Massachusetts Department of Environmental Protection Central Regional Office Bureau of Waste Site Cleanup 8 New Bond Street Worcester, MA

July 26, 2017

**Post-Audit Completion Statement** 

640 Crawford Street Fitchburg, MA

RTN's 2-15389, 2-15391 & 2-15589

Prepared By: IES, Inc. 50 Salem Street Building A, Suite 108 Lynnfield, MA 01940 617-623-8880





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July 26, 2017

eDEP Massachusetts Department of Environmental Protection Central Regional Office Bureau of Waste Site Cleanup 8 New Bond Street Worcester, MA

RE: Statement of Provisions Post-Audit Completion Statement 640 Crawford Street Fitchburg, MA **RTN's 2-15389, 2-15391 & 2-15589** 

Dear eDEP:

IES, Inc. is please to submit electronically, the information concerning the above referenced Disposal Sites (RTN's 2-15389, 2-15391 & 2-15589).

- 1. "Audit Follow-Up Plan Transmittal Form & Post-Audit Completion Statement" (BWSC111) submitted via eDEP.
- 2. Supporting Documents "Notice of Audit Findings & Notice of Noncompliance" report, dated July 28, 2016 completed for the site by IES, Inc. of Lynnfield, MA.
- 3. eDEP authorization letter.

Please do not hesitate to call with any questions,

Respectfully submitted, IES, Inc.

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Daniel G. Jaffe President

#### **TABLE OF CONTENTS**

SECTION			
1.	Introduction	1	
2.	Actions to be Taken and Deadlines for Taking Such Actions	2	
3.	40.1770(2): Post Audit Completion Statement	4	
(a)	An LSP Opinion as to whether the response actions required by the Notice of Audit Findings and any approved Audit Follow-up Plan have been completed in accordance with M.G.L. c. 21E, 310 CMR 40.0000, the terms of any Department approval, and any other applicable laws and requirements;	4	
(b)	A description of the response actions completed pursuant to the Notice of Audit Findings and any approved Audit Follow-up Plan;	4	
(c)	The investigatory and monitoring data obtained, if any, during the implementation of such response actions;	5	
(d)	) Any other information required by the Department in the Notice of Audit Findings or any approved Audit Follow-up Plan;	5	
(e)	A description of additional response activities, if any, necessary to confirm, demonstrate or achieve compliance with the requirements stated in the Notice of Audit Findings or any approved Audit Follow-up Plan;	5	

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#### **ATTACHMENTS**

ATTACHMENT "A":	Photographs
ATTACHMENT "B"	VaporTrac User Manual
ATTACHMENT "C"	BWSC-111 (submitted via eDEP) eDEP Authorization



#### Notice of Audit Findings & Notice of Noncompliance 640 Crawford Street Fitchburg, MA RTN's 2-15389, 2-15391 & 2-15589

#### SECTION 1

#### Introduction

On behalf of LGA, LLC, IES, Inc. has prepared this submittal in response to the MassDEP's "Notice of Audit Findings & Notice of Noncompliance" letter, dated June 7, 2017 (Enforcement Document #00002562). According to this letter, "the Department has no record that remote monitoring technology, designed to alert the owner and operator of the building protected by the AEPMM and the Department in the event of a failure has been implemented", which was in violation of 310 CMR 40.1025(3). The letter stated that in order to correct the violation, it is necessary "to demonstrate that the remote monitoring is capable of communicating the operating status of the AEPMM to the owner and operator of the building protected by the AEPMM and MassDEP and to submit documentation to MassDEP confirming that these steps have been taken.

#### **SECTION 2**

#### Actions to be Taken and Deadlines for Taking Such Actions

1) Ensure that remote monitoring technology for AEPMM has the capability to clearly communicate to MassDEP immediately upon failure of the system, such as loss of power, mechanical failure or other significant disruption of the effectiveness of the system.

As indicated in a "Release Amendment Form" (BWSC-102) completed by Ms. Stephanie Kelley of the MassDEP on July 13, 2017, the telemetry system was being upgraded "to conform with the regulatory messaging requirement" by Mr. Isaac Anderson of Cooperstown Environmental since "the first system was determined to be outdated and not capable of sending the message in the proper format". The SSDS has two fans, and each now has its own telemetry unit, which were registered with the DEP's Boston Office. According to Ms. Kelley, "a call to Rebecca Wooley confirmed receipt of the messages to the database in the proper format, although the subject line did not identify the locations". As a result, Mr. Anderson "made a call to the programmer to correct the subject line".

