

drinking water, wastewater treatment, and addressing acid mine drainage in rivers and streams.³ In addition, there was a recognition that lime was an essential ingredient for a variety of critical uses, including manufacture of metal, paper, and chemical products, animal feed, pollution control, road construction, and stabilization of earthen dams. Lime products are typically not stored or stockpiled for a long period of time, with most of the industry practicing on demand production and delivery. If lime production were to be disrupted, stocks of lime for the uses mentioned above would be rapidly depleted, in some cases in a matter of days.

More details on the essential uses of lime can be found in U.S. Geological Survey documents at <https://pubs.usgs.gov/myb/vol1/2019/myb1-2019-lime.pdf>.

Accordingly, the Lime Rule implicates national security interests because lime products are essential to an array of essential industries and activities, including steelmaking, clean drinking water, and many others.

For all the reasons stated above, NLA urges the issuance of a 2-year exemption from the current July 16, 2027, compliance date of the final Lime Rule *National Emission Standards for Hazardous Air Pollutants: Lime Manufacturing Plants Technology Review* (the "Lime Rule"), published in the *Federal Register* at 89 Fed. Reg. 57,738 (July 16, 2024), extending the compliance date to July 16, 2029, pending EPA's review of the rule for possible revision. Attached is a list of all of the stationary sources in the lime industry that require a two-year extension of the compliance date.

Respectfully submitted,

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³ See, e.g., *Pennsylvania Governor Wolf's Listing of Life-Sustaining Businesses, (Including Lime)*(March 24, 2020). [PA-List-of-Life-Sustaining-Businesses-Updated.pdf](#).