

## Advocacy Comments on EPA's Proposed Revisions to the Lime Manufacturing NESHAP

On January 5, 2023, the Environmental Protection Agency (EPA) published a proposed rule titled National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants; Residual Risk and Technology Review. This rule establishes emission standards for pollutants from lime manufacturing facilities that have not been regulated previously and which EPA has found do not pose an unreasonable risk to the public. Advocacy filed a public comment on this rule on February 16, 2023.

EPA certified that this rule will not have a significant economic impact on a substantial number of small entities. However, after consultation with all three small businesses in this industry, Advocacy believes that EPA has significantly underestimated the costs of compliance. Therefore, EPA should convene a SBREFA panel immediately and prepare an Initial Regulatory Flexibility Analysis for public notice and comment.

According to EPA's analysis, this rule would have no appreciable impact on public health. Therefore, EPA should exercise the maximum flexibility permitted by the Clean Air Act to allow small businesses to continue operating without requiring investment in expensive emission control equipment, including:

- Setting a health-based standard for hydrogen chloride,
- Including mercury variability within a limestone deposit as a factor in setting emissions standards, and
- Setting a workplace standard for dioxin/furans.

A complete copy of [Advocacy's letter to EPA](#) is available. For more information, please contact Dave Rostker, Assistant Chief Counsel, at [david.rostker@sba.gov](mailto:david.rostker@sba.gov).

