

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 during 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.). Lime is also essential for the treatment of air emissions from numerous industries, including flue gas desulfurization in coal-fired power plants.

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 drinking water, wastewater treatment, and addressing acid mine drainage in rivers and streams.⁶ 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 all 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 the major sources in the lime industry that require a two-year extension of the compliance date.

⁶ 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.