

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Interested Parties

Date: May 11, 2022

FROM: John Harader, Supervisor
Permit Engineering Division

SUBJECT: Permitting Policy on Drilling and Vapor Extraction Testing of Contaminated Soil
For Testing Involving Drilling or Soil Sampling,

The drilling operation is exempt if:

- Vapor is not being extracted (may also be exempt if vapors are being extracted but specific conditions are met which are described below); and
- Any engine used has a maximum rated brake horsepower of less than 50.

If the drilling unit has an engine rated greater than 50 brake horsepower, the engine needs an APCD permit or shall be registered with the Air Resources Board Portable Equipment Registration Program <https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp> (portable@arb.ca.gov). If vapor extraction is occurring, an exemption may still apply if the following conditions are met.

For vapor extraction testing, the policy is to allow a limited permit exemption for vapor extraction testing in which they actually extract vapors. This is usually conducted to get preliminary figures on outlet concentration, etc. The conditions of the limited exemption are as follows:

- Required to use a control device at the vapor extraction exhaust (e.g. - carbon, oxidizer).
- Only allowed a maximum of 48 hours of testing when exhausting (can be split up over multiple days). A currently permitted portable vapor extraction system can be used if more than 48 hours of testing is needed.
- Required to provide the District with at least one day written notification (send email to: notifications@vcapcd.org). Include: location, when, duration, and type of control.
- Afterwards, send the District a log of the operations which include the concentration before and after control, duration of test, where, when, etc. (send email to: notifications@vcapcd.org)
- Permit exemption does not apply at landfills.
- Permit exemption only applies to gasoline, diesel, jet fuel, or crude oil contamination (e.g. - doesn't apply to perchloroethylene, trichloroethylene, etc.)
- Permit exemption does not apply if the testing will be within 1,000 feet from the outer boundary of a school-site.