

GREER LIME COMPANY

a division of Greer Industries, Inc.

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

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.

RE: Greer Lime Company's Comments on the *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

Dear Sir or Madam:

Greer Lime Company (Greer Lime) 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* ("Supplemental Proposal"), 89 Fed. Reg. 9088 (Feb. 9, 2024). Greer Lime owns and operates a lime manufacturing plant, limestone quarry, and related limestone processing operations in Riverton, West Virginia. Greer Lime has exclusive access to one of the purest limestone deposits east of the Mississippi River, consisting of on average 98 percent calcium carbonate and very low levels of silica, iron, aluminum, magnesium, and other impurities. Greer Lime's manufacturing plant has been producing pebble lime, hydrated lime, limestone aggregates, agricultural lime, rock dust, and limestone sand for over 60 years. Greer Lime has about 70 employees and is one of the largest employers in rural Pendleton County, West Virginia. Greer Lime is a fixture of the local economy.

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. Greer Lime's products are used by a wide variety of industries across the eastern United States. These products are used to treat drinking water, neutralize acid mine drainage, feed livestock, fertilize gardens, and make steel. With the state-of-the-art steel manufacturing facilities



that are currently being built in West Virginia, the demand for Greer Lime's products is expected to increase.

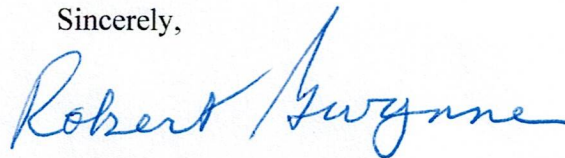
Greer Lime is a member of the National Lime Association (NLA), which has developed comprehensive comments addressing all aspects of EPA's proposed regulation. Greer Lime strongly endorses NLA's comments on the proposed rule, and expressly incorporate NLA's comments by reference as our own. Greer Lime also incorporates its prior comments on EPA's initial Proposal, dated February 21, 2023, and those that were submitted to EPA in August 2023, following the Small Business Advocacy Review Panel meeting with EPA.

While Greer Lime appreciates EPA's request for comments on a health-based emission limit for hydrogen chloride (HCl) for the lime industry and strongly supports such a limit, along with the other aspects of EPA's Supplemental Proposal that would lessen the burdens on the lime industry, EPA's proposed changes do not go far enough. Greer Lime agrees with EPA's belated conclusion that the Supplemental Proposal will "have significant economic impacts on both of the small businesses in this source category," one of which is Greer Lime.¹ As EPA acknowledges in its updated Regulatory Impact Analysis, its assumed compliance "costs may be underestimated."² Greer Lime has demonstrated to EPA that facility-specific initial estimated capital costs to comply with the proposed changes to the rule far exceed those calculated using EPA's *Air Pollution Control Cost Manual*.

EPA readily acknowledges that even with no additional controls, there is already acceptable risk with an ample margin of safety to protect public health for all hazardous air pollutants at all lime plants. Given this acknowledgment and as one of the small businesses that will incur significant economic impacts from the Supplemental Proposal, Greer Lime strongly urges EPA to provide the maximum amount of flexibility possible in the rule's requirements.

Thank you for the opportunity to provide these comments on the Supplemental Proposal.

Sincerely,



Robert Gwynne
Executive Vice President
Greer Lime Company

cc: Kyle Apple
Scott Kisner
Gary Steinbauer, Esq.

¹ U.S. EPA, *Regulatory Impact Analysis for the Supplemental Proposed Amendments to the National Emission Standards for Hazardous Air Pollutants: Lime Manufacturing Plants*, Doc. NO. EPA-HQ-OAR-2017-0179 (Jan. 2024) ("RIA"), p. 47

² RIA, p. 28