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March 11, 2024

Via Regulations.gov

Brian Storey
U.S. Environmental Protection Agency
EPA Docket Center, OAR Docket
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: American Iron and Steel Institute Comments on EPA's National Emission Standards for Hazardous Air Pollutants: Lime Manufacturing Plants Amendments Proposal (EPA-HQ-OAR-2017-0015)

Dear Mr. Storey:

The American Iron and Steel Institute (AISI) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA) proposed rule entitled National Emission Standards for Hazardous Air Pollutants: Lime Manufacturing Plants Amendments (89 FR 9088, Feb. 9, 2024). AISI serves as the voice of the American steel industry in the public policy arena and advances the case for steel in the marketplace as the preferred material of choice. AISI also plays a leading role in the development and application of new steels and steelmaking technology. AISI is comprised of member companies, including electric arc furnace steelmakers and integrated steelmakers, and associate members who are suppliers to, or customers of, the steel industry.

AISI is writing to add our support for the stance taken by EPA in the proposal to set health-based emission limits (HBELs) for hydrogen chloride (HCl) emissions. AISI strongly supports EPA's proposal to adopt such standards. AISI further believes that HBELs can and should be much more widely used to minimize unwarranted over-regulation and that EPA should adopt additional HBELs for many other source categories as part of the periodic technical reviews required by CAA Sec. 112(d)(6). In particular, AISI fully supports the National Lime Association (NLA) comments on the proposal. NLA provides an extensive discussion and analysis in support of EPA's legal, technical and scientific assertions regarding this matter. Further, AISI is a member of the Air Advocacy Coalition (A2C) and supports the A2C comments on this EPA proposal.

The Clean Air Act (CAA) Sec. 112(d)(4) provides EPA with authority to set a less stringent emission limitation for a threshold hazardous air pollutant (HAP) than would otherwise be required using the typical maximum achievable control technology (MACT) process for setting standards. In this case, the alternative standard must provide an ample margin of safety against potential health impacts.

Additionally, AISI agrees with EPA's technical and scientific assertions that the available evidence supports the conclusion that there is a protective health threshold below which there should be no appreciable risk of developing cancer to any segment of the population. Further, AISI holds that EPA's reference concentration (RfC) for HCl is an appropriate benchmark in establishing an HBEL for HCl.

If you have any questions on these comments, please do not hesitate to contact me at 202.452.7122.

Sincerely,

A handwritten signature in dark ink, appearing to read "Paul Balserak", with a stylized, flowing script.

Paul Balserak
Vice President, Environment