

December 28, 2006

Natural building blocks for quality of life

EPA Docket Center (EPA/DC)
Docket ID No. EPA-HQ-OPA-2006-0949
EPA West, Room B102
1301 Constitution Avenue, N.W.
Washington, D.C. 20460

To Whom It May Concern:

The National Stone, Sand & Gravel Association (NSSGA) submits the following comments on the Environmental Protection Agency's (EPA's) proposed rule to extend the dates by which facilities must prepare, amend and/or implement Spill Prevention, Control, and Countermeasure (SPCC) Plans. This proposed rule was published in the Federal Register, Volume 71, No. 247, on December 26, 2006.

NSSGA is the world's largest mining association by product volume. Our member companies' account for more than 90 percent of the crushed stone and in excess of 70 percent of the sand and gravel produced annually in the United States. These products, often referred to together as "aggregates", are used extensively for construction and repair of the nation's infrastructure as well as for commercial and residential building purposes. Our members' materials are also used extensively in environmental applications such as for water filtration, erosion control and landscaping as well as other forms of pollution control. Sales of natural aggregates (crushed stone, sand and gravel) generate nearly 38 billion dollars annually for the U.S. economy. During 2005, a total of 3.2 billion tons of crushed stone, sand and gravel, valued at \$17.4 billion, were produced and sold in the United States.

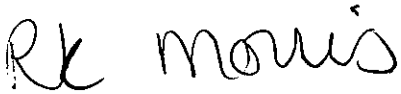
The NSSGA supports EPA's proposed rule to extend the dates in 112.3 (a), (b) and (c) by which a facility must prepare or amend and implement its SPCC Plan on or before July 1, 2009. NSSGA supports this rule for the following reasons:

- The proposed extension would allow those affected in the regulatory community an opportunity to make changes to their facilities and to their SPCC Plans necessary to comply with the revised requirements expected to be proposed in 2007, rather than with the existing requirements.

- The proposed extension would provide facilities enough time necessary to fully comprehend the potential for regulatory relief offered by revisions to the 2002 SPCC rule.
- The guidance document titled "SPCC Guidance for Regional Inspectors" may be revised in 2007. The proposed extension would allow facilities to review this guidance document prior to amending or preparing their SPCC Plans.

Thank you for the opportunity to submit comments on this proposed rule. Please contact me at 703.526.1064 if you have any questions.

Sincerely,
National Stone, Sand and Gravel Association

A handwritten signature in black ink that reads "Rk Morris". The letters are cursive and somewhat stylized.

Rebecca K. Morris
Director, Environment, Safety & Health