

BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:

HDI Landing Gear USA, Inc.
15900 Foltz Ind Pkwy
Strongsville, Ohio 44149

Director's Final
Findings and Orders

Respondent

PREAMBLE

It is agreed by the parties hereto as follows:

I. JURISDICTION

These Director's Final Findings and Orders (Orders) are issued to HDI Landing Gear USA, Inc. (Respondent) pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency (Ohio EPA) under Ohio Revised Code (ORC) §§ 3734.13 and 3745.01.

II. PARTIES BOUND

These Orders shall apply to and be binding upon Respondent and successors in interest liable under Ohio law. No change in ownership of Respondent or of the Facility shall in any way alter Respondent's obligations under these Orders.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapter 3734. and the rules promulgated thereunder.

IV. FINDINGS

All of the findings necessary for the issuance of these Orders pursuant to ORC §§ 3734.13 and 3745.01 have been made and are outlined below. Nothing in the findings shall be considered to be an admission by Respondent of any matter of law or fact. The Director of Ohio EPA has determined the following findings:

1. Respondent is a "person" as defined in ORC § 3734.01(G) and Ohio Administrative Code (OAC) rule 3745-50-10(P).
2. Respondent operates an aircraft landing gear electroplating, painting and assembling business located at 15900 Foltz Industrial Pkwy, Strongsville, OH 44149 (Facility). The Facility has been assigned U.S. EPA identification number OHR000177519.
3. At the Facility, Respondent generates "hazardous waste" as that term is defined by ORC §3734.01 and OAC rules 3745-50-10(H) and 3745-51-03. Respondent generates non-acute hazardous waste in amounts greater than 1000 kilograms per calendar month and therefore is operating as a "Large Quantity Generator" (LQG) of hazardous waste, as defined in OAC rule 3745-50-10(L), subject to the requirements in OAC Chapter 3745-52.
4. At the Facility, Respondent generates characteristic hazardous wastes, including but not limited to, hazardous waste sulfuric and hydrofluoric wastewater which exhibits the characteristics of corrosivity (D002) as defined in OAC rule 3745-51-22, and toxicity for cadmium (D006), chromium (D007), and lead (D008) as defined in OAC rule 3745-51-24, hazardous waste aerosol can contents which exhibit the characteristic of ignitability (D001) as defined in OAC rule 3745-51-21, hazardous waste honing oil rags which exhibit the characteristic of toxicity for cadmium (D006), chromium (D007), and selenium (D010) as defined in OAC rule 3745-51-24, hazardous waste flammable debris which exhibits the characteristic of ignitability (D001), hazardous waste wastewater and filters from cleanout of the titanium cyanide plating tank which exhibit the characteristics of corrosivity (D002), reactivity (D003) as defined in OAC rule 3745-51-23, toxicity for cadmium (D006), chromium (D007), and lead (D008), and are listed hazardous waste for toxicity (F006) and toxicity and reactivity (F007) as defined in OAC rule 3745-51-31, hazardous waste oily debris which exhibits the characteristic of toxicity for cadmium (D006), chromium (D007), and lead (D008), and hazardous waste cyanide solution which exhibits the characteristics of reactivity (D003), toxicity for cadmium (D006) and chromium (D007), and is a listed hazardous waste (F008) as defined in OAC rule 3745-51-31.
5. On March 5, 2025, Ohio EPA performed a Compliance Evaluation Inspection (CEI) at the Facility. As a result of this CEI, Ohio EPA determined Respondent, *inter alia*:
 - a. Established and operated the Facility as a hazardous waste storage facility without a hazardous waste installation and operation permit, in violation of ORC § 3734.02(E) and (F) and OAC rules 3745-50-41(A) and 3745-50-45(A). Specifically, Respondent stored two, 275-gallon containers of

hazardous waste sulfuric and hydrofluoric wastewater (D002, D006, D007, D008) for greater than 90 days in the central accumulation area. The containers had been accumulated for 110 days.

