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***& Sons, Inc.***

March 6, 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 Pete Lien & Sons, Inc. 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**

Pete Lien & Sons, Inc. 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). Pete Lien & Sons, Inc., established in 1944, is a family owned small business that owns and operates two lime manufacturing plants that produce high calcium quicklime, and hydrated lime.

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.

Pete Lien & Sons, Inc. is a member of 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. Hydrated lime is currently used for environmental purposes that achieve pollutant control that is necessary for public health. To require the industry to use this product to treat emissions that pose no health risk is an irresponsible use of resources and finished product which will have cascading effects on other industries. This is not the highest and best use of this



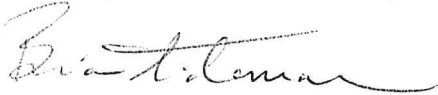
product, risks public health through possible product shortages for necessary pollutant control, and is a textbook case of treatment for treatment sake only.

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.

Pete Lien & Sons, Inc., participated in the SBREFA panel with regards to this rule. As a small business, we experience hardships related to vendor access and response, namely through vendors preferring to work with the larger industry players first and more often. This creates delays that make it difficult to prepare and implement compliance strategies. The rule as proposed prior to the SBREFA panel was flawed, but the current proposed rule provides no relief to us as a small business and would in some cases, such as with what has been proposed by EPA for Organic HAPs, be even more restrictive. We strongly urge EPA to use NLA's corrected M.320 Detection Limits for Organic HAPs and provide the maximum amount of flexibility possible to small business in particular with regards to compliance timelines, 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,



Brian Tideman, P.E.  
Chief Operating Officer  
Pete Lien & Sons, Inc.