MONTEREY BAY
Unified Air Pollution Control District
serving Monterey, San Benito, and Santa Cruz counties

POLICY FOR APPROVING REQUESTS TO AERATE GASOLINE CONTAMINATED SOIL

Each permit application is assigned to an engineer to serve as the District Project Officer for the evaluation, preparation and subsequent permit issuance.

Permits will be conditioned so as to assure that the following procedure is observed for the issuance of all District permits to aerate gasoline contaminated soil:

1) During the soil excavation process, odors and dust must not be evident to such a degree as to cause a public nuisance. This can be mitigated by covering contaminated soil, not needing immediate exposure during the excavation process, with plastic.

2) Clean soil must be segregated from contaminated soil to the extent possible.

3) After the soil samples have been gathered, the soil pile must be thoroughly covered with plastic until the conditions of the air pollution permit have been determined and aeration is approved. A violation occurs if there are holes in the plastic so that the soil is essentially aerating.

4) At least 4 grabs of soil per 50 cubic yards for projects with less than 1,000 cubic yards of soil, and at least 4 grabs of soil per 100 cubic yards for projects equal to or greater than 1,000 cubic yards of soil, must be taken from the contaminated soil pile for lab analysis. The composite samples must be analyzed for benzene and total hydrocarbons. These ensure representative concentration values for the entire pile.

5) The containers holding the sampled soil must be packed in ice immediately after the samples are gathered for transport to the lab.

6) The lab is to be instructed to keep the samples chilled as equal portions are mixed during preparation of the composite sample.

Once the soil sample results have been received, the applicant and the District Project Engineer will discuss how the aeration can be accomplished to assure compliance with District Rule 1000. The following information must be gathered and submitted for the permit evaluation:

1) Quantity of soil to be aerated (cubic yards),

2) Distance to nearest property line form the edge of aeration area (feet or meters),

3) Sketch of property where aeration is to occur. Sketch must include the distance from the spread soil to the nearest property line. Sketch must also include description of activities occurring on adjacent properties.

4) Laboratory results of composite analysis for Benzene and Total Hydrocarbons.

5) Completed permit application (APCD FORM 1) and permit application fees as determined from APCD FORM 400.

This data will be used to run an air quality model to determine the maximum concentration of benzene and total hydrocarbons at the nearest property line. A permit will only be issued if the concentration of benzene at the property line does not exceed a concentration that causes a 1/100,000 cancer risk. Neither will the permit be issued if the benzene and total hydrocarbon concentrations exceed the OSHA 8-hour Permissive Exposure Limit divided by 420. This may result in limiting the amount of soil that can be aerated to a fraction of the total pile per day.

If it is not practical to aerate only a portion of the pile each day, then another remediation technique can be proposed, or the soil may need to be hauled to a hazardous waste facility.

You are encouraged to contact the District's Engineering Division at (831) 647-9411, if you have any questions regarding sites with contaminated soil.