

**Status of Active Sanction Clocks under the Clean Air Act
As of September 30, 2025**

Overview: This table shows the status of sanction “countdown” clocks under the Clean Air Act that have been started and have not yet been officially terminated. (Additional background is provided at the end of this document.) The “Date of Sanction” columns indicates the date by which sanctions have applied or would apply if they have not been stayed or deferred. The “Sanction Clock Stayed or Deferred” column indicates whether EPA has taken an action to stay the relevant sanction after it had started to apply; and/or whether EPA has taken an action to defer one or both sanctions that had not yet applied. Additional information is available under the “Status” column. Maps for the areas referenced in this table are available at: <https://www.epa.gov/green-book/green-book-map-download>.

TABLE 1. Areas Where Sanctions Are Currently in Effect

State	Area	Required Element(s)	Effective Date and Type of Finding	Date of New Source Review 2:1 Offset Sanction	Date of Highway Sanction	Sanction Clock Stayed or Deferred?	Status
AZ	Hayden	2010 SO ₂ : Several elements including Rule R18-2-B1302 (Limits on SO ₂ from the Hayden Smelter)	12/7/2020 <u>Limited Disapproval</u>	6/7/2022	12/7/2022	No	
AZ	Hayden	2010 SO ₂ : Attainment Demonstration, SO ₂ Contingency Measures, SO ₂ RACM/RACT, SO ₂ RFP	12/10/2020 <u>Partial Disapproval</u>	6/10/2022	12/10/2022	No	
SD	Nonattainment areas statewide (for applicable NAAQS)	SSM SIP Call Response	2/11/2022 <u>Failure to Submit</u>	8/11/2023	2/11/2024	No	

TABLE 2. Areas Where Sanctions Have Not Taken Effect

State	Area	Required Element(s)	Effective Date and Type of Finding	Date of New Source Review 2:1 Offset Sanction	Date of Highway Sanction	Sanction Clock Stayed or Deferred?	Status
WV	Nonattainment Areas Statewide (for applicable NAAQS)	SSM SIP Call Response	5/17/2023 <u>Failure to Submit</u>	11/17/2024	5/17/2025	No	
IN	Chicago	2015 Ozone NAAQS: NO _x RACT for major sources	11/17/2023 <u>Failure to Submit</u>	5/17/2025	11/17/2025	No	
AZ	Miami	2010 SO ₂ Attainment Plan Emissions Inventory, Attainment Demonstration, RACM/RACT, RFP, NNSR, Contingency Measures	9/16/2024 <u>Failure to Submit</u>	3/16/2026	9/16/2026	No	
NY	St Lawrence County (part)	2010 SO ₂ Attainment Plan Emissions Inventory, Attainment Demonstration, RACM/RACT, RFP, NNSR, Contingency Measures	9/16/2024 <u>Failure to Submit</u>	3/16/2026	9/16/2026	No	

State	Area	Required Element(s)	Effective Date and Type of Finding	Date of New Source Review 2:1 Offset Sanction	Date of Highway Sanction	Sanction Clock Stayed or Deferred?	Status
VA	Giles County (part)	2010 SO2 Attainment Plan Emissions Inventory, Attainment Demonstration, RACM/RACT, RFP, NNSR, Contingency Measures	9/16/2024 <u>Failure to Submit</u>	3/16/2026	9/16/2026	No	
LA	St. Bernard Parish	2010 SO2 Attainment Plan Emissions Inventory, Attainment Demonstration, RACM/RACT, RFP, NNSR, Contingency Measures	9/16/2024 <u>Failure to Submit</u>	3/16/2026	9/16/2026	No	SIP submitted by LDEQ on July 31, 2025.
PA	Nonattainment Areas Statewide for applicable NAAQS	2008 Ozone CTG RACT	9/16/2024 Disapproval	3/16/2026	9/16/2026	No	
CA	San Diego County	RACT SIP elements for 2008 and 2015 ozone	1/13/2025 <u>Failure to Submit</u>	7/13/2026	1/13/2027	No	
AZ	Maricopa County	Rules 352 and 353, gasoline stations/ Stage I vapor recovery	2/10/2025 <u>Limited Disapproval</u>	8/10/2026	2/10/2027	No	
AZ	Phoenix-Mesa	2008 ozone RACT for gasoline tank trucks/ Stage I	2/10/2025 <u>Disapproval</u>	8/10/2026	2/10/2027	No	

