



**ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 1 – NEW ENGLAND**  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

February 28, 2025

Cara Burzynski  
President  
AeroDynamics, Inc.  
142 Batchelder Rd.  
Seabrook, NH 03874

Re: U.S. EPA-Region 1 Inspection Report of AeroDynamics, Inc., January 14-15, 2025

Dear Ms. Burzynski:

In accordance with current policy, I am providing you with a copy of the final inspection report summarizing observations made during the January 14-15 inspection of your facility.

This inspection was conducted under the authority of RCRA.

Please contact me at 617-918-1309 or [maisano.ryan@epa.gov](mailto:maisano.ryan@epa.gov) if you have any questions.

Sincerely,

Ryan Maisano, Physical Scientist  
Waste and Chemical Compliance Section

cc: Todd Piskovitz, New Hampshire Department of Environmental Services (NHDES)

***Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.***

**ENVIRONMENTAL PROTECTION AGENCY**

**REGION 1 – NEW ENGLAND**

5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

**RCRA Compliance Inspection of:**

**AeroDynamics, Inc.**

**142 Batchelder Rd.**

**Seabrook, NH 03874**

January 14-15, 2025

Date of Inspection

Ryan Maisano, Physical Scientist

Waste and Chemical Compliance Section

February 28, 2025

Date Inspection Report Approved

\_\_\_\_\_  
Mary Jane O'Donnell, Manager

Waste and Chemical Compliance Section

February 28, 2025

Date Inspection Report Finalized

February 28, 2025

Date Inspection Report Transmitted to Facility

***Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.***

## RCRA HAZARDOUS WASTE INSPECTION REPORT

### I. GENERAL INFORMATION

- a. **Facility Name:** AeroDynamics, Inc. (“AeroDynamics” or the “Facility”)
- b. **Inspection Date:** January 14-15, 2025
- c. **Inspection Type:** RCRA Compliance Evaluation Inspection (CEI)
- d. **EPA Inspectors:** Ryan Maisano, Physical Scientist  
Cheryl Wilkinson, Life Scientist  
Adam Plourde, Physical Scientist
- e. **EPA ID Number:** NHD091494971
- f. **NAICS:** 332813 (electroplating, anodizing, polishing)
- g. **Street Address:** 142 Batchelder Rd., Seabrook, NH 03874
- h. **Mailing Address:** 142 Batchelder Rd, Seabrook, NH 03874
- i. **Facility Contacts:** Cara Burzynski  
President  
Email: cb@aerodynamicsmetalfinishing.com  
Phone: 603-814-4253  
  
Kenn Bevins  
Chief Executive Officer  
Email: kbevins@aerodynamicsmetalfinishing.com  
Phone: 603-814-4254
- j. **Generator Status (per RCRAInfo):** Large Quantity Generator (LQG)
- k. **Date first notified as a generator (per RCRAInfo):** 9/5/2006

- l. **Date of most recent notification in RCRAInfo:** 2/7/2024
- m. **Current Property Owner:** GBC Holdings
- n. **Current Operator:** AeroDynamics, Inc., 142 Batchelder Rd., Seabrook, NH 03874
- o. **Wastes generated (per most recent RCRAInfo notification):** D001, D002, D003, D005, D007, D008, D011, F003, F006, F019, U154, NH02

**Report Attachments:**

ATTACHMENT 1 – Digital photo log of photos taken by EPA inspectors throughout the inspection

## **II. FACILITY DESCRIPTION**

AeroDynamics, Inc. (“AeroDynamics” or the “Facility”) is a Large Quantity Generator (LQG) and functions as a metal finishing company. In business since 1989, and at their present location since 2008, they conduct anodizing, passivation, ChemFilm, and black oxide processes on metal parts primarily from the aerospace and defense industries. The Facility occupies a 32,000 square foot building and consists mainly of a front bay, back bay, annex, wastewater treatment area, laboratory, chemical storage, loading area, shipping and receiving area, dry room, and strip room. AeroDynamics employs about 35 people and has one work shift, 7:00-3:30 Monday-Friday. AeroDynamics first notified as a large quantity generator in 2010. The Facility is located in an area with light industry and is not located near any immediate water bodies.