2) Conduct a shutdown test of the AEPMM to demonstrate that the remote monitoring is able to communicate to the Department as required.

As previously noted, the shutdown test of the AEPMM was conducted on July 12, 2017, where "a call to Rebecca Wooley confirmed receipt of the messages to the database in the proper format".

It is also noted that the VaporTrac alerts include the site address (640 Crawford Street); the Device Number (01 or 02), the Serial Number, and the time and date, with the address and device number also included in the Subject Line, as indicated in the following email:

(From): VaporTrac <noreply@vaportrac.com>
(Subject): [VaporTrac] Power Restored Alert (Device: 640 Crawford Street 01 MA)
Power Restored Alert
Device: 640 Crawford Street 01 MA
Serial #: 657e6ab5
Date: 2017-07-23 @ 01:09 pm

3) After conducting the shutdown test, contact Brian Roden to confirm that the Department has received the automated notification.

After conducting the shutdown test, Mr. Anderson contacted Mr. Roden, who verbally confirmed that the Department has received the automated notification. In addition, as documented in an email from Mr. Brian Roden, dated July 17, 2017:



From: BWSC, AEPMM (DEP) [mailto:AEPMM.BWSC@MassMail.State.MA.US] Sent: Monday, July 17, 2017 12:00 PM To: Dan Jaffe <djaffe@iesinc.com> Subject: RTN 2-0015389 - Fitchburg - Telemetry Registration Complete MassDEP received successful shutdown and restart notifications on 7/12/2017 from device 01 and 02 for RTN 2-0015389. The registration process for these devices is complete as of 7/12/17. Thanks for your assistance. Brian Roden Environmental Analyst MassDEP Bureau of Waste Site Cleanup One Winter Street, Boston, MA 02108 (617) 292-5920 Brian.Roden@state.ma.us

4) After completion of the actions specified above, submit a Post-Audit Completion Statement in accordance with 310 CMR 30.1170 on the form established by the Department (BWSC-111).

This report and accompanying Form BWSC-111 are being submitted via eDEP as a "Post-Audit Completion Statement in accordance with 310 CMR 30.1170".



#### **SECTION 3**

#### Post Audit Completion Statement

# <u>40.1770(2): Each Post-Audit Completion Statement shall include the following information;</u>

(a) An LSP Opinion as to whether the response actions required by the Notice of Audit Findings and any approved Audit Follow-up Plan have been completed in accordance with M.G.L. c. 21E, 310 CMR 40.0000, the terms of any Department approval, and any other applicable laws and requirements;

It is the opinion of Daniel Jaffe (LSP #2347) that the response actions required by the June 7, 2017 "Notice of Audit Findings & Notice of Noncompliance" (Enforcement Document# 00002562) and any approved Audit Follow-up Plan have been completed in accordance with M.G.L. c. 21E, 310 CMR 40.0000, the terms of any Department approval, and any other applicable laws and requirements.

(b) A description of the response actions completed pursuant to the Notice of Audit Findings and any approved Audit Follow-up Plan;

The two telemetry devices were registered on July 10, 2017 by Mr. Isaac Anderson of Cooperstown Environmental of Andover, MA, with confirmatory emails received for Device #1 at 10:17 a.m. and Device #2 at 10:18 a.m., as shown below:

From: BWSC, AEPMM (DEP) <<u>aepmm.bwsc@state.ma.us</u>>
Sent: Monday, July 10, 2017 10:17 AM
To: Isaac Anderson
Subject: DEP Registration Information Received
Thanks for your registration information.

From: BWSC, AEPMM (DEP) <<u>aepmm.bwsc@state.ma.us</u>>
Sent: Monday, July 10, 2017 10:18 AM
To: Isaac Anderson
Subject: DEP Registration Information Received
Thanks for your registration information.

