

TO: Shaun Ragnauth, EPA
FROM: Patricia Hertzler, Cadmus
THROUGH: Brooks Depro, RTI
DATE: October 6, 2010
SUBJECT: Mandatory Greenhouse Gas Reporting: Technical Corrections Memo

On October 30, 2009, United States Environmental Protection Agency (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 Mandatory Greenhouse Gas Reporting rule (Final MRR) requires reporting of greenhouse gas (GHG) emissions from all sectors of the economy. The rule requires the reporting of GHGs beginning with the 2010 calendar year, with reports submitted annually by a March 31 deadline in each following year.

Following promulgation of the rule, the Administrator identified a number of technical issues that need to be corrected and specific portions of the rule that need to be clarified. On May 27, 2010, EPA signed proposed revisions to certain provisions of the Final MRR. This proposal was published on June 15, 2010 (75 FR 33450). EPA is now finalizing these technical corrections. The technical corrections 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.
- The addition of information that is needed to fully understand and comply 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 technical corrections 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. These 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.

Please let me know if you have any questions or require additional information.