene analysis (Appendix D, Active Soil Gas Investigations, July 2015, DTSC)