## **III. INSPECTION IN-BRIEF**

EPA inspectors arrived at the Facility at 142 Batchelder Rd., Seabrook, NH at 0950 on January 14, 2025. The EPA inspection team (“Inspection Team” or “Team”) consisted of Ryan Maisano, Cheryl Wilkinson, and Adam Plourde. The Inspection Team entered through the main entrance and checked in with the receptionist. EPA inspectors presented their credentials to Kenn Bevins, Chief Executive Officer, and announced that they were conducting a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI). The following personnel were present for all or part of the in-brief:

EPA:	Ryan Maisano, Physical Scientist
	Cheryl Wilkinson, Life Scientist
	Adam Plourde, Physical Scientist

Facility: Kenn Bevins, Chief Executive Officer  
Cara Burzynski, President  
Emerson Bilodeau, Director of Quality and Engineering

EPA inspectors began the briefing with Mr. Bevins by giving out business cards, the Confidential Business Information (CBI) and Small Business handouts, and providing an overview of the inspection process. The Inspection Team listed records that would be requested, areas of interest, and asked about the Facility's photo taking policy. The Inspection Team then requested information and history on the business, processes, and generation of hazardous waste. A short time later, Ms. Burzynski arrived and remained for the rest of the in-brief and inspection.

Ms. Burzynski began by explaining that the Facility holds a National Pollutant Discharge Elimination System (NPDES) permit for wastewater treatment. AeroDynamics did not have any hazardous waste tanks on site. The facility has one hazardous waste accumulation area (HWAA) and six satellite accumulation areas (SAA). Aerodynamics does export hazardous waste to Canada through Red Technologies which subcontracts to Clean Harbors and Veolia. The facility has not had any spills within the last five years. The 32,000 square foot building, where AeroDynamics has resided since 2008, is owned by an organization called GBC Holdings, of which Ms. Burzynski is an owner. She explained that no hazardous waste is treated on site, but they do treat a non-hazardous dye by reduction that, when reduced and concentrated, does become hazardous for chromium and is managed as such.

Emerson Bilodeau, the Director of Quality and Engineering, arrived and joined the in-brief to explain the operations and processes conducted at the Facility. He stated the processes on-site are metal finishing, anodizing, passivation, ChemFilm, and black oxide. Ninety percent of AeroDynamics' business comes from the aerospace, defense, and medical industries. There is a laboratory on-site used for quality assurance and process analysis. Batteries and lamps are collected as universal waste (UW). The facility does not generate used oil. Mr. Bilodeau explained the process when a customer order arrives at the Facility the part(s) goes through a quality control damage inspection, gets racked (hung up), then masked (taped), and is then cleaned with a mild alkaline wash to remove oils, or an acidic solution for aluminum parts to remove oxides.

According to Mr. Bilodeau, there are three types of baths used in the ChemFilm process: yellow and clear hexavalent chromium, and trivalent chromium. The ChemFilm baths contain 97% less chromium than a chromium plating bath, and the clear hexavalent chromium has a lower chromium content than the yellow. Only one bath is used in the process. Sulfuric acid, rather than chromium, is used in anodizing. Passivation involves a mild alkaline wash followed by four baths of varying concentrations of citric and nitric acid. The baths used depends on what alloy the part is and the customer's order. Black oxide is used for steel and stainless-steel parts and involves a cleaning soak and two different baths. Stainless steel is activated with a mild hydrochloric acid, and the baths are mostly caustic, using sodium hydroxide.

Regarding the management of waste streams, Mr. Bilodeau explained that the need for bath changeouts is determined by the Facility's quality control lab, or by a visual or performance-based inspection. The most frequent bath change is done every six months. When this occurs, the spent bath solution is pumped into a container and, if a hazardous waste, is dated, labeled, and moved to the HWAA the same day. Red Technologies removes the Facility's wastes (while subcontracting with Veolia and Clean Harbors) approximately once per month. The rinse water baths are manually pumped to the wastewater treatment (WWT) system when spent. The WWT process results in a metal hydroxide sludge, which is managed as hazardous, and the treated liquid is discharged to the town's wastewater system. Scrubber waste from the black oxide process is sent to the WWT, but this is not done often. Laboratory sinks are hard plumbed to the WWT. The Facility does not engage in any neutralization of its hazardous waste before it is picked up for shipment.

A vapor degreaser is used by AeroDynamics as needed for cleaning oil from parts. The degreaser uses trichloroethylene and has a distiller. Sandblasting is sometimes used on parts for surface finishing before going through any process; the aluminum oxide media used for that is then returned to the vendor for reclaiming. Heat treatment in ovens is also sometimes used on parts for hardness before any process.

Mr. Bilodeau continued and described how some of the other spaces around the Facility are used. The Strip Room stores infrequently used tanks that may be used in the ChemFilm process. The Paint Booth is used to apply a thin, dry film lube to parts, and the machine used for this is cleaned after each use with acetone. The Workshop is where racks are built for hanging parts; no oil is used for the machines in this space. The Dry Room is used for drying parts.