- b. Failed to evaluate seven 275-gallon containers of cyanide wastewater which had been partially treated and removed from the wastewater treatment system, in violation of OAC rule 3745-52-11.
- c. Failed to close one 55-gallon satellite accumulation container of hazardous waste punctured aerosol can contents (D001) and one 55-gallon satellite accumulation container of hazardous waste honing oil rags (D006, D007, D010), in violation of OAC rule 3745-52-15(A)(4). Respondent closed the satellite accumulation containers before the completion of the CEI.
- d. Failed to label seven containers of hazardous waste with an indication of the hazards, in violation of OAC rule 3745-52-17(A)(5)(a)(ii). Specifically, Respondent did not indicate the hazards on:
 - i. three 275-gallon containers of hazardous waste sulfuric and hydrofluoric acid wastewater (D002, D006, D007, D008); and
 - ii. four 55-gallon containers of titanium cyanide plating tank wastewater and filters (D002, D003, D006, D007, D008, F006, F007).
- e. Failed to label, including in a manner clearly visible for inspection, 19 containers of hazardous waste with the date the accumulation of the hazardous waste began, in violation of OAC rule 3745-52-17(A)(5)(a)(iii). Specifically, Respondent did not properly label:
 - i. three 55-gallon containers and two supersack containers of hazardous waste flammable debris (D001) did not have a visible accumulation start date during the CEI;
 - ii. three supersack containers of hazardous waste oily debris (D006, D007, D008) were not dated;
 - iii. four 55-gallon containers of hazardous waste cyanide solution (D003, D006, D007, F008) were not dated;
 - iv. three 275-gallon containers of hazardous waste sulfuric and hydrofluoric wastewater (D002, D006, D007, D008) were not dated; and

- v. four 55-gallon containers of titanium cyanide plating tank wastewater and filters (D002, D003, D006, D007, D008, F006, F007) were not dated.
 - f. Failed to label seven containers of hazardous waste with the words "hazardous waste," in violation of OAC rule 3745-52-17(A)(5)(a)(i). Specifically, Respondent did not properly label:
 - i. three 275-gallon containers of hazardous waste sulfuric and hydrofluoric acid wastewater (D002, D006, D007, D008); and
 - ii. four 55-gallon containers of titanium cyanide plating tank wastewater and filters (D002, D003, D006, D007, D008, F006, F007).
 - g. Failed to file exception reports for five hazardous waste shipments that exceeded 45 days over the past three years, in violation of OAC rule 3745-52-42(A)(2).
 - h. Failed to maintain sufficient aisle space for hazardous waste containers in the flammable hazardous waste central accumulation area, in violation of OAC rule 3745-52-255.
- 6. On March 11, 2025, Respondent provided images to Ohio EPA demonstrating that the date of accumulation on the containers referenced in Finding No. 5.e.i. of these Orders was visible.
- 7. On March 20, 2025, Respondent provided the hazardous waste manifest to Ohio EPA demonstrating that Respondent transported the three containers of hazardous waste sulfuric and hydrofluoric wastewaters (D002, D006, D007, D008) referenced in Findings Nos. 5.a., 5.d.i., 5.e.iv., and 5.f.i. of these Orders off-site to a permitted hazardous waste facility for disposal on March 17, 2025.
- 8. On March 27, 2025, Respondent notified Ohio EPA that the seven containers of cyanide wastewater referenced in Finding No. 5.b. of these Orders had been returned to the wastewater treatment system.
- 9. On March 28, 2025, Respondent provided Ohio EPA with documentation that an appropriate tracking system had been developed and instituted to identify the need to submit an exception report for hazardous waste that had been shipped offsite.
- 10. On March 31, 2025, Respondent submitted to Ohio EPA documentation showing that the containers of titanium cyanide plating tank wastewater (D002, D003, D006, D007, D008, F006, F007) referenced in Findings Nos. 5.d.ii., 5.e.v., and 5.f.ii. of

these Orders had been treated in the wastewater treatment system, and the filters (D002, D003, D006, D007, D008, F006, F007) referenced in Findings Nos. 5.d.ii., 5.e.v., and 5.f.ii. of these Orders had been labeled and dated appropriately and placed in the central accumulation area. This documentation also indicated the three supersack containers of hazardous waste oily debris (D006, D007, D008) and four 55-gallon containers of hazardous waste cyanide solution (D003, D006, D007, F008) referenced in Findings Nos. 5.e.ii. and 5.e.iii. of these Orders had been dated appropriately.

