



Discovering what's possible with calcium

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March 11, 2024

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

**Subject: Comments of Mississippi Lime Company 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**

Dear Sir or Madam:

Mississippi Lime Company (Mississippi Lime) appreciates the opportunity to comment on EPA's Supplemental Notice of Proposed Rulemaking: National Emission Standards for Hazardous Air Pollutants: Lime Manufacturing Plants Amendments (Proposed Rule), published in the Federal Register February 9, 2024 (89 Fed. Reg. 9088).

Mississippi Lime, headquartered in St. Louis, MO, is a leading global supplier of high-calcium and dolomitic lime products and technical solutions. With over a century in business, the company has built a reputation on the purity of its products, commitment to research and development, and tradition of customer service. Mississippi Lime operates the largest lime facility in the Americas and mines some of the purest limestone reserves in the world. The company supplies high-calcium quicklime, dolomitic lime, hydrated lime, calcium carbonate products, trucking services, and technical solutions from a diversified, reliable network of facilities in Ste. Genevieve, MO; Bonne Terre, MO; Calera, AL; Verona, KY; Vicksburg, MS; Weirton, WV; Chester, SC; Mobile, AL; Prairie du Rocher, IL; Kansas City, KS; as well as several distribution sites throughout the country.

Lime is a critical ingredient in many other manufacturing processes and industries. It is an important part of the steel manufacturing process, chemical manufacturing, road building, and the creation of building products like mortar and plaster. Lime is also a critical component in environmental compliance of many industries, as it is used to scrub pollutants from air emissions stacks and is used to purify water at municipal water treatment plants.

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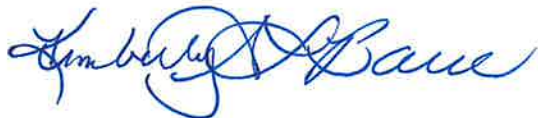
As a long-time member of the National Lime Association, Mississippi Lime strongly supports the comments filed by the National Lime Association (NLA) regarding the subject proposed rule. We expressly incorporate NLA's comments by reference as our own and we request that EPA act upon the suggestions presented in the NLA comment letter.

Specifically, Mississippi Lime appreciates EPA's request for comments on the potential for a health-based emission limit (HBEL) 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. Additionally, we 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, including those related to emissions averaging.

Given that the new proposed requirements, even if modified as NLA requests, will be extremely burdensome and costly for Mississippi Lime, we strongly urge EPA to provide the maximum amount of flexibility possible in the rule's requirements, particularly in light of the fact that even with no additional controls, there is already acceptable risk with an ample margin of safety for all HAPs at Mississippi Lime's lime plants, as well as at lime plants industry-wide.

Thank you for your time and consideration.

Sincerely,



Kimberly S. L. Bauman, Ph.D.
Director, Environmental Affairs