



January 25, 2007

EPA Docket Center (EPA/DC)
Docket ID No. EPA-HQ-OPA-2006-0949
EPA West, Room B102
Environmental Protection Agency
1301 Constitution Avenue, NW
Washington, DC 20460

**RE: Oil Pollution Prevention; Non-Transportation-Related Onshore Facilities;
Proposed Rule [Docket No. EPA-HQ-OPA-2006-0949; 71 Fed. Reg. 77357,
(December 26, 2006)]**

IPC - Association Connecting Electronics Industries - is pleased to submit the following comments in response to the Environmental Protection Agency's (EPA's) above referenced proposed rule extending the compliance date for the July 2002 Spill Prevention Control and Countermeasures (SPCC) amendments.

IPC is the national trade association for the electronic interconnection industry, and represents more than 2,400 member companies. IPC members manufacture printed circuit boards and electronic assemblies, which are used in a variety of electronic devices including computers, cell phones, pacemakers, and sophisticated missile defense systems. The industry is vital to the U.S. economy, employing more than 350,000 people and exceeding \$44 billion in sales. Although IPC members include electronic giants, such as Intel, Hewlett Packard, and IBM, sixty percent of IPC members meet the Small Business Administration's definition of "small business."

IPC supports EPA's proposal to extend the deadline for preparing/amending and implementing facility SPCC Plans. IPC member facilities, along with the many other manufacturing facilities in the U.S., are grappling to understand and comply with the December 2006 (71 Fed. Reg. 77266) amendments to the SPCC rule. Given EPA's recent amendments, the pending update of its *SPCC Guidance for Regional Inspectors*, and the agency's intent to propose further SPCC rule amendments in 2007, an extension is appropriate and essential. However, EPA's proposed compliance date to July 1, 2009 is premature given EPA's intent to propose further changes to the SPCC rule this year. IPC asks EPA to consider an extension of 18 months from promulgation of the final

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amendments to the SPCC rule, rather than prematurely setting a specific compliance date. IPC believes this alternative to EPA's proposed compliance date of July 1, 2009 is a more suitable extension and will provide regulated facilities adequate time to review the amendments, develop and/or modify existing plans, and comply with any final changes to the rule or guidance. Without this additional time, facilities' compliance efforts would be unnecessarily burdensome.

IPC appreciates the opportunity to submit these comments. Should you have any questions, feel free to contact me by email at saharosman-sypher@ipc.org or by phone at (703) 522-0225.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sahar Osman-Sypher', written over a set of horizontal lines.

Sahar Osman-Sypher
Project Manager, Environmental, Health and Safety