



March 26, 2025

Mr. Lee Zeldin
EPA Administrator
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
Sent Via Email: airaction@epa.gov

Subject: Request For Presidential Exemption – New Sources

Dear Mr. Zeldin,

Pursuant to Section 112(i)(4) of the Clean Air Act (CAA), Lhoist North America (LNA) hereby requests and recommends that the President issue a two-year exemption from the emissions standards promulgated in the final 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).

The National Lime Association (NLA) submitted a similar request and recommendation which would extend the compliance deadline of the Lime Rule for existing sources from July 16, 2027 to July 16, 2029. LNA believes this exemption should be applied to all applicable sources and include both existing and new sources, as defined in the Lime Rule. LNA proposes that the two-year exemption be applied to new sources upon the date of startup, but not extend beyond July 16, 2029.

The Clifton Plant (FRS ID: 110013286595) is currently regulated as an Area Source of Hazardous Air Pollutants (HAPs). The Facility is expected to commence operation of two new lime kilns that are expected to make the Facility a Major Source of HAP. Without this Presidential exemption, the two new sources will become subject to the Major Source emission standards for hydrogen chloride, mercury, organics, and dioxins & furans upon startup.

NLA has provided EPA with supplemental information on why the technology to implement the standard is not available and why it is in the national security interests of the United States to grant the exemption. Regardless of if the source is defined as new or existing, the justification provided by NLA is the same and has been included with this letter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Philipp Niemann', is written over a horizontal line.

Philipp Niemann
Chief Executive Officer
Lhoist North America

Attached: NLA Request For Presidential Exemption