#### **IV. FACILITY TOUR**

This section consists of observations by EPA Inspectors during the physical tour of the Facility. Please see Attachment 1 for a digital photo log of photos taken throughout the inspection. All containers observed were found closed unless otherwise noted.

The tour of the Facility took place on January 14. The following personnel were present for all or part of the tour:

EPA: Cheryl Wilkinson  
Ryan Maisano  
Adam Plourde

Facility: Cara Burzynski  
Kenn Bevins  
Emerson Bilodeau

### Hazardous Waste Accumulation Area

The Facility's only Hazardous Waste Accumulation Area (HWAA) is located in the Back Bay Room of the building. The Inspection Team noted a "Hazardous Waste Storage Area" sign and "No Smoking" sign. There was a sprinkler system present, fire extinguisher, eye wash station, spill kit, telephone, and emergency contact list. Sean Adams and Ms. Burzynski were listed as the primary and secondary emergency contacts, respectively. The floor of the HWAA was constructed of concrete, did not appear to be sealed, and was cracked in places. The Inspection Team noted two, cubic yard boxes and 18 total 55-gallon containers arranged in rows in the HWAA, all with adequate aisle space. All hazardous waste drums were placed on top of spill pallets, which serve as secondary containment. Three metal drums were in a row and listed for recycling, included sandblast media, and there was one separate plastic drum of non-hazardous material containing tan dye waste. Mr. Bilodeau explained that the tan dye had dropped out and the contents were mostly water. The hazardous waste containers are listed below (Photos number 1-10):

- Hazardous waste, F006, F019, 12/26/24, metal hydroxide sludge, hazardous/toxic waste
- Hazardous waste, F006, F019, 12/10/24, metal hydroxide sludge, hazardous/toxic waste
- Hazardous waste, D002, 10/28/24, nitric acid 10%, hazardous/toxic waste
- Hazardous waste, D002, 10/28/24, nitric acid 10%, hazardous/toxic waste
- Hazardous waste, D007, D008, 8/30/24, anodize debris, hazardous/toxic waste, full 10/29/24
- Hazardous waste, D007, blue dye (specialty PC 3015C), 12/9/24, hazardous/toxic waste
- Hazardous waste, D002, 10/28/24, nitric acid 10%, hazardous/toxic waste
- Hazardous waste, D002, 10/28/24, nitric acid 10%, hazardous/toxic waste
- Hazardous waste, D007, blue dye (specialty PC 3015C), 12/9/24, hazardous/toxic waste
- Hazardous waste, D002, Black Magic Infusion, 12/18/24, hazardous/toxic waste
- Hazardous waste, D002, D007, tan dye precipitate, 11/27/24, hazardous/toxic waste
- Hazardous waste, D002, Oakite 90, 1/6/25, hazardous/toxic waste
- Hazardous waste, D002, Black Magic Infusion, 12/18/24, hazardous/toxic waste
- Hazardous waste, D002, D007, 25% hydrochloric acid, 12/30/24, hazardous/toxic waste

- Hazardous waste, D007, green dye (specialty green), 1/7/25, hazardous/toxic waste
- Hazardous waste, D007, green dye (specialty green), 1/7/25, hazardous/toxic waste

One container of waste 25% hydrochloric acid (HCl) was on the same pallet as a container of waste Black Magic Infusion, and one container of waste Oakite 90 was on the same pallet as a container of tan dye precipitate.

### Front Bay

The Front Bay walkthrough began where parts arrive at Shipping and Receiving. The Facility has a reverse osmosis filter system to purify municipal water for their processing lines, mainly for the rinse baths. The Inspection Team observed the anodizing and ChemFilm processing lines where most of the baths are 250 gallons in capacity. There was a SAA behind the processing lines with one, 55-gallon container with the following label (Photos number 11-12):

- Hazardous waste, D002, D011, silver nitrate, start date: 1/13/23 (not full)

The container was closed and within secondary containment. An SAA and “No Smoking” sign were present, as well as a fire extinguisher and emergency response information. The facility labeled each drum in the SAA with a start accumulation date. Just past the SAA was an acid recycler that is managed by a company called MetChem. Mr. Bilodeau explained the recycler separates dissolved metals from the process baths which allows for reuse of the acid. The liquid waste stream from the machine is sent to the WWT. All other waste, like waste filters, is taken off site and handled by MetChem. There was a second SAA behind the process lines with one, 55-gallon container with the following label (Photo number 13):

- Hazardous waste, D007, D008, anodize debris, start date: 10/29/24

The container was closed and within secondary containment. A SAA and “No Smoking” sign were present, as well as a fire extinguisher and emergency response information. The anodize debris consisted of things such as filters, rags, and gloves. At the end of the anodizing process line were dye storage containers.

