



Carmeuse Americas

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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 Carmeuse Americas 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**

Carmeuse Americas 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). Carmeuse America owns and operates eleven lime manufacturing plants in the United States with over 1900 employees that produce high calcium quicklime and dolomitic quicklime.

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.

Carmeuse Americas 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 acceptable as required by the Clean Air Act, 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.

Carmeuse Americas is committed to being a sustainable company and our vision of contributing to a better world. A key part of that vision is reducing our carbon footprint and moving toward being a carbon neutral company. These new requirements, even if modified as NLA requests, will be extremely burdensome and costly and risk diverting limited resources from these sustainability efforts. 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, it has been demonstrated that emissions from the manufacture of lime present an acceptable level of risk with an ample margin of safety for all HAPs at all lime plants and that these new requirements are not required for EPA to satisfy its obligations under the Clean Air Act.

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

Sincerely,

DocuSigned by:

Jack Fahler

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Jack Fahler

Chief Executive Officer

Carmeuse Americas