

Title V/Clean Air Act: Sierra Club Petition to Object Filed Addressing Fairfield, Iowa Foundry



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10/09/2026

The Iowa Chapter of the Sierra Club filed a Petition to Object ("Petition") to the issuance of a Title V Operating Permit before the United States Environmental Protection Agency ("EPA") addressing HyCast Foundry LLC ("HCF").

Sierra Club provides that HCF operates a grey and ductile foundry in Fairfield, Iowa.

The Petition objects to the Iowa Department of Natural Resources' ("IDNR") renewal of the Title V Air Permit.

Title V of the Clean Air Act requires certain stationary sources of air pollutants to obtain operating permits. The Clean Air Act provides that States administer Title V through adopted implementation plans. The intent of a Title V permit is to organize in a single document all the requirements that apply to the permit holder.

42 U.S.C. § 7661 requires that states submit each proposed Title V Permit to EPA for review. Section 505(b)(1) of the Clean Air Act requires that EPA object to the issuance of a proposed Title V Permit in writing within 45 days of the receipt of the proposed Permit (and all necessary supporting information) if the agency determines it is not in compliance with the applicable requirements of the Clean Air Act.

If EPA does not object to a Permit, Section 505(b)(2) provides that any person may petition the EPA Administrator within 60 days of the expiration of the 45-day review period to object to the Permit.

The HCF facility is described as manufacturing a variety of products, including:

- Castings for agricultural, construction, and mining equipment.
- Industrial machinery.
- Heavy trucks.
- Railroads.
- Hydraulic components.

The facility is stated to use induction furnaces to melt scrap iron for production of ductile castings. Molten iron is then poured from the furnaces into ladles for magnesium inoculation (the production of ductile iron) and transported to the mold, pour, and cool lines. The castings continue through the production line to shakeout and various cleaning operations.

The Petition argues that the Title V Permit renewal does not contain the required monitoring provisions in 40 C.F.R. § 70.6(3). It further states in part:

... Even after the draft permit was issued despite objections made by Sierra Club members and others, HyCast failed a stack test on April 7, 2026. So the insufficient monitoring did not detect what turned out to be a violation of the particulate limits in the permit.

The Petition further argues that although HCF has the potential to emit hazardous air pollutants (“HAPs”) over 25 tons per year, which is the threshold for stricter regulation, it claims to be a synthetic minor. This claim is stated to be premised on permit conditions that allegedly keep the actual emissions below 25 tpy. HCF’s application for a Title V Permit renewal is alleged to indicate that the actual potential to emit HAPs from the HyCast foundry is 40.53 tpy.

The Petition alleges that the lack of adequate monitoring, analysis procedures, and test methods, means that there are no restrictions that are “enforceable as a practical matter” for the facility to be treated as a synthetic minor HAP source. Therefore, Sierra Club argues that the facility is not a minor source.

Finally, the Petition alleges that the Compliance Assurance Monitoring plan is insufficient to demonstrate continuous compliance as a minor HAP source based on the previously referenced failed stack test. The facility is alleged to require more frequent stack test requirement and more frequent fugitive emissions testing involving EPA Method 9 of Opacity observations.

A copy of the Petition can be found [here](#).