



RHI MAGNESITA

Magnesita Refractories Company
425 S. Salem Church Road
York, PA 17408
www.rhimagnesita.com

March 26, 2025

Mr. William C. Herz
Executive Director
National Lime Association
200 North Glebe Road
Suite 800
Arlington, Virginia 22203

Dear Bill,

As General Counsel and Secretary of Magnesita Refractories Company, I hereby authorize the National Lime Association (NLA) to submit a request on our behalf for a two-year presidential exemption of our major source lime plants pursuant to Clean Air Act § 112(i)(4) from the requirements of the final rule titled: "National Emission Standards for Hazardous Air Pollutants: Lime Manufacturing Plants Technology Review" (89 FR 57738; July 16, 2024) (Lime Rule). Such exemption, if granted, would extend the compliance date from July 16, 2027 to July 16, 2029, while EPA reconsiders the Lime Rule.

The facilities in this request include the following major source lime plants owned and controlled by Magnesita Refractories Company:

York Plant
425 S. Salem Church Road
York, PA 17408

The emissions standards subject to this exemption include hazardous air pollutant (HAP) standards for hydrogen chloride, mercury, organics, and dioxins & furans.

NLA will provide the agency with additional 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.

Sincerely,

Mark Plantan
General Counsel and Secretary
Magnesita Refractories Company
RHI Magnesita