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HEALTH CARE SERVICES AGENCY
 DEPARTMENT OF ENVIRONMENTAL HEALTH
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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)

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 29th 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 29th 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 29th 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)