Injection; and Heat Exchangers) will collectively use an additional 1.77 ***trillion*** Btu's of energy annually (equivalent to unnecessarily burning about 88,000 tons of coal annually).[5] This wasteful use of natural resources constitutes environmental harm.

NLA believes that a technology should not be considered "available" if its use would cause more harm to the environment that the benefits it would confer.

4. <u>The Standards Cannot Be Implemented with Cost-Effective Technology</u>

No *cost-effective* technology is available, or could be available, to implement the standards established in the Lime Rule. EPA estimates that the rule will cost the industry up to $2.4 billion over the next 20 years ($485 million in capital investment) or $175 million annually. (NLA's cost estimates are even higher: $924 million capital investment and $180 million annually.) As noted above, EPA's own risk assessment showed that even without controls, emissions from the industry presented an acceptable level of risk with an ample margin of safety. As a result, any costs expended to meet these standards are unreasonable, and, by definition, not cost-effective. This factor is particularly significant for small business sources that cannot spread compliance costs across multiple locations, and the U.S. Small Business Administration's Office of Advocacy raised serious concerns about the Lime Rule's feasibility and cost, leading EPA to reopen the rule for additional proceedings to address issues affecting small businesses.

For all the reasons stated above, none of the technologies identified to implement standards in the Lime Rule are available within the period between the present and the compliance date of July 16, 2027, and an exemption should be granted extending the compliance date until July 16, 2029, to all the sources on the attached list, while EPA reconsiders the rule.

B. IT IS IN THE NATIONAL SECURITY INTERESTS OF THE UNITED STATES TO PROVIDE AN EXEMPTION FROM THE LIME RULE COMPLIANCE DATE

Lime production is essential to the national security of the United States. EPA's Lime Rule, if implemented, would both increase the cost of lime, and restrict the availability of lime products. This would have a negative impact on multiple other industries and activities, harming the national security interests of the United States.

The U.S. Geological Survey has noted that the major markets for lime, in descending order of consumption are "steelmaking, chemical and industrial applications (such as the manufacture of fertilizer, glass, paper and pulp, and precipitated calcium carbonate, and in sugar refining), flue gas treatment, construction, water treatment, and nonferrous-metal mining." These are all essential industries.

---

[5] *See Regulatory Impact Analysis for the Final Amendments to the National Emission Standards for Hazardous Air Pollutants: Lime Manufacturing Plants,* EPA-452/R-24-014 (June 2024) at pp. 29-30.

ED_018388_00000249-00008

Sierra Club FOIA -
2025-EPA-04883

SC_EVERSPLIT0006024