Following the registration documented above, the telemetry system was installed by Mr. Anderson on July 12, 2017, with Ms. Stephanie Kelley of the MassDEP and Mr. Daniel Jaffe, LSP also present that day to observe the installation. As documented in an email from Mr. Brian Roden, dated July 17, 2017:



From: BWSC, AEPMM (DEP) [<u>mailto:AEPMM.BWSC@MassMail.State.MA.US</u>] Sent: Monday, July 17, 2017 12:00 PM To: Dan Jaffe <<u>djaffe@iesinc.com</u>> Subject: RTN 2-0015389 - Fitchburg - Telemetry Registration Complete

MassDEP received successful shutdown and restart notifications on 7/12/2017 from device 01 and 02 for RTN 2-0015389. The registration process for these devices is complete as of 7/12/17.

(c) The investigatory and monitoring data obtained, if any, during the implementation of such response actions;

As previously noted, the telemetry system was installed by Mr. Isaac Anderson of Cooperstown Environmental on July 12, 2017, with Ms. Stephanie Kelley of the MassDEP also present that day. At the time of the installation, a minor leak in the piping was noted near Device #1 (see Photograph #1 in **Attachment "A"**); and a minor leak in the joint of the plenum in the concrete floor beneath Device #2 (see Photograph #3 in **Attachment "A"**). Both of these minor leaks were repaired with silicone that day. The Magnehelic gauges displayed a pressure of 8 psig, as intended (see Photographs #2 and #4 in **Attachment "A"**), indicating that the AEPMM is operating properly, fans are operational, the piping is structurally sound, and the system is operating under a vacuum.

It is also recommended that warehouse employees check the units daily (on days when personnel are available) to make sure they are intact and that no leaks are evident in the floor.

(d) Any other information required by the Department in the Notice of Audit Findings or any approved Audit Follow-up Plan;

A copy of the user manual for the VaporTrac Telemetry System installed at the site is included in **Attachment "B"** of this submittal.

(e) A description of additional response activities, if any, necessary to confirm, demonstrate or achieve compliance with the requirements stated in the Notice of Audit Findings or any approved Audit Follow-up Plan;

None necessary beyond those previously discussed.

The "Audit Follow-Up Plan Transmittal Form & Post-Audit Completion Statement" (BWSC-111) is submitted to the DEP via eDEP concurrently with this report.



Respectfully submitted, IES, Inc.

Val 2 Jalt

Daniel G. Jaffe, LSP (#2347) President Reviewed by:

Steven Jois -

Steven Iorio Project Manager

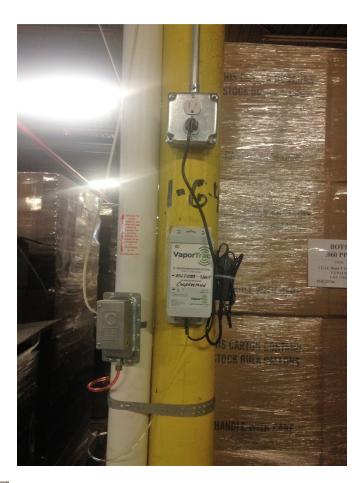


#### ATTACHMENT "A"

#### Photographs



**Photograph #1:** View of Telemetry Device #1.





**Photograph #2:** View of the Magnehelic gauge associated with Telemetry Device #1 at the Site.

#### Photograph #3:

View of the plenum, where a minor leak was identified and repaired, associated with Telemetry Device #2 at the Site.





#### **Photograph #4:** View of the Magnehelic gauge associated with Telemetry Device #2 at the Site.

#### ATTACHMENT "B"

### VaporTrac User Manual



# VaporTrac<sup>®</sup> VT-00-2.4A



# User's Manual

# VaporTrac VT-00-2.4A

# User's Manual

Version 1.1.1

July 2017



VaporTrac has developed this User's Manual for the purposes of providing our clients and end users with the information needed to evaluate, install, trouble-shoot and maintain VaporTrac Controller Model VT-00-2.4A.

Every effort has been made to ensure that the information in this document is complete, accurate and up-to-date. VaporTrac does not guarantee that changes in equipment made by others, and referred to in this manual, will not affect the applicability of the information in this manual.

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First Edition, version 1.1.1, July 2017.

