MEMORANDUM

DATE: February 18, 2026

TO: File

FROM: Greg DeAngelo, Executive Director

SUBJECT: Tracking EPA's Regulatory Actions

The U.S. Environmental Protection Agency (EPA) regulatory development team at EPA's Office of State Air Partnerships (in the Air Quality Planning Division) continue to launch a great number of regulatory projects, many of which implement the 31 actions announced in EPA's press releases from March 12, 2025.[1]

The following table will track the air-related actions taken by EPA, and it will provide links and deadlines to provide comments to the agency. This table will be updated periodically as EPA takes more regulatory actions, issues guidance documents, and pursues other related activities. Rows that are new or updated from the previous table are indicated by a red star (★).

Items from the March 12, 2025 Press Releases

Action(s) Taken / Rule(s) Addressed	Status	Links
Repeal of GHG Emissions Standards for Fossil Fuel-Fired Electric Generating Units (1) Repeal all GHG emissions standards for the power sector under CAA section 111; or, alternatively, (2) Revise the BSER determination to remove CCS and natural gas co-firing Press release addressed: "Reconsideration of regulations on power plants"	Proposed rule 6/17/2025 Public hearing 7/8/2025 (8:00 am ET) Comments due 8/7/2025	EPA web page https://www.epa.gov/stationary-sources-air-pollution/greenhouse-gas-standards-and-guidelines-fossil-fuel-fired-power Docket https://www.regulations.gov/docket/EPA-HQ-OAR-2025-0124
Extension of deadlines for NSPS and EG for Oil and Natural Gas Sector Final rule (signed 11/26/2025) adds time for state plans for 40 CFR 60 subparts OOOOb and OOOOc, i.e., the GHG standards for oil and gas under 111(d). 1/22/2027 is new deadline for state plans; federal plan would be expected after that. Press release addressed: "Reconsideration of regulations throttling the oil and gas industry"	Interim final rule 7/31/2025 Final rule 12/3/2025	EPA web page https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-operations/2025-interim-final-rule-extend-compliance Docket https://www.regulations.gov/docket/EPA-HQ-OAR-2025-0162

Action(s) Taken / Rule(s) Addressed	Status	Links
Repeal of Mercury and Air Toxics Standards (MATS) Proposal to repeal portions of the 5/7/2024 amendments to 40 CFR 63 subpart UUUUU related to the filterable PM emission standard for coal-fired EGUs and the revised Hg emission standard for lignite-fired EGUs. Press release addressed: "Reconsideration of Mercury and Air Toxics Standards that improperly targeted coal-fired power plants"	Proposed rule 6/17/2025 Public hearing 7/10/2025 (11:00 am ET) Comments due 8/11/2025	EPA web page https://www.epa.gov/stationary-sources-air-pollution/mercury-and-air-toxics-standards Docket https://www.regulations.gov/docket/EPA-HQ-OAR-2018-0794
Reconsideration of GHG Reporting Proposal to amend the GHG reporting program to remove obligations for most source categories, including oil and natural gas distribution, and suspending other oil and natural gas reporting obligations until 2034. Press release addressed: "Reconsideration of mandatory Greenhouse Gas Reporting Program that imposed significant costs on the American energy supply	Proposed rule 9/16/2025 Public hearing 10/1/2025	EPA web page https://www.epa.gov/ghgreporting GHG Reporting Program web page for rulemaking notices https://www.epa.gov/ghgreporting/rulemaking-notices-ghg-reporting Docket https://www.regulations.gov/docket/EPA-HQ-OAR-2025-0186
★ **2009 GHG Endangerment Finding** Press release addressed: "Reconsideration of the 2009 Endangerment Finding and regulations and actions that rely on that Finding"	Proposed rule 8/1/2025 Final rule 2/18/2026	EPA web page https://www.epa.gov/regulations-emissions-vehicles-and-engines/proposed-rule-reconsideration-2009-endangerment-finding Docket https://www.regulations.gov/docket/EPA-HQ-OAR-2025-0194
★ **Reconsideration of Automobile GHG Rules** Press release addressed: "Reconsideration of light-duty, medium-duty, and heavy-duty vehicle regulations that provided the foundation for the Biden-Harris electric vehicle mandate"		
Risk Management Program Rule Press release addressed: "Reconsideration of Biden-Harris Administration Risk Management Program rule that made America's oil and natural gas refineries and chemical facilities less safe"		

