

Dear.....

The HyCast Iron Castings Foundry, located at 905 W. Depot Avenue in Fairfield, Iowa, was originally constructed in 1912 and has operated under multiple owners over time. Most recently, the foundry operated as Faircast, Inc. and ceased operations in April 2024. The facility was acquired by HyCast LLC in August 2024 and is now in the process of resuming foundry operations.

To operate as a major source under the federal Clean Air Act Title V program, HyCast must obtain a valid Title V Air Operating Permit from the Iowa Department of Natural Resources (DNR). The draft permit issued by Iowa DNR raises serious concerns.

The draft permit authorizes substantial annual emissions of air pollutants. Specifically, the draft permit authorizes **441.24 tons per year of total particulate matter**, along with approximately **241 tons per year of additional non-particulate air pollutants**, including volatile organic compounds (VOCs), carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), lead, and hazardous air pollutants. **These figures are stated without double-counting particulate matter fractions.**

#### **Annual Emission Limits Listed in the Draft Permit (tons/year)**

##### **Particulate Matter**

- **PM<sub>2.5</sub> (≤ 2.5 μm):** 179.73
- **PM<sub>10</sub> (≤ 10 μm):** 215.98 (*includes PM<sub>2.5</sub>*)
- **Total PM:** 441.24 (*includes PM<sub>10</sub>; remaining fraction represents PM >10*)
  - **Calculated PM >10:** 225.26 (*Total PM – PM<sub>10</sub>*)

##### **Other Criteria Pollutants**

- **Sulfur Dioxide (SO<sub>2</sub>):** 3.04
- **Nitrogen Oxides (NO<sub>x</sub>):** 7.33
- **Volatile Organic Compounds (VOCs):** 144.49
- **Carbon Monoxide (CO):** 62.30
- **Lead:** 0.065

##### **Hazardous Air Pollutants**

- **Total HAPs:** 24.83

The hazardous air pollutants identified in the permit record include compounds such as acetaldehyde, acrolein, arsenic compounds, benzene, 1,3-butadiene, cadmium compounds, chromium compounds, cumene, cyanide compounds, formaldehyde, hydrochloric acid, manganese compounds, mercury compounds, naphthalene, nickel compounds, phenol, toluene, and xylenes.

The draft permit authorizes emissions of fine particulate matter (PM<sub>2.5</sub>) and other pollutants associated with serious health risks. The **International Agency for Research on Cancer (IARC)**, a component of the **World Health Organization**, has classified **outdoor air pollution and particulate matter as carcinogenic to humans (Group 1)**. PM<sub>2.5</sub> exposure is also associated with increased risks of cardiovascular disease, respiratory illness, neurological impacts, and premature death. Several authorized pollutants are additionally linked to fetal developmental harm and long-term chronic health effects.

The foundry is located immediately adjacent to residential neighborhoods and within approximately 0.5 miles of Maharishi School and approximately 0.6 miles of Maharishi International University (MIU). The Fairfield Town Square is approximately 0.7 miles from the facility, and many Fairfield neighborhoods lie within roughly 1.0 to 1.3 miles of the site. Depending on wind conditions, emissions may be transported into these nearby residential and sensitive-use areas.

After review of the draft permit, fact sheet, and supporting materials, a central problem is clear: **the permit does not demonstrate that compliance can be reliably verified under real-world operating conditions**. While emission limits are specified, the permit relies primarily on infrequent stack testing, operating parameters, and emission factors rather than continuous or representative measurement.

Key concerns include:

- The absence of required **off-site or ambient air monitoring**, meaning community exposure is inferred rather than measured.
- No direct verification of **PM<sub>2.5</sub> concentrations** in nearby neighborhoods or sensitive locations.
- Hazardous air pollutants are largely **estimated**, not measured through ongoing monitoring.
- **Fugitive and intermittent emissions**, including startup, shutdown, and malfunction events, remain largely unquantified.
- The permit does not assess whether **aging pollution control equipment** continues to perform effectively.
- The permit does not evaluate **localized exposure risks** for children, older adults, or individuals with heart or lung disease.

Once issued, a Title V permit may provide a **permit shield** for requirements addressed in the permit. If monitoring and verification are inadequate at issuance, future correction becomes far more difficult. For this reason, enforceable, real-world monitoring must be required at the outset.

This is not an allegation of violations. It is a request for accountability. A Title V permit must provide a demonstrable and enforceable basis for verifying compliance over time. If compliance cannot be reliably verified, Iowa DNR should decline approval of the draft permit.

**A public meeting at the Fairfield Public Library will be held on January 17, 2026, from 2:00-3:30 pm regarding the DNR Draft Operating Permit for Hycast Foundry.**

**A community petition regarding the HyCast draft permit is also available for signing at Everybody's.**

**The public comment period for the Draft HyCast Title V Air Operating Permit runs through February 2, 2026, as extended by Iowa DNR.** Please email relevant comments to [zane.peters@dnr.iowa.gov](mailto:zane.peters@dnr.iowa.gov) Submitting comments is important to preserve your rights. Under the Clean Air Act, a petition to EPA generally must be based on objections that were raised with reasonable specificity during the public comment period.. Failure to comment may limit the ability to seek EPA review later.

All permit materials are available at: <https://www.iowadnr.gov/environmental-protection/air-quality/operating-permits>

**A virtual public hearing will be held on January 29, 2026, from 7:00 pm to 9:00 pm. Registration is available at:**

**[https://us02web.zoom.us/meeting/register/ymxuYH\\_rOPO6d7y7EM0gwQ](https://us02web.zoom.us/meeting/register/ymxuYH_rOPO6d7y7EM0gwQ)**

Thank you for being informed and engaged.

Sincerely,

**Fairfield Clean Air**