Written and produced by VaporTrac

Please address comments on this publication to:

VaporTrac, LLC 30343 Canwood Street, Suite 208B Agoura Hills, CA 91301 (888) 670-7325

# **IMPORTANT SAFETY INSTRUCTIONS**

VaporTrac has designed the Controller Model VT-00-2.4A to provide our clients/end users with a safe, reliable means to monitor vacuum on a variety of remediation systems. The equipment is easy to install and maintain but as with all electrical equipment, there are precautions that should be followed prior to installing or trouble-shooting the units:

- Please review the installation and operating instructions in this manual prior to handling, installing, or modifying your VaporTrac unit.
- Read and follow all warning and instruction labels on the product itself.
- Ensure that the VaporTrac unit is installed in a dry location, out of direct sunlight, and is not adjacent to a heat source.
- Be certain that the vacuum tube is secure and won't become dislodged or accidently pulled from the blower system.
- To reduce the risk of unit failure, do not disassemble this product, but return it to VaporTrac Customer Service, when any service or repair work is required. Opening or removing the unit cover will nullify the unit's warranty.

If anything happens that indicates that your VT-00-2.4A is not working properly or has been damaged, turn the unit off, remove it from the mitigation system and follow the procedures in this the manual for having it serviced. Return the unit for servicing under the following conditions:

- 1. The vacuum tubing is damaged or missing.
- 2. Liquid has been spilled into the product or it has been exposed to water.
- 3. The unit has been dropped, or the enclosure is damaged;
- 4. The unit doesn't function normally when you're following the operating instructions.

# **ONEYEAR LIMITED WARRANTY**

#### Please Read this Warranty Carefully Before Using the Product

**Warranty.** Subject to applicable consumer protection legislation, VaporTrac warrants that the VaporTrac device will be free from defective material and workmanship for a period of (1) year from the date of purchase. Warranty is contingent on installation in accordance with the instructions provided. This warranty does not apply where repairs or alterations have been made or attempted by others; or the unit has been abused or misused. Warranty does not include damage in shipment unless the damage is due to the negligence of VaporTrac. All other warranties, expressed or written, are not valid. To make a claim under these limited warranties, you must return the defective item to VaporTrac with a copy of the purchase receipt. VaporTrac is not responsible for installation or removal cost associated with this warranty. In no case is VaporTrac liable beyond the repair or replacement of the defective product FOB VaporTrac.

THERE ARE NO WARRANTIES WHICH EXTEND BEYOND THE DESCRIPTION ON THE FACE HEREOF. ALL OTHER WARRANTIES, EXPRESSED OR WRITTEN, ARE NOT VALID.



# SYSTEM OVERVIEW

The VaporTrac<sup>®</sup> VT-00-2.4A is a sensor-equipped telemetry device that remotely monitors performance of radon and vapor intrusion mitigation systems and triggers a notification when a system failure is detected. The system transmits pressure (vacuum), power state, and device temperature measurements continuously via cellular or WiFi communication networks.

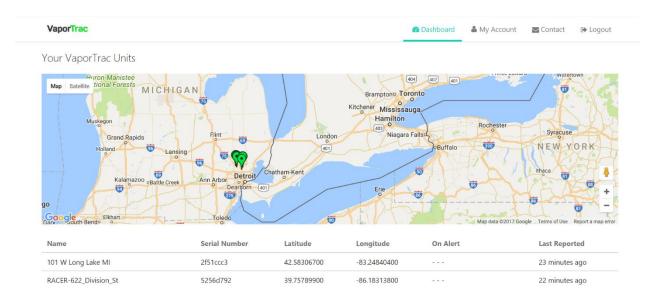


Installation of a VaporTrac VT-00-2.4A allows the client/end user to verify, in real time, that the installed vapor or radon mitigation system is providing continuous protection of human health, while at the site time, eliminating the need for routine physical site inspections.

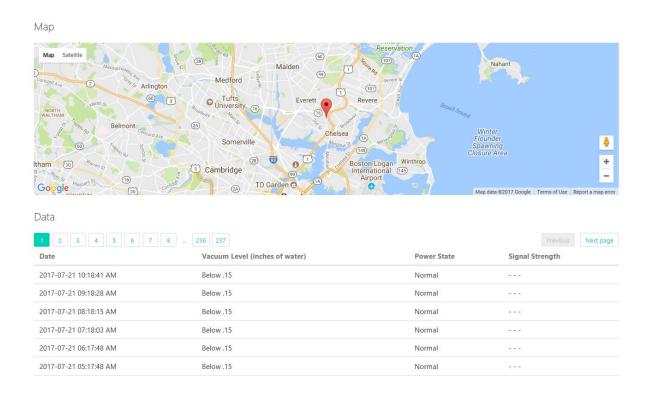
Using either a cellular or Wi-Fi connection, each VaporTrac unit's data is transmitted to cloud-based servers where the data is stored in a client-specific database which can be easily accessed by the client through the **VaporTrac.com** web interface.

