

March 11, 2024

U.S. Environmental Protection Agency  
EPA Docket Center,  
Docket ID No. EPAHQ-OAR-2017-0015  
Mail Code 28221 T  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460.

(Submitted electronically at <http://www.regulations.gov>)

**RE: Comments of Magnesita Refractories Company (RHI Magnesita) on:  
Supplemental Notice of Proposed Rulemaking: National Emission Standards  
for Hazardous Air Pollutants: Lime Manufacturing Plants Amendments,  
Docket ID No. EPA-HQ-OAR-2017-0015, RIN 2060-AV59**

RHI Magnesita appreciates the opportunity to provide comments on EPA's Supplemental Notice of Proposed Rulemaking: National Emission Standards for Hazardous Air Pollutants: Lime Manufacturing Plants Amendments ("Proposed Rule"), 89 Fed. Reg. 9088 (Feb. 9, 2024). Magnesita Refractories Company is part of the RHI Magnesita group of companies. The York, Pennsylvania facility operates a quarry, two straight rotary kilns, and a lime manufacturing plant with nearly 400 employees that produces high-quality refractory products. Our quarry provides dolomitic limestone which is crushed and fired through the rotary kilns to produce dead-burned doloma sinter.

Lime is an integral ingredient in many other manufacturing processes and industries. It is an important part of the steel manufacturing process, road building, and the creation of other building products like mortar and plaster. Lime is also a critical component in environmental compliance of many industries, as it is used to purify water and scrub pollutants from air stack emissions. The high-quality refractories products made at Magnesita Refractories are used in all high-temperature industrial processes. Without them, the steel, cement, lime, non-ferrous metals, glass, energy, environment and chemical industries couldn't exist.

RHI Magnesita is a member of the National Lime Association (NLA), which has developed comprehensive comments addressing all aspects of EPA's proposed regulation. We strongly endorse NLA's comments on the proposed rule, and expressly incorporate NLA's comments by reference as our own.

We appreciate EPA's request for comments on the potential for a health-based emission limit for HCl for the lime industry, and we strongly urge EPA to set such a limit. As demonstrated in NLA's comments, the risks from HCl are extremely low, while the costs to comply with the proposed limits would be extremely high. We also support EPA's proposal to set an intra-quarry variability factor for mercury, and an aggregate standard for organic HAPs, but urge EPA to adopt the corrections set out in NLA's comments for these standards. We further urge EPA to adopt the additional changes and corrections set out in detail in NLA's comments.

RHI Magnesita has evaluated pathways to comply with the new standards. All options we have explored come with an extremely high environmental and financial cost. We strongly urge EPA to provide the maximum amount of flexibility possible in the rule's requirements, given the fact that even with no additional controls, there is already acceptable risk with an ample margin of safety for all HAPs at all lime plants.

We thank EPA for the opportunity to provide comments on this proposed rule.

Sincerely,

A handwritten signature in cursive script that reads "LeAnn Caviness".

LeAnn Caviness  
Head of HSEE  
Magnesita Refractories Company