

**VENTURA COUNTY**  
**AIR POLLUTION CONTROL DISTRICT**  
Memorandum

TO: Interested Parties

Date: August 13, 1998

FROM: Kerby E. Zozula, Supervisor  
Permit Engineering Section

SUBJECT: 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 (916/324-5869). 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 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:

- Need to use a control device at the vapor extraction exhaust (e.g. - carbon, oxidizer).
- Only allowed a maximum of 24 hours of testing when exhausting (can be split up over multiple days)
- Need to provide us with at least one day written notification (can fax it).  
Need to tell us where, when, how long, type of control.
- Afterwards, they need to send us a log of the operations which include the concentration before and after control, duration of test, where, when, etc.
- Doesn't apply at landfills.
- Only applies to gasoline, diesel, or crude oil contamination (e.g. - doesn't apply to perchloroethylene, trichloroethylene, etc.)
- Doesn't apply if the testing will be within 1,000 feet from the outer boundary of a schoolsite.