



REGION 5
CHICAGO, IL 60604

May 9, 2026

Ms. Ashleigh Tobe
Honda Development & Manufacturing of America LLC. – Anna Engine Plant
12500 Meranda Road
Anna, Ohio 45302

Via email: ashleigh_tobe@na.honda.com

RE: Request for an applicability determination of 40 CFR Part 63, subpart ZZZZZ
Honda Development and Manufacturing of America– Anna Engine Plant, Anna, OH

Dear Ms. Tobe:

The U.S. Environmental Protection Agency (EPA) has received and reviewed a letter from Honda Development & Manufacturing of America LLC.– Anna Engine Plant (AEP), dated August 12, 2025, requesting a determination regarding the applicability of 40 CFR Part 63, subpart ZZZZZ (“subpart ZZZZZ”) to its facility in Anna, Ohio. In summary, the EPA has determined that AEP remains subject to the requirements of subpart ZZZZZ, except for those specifically pertaining to mold or core making lines because the facility remains an iron and steel foundry that is an area source of hazardous air pollutant emissions but no longer owns or operates a mold or core making line.

Background

AEP submitted a notification letter to the EPA on May 1, 2008, informing the EPA that its facility was subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for iron and steel foundry area sources at 40 CFR Part 63, subpart ZZZZZ. The letter described the facility’s operations as a gray and ductile iron foundry consisting of scrap storage, charge handling, a cupola melt furnace, electric induction melting furnaces, pouring, cooling, shakeout, shotblasting, grinding/finishing, sand handling/storage, mold or core making, and additional support functions. Prior to 2008, AEP operated two Dansk Industri Syndikat A/S (DISA) mold casting lines, lines 1 and 2, which used foundry sand molds to cast brake discs and drums. DISA mold casting line 1 was shut down in 2008, followed by the shutdown of line 2 in 2012.

AEP’s current process involves pouring molten iron and steel into copper and steel permanent dies, rather than sand molds as it did prior to 2012, to form the final shapes of its products. In the August 12, 2025 request, AEP provided process flow diagrams of its existing and planned lines illustrating its casting methods which include metal handing and charging, melting furnaces, baghouses, transfer ladles, pouring and casting machinery, as well as cutting and finishing operations. According to the

August 12, 2025, letter, AEP also submitted an application to the Ohio EPA, Northwest District Office to install two induction melting furnaces to replace a cupola furnace which AEP will permanently remove after quality verifications.

Honda AEP's Request

Based on the shutdown of the DISA casting lines and other casting process changes described above, AEP argues that the definitions of an iron and steel foundry and mold or core making line are no longer applicable and therefore subpart ZZZZZ should no longer apply. In its letter, AEP focuses on the term *molds* in the inclusion of the phrase "...pours the resulting molten metal into molds" from the definition of iron and steel foundry at 40 CFR section 63.10906 and equates the term *molds* here to the definition of mold or core making line. AEP's letter implies that the inclusion of a mold or core making line is inherent to the definition of an iron and steel foundry and highlights the exclusion of sand molds from its own process. AEP notes that the planned replacement of furnaces at its facility will not have any further implications regarding the applicability of subpart ZZZZZ.

Analysis

The NESHAP for iron and steel foundries area sources describes emission limitations for a variety of emission sources at foundry operations, including, but not limited to, melting furnaces, particulate matter (PM) and other control devices, scrap management, and mold or core making lines. According to 40 CFR section 63.10880, an affected source is one that owns or operates an iron and steel foundry that is an area source of hazardous air pollutants (HAP). The absence or removal of one of these listed emission sources, however, does not automatically affect the facility's classification as an area source of HAP nor does that removal relieve a facility from the requirements of the entire NESHAP.

An iron and steel foundry, as defined at 40 CFR section 63.10906, means a facility or portion of a facility that melts scrap, ingot, and/or other forms of iron and/or steel and pours the resulting molten metal into molds to produce final or near final shape products for introduction into commerce. Based on the processes described in AEP's August 12, 2025, letter, the facility continues to melt iron and pours the resulting molten material into a permanent die to form final shapes, thus fitting the definition of iron and steel foundry. Additionally, the definition of iron and steel foundry does not specify that a facility must make molds on-site, nor that molds in use must be made of an aggregate of sand and binder chemicals. Furthermore, the definition of mold or core making line refers to the collection of equipment used in the process of making a mold or core, not an individual piece of equipment, as is implied in AEP's letter.

Secondly, the removal of the DISA casting lines and AEP's ongoing operations do not change the facility's classification as an area source of HAP. The shutdown of the DISA casting lines will have reduced organic HAP emissions from AEP's operations, but as specified in the proposed rule for 40 CFR Part 63, subpart ZZZZZ (72 FR 52984), the primary processing units of interest at iron and steel foundries are metal melting furnaces because of their potential to generate HAP emissions. AEP currently uses a cupola to melt iron and steel and intends to replace the cupola with two electric induction melting furnaces, although the casting method used to produce this line's product will remain the same. Regardless of these plans, metal HAP in PM emissions from electric induction furnaces are similar to those emitted by cupola furnaces. Therefore, EPA expects that AEP will remain an area source of HAP.

In summary, AEP remains an iron and steel foundry that is an area source of HAP emissions and must, therefore, continue to comply with the applicable requirements in 40 CFR Part 63, subpart ZZZZZ. However, because the DISA casting mold or core making lines, which utilized an aggregate of sand and binder chemicals, have been shut down, the requirements pertaining explicitly to mold or core making lines in this subpart no longer apply.

This applicability determination relies upon the accuracy of the information submitted in the August 12, 2025, letter. We have coordinated this determination with the Office of Clean Air Programs. If you have any further questions, please contact Dan Wolski of my staff at (312) 886-0557.

Sincerely,

DOUGLAS
ABURANO

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DOUGLAS ABURANO
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Douglas Aburano
Manager
Air Programs Branch

cc: (Russell Flagg, Assistant Chief, Division of Air Pollution Control, Ohio Environmental Protection Agency)