



CHOOSE YOUR OWN ADVENTURE | PATH A

THE ENERGY SECTOR CROSSROADS

YOU ARE HERE: power plants, combustion turbines, oil and gas sites, and GHG reporters



PATH CLOSED

Removed from the rulebook

Endangerment Finding

Rescinded with vehicle GHG standards; effective Apr. 20, 2026.

91 FR 7686

111(d) EGU GHG guidelines

Subpart UUUUb repealed with CCS standards; effective Nov. 16, 2026.

91 FR 58954

2024 MATS amendments

Repealed as of Apr. 27, 2026: fPM limit, PM CEMS, lignite Hg limit.

91 FR 9088

Waste Emissions Charge rule

EPA's methane fee rule disapproved by Congress; charge delayed to 2034.

Pub. L. 119-2; Pub. L. 119-21



PATH OPEN

In force, with live dates

GHG Reporting Program

Reporting year 2025 reports due Oct. 30, 2026 (was Mar. 31).

91 FR 9712

Oil and gas NSPS OOOOb

Key control and leak detection deadlines move to Jan. 22, 2027.

90 FR 55671

Turbine NSPS KKKKa

NOx and SO2 limits for units built or modified after Dec. 13, 2024.

91 FR 1910

Standards that remain

2015 subpart TTTT and Phase 1 new-turbine limits stay in force.

91 FR 58954



TO BE CONTINUED

Proposed or in litigation

Full power plant GHG repeal

Would repeal all remaining EGU GHG rules; comments due Nov. 2, 2026.

91 FR 59002

GHGRP rescission

Would drop 46 source categories; subpart W suspended to 2034.

90 FR 44591

In the D.C. Circuit

Endangerment rescission and UUUUb repeal face petitions for review.

Nos. 26-1037 and 26-1238

Datacenter Growth

Expect energy demands to increase over the next several years

YOUR NEXT MOVE: *If you hold a NESHAP, NSR, or Title V permit, turn to Path B. If you work on SIPs or state plans, turn to Path C.*

Status as of Sept. 29, 2026. Citations are to the Federal Register (volume FR page) unless noted.





CHOOSE YOUR OWN ADVENTURE | PATH B

THE AIR TOXICS & PERMITTING FORK

● PATH CLOSED

● PATH OPEN

● TO BE CONTINUED

YOU ARE HERE: NESHAP sources, NSR and Title V permit holders, and permit writers



PRESIDENTIAL EXEMPTIONS Clean Air Act §112(i)(4)

- Eight proclamations since April 2025 add two years to 2024 NESHAP deadlines for listed facilities. 90 FR 16777 and others
- Arkansas facilities listed: Bakelite Synthetics, Crossett (HON); White Bluff and Plum Point (MATS). Procl. 10914, 10957
- Challenges to the HON, coke oven, and taconite exemptions are pending in D.D.C. No. 1:25-cv-03745

NESHAP RULES 40 CFR Part 63

- Plywood and composite wood products: new limits including lumber kilns; existing sources by July 6, 2029. 91 FR 41410
- Chemical manufacturing area sources: leak detection and pressure relief standards by Apr. 1, 2029. 91 FR 16502
- Revoked by Congress: 2024 rubber tire amendments and 2024 major-to-area reclassification rule. Pub. L. 119-14, 119-20



NSR AND TITLE V Preconstruction and operating permits

- Effective Oct. 26, 2026: narrower Title V review of NSR terms; §112(r) general duty excluded. 91 FR 61026
- Withdrawn: 2024 project emissions accounting proposal; NSR reactivation policy dropped. 90 FR 34206; Sept. 2025 memo
- Proposed: pre-permit construction of non-emitting parts; state discretion on minor NSR notice. 91 FR 26958; 91 FR 41591

RMP AND INCINERATORS 40 CFR Parts 68 and 60

- RMP: proposed rescission or revision of 2024 safer technology, third-party audit, and information rules. 91 FR 8970
- RMP root cause, employee participation, and emergency response dates stay May 10, 2027. 91 FR 8970
- Air curtain incinerators (wood, yard waste, clean lumber only): one proposed rule; no Title V if non-major. 91 FR 13543



YOUR NEXT MOVE: *If you work on SIPs or state plans, turn to Path C. If you run a power plant or oil and gas site, turn back to Path A.*



CHOOSE YOUR OWN ADVENTURE | PATH C

THE STATE PLANNING TRAIL

YOU ARE HERE: SIPs, designations, modeling, and state plans

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Annual PM_{2.5} standard upheld by the D.C. Circuit on June 26, 2026

Kentucky v. EPA, No. 24-1050

3 Potential NA Areas

Pulaski, Union, Garland counties; Little River/Miller by Texas CBSA

APPROVED

Arkansas second-period haze SIP; effective Sept. 28, 2026

91 FR 55268

THE ROAD AHEAD: STATE PLAN AND DESIGNATION DEADLINES

NOV
2026

Nov. 16, 2026

UUUUb repeal takes effect; EGU GHG state plan duty ends
91 FR 58954

JAN
2027

Jan. 22, 2027

OOOOc Oil & gas methane state plan due
90 FR 55671

FEB
2027

Feb. 6, 2027

Court-ordered deadline for 2024 PM_{2.5} designations
N.D. Cal order

MAR
2027

Mar. 10, 2027

WWWW Large muni waste combustor state plan due
91 FR 11802

JUL
2031

July 31, 2031

Regional Haze 3rd period SIPs due (moved from 2028)
91 FR 331

YOUR NEXT MOVE: *If you operate a regulated source, turn back to Path A or Path B.*

Status as of Oct. 5, 2026. Citations are to the Federal Register (volume FR page) unless noted.



TO BE CONTINUED

Good Neighbor: Arkansas's 2023 SIP disapproval is stayed; EPA plans a separate Arkansas rulemaking.
8th Cir. No. 23-1320; 91 FR 4026

Regional haze rule: EPA took comment on a restructuring in Oct. 2025; no proposal yet.
90 FR 47677

Exceptional events: Rule revision under way; an Oct. 2025 memo targets SIP barriers to prescribed fire.
EPA memo, Oct. 16, 2025