



August 1, 2020

U.S. Environmental Protection Agency
EPA Docket Center,
Docket ID No. EPAHQ-OAR-2017-0015
Mail Code 28221 T
1200 Pennsylvania Avenue, NW
Washington, DC 20460.

(Submitted electronically at <http://www.regulations.gov>)

RE: Comments of the National Lime Association on: Increasing Consistency and Transparency in Considering Benefits and Costs in the Clean Air Act Rulemaking Process, Docket ID No. EPA-HQ-OAR-2020-00044

The National Lime Association (NLA) submits the following comments on the Environmental Protection Agency's proposed rule titled "*Increasing Consistency and Transparency in Considering Benefits and Costs in the Clean Air Act Rulemaking Process*" 85 Fed Reg 35612 - 35627 (June 11, 2020).

NLA is the trade association for manufacturers of high calcium quicklime, dolomitic quicklime, and hydrated lime, collectively referred to as "lime." Lime is a chemical without substitute, providing cost-effective solutions to many of society's environmental problems. Lime is an important ingredient in many other manufacturing processes and industries. It is used in the steel manufacturing process, road building, and the creation of other building products like mortar and plaster. Lime is also a critical component in environmental compliance for many industries, as it is used to purify water and scrub air pollutants from stack emissions.

NLA supports this proposal to provide consistency and greater transparency in analyzing the benefits and costs of proposed rules. NLA is in favor of an open and standardized approach to benefit-cost analysis (BCA) development and supports using the best available scientific information, in accordance with best practices from the economic, engineering, physical, and biological sciences, and ensuring transparency of the BCA.

NLA endorses the use of objective risk assessments that utilize the best available science including a weight of the scientific evidence approach as an integral component of effective cost-benefit analyses including the use of probabilistic risk analysis for reducing uncertainty in risk analysis. The proposal to codify into regulation the selection criteria for selecting among studies characterizing concentration-

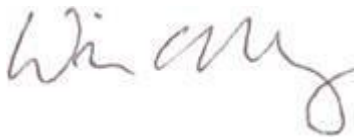
response relationships and a more standardized approach for synthesizing evidence across the literature will also further increase transparency and credibility of risk assessments used in rulemaking.

NLA also supports a separate reporting of the public health and welfare benefits that are specific to the objective of the CAA provision under which the rule is promulgated.

Implementation of a robust benefit and cost analysis process will enable the Agency and other stakeholders to focus on rulemakings with the best opportunities to support further emission reductions.

NLA appreciates the opportunity to comment on these important issues.

Very truly yours,

A handwritten signature in black ink, appearing to read "W. Herz".

William C. Herz
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