year. And finally, EPA states that all types of pollution controls installed under the rule (including WPTGAs, Dry Sorbent Injection; Regenerative Thermal Oxidizers; Activated Carbon Injection; and Heat Exchangers) will collectively use an additional 696 ***billion*** Btu's of energy annually. This wasteful use of natural resources is an 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.

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

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.

For steel production lime is used as a flux and slagging agent to remove impurities. The steel industry accounts for approximately 30% of all lime sold or used in the United States. Lime is also used in nonferrous metallurgy, such as in the production or recovery of copper, zinc, alumina, magnesia, uranium, nickel, gold, and silver. Lime is also used widely in construction, including in the building of roads and airports.

Lime is used across the United States to treat drinking water, and to treat sewage. Lime is an essential element in the production of numerous materials that would be needed in the course of any medical crisis, such as paper products (including toilet paper), as well as latex and glass products used in medical applications. Lime products are also used in the production of animal feed, food and medicinal products (antacids, stabilizers, vitamins, etc.).

During the COVID-19 pandemic, many state governors issued emergency orders instructing industrial plants to shut down operations to control the spread of the virus. Lime plants were routinely exempted from these emergency state orders because lime is considered essential to public health and welfare due to its use in ensuring adequate supplies of clean