System performance is continuously monitored through the network, and if a mitigation system fails or departs from set specifications, an Alert will be sent via text or e-mail message to selected parties through the client dashboard.

The VaporTrac website and client dashboard provide the owner/operator with a user-friendly, easily accessible portal to access site specific data 24/7, thereby allowing quick evaluation of system performance and Alert conditions. The client can evaluate current unit conditions and real-time analytics including vacuum pressure, operating history, 24-hour graph of vacuum readings, and locational information.



The client can quickly determine if the Alert received is due to a vacuum failure or if is conveying an interruption in power, or low battery, etc. Users can also determine who receives VaporTrac Alerts from within the portal. The dashboard also provides downloadable, robust data sets to enable long-term performance analytics (trend analyses, operating efficiencies, etc.)



VaporTrac servers are hosted on Amazon's AWS cloud infrastructure. AWS is the largest cloud computing provider in the world. All resources are secured with a firewall and monitored 24/7. All VaporTrac data is backed up regularly. Access to client data sits securely behind a password protected login. Additionally, all VaporTrac IOT devices are secured via firewall.

VaporTrac is designed and manufactured in the U.S. then installed by trained teams from VaporTrac LLC.

#### AGENCY COMPLIANCE

Responsible parties and environmental agencies have become dependent on continuous operation of remediation systems to mitigate radon and/or chemical vapors before they enter structures such schools, commercial buildings, and residences. These mitigation systems need to operate continuously in order to remain protective of human health. VaporTrac VT-00-2.4A units allow responsible parties to remotely and continuously monitor these systems without the need for physical inspections.

The VaporTrac<sup>®</sup> telemetry system is an approved technology with the Massachusetts Department of Environmental Protection (MassDEP). Such devices are required to be installed in conjunction with an Active Exposure Pathway Mitigation Measure (AEPMM) such as a sub-slab depressurization system. The devices must provide immediate notification to both MassDEP and the owner/operator of system failure, as the result of loss of power, mechanical failure or other significant disruption.

(Section 310 Code of Massachusetts Regulations (CMR) 40.1025 and 40.1026).

# SET-UP, INSTALLATION AND OPERATION

# **Unit Configuration**

Each VT-00-2.4A unit will be pre-programmed by VaporTrac per the specifications provided by the client/end user taking into consideration issues related to weather, humidity, vacuum tolerances, etc.

In general, the VT-00-2.4A units are designed with the following specifications:

- Vacuum Pressure 0 to 5 inches water, sensitivity 0.1"
- Local Power on/off detection (Cellular model only)
- Local Battery 10% power alert (Cellular model only)
- Base Unit Size 6.3 by 3.6 by 2.44 inches (L, W, D)
- Base Unit Weight 455 grams (cellular), 265 grams (WiFi)

Each type of unit will be factory-ready for installation and use at the designated facility.

Supplied equipment includes:

- VaporTrac Remote Monitoring Base Unit
- 5V Power Supply
- Vacuum Tubing



The VaporTrac VT-00-2.4A can be set up to communicate via a WiFi connection or through cellular service:

- **Cellular:** Provides hourly status update via cellular network. Monitors vacuum, power failure, temperature and battery failure.
- WiFi: Provides hourly status update via accessible WiFi network. Monitors vacuum (pressure).

Both options are available through VaporTrac. VaporTrac recommends working with a VaporTrac customer support technician to determine which type of unit would be preferable for the specified project type and location. Considerations for selection include:

- Communication options and signal strength
- Number of units required
- Spacing of mitigation systems

#### WiFi Unit Limitations:

- 1. VaporTrac cannot guarantee the uptime connectivity of the Unit via WiFi connection.
- 2. Power failure alerts cannot be provided when using WiFi.
- 3. Client will need to supply WiFi network information including router SSID and password.
- Client will need to make sure proper router ports are open to allow for normal operation of the VaporTrac unit (specifically UDP Port 1194 must be open).
- 5. If the client/end user changes their router SSID and/or password, the Unit will need to be returned to VaporTrac for reprogramming.