Action(s) Taken / Rule(s) Addressed	Status	Links
Revisiting the PM2.5 NAAQS EPA filed a motion to vacate the 2/7/2024 PM NAAQS reconsideration on the grounds that the CAA process was not followed and that EPA did not appropriately consider costs. Press release addressed: "Reconsideration of Particulate Matter National Ambient Air Quality Standards that shut down opportunities for American manufacturing and small businesses"	Motion for Vacatur 11/24/2025	EPA web page https://www.epa.gov/pm-pollution/national-ambient-air-quality-standards-naaqs-pm
NESHAP (and Adjacent) Reconsiderations Press release addressed: "Reconsideration of multiple National Emission Standards for Hazardous Air Pollutants for American energy and manufacturing sectors"		
Aerosol coatings national VOC emission standards—interim final rule to revise compliance date (from 7/17/2025 to 1/17/2027) for 40 CFR 59 subpart E.	Interim final rule 7/2/2025 Comments due 8/1/2025	EPA web page https://www.epa.gov/stationary-sources-air-pollution/aerosol-coatings-national-volatile-organic-compound-emission Docket https://www.regulations.gov/docket/EPA-HQ-OAR-2006-0971
Integrated iron and steel NESHAP—final rule (signed 11/26/2025) to revise compliance date (from 7/1/2025 to 4/3/2027) for 40 CFR 63 subpart FFFFF.	Interim final rule 7/3/2025 Final rule (not yet published)	EPA web page https://www.epa.gov/stationary-sources-air-pollution/integrated-iron-and-steel-manufacturing-national-emission Docket https://www.regulations.gov/docket/EPA-HQ-OAR-2002-0083
Coke ovens NESHAPs—interim final rule to revise compliance date (from 7/7/2025 and 1/6/2026 to 7/5/2027) for 40 CFR 63 subparts L and CCCCC. EPA rescinded the interim final rule. Instead, subject sources were granted a 112(i)(4) 2-year exemption from compliance (see below).	Interim final rule 7/8/2025 Interim final rule rescission 12/5/2025	EPA web page https://www.epa.gov/stationary-sources-air-pollution/coke-ovens-batteries-national-emissions-standards-hazardous-air and https://www.epa.gov/stationary-sources-air-pollution/coke-ovens-pushing-quenching-and-battery-stacks-national-emission Docket https://www.regulations.gov/docket/EPA-HQ-OAR-2003-0051 and https://www.regulations.gov/docket/EPA-HQ-OAR-2002-0085