The last stop in the Front Bay was the Paint Booth. There was one 55-gallon waste container stored at the SAA next to the Paint Booth with the following label (Photos number 14-15):

- Hazardous waste, D001, D003, Acetone, start date: 4/19/24 (not full)

The container was closed and within secondary containment. A SAA and “No Smoking” sign were present. A parts washer, consisting of a centrifuge and a container for waste, was located here. Ms. Burzynski stated that after the parts are rinsed, they may be sent through this part washer. The waste liquid from this process is sent to the WWT.

### Loading Area

The Inspection Team was then led to the Loading Area. Here, there were three flammable cabinets with a total of two acetone containers, one trichloroethylene container, and various paints. These cabinets only stored usable product and not hazardous waste.

### Chemical Storage Area

Various chemical products were present in the Chemical Storage Area with acids one side of the room and bases on the other, all in secondary containment.

Just outside the Chemical Storage Area in the Front Bay was another SAA with one, 30-gallon container with the following label (Photo number 16):

- Hazardous waste, D008, masking debris (lead tape), start date: 2/13/24 (not full)

The container was closed, and a No Smoking sign was present.

### Lab/Quality Control

The Facility's laboratory had various instruments and machines to provide quality control for its operational processes, such as a humidity chamber and autotitrators. There was also a one-gallon universal waste (UW) container for batteries, dated 4/22/24 (Photo number 17). Ms. Burzynski explained this container was mainly used for alkaline batteries.

### Shipping & Receiving, Dry Room, Tool Room

No hazardous waste was observed in these rooms.

### Wastewater Treatment Area

The WWT was located within the Back Bay. There was one, cubic yard cardboard box of metal hydroxide sludge hazardous waste with a metal lid (Photo number 18). The container had a start date of 1/3/25 and is inspected separately from the HWAA weekly inspections. The cubic yard container was labeled as hazardous waste metal hydroxide sludge (F006, F019). The WWT consists of two, 2800-gallon treatment tanks, one, 3,000-gallon holding tank, and one, 1,050-gallon sludge tank, all within secondary containment. The treatment tanks adjust the pH of the influent and reduce the chrome content using flocculation. The solids settle out and are pumped to the 1,500-gallon sludge holding tank and then fed through the filter press. The remaining water is pumped to the 3,000 gallon holding tank where it is plumbed and gravity-fed to the municipal WWT in batch discharges.

### Back Bay

The Inspection Team was then led to the back of the Back Bay. There was one SAA in this location with the following 55-gallon black drum (Photo number 19):

- Hazardous waste, D040, F001, Trichloroethylene, start date: 8/30/23

The drum was on secondary containment, SAA and “No Smoking” signs were present, and emergency response contact information was posted. A quench oven (for drying parts), vapor degreaser (using trichloroethylene), and the black oxide process line were observed (Photo number 22).

On the way to see the Annex, Mr. Bevins told the Inspection Team that the incompatible drums in the HWAA had been rearranged. The two acids (tan dye precipitate and 25% HCl) and the two bases (Oakite 90 and Black Magic Infusion) were separated from each other and stored appropriately (Photo numbers 23-25).

### Annex

The last room observed during the walkthrough was the Annex. This space was being used mainly for storage of empty drums, spare parts, and equipment, as well as some shipping and receiving.

The Facility walkthrough and Day 1 ended with the Annex.

## **V. RECORDS REVIEW**

### Day 2 January 15, 2025

The inspection team arrived at the facility and were taken to the same conference room as used on Day 1 to conduct the Records Review and Out-Brief. Most documents were reviewed electronically on site.

The following personnel were present for the records review:

EPA: Cheryl Wilkinson  
Ryan Maisano  
Adam Plourde

Facility: Cara Burzynski  
Kenn Bevins  
Emerson Bilodeau

### Manifests/LDR Notifications

Hazardous waste manifests and LDR notifications were examined for the prior three years. Some waste was exported to Canada, and the Inspection Team discussed the requirements for this process with the Facility. Manifest signers included Owen Labrie, Chris Basti, Clayton Walter, and Robert Levesque. Ms. Burzynski explained the Facility submitted an exception report for a particular manifest (#019356378) and that the New Hampshire Department of Environmental Services had been contacted and follow up is still occurring. The manifest, number 019356378FLE, was shipped 11/11/2024.