# Installation

The VaporTrac VT-00-2.4A units can be installed during the initial mitigation system construction, or as a retrofit during routine maintenance. The units are

activated by VaporTrac technicians during installation and once connected to the monitoring network, data is immediately transmitted to the client's database.

Installing VaporTrac is easy; the units can be mounted on a wall or on a pipe. Once mounted, affix the vacuum tube, plug in power cord, and in approximately 15 seconds you will have confirmation.

#### Installation for Wall or Pipe Mounting

- 1. Wall Mounting:
  - Locate a wall mounting area near the mitigation system pipe
     (Dynameter / Electrical Outlet). Mark (4) holes using the hole openings of the monitor mounting plate.
  - Drill 3/16" holes for drywall or 7/32" holes for plaster.
  - Insert wall anchors and insert (4) mounting screws to secure monitor.
  - Drill 3/16" hole into PVC pipe and insert monitor plastic tube.



- 2. Pipe Mounting
  - Use (2) 14" zip ties to mount monitor to pipe.
- 3. Plug in main power connector to monitor. Monitor will activate automatically.
- 4. Call VaporTrac Technical Support to confirm unit has been identified in the network. VaporTrac will provision account access for remote monitoring and configuration via VaporTrac web portal.

After installation and programming have been completed, VaporTrac VT-00-2.4A is fully operational.

# **Unit Operation**

Polling occurs when the VaporTrac VT001 automatically communicates with the VaporTrac database at a predetermined time and retrieves information. Your VT-00-2.4A is preprogrammed to connect with the VaporTrac database every 10 minutes to retrieve data and populate the database. The data is stored in a database and can be accessed and viewed at any time.

#### Alarm Send-Out/Communication

There are 3 stages to a complete alarm event: 1) Alarm Recognition, 2) Alarm Notification, 3) Acknowledgment. Note that not all alert conditions will go through each stage. For example, some may not meet the recognition time.

#### 1) Alarm Recognition

#### 2) Alarm Notifications

Alarms will be automatically sent to the client/end user when the following conditions are encountered by the unit:

- Power Failure
- Vacuum readings above or below established "set points."

The alarm will be sent via e-mail or text.

#### 3) Acknowledgement

4) Clear Alarms

## Website/Database Access

Once your VT-00-2.4A units have been installed, the VaporTrac technician will establish the connection with the VaporTrac website. Each unit will be configured with a unique identification number. The ID number will be set up in a format that acceptable to the receiving agency (i.e., MassDEP) if needed.

Once the installer has established web access for each unit, the client/end user will be given a unique User ID and Password allowing access to the VaporTrac website (<u>www.vaportrac.com</u>) and user-specific data. The Username and Password may be changed and/or recovered through\_\_\_\_\_\_.

VaporTrac recommends that users access the website via Google Chrome or Firefox.

The client/end user can add contacts in the dashboard and determine which contacts will receive notifications/alarms:

Vap	orTrac		🍪 Dashboard	& My Account	Contact	۲	Logout
Devi	ce Contacts (Name: 158 Carter St MA, Serial#	: 1e8cb06a)					
Select	which contacts should receive VaporTrac email alerts for this un	it:					
	Name	Email			Е	dit	Delete
	VaporTrac Alerts	vaportrac.alert@gmail.com			6		Û
	Samuel Creamer	sam.creamer@gmail.com			6	1	Û
$\checkmark$	David Scott	ds@peakenvironment.com			6		Û
	Test test	test@test.com			6		Û
	VaporTrac User	user@vaportrac.com			6		Û
	David White	drwhite@envirosolve.com			6	1	Û
		Save Contact Selections					
Add New Contact							
Use the form below to add contacts not listed above. First Nane							
Last N	ame						
Email	Address						
		Add New Contact					

#### **Data Downloads and Reporting**

The data collected by the VaporTrac.com system can be easily accessed and evaluated. Provides downloadable, robust data sets to enable long-term performance analytics (trend analyses, operating efficiencies, etc.)

VaporTrac Model VT-00-2.4A User's Manual

# CHECKING YOUR VAPORTRAC VT-00-2.4A FOR PROPER OPERATION

Your VaporTrac unit will be fully functional upon installation. VaporTrac technicians will interface with the client/end user to make sure that the unit(s) are functioning properly. This will ensure that when a problem arises the VaporTrac will be ready to alert the appropriate personnel.