TABLE 3. Areas Where Sanctions Have Been Deferred or Stayed

State	Area	Required Element(s)	Effective Date and Type of Finding	Date of New Source Review 2:1 Offset Sanction	Date of Highway Sanction	Sanction Clock Stayed or Deferred?	Status
CA	San Francisco Bay Area	1-hour Ozone Attainment Plan	10/22/2001 <u>Limited Disapproval</u>	4/22/2003	10/22/2003	Yes	Offset sanction stayed (and highway sanction deferred) by interim final determination on 07/16/03 (68 FR 42172). Effective on 4/24/2004 the interim final action stayed the offset sanction and deferred the highway sanction for as long as the area continues to attain the 1-hour ozone standard.
NY	Jefferson County	1997 Ozone attainment demonstration, RFP	3/24/2008 <u>Failure to Submit</u>	9/24/2009	3/24/2010	Yes	Sanctions clocks deferred by Clean Data Determination (73 FR 15672)
CA	Sacramento Metro Area, CA — Yolo/Solano Air Quality Management District portion; Feather River Air Quality Management District portion; Placer County Air Pollution Control District portion; El Dorado County Air Quality Management District portion	1-hour Ozone section 185 fee program	1/5/2010 <u>Failure to Submit</u>	7/5/2011	1/5/2012	Yes	On 05/18/11, interim final determination deferred sanctions (76 FR 28661) that was based on proposed termination determination (76 FR 28696) published the same day. The interim final determination is effective 05/18/11, although EPA accepted comments on both notices. Sanctions clock permanently stopped on 10/28/2022 for Feather River AQMD portion due to complete rule submittal. Sanctions clock permanently stopped on 8/8/2024 for El Dorado AQMD portion due to complete rule submittal.

State	Area	Required Element(s)	Effective Date and Type of Finding	Date of New Source Review 2:1 Offset Sanction	Date of Highway Sanction	Sanction Clock Stayed or Deferred?	Status
MI	St. Clair	2010 SO2: Emission Inventory, SO2 Attainment Demonstration, SO2 Contingency Measures, SO2 Nonattainment NSR, SO2 RACM/RACT, SO2 RFP	10/21/2019 <u>Failure to Submit</u>	4/21/2021	10/21/2021	Yes	On 12/7/2021, EPA issued a Clean Data Determination for the St. Clair, MI SO2 area (86 FR 69173). The CDD action was effective on 12/7/2021 and stayed the emission offset and highway sanctions being imposed.
TX	Titus	2010 SO2: Emission Inventory, SO2 Attainment Demonstration, SO2 Contingency Measures, SO2 Nonattainment NSR, SO2 RACM/RACT, SO2 RFP	9/9/2020 <u>Failure to Submit</u>	3/9/2022	9/9/2022	Yes	On May 14, 2021, EPA issued a Clean Data Determination for the Titus, TX SO2 area (86 FR 26401). The CDD action was effective on June 14, 2021 and deferred the emission offset and highway sanctions. The CDD only suspended the attainment demonstration, contingency measures, nonattainment NSR, RACM/RACT, and RFP requirements. The sanctions clocks associated with failure to submit Emission Inventory and Nonattainment NSR requirements are terminated by completeness letter dated 8/24/2022.

State	Area	Required Element(s)	Effective Date and Type of Finding	Date of New Source Review 2:1 Offset Sanction	Date of Highway Sanction	Sanction Clock Stayed or Deferred?	Status
TX	Freestone/Anderson	2010 SO2: Emission Inventory, SO2 Attainment Demonstration, SO2 Contingency Measures, SO2 Nonattainment NSR, SO2 RACM/RACT, SO2 RFP	9/9/2020 <u>Failure to Submit</u>	3/9/2022	9/9/2022	Yes	On May 14, 2021, EPA issued a Clean Data Determination for the Titus, TX SO2 area (86 FR 26401). The CDD action was effective on June 14, 2021 and deferred the emission offset and highway sanctions. The CDD only suspended the attainment demonstration, contingency measures, nonattainment NSR, RACM/RACT, and RFP requirements. The sanctions clocks associated with failure to submit Emission Inventory and Nonattainment NSR requirements are terminated