### Inspection Logs

HWAA inspection logs were reviewed by the Inspection Team from 2024 to the present. Robert Levesque conducted the inspections, and no inspection forms were missing for that time period. Inspection log items included container condition, container closed or open, labels and hazardous waste codes, compatible containers, dates, and adequate (2ft) aisle space. The HWAA was also checked for a telephone located within 100ft, eyewash station, and safety equipment and a fire extinguisher located within 100ft. As part of the weekly inspections, the inspector takes a photo of the HWAA on a tablet and signs the document electronically. The hazardous waste sludge box associated with the WWT is inspected separately from the HWAA.

### Training

The Facility had training records for the following courses and personnel:

- Sean Adams, Hazardous Waste Coordinator Training, 3/9/23, and Emergency Coordinator, 5/29/24  
-Offered by NH DES
- Cara Burzynski, Hazardous Waste Coordinator Training, 12/7/22 and 1/10/24  
-Offered by NH DES  
-Ms. Burzynski stated she was enrolled for this course the following day, 1/16/25
- Clayton Walter, Hazardous Waste Coordinator Training, 5/31/23 – 6/1/23 and 6/20/24  
-Offered by NH DES
- Robert Levesque, Hazardous Waste Coordinator Training, 9/21/22, 9/14/23, 8/29/24  
-Offered by NH DES

- Chris Basti, Hazardous Waste Coordinator Training, 6/15/22
  - Offered by NHDES
  - No longer employed by the Facility
  
- Kelly Millerick, Hazardous Waste Coordinator Training, 9/14/22, 10/18/23, 7/18/24
  - Offered by NH DES
  
- Owen Labrie, Hazardous Waste Coordinator Training, 1/6/22, 2/16/23
  - Offered by NH DES
  - No longer employed by the Facility

Mr. Bilodeau does not have hazardous waste management duties and is not trained in RCRA. Mr. Bevins is a newer employee and is also not trained in RCRA; he does not have any hazardous waste management duties. The Facility does annual training on its Contingency Plan and safety protocols, which had taken place the week prior to this inspection.

The inspection team also reviewed the training plan.

#### Contingency Plan

The Contingency Plan was written by Verdantas—with input from the Facility—and was last revised in May 2024. The plan (with mail delivery receipts) was submitted in 2024 to the following organizations: US EPA Region 1, NH DES, Town of Seabrook, Seabrook Sewer Department, Republic Services, and Seabrook Hospital. It listed emergency contacts and their information, emergency equipment and their locations, actions to take in the event of a fire or explosion, and spill response procedures.

#### Waste Profiles

The Inspection Team reviewed the following waste profiles:

- Coyote tan dye precipitate (D002, D007)
  - pH 2.1-6.9
  - generator knowledge
  
- Spent Oakite 90 (D002)
  - pH >12.5
  - mainly sodium chloride
  - generator knowledge
  
- Black Magic Infusion (D002)

- pH >12.5
- mainly sodium hydroxide
- generator knowledge

## Permits

Lastly, the Inspection Team reviewed the Facility's Limited Permit for the WWT and elementary neutralization unit. Mr. Maisano also reviewed a National Emissions Standard Hazardous Air Pollutant emissions report, dated July 30, 2024, for exceedance from January to June of 2024.

## **VI. INSPECTION OUT-BRIEF**

An out-brief conference was conducted on January 15, 2025, prior to leaving the Facility. The following personnel were present for the closing conference:

EPA:	Ryan Maisano Cheryl Wilkinson Adam Plourde
Facility:	Cara Burzynski Kenn Bevins Emerson Bilodeau

EPA Inspectors noted that compliance determinations are not made at the time of the inspection. EPA then relayed the following area of concern that arose from observations throughout the inspection:

1. There were two pairs of drums stored incompatibly in the HWAA. One drum of 25% hydrochloric acid (HCl) was on the same spill pallet as a drum of Black Magic Infusion (alkaline), and one drum of Oakite 90 (alkaline) was on the same pallet as a drum of tan dye precipitate (acidic). This was remedied by the Facility by the end of the first inspection day (Photos number 23-25).

After discussing the above area of concern, the inspection team reviewed the broad spectrum of all possible post-inspection follow-ups, including both informal and formal notices.

Following this discussion, the inspection team left the premises concluding the on-site portion of the inspection.

**Attachment 1**

**Photo Log**