

PETITION REGARDING THE HYCAST DRAFT OPERATING PERMIT

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. The facility was acquired by **Revstone Industries** in 2010 and later transitioned through additional ownership and operational changes. Most recently, the foundry operated as **Faircast Inc.**, which ceased operations in April 2024. The facility was thereafter acquired by **HyCast LLC** in August 2024 and is now in the process of resuming foundry operations.

As part of this restart, the **Iowa Department of Natural Resources** has issued a Draft Title V Air Operating Permit for public review and opened a formal public comment period through **Feb. 2**.

Because the facility is resuming operations following extended periods of inactivity and because it predates modern air quality standards, emissions controls, and monitoring expectations, members of the public have raised concerns regarding emissions characterization, enforceable limits, monitoring adequacy, and potential localized impacts to nearby residents and sensitive receptors.

REQUEST: DO NOT APPROVE THE DRAFT OPERATING PERMIT AS WRITTEN

We, the undersigned, respectfully petition the Iowa Department of Natural Resources not to approve the HyCast Draft Toxic Air Operating Permit as written, because the current administrative record does not demonstrate that compliance can be reliably verified, including for hazardous air pollutants (HAPs) and fine particulate matter (PM_{2.5}), to the extent fine particulate matter results from permitted particulate emissions, associated with foundry operations.

BASIS FOR THIS PETITION

1. Verification Is Inadequate

Compliance under the draft permit relies on infrequent, short-duration stack testing and operating parameters. These methods provide snapshots in time and cannot verify ongoing performance, operational variability, or intermittent conditions.

2. PM_{2.5} Is Not Directly Verified Off-Site

PM_{2.5} is a regulated air pollutant with well-documented health significance. The draft permit does not require measurement of off-site PM_{2.5} concentrations. Instead, compliance determinations rely on stack-level data, from which off-site dispersion is inferred, rather than directly confirmed.

3. Hazardous Air Pollutants Are Estimated, Not Reliably Verified

Foundry operations are known to emit hazardous air pollutants (HAPs), including representative compounds such as benzene and toluene, as well as toxic metals. In the draft permit, HAP emissions are addressed primarily through emission factors, assumptions, and limited testing, rather than ongoing verification. The record does not demonstrate that variability, intermittent releases, or cumulative emissions of these toxic pollutants can be reliably confirmed over time.

4. Fugitive and Intermittent Emissions Remain Unquantified

Emissions not routed through stacks are acknowledged but not directly measured. Short-term releases during startup, shutdown, maintenance, or malfunctions are difficult to detect or verify under the proposed framework.

5. Aging Control Equipment Raises Reliability Concerns

The draft permit does not require evaluation of whether long-used pollution control equipment continues to perform effectively over time, raising concerns about the reliability and consistency of emissions control.

6. Physiological Vulnerability and Relative Exposure Are Not Evaluated

PM2.5 and hazardous air pollutants are known to pose greater health risks to physiologically susceptible individuals, including children, older adults, and persons with respiratory or cardiovascular conditions. The draft permit does not evaluate whether relative pollutant levels or exposure potential may differ closer to the facility compared to other areas. Because off-site air conditions are not measured, the record does not demonstrate that potentially higher localized exposures, particularly affecting physiologically vulnerable individuals, can be identified or ruled out.

7. Sensitive nearby locations are not evaluated.

The permit does not evaluate air conditions in nearby sensitive-use areas, such as a school and university located approximately .5 miles and .6 miles, respectively, from the facility. In comparison, the Fairfield Town Square is .7 miles away from the facility. Without off-site measurement, the record does not demonstrate that conditions at these nearby locations can be reliably confirmed.

8. Public Accountability and the Title V Permit Shield

Because a Title V operating permit provides a compliance shield, verification gaps at issuance limit the public's ability to identify, confirm, and address emissions problems after approval. A permit that cannot be verified in practice cannot be meaningfully enforced.

PETITION REQUEST

For these reasons, we respectfully request that the Iowa Department of Natural Resources:

Decline to approve the HyCast Draft Operating Permit as written unless and until the record demonstrates, with verifiable evidence, that compliance — including for hazardous air pollutants such as benzene and toluene, PM2.5 (to the extent it results from permitted particulate emissions), fugitive emissions, and potential localized exposure affecting physiologically vulnerable individuals — can be reliably confirmed over time, while preserving the agency's ability to deny the permit if these requirements cannot be met.

SIGNATURES (attached)

Name (Print) / Signature / City / Zip / Date / Email address