Following initial set up, the VaporTrac technician will conduct a series of field checks to ensure proper operation of the VT-00-2.4A:

- 1. Review connectivity with the website. Ensure unit ID is configured and displayed appropriately.
- 2. Test the unit by disconnecting the power cord to ensure that battery backup is functioning; evaluate alarm send out. Replace the power cord.
- 3. Test the unit by disconnecting the vacuum tube; evaluate alarm send out. Replace the vacuum tube.
- 4. Tests for cellular and WiFi connectivity?

Once the system is configured and operational, it is unlikely that the client/end user will need to conduct any system checks or maintenance. However, if the system sends an alarm indicating that the mitigation system power has gone off, or the system vacuum has dropped below the pre-programmed set point, follow-up action by the client/end user (or VaporTrac technician) is required.

Steps necessary following Alarm condition:

- 1. Review unit data on the dashboard; determine which parameter(s) created the alarm condition.
- 2. Allow the system to recalibrate for a period of 10 minutes.
- 3. If the system does not return to normal operation, initiate a field inspection:

# **Returning the Unit for Repair**

In the event that the VaporTrac VT-00-2.4A does not function properly, we suggest that you do the following:

- 1) Record your observations regarding the VT-00-2.4A's malfunction.
- 2) Contact VaporTrac at 888-670-7325 to obtain a Return Material Authorization (RMA) number and shipping information. No returns can be accepted without an RMA (Note: if factory return is required, the customer assumes all shipping costs to and from factory).

If the unit must be sent to VaporTrac for servicing, please do the following:

- 1) Turn the power switch off, disconnect vacuum tubing from the blower system and unplug the unit.
- 2) Carefully pack the unit to avoid damage in transit. Use the original container (if available) or a sturdy shipping box
- 3) To avoid shipping delays, you must include the following information
  - a) Your name, address, and telephone number.
  - b) A note explaining the problem.
- 4) Ship your package to the address below:

#### VAPORTRAC SALES AND CUSTOMER SUPPORT 30343 Canwood Street, Suite 208B Agoura Hills, CA 91301 (888) 670-7325

#### EMAIL: INFO@VAPORTRAC.COM

## Warranty

One-year parts and labor

Specifications subject to change without notice.

Copyright 2017

VaporTrac<sup>®</sup> 30343 Canwood Street, Suite 208B Agoura Hills, CA 91301 (888) 670-7325



#### ATTACHMENT "C"

#### Audit Follow-Up Plan Transmittal Form & Post-Audit Completion Statement (BWSC-111 – submitted via eDEP)

#### eDEP Authorization





Direct Dial Numbers (617) 776-8549 David Borans: (617) 776-2715 Daniel Jaffe: 617-623-8880 Kerry Asetta: x-206 John Beck: x-205 Christopher Buchanan: x-203 Ligia Rivera: x-207 Steven Iorio: x-208 Kevin Taylor: x-210 James Sullivan x-204

50 Salem Street, Building A, Suite 108 Lynnfield, MA 01940 617-623-8880 • Fax: 781-224-9713 www.iesinc.com

April 12, 2016

Ms. Svetlana Aptekman LGA, LLC 14 Brent Drive Hudson, MA 01749

Re: eDEP Agent for Authorization 640 Crawford Street Fitchburg, MA RTN's 2-15389 & 2-15589

Dear Ms. Aptekman:

The signing of this letter by you, as the Authorized Agent of LGA, LLC, the "Potentially Responsible Party" (PRP) for the releases at the above mentioned property, authorizes Mr. Daniel G. Jaffe as a Licensed Site Professional (LSP) on behalf of IES, Inc. to submit the MADEP submittals via eDEP regarding the releases at the above mentioned site.

Respectfully,

Daniel G. Jaffe (LSP #2347) President

Accepted by:

LGA, LLC

By: .

4.12.16

Date:

Svetlana Aptekman

Connecticut: 72 Country View Drive South Windsor, CT 06074 • (617) 623-8880 x-10 Florida: 412 Cardiff Road Venice, FL 34293 • (941) 493-7167 Maine: 7 Camp Road West Newfield, ME 04095 • (207) 636-2034