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**THROUGH:** Brooks Depro, RTI  
**DATE:** May 3, 2010  
**SUBJECT:** Mandatory Greenhouse Gas Reporting: Technical Corrections, Clarifying and Other Amendments Memo

On October 30, 2009, EPA promulgated the final rule titled: Mandatory Greenhouse Gas Reporting (74 FR 56259), under the authority of Sections 114 and 208 of the Clean Air Act. The final rule requires reporting of greenhouse gas (GHG) emissions and other relevant information from certain sources beginning with the 2010 calendar year.

Following promulgation of the rule, the Administrator has identified a number of technical issues that need to be corrected and specific portions of the rule that need to be clarified. EPA is proposing to amend specific provisions in the Final MRR to correct these technical and editorial errors that have been identified since promulgation and to propose amendments to address certain provisions that have been the subject of questions from reporting entities. The amendments EPA is proposing include the following types of data reporting and recordkeeping changes:

- Correcting data reporting requirements so that they more closely conform to the information used to perform emission calculations.
- Additional information to assist in fully understanding and complying with a specific provision, such as the reference to a standardized method that must be followed.
- Changes to correct cross references within and between subparts.

This memo documents the recorded changes in the data reporting requirements and the recordkeeping requirements for owners or operators of certain fossil fuel and industrial gas suppliers and direct emitters of GHGs. The changes are not expected to affect burden. Changes to the reporting requirements and the recordkeeping requirements are enumerated in the revised Appendix A-1 Reporting Thresholds and Reporting Requirements and Appendix A-2 Recordkeeping Requirements, which are attached.