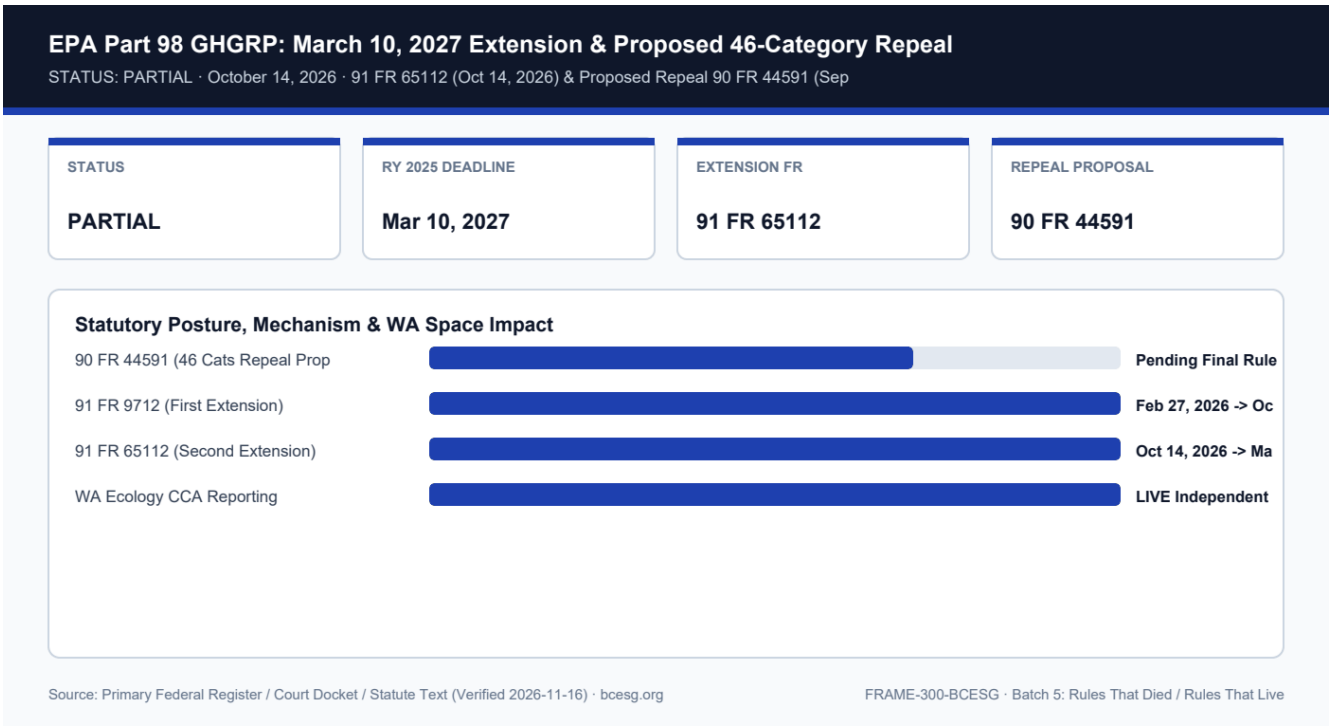
EPA GHGRP (40 CFR Part 98): PARTIAL — RY 2025 Extended to Mar 10, 2027 (91 FR 65112); 46 Categories Proposed for Repeal

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Rule: EPA Greenhouse Gas Reporting Program (40 CFR Part 98) | **Status:** PARTIAL | **Instrument:** 91 FR 65112 (Oct 14, 2026) & Proposed Repeal 90 FR 44591 (Sept 16, 2025) | **Date:** October 14, 2026

Verdict & Proof: EPA's 40 CFR Part 98 GHGRP is PARTIAL / CONTESTED. Baseline monitoring remains legally in effect, but EPA proposed repealing 46 non-Subpart W categories (90 FR 44591, Sept 16, 2025) and pushed the RY 2025 reporting deadline twice—most recently to March 10, 2027 (91 FR 65112, Oct 14, 2026).



EPA Part 98 Action	Citation & Date	Effect
Reconsideration / 46-Cat Repeal Prop.	90 FR 44591 (Sep 16, 2025)	Proposed permanent removal of 46 categories
First RY 2025 Extension	91 FR 9712 (Feb 27, 2026)	Moved Mar 31, 2026 deadline to Oct 30, 2026
Second RY 2025 Extension	91 FR 65112 (Oct 14, 2026)	Moved Oct 30, 2026 deadline to Mar 10, 2027

Statutory Posture: Active Monitoring vs. Proposed Repeal & Deadline Push

On September 16, 2025, EPA published a major reconsideration proposal (90 FR 44591) to permanently eliminate Part 98 reporting obligations for 46 non-Subpart W industrial source categories and suspend most Subpart W segments until RY 2034. While reviewing over 50,000 public comments, EPA extended the RY 2025 reporting deadline twice: first to October 30, 2026 (91 FR 9712, Feb 27, 2026), and then via an interim final rule on October 14, 2026 (91 FR 65112) to March 10, 2027.

Until EPA publishes a final repeal rule, 40 CFR Part 98 monitoring and recordkeeping remain legally on the books for facilities emitting >=25,000 metric tons CO2e/year.

What Applies in Washington Regardless of EPA

Even if EPA finalizes the 46-category federal repeal, Washington Ecology's state GHG reporting rule (WAC 173-441) and the Climate Commitment Act (RCW 70A.65) remain fully active for covered facilities (>=10,000 MT CO2e reporting / >=25,000 MT compliance).

Verified Primary Sources & Internal Bridges

• Federal Register: EPA GHGRP Extension (91 FR 65112): https://www.federalregister.gov/documents/2026/10/14/2026-19532/greenhouse-gas-reporting-program-deadline-extension

• eCFR Title 40 Part 98: https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-98