11. By letter dated April 3, 2025, Ohio EPA notified Respondent of the violations referenced in Finding No. 5. of these Orders and that based upon the inspection and information submitted by Respondent referenced in Findings Nos. 6., 7., 8., 9., and 10. of these Orders the violations referenced in Findings Nos. 5.b., 5.c., 5.d., 5.e., 5.f., 5.g., and 5.h. of these Orders had been resolved.
12. By letter dated December 19, 2025, Ohio EPA received a response letter to the Invitation to negotiate explaining Respondent's perspective of the situation and Respondent's background.
13. Because there was no evidence of releases of hazardous waste observed where the hazardous waste was unlawfully stored at the Facility, as referenced in Finding No. 5.a. of these Orders, and Respondent will continue to accumulate hazardous waste in this area, the Director has determined that closure is not required of Respondent at this time and no further action is required of Respondent to resolve the violations of ORC § 3734.02(E) and (F) and OAC rules 3745-50-41(A) and 3745-50-45(A) referenced in Finding No. 5.a. of these Orders. However, pursuant to OAC rule 3745-52-17(A)(8), as an LQG Respondent will be required to meet clean-up standards where hazardous waste has been accumulated to satisfy closure obligations, such as when use of the accumulation area ceases.

V. ORDERS

Respondent shall achieve compliance with Chapter 3734. of the ORC and the regulations promulgated thereunder according to the following compliance schedule:

1. Within 30 days after the effective date of these Orders, Respondent shall pay Ohio EPA the amount of \$7,000.00 in settlement of Ohio EPA's claims for civil penalties, which may be assessed pursuant to ORC Chapter 3734. and which will be deposited into the environmental protection remediation fund established pursuant to ORC § 3734.281. The official payment shall be submitted to Ohio EPA according to the instructions on the invoice. Notification of penalty payment shall

be sent to the Hazardous Waste Program Compliance Assurance Manager, Ohio EPA, Division of Environmental Response and Revitalization, P.O. Box 1049, Columbus, Ohio 43216-1049 or via electronic mail at Mitchell.Mathews@epa.ohio.gov.

VI. TERMINATION

Respondent's obligations under these Orders shall terminate upon Ohio EPA's receipt of the official payment required by Section V. of these Orders.

VII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to, the operation of Respondent's Facility.

VIII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to Respondent.

IX. MODIFICATIONS

These Orders may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

X. NOTICE

All documents (except penalty payment checks) required to be submitted by Respondent pursuant to these Orders shall be addressed to Mitchell.Mathews@epa.ohio.gov.

XI. RESERVATION OF RIGHTS

Ohio EPA reserves its rights to exercise its lawful authority to require Respondent to perform closure and corrective action at the Facility at some time in the future, pursuant to ORC Chapter 3734. or any other applicable law. Respondent reserves its rights to

raise any administrative, legal, or equitable claim or defense with respect to any final action of the Director regarding closure or corrective action. Ohio EPA and Respondent each reserve all rights, privileges and causes of action, except as specifically waived in Section XII. of these Orders.

XII. WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, and in lieu of further enforcement action by Ohio EPA for only the violations specifically cited in these Orders, Respondent consents to the issuance of these Orders and agrees to comply with these Orders. Except for the right to seek closure and corrective action at the Facility, which rights Ohio EPA does not waive, compliance with these Orders shall be a full accord and satisfaction for Respondent's liability for the violations specifically cited herein.

Respondent hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders, and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated or modified.

XIII. EFFECTIVE DATE

The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

XIV. SIGNATORY AUTHORITY

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

IT IS SO ORDERED AND AGREED:

Ohio Environmental Protection Agency



John Logue
Director

1-9-2026

IT IS SO AGREED:

HDI Landing Gear USA, Inc.

AW Williams
Signature

1/6/2026
Date

Andrew Williams
Printed or Typed Name

General Manager
Title