Action(s) Taken / Rule(s) Addressed	Status	Links
Secondary Lead Smelting NESHAP—proposed rule ending the ongoing reconsideration and risk review of the NESHAP, without lowering or adding emissions limits.	Proposed rule 10/1/2025 Comments now due 12/8/2025	EPA web page https://www.epa.gov/stationary-sources-air-pollution/secondary-lead-smelting-national-emissions-standards-hazardous-air Docket https://www.regulations.gov/docket/EPA-HQ-OAR-2025-0078
★ **Restructuring the Regional Haze Program (new glidepath policy)** In several recent SIP actions, EPA has announced the following new policy: "Where visibility conditions for a Class I area impacted by a State are below the URP and the State has considered the four statutory factors, the State will have presumptively demonstrated reasonable progress for the second planning period for that area." The new policy was first announced in the West Virginia SIP approval and then subsequently announced in SIP approvals for many other states. EPA has requested comment on the new policy, but it has not formally kicked off a rulemaking project to revise the regional haze rule.	EPA web page https://www.epa.gov/visibility/visibility-regulatory-actions Federal Register notices referencing new policy West Virginia (4/18/25) – final (7/7/25) S Dakota (5/14/25) – final (8/28/25) Vermont (5/23/25) – final (11/18/25) Texas (5/23/25) – final (12/5/25) California (6/18/25) – final (9/5/25) Indiana (6/18/25) – extended (7/16/25) final (1/26/26) Michigan (6/18/25) – final (9/5/25) Ohio (8/30/24) – final (7/8/25) Colorado (7/16/25) – final full disapproval (1/26/26) Washington (7/24/25) – final (9/25/25) S Carolina (7/31/25) – final (12/11/25) correction (12/30) Tennessee (8/19/25) – final (12/11/25) Arkansas (9/5/25) Montana (9/11/25) – final (11/28/25) Nevada (10/23/25) – final (2/6/25) Alaska (10/30/25) – extended (11/20/25) Rhode Island (11/20/25) Oklahoma (2/12/26)	
Restructuring the Regional Haze Program (extension of SIP due date) Extends due date three years (to 7/31/2031) but makes no other changes to the planning period, progress report due dates, etc.	Proposed rule 12/23/2024 Final rule 1/6/2026	Docket https://www.regulations.gov/docket/EPA-HQ-OAR-2023-0262
Restructuring the Regional Haze Program (regional haze rule revisions) Press release addressed: "Restructuring the Regional Haze Program that threatened the supply of affordable energy for American families"	Advance Notice of Proposed Rulemaking 10/2/2025	Docket https://www.regulations.gov/docket/EPA-HQ-OAR-2025-1477

Action(s) Taken / Rule(s) Addressed	Status	Links
Ending the Good Neighbor Plan Proposed rule regarding interstate transport for the 2015 8-hour ozone NAAQS, including: withdrawal of previously proposed disapproval for TN, removing "good neighbor" provisions from 10 states, and approving SIPs for AL, KY, MS, and TN. (Also impacts other states.) Press release addressed: "Ending so-called 'Good Neighbor Plan' which the Biden-Harris Administration used to expand federal rules to more states and sectors beyond the program's traditional focus and led to the rejection of nearly all State Implementation Plans"	Proposed rule 1/30/2026	EPA web page https://www.epa.gov/Cross-State-Air-Pollution/interstate-transport-2015-ozone-naaqs Docket https://www.regulations.gov/docket/EPA-HQ-OAR-2025-0192
Resolve SIP Backlog Press release addressed: "Working with states and tribes to resolve massive backlog with State Implementation Plans and Tribal Implementation Plans that the Biden-Harris Administration refused to resolve"		
Reconsider Exceptional Events Rules New EPA policy states that SIPs should not limit strategic deployment of prescribed fire as part of control strategies for NAAQS nonattainment or regional haze. Press release addressed: "Reconsideration of exceptional events rulemaking to work with states to prioritize the allowance of prescribed fires within State and Tribal Implementation Plans"	Final policy 10/16/2025	EPA press release https://www.epa.gov/newsreleases/epa-issues-policy-guidance-help-prevent-catastrophic-wildfires-promote-use-prescribed
Reconstitute Science Advisory Board (SAB) and CASAC The nomination period for the boards is now closed. EPA will publish a List of Candidates on the CASAC and SAB web pages, followed by a a 21-day public comment period. Press release addressed: "Reconstituting Science Advisory Board and Clean Air Scientific Advisory Committee"	Published 5/1/2025 CASAC SAB CASAC list published 7/8/2025 Comments due 7/29/2025	EPA web pages https://casac.epa.gov and https://sab.epa.gov CASAC candidate list
Overhauling Social Cost of Carbon Press release addressed: "Overhauling Biden-Harris Administration's 'Social Cost of Carbon' "		

Action(s) Taken / Rule(s) Addressed	Status	Links
Redirecting Enforcement Resources Press release addressed: "Redirecting enforcement resources to EPA's core mission to relieve the economy of unnecessary bureaucratic burdens that drive up costs for American consumers"		
Terminating EJ and DEI Programs Press release addressed: "Terminating Biden's Environmental Justice and DEI arms of the agency"		
Enforcement Discretion to further NC Recovery from Hurricane Helene Press release addressed: "Utilizing enforcement discretion to further North Carolina's recovery from Hurricane Helene"		Hurricane Helene resources (link for Metro 4/SESARM directors) Storm Debris

Other Rulemakings and Related Actions

Action / Rule Addressed	Status	Links
Temporary CISWI Use for Disaster Recovery Interim final rule to provide for incinerators (including ACI) subject to CISWI to combust debris from a disaster or emergency on a temporary basis.	Final rule 8/26/2025 Comments due 10/10/2025	EPA web page https://www.epa.gov/stationary-sources-air-pollution/commercial-and-industrial-solid-waste-incineration-units-ciswi-new
Other Solid Waste Incinerators (OSWI) Final rule (signed 6/17/2025) sets emissions standards for OSWI, including SSM provisions and new subcategories. Does not update requirements associated with ACIs and permitting. Amendments impact NSPS and EG at 40 CFR 60 subparts A, CCCC, DDDD, EEEE, and FFFF.	Final rule published 6/30/2025 Effective 8/29/2025	EPA web page https://www.epa.gov/stationary-sources-air-pollution/other-solid-waste-incinerators-oswi-new-source-performance Docket https://www.regulations.gov/docket/EPA-HQ-OAR-2003-0156

Action / Rule Addressed	Status	Links
Removal of Affirmative Defense Provisions from Specified NSPS and NESHAP Affirmative defense provisions in some NSPS and NESHAP allow sources to demonstrate that despite efforts to avoid a malfunction, a standard was violated. Provision was vacated in a court case and is being systematically removed.	Proposed rule 6/24/2024 (Addressed 18 NESHAP and NSPS rules.)	Final Rules Polyether Polyols (9/2/2025) EPA web page https://www.epa.gov/stationary-sources-air-pollution/removal-affirmative-defense-provisions-specified-new-source Docket https://www.regulations.gov/docket/EPA-HQ-OAR-2023-0509
Hazardous Waste Combustors (HWC) NESHAP Withdrawal of SSM provisions proposed in July 2024, along with proposal of new limits, SSM provisions, electronic reporting, and other requirements.	Proposed rule 10/10/2025 Comments due 12/26/2025	EPA web page https://www.epa.gov/stationary-sources-air-pollution/hazardous-waste-combustors-national-emission-standards-hazardous Docket https://www.regulations.gov/docket/EPA-HQ-OAR-2004-0022
Project Emissions Accounting Rule (PEAR) Proposed rule to clarify the process for evaluating whether NSR permitting applies to projects at existing major sources.	Proposed rule 5/3/2024 Withdrawn 7/21/2025	EPA web page https://www.epa.gov/nsr/nsr-regulatory-actions Docket https://www.regulations.gov/docket/EPA-HQ-OAR-2022-0381
Title V Applicable Requirements Rule Proposed rule to set policy regarding when and whether applicable NSR requirements should be reviewed or modified via Title V permitting. Final rule is at EPA senior management review.	Proposed rule 1/9/2024	EPA web page https://www.epa.gov/title-v-operating-permits/current-regulations-and-regulatory-actions Docket https://www.regulations.gov/docket/EPA-HQ-OAR-2023-0401
Begin Actual Construction EPA is planning to propose rules to define begin actual construction, providing more flexibility to determine on a case-by-case basis what activities can occur prior to permit issuance.	In development (expected in fall) Maricopa Co. determination 9/2/2025	EPA web page https://www.epa.gov/nsr/construction-activities-allowed-obtaining-preconstruction-air-permit
Minor Source NSR Guidance EPA had discussed issuing draft guidance for public comment. EPA now plans a rulemaking effort. Proposed rule at EPA senior management review.	In development (expect proposal in Jan or Feb)	EPA web page https://www.epa.gov/nsr/minor-new-source-review-program-public-notice-requirements-under-40-cfr-51161b3

Action / Rule Addressed	Status	Links
Air Curtain Incinerator Consolidation EPA plans an action to consolidate the rules for ACIs that only burn wood wastes, yard wastes, and clean lumber into a single location.	In development	OMB regulatory agenda web page https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202410&RIN=2060-AW43
Actual to Projected Actual Proposed rule at EPA senior management review.		
Source Reactivation Proposed rule at EPA senior management review.		
Title V Emergency Affirmative Defense EPA staff have briefed senior management and are waiting for direction.		
Major MACT to Area (MM2A) S.J. Res. 31 disapproved the 2024 amendments to the 2020 MM2A rule. The 2024 MM2A rule is "treated as though it had never taken effect." The 2024 amendments had impacted sources of seven persistent and bioaccumulative HAP under CAA 112(c)(6).	Joint resolution 6/20/2025 Final rule 1/2/2026	https://www.epa.gov/stationary-sources-air-pollution/reclassification-major-sources-area-sources-under-section-112
Stationary Combustion Turbines NSPS Amendments to the NSPS for stationary combustion turbines and stationary gas turbines (40 CCR 60 subpart GG, KKKK, and new KKKKa). Requires combustion controls including SCR for NOx. Maintains current SO2 limits (low-sulfur fuels).	Proposed rule 12/13/2024 Final rule 1/15/2026	https://www.epa.gov/stationary-sources-air-pollution/stationary-gas-and-combustion-turbines-new-source-performance

112(i)(4) Presidential Exemptions (2-year delay in MACT compliance date)

Action / Rule Addressed	Status	Links
Coal- and Oil-Fired Electric Utility Steam Generating Units (MATS, 1st proclamation) 40 CFR 63 Subpart UUUUU	Proclamation	EPA web page Fact sheet List of sources https://www.epa.gov/system/files/documents/2025-04/regulatory-relief-for-certain-stationary-annex-1.pdf

Action / Rule Addressed	Status	Links
Coal- and Oil-Fired Electric Utility Steam Generating Units (MATS, 2nd proclamation) 40 CFR 63 Subpart UUUUU	Proclamation (includes list of sources)	EPA web page Fact sheet
ETO Sterilizers 40 CFR 63 Subpart O	Proclamation (includes list of sources)	EPA web page Fact sheet
HON; Group I and II Polymers and Resins Multiple (link to initial ETO-related final rule)	Proclamation (includes list of sources)	EPA web page Fact sheet
Taconite Iron Ore Processing 40 CFR 63 Subpart RRRRR	Proclamation (includes list of sources)	EPA web page Fact sheet
Coke Ovens: Pushing, Quenching, and Battery Stacks and Coke Oven Batteries	Proclamation (includes list of sources)	EPA web page

[1] There were not 31 distinct press releases, but the talking points from EPA consistently referred to "31 actions." To get to 31, you have to individually count each of the three mobile source GHG rules and each of the eight NESHAP rules. The full list of 31 actions follow:

1. Reconsideration of regulations on power plants (Clean Power Plan 2.0)
2. Reconsideration of regulations throttling the oil and gas industry (OOOO b/c)
3. Reconsideration of Mercury and Air Toxics Standards that improperly targeted coal-fired power plants (MATS)
4. Reconsideration of mandatory Greenhouse Gas Reporting Program that imposed significant costs on the American energy supply (GHG Reporting Program)
5. Reconsideration of limitations, guidelines and standards (ELG) for the Steam Electric Power Generating Industry to ensure low-cost electricity while protecting water resources (Steam Electric ELG) *(NOTE: not CAA)*
6. Reconsideration of wastewater regulations for coal power plants to help unleash American energy (Oil and Gas ELG) *(NOTE: not CAA)*
7. Reconsideration of Biden-Harris Administration Risk Management Program rule that made America's oil and natural gas refineries and chemical facilities less safe (Risk Management Program Rule)
8. Reconsideration of light-duty, medium-duty, and heavy-duty vehicle regulations that provided the foundation for the Biden-Harris electric vehicle mandate (Car GHG Rules) – Multi-pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles
9. Reconsideration of light-duty, medium-duty, and heavy-duty vehicle regulations that provided the foundation for the Biden-Harris electric vehicle mandate (Car GHG Rules) – Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles, Phase 3
10. Reconsideration of light-duty, medium-duty, and heavy-duty vehicle regulations that provided the foundation for the Biden-Harris electric vehicle mandate (Car GHG Rules) – Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards
11. Reconsideration of the 2009 Endangerment Finding and regulations and actions that rely on that Finding (Endangerment Finding)
12. Reconsideration of technology transition rule that forces companies to use certain technologies that increased costs on food at grocery stores and semiconductor manufacturing (Technology Transition Rule)
13. Reconsideration of Particulate Matter National Ambient Air Quality Standards that shut down opportunities for American manufacturing and small businesses (PM 2.5 NAAQS)
14. Reconsideration of multiple National Emission Standards for Hazardous Air Pollutants for American energy and manufacturing sectors (NESHAPs) - ("HON Rule").
15. Reconsideration of multiple National Emission Standards for Hazardous Air Pollutants for American energy and manufacturing sectors (NESHAPs) – ("Sterilizer Rule")

16. Reconsideration of multiple National Emission Standards for Hazardous Air Pollutants for American energy and manufacturing sectors (NESHAPs) – ("Rubber Tire Rule")
17. Reconsideration of multiple National Emission Standards for Hazardous Air Pollutants for American energy and manufacturing sectors (NESHAPs) – ("Copper Rule")
18. Reconsideration of multiple National Emission Standards for Hazardous Air Pollutants for American energy and manufacturing sectors (NESHAPs) – ("Iron and Steel Rule")
19. Reconsideration of multiple National Emission Standards for Hazardous Air Pollutants for American energy and manufacturing sectors (NESHAPs) – ("Lime Rule")
20. Reconsideration of multiple National Emission Standards for Hazardous Air Pollutants for American energy and manufacturing sectors (NESHAPs) – ("Coke Ovens Rule").
21. Reconsideration of multiple National Emission Standards for Hazardous Air Pollutants for American energy and manufacturing sectors (NESHAPs) – ("Taconite Rule")
22. Restructuring the Regional Haze Program that threatened the supply of affordable energy for American families (Regional Haze)
23. Overhauling Biden-Harris Administration's "Social Cost of Carbon"
24. Redirecting enforcement resources to EPA's core mission to relieve the economy of unnecessary bureaucratic burdens that drive up costs for American consumers (Enforcement Discretion)
25. Terminating Biden's Environmental Justice and DEI arms of the agency (EJ/DEI)
26. Ending so-called "Good Neighbor Plan" which the Biden-Harris Administration used to expand federal rules to more states and sectors beyond the program's traditional focus and led to the rejection of nearly all State Implementation Plans
27. Working with states and tribes to resolve massive backlog with State Implementation Plans and Tribal Implementation Plans that the Biden-Harris Administration refused to resolve (SIPs/TIPs)
28. Reconsideration of exceptional events rulemaking to work with states to prioritize the allowance of prescribed fires within State and Tribal Implementation Plans (Exceptional Events)
29. Reconstituting Science Advisory Board and Clean Air Scientific Advisory Committee (SAB/CASAC)
30. Prioritizing coal ash program to expedite state permit reviews and update coal ash regulations (CCR Rule) *(NOTE: not CAA—see CCR actions published in Federal Register on 7/22/2025)*
31. Utilizing enforcement discretion to further North Carolina's recovery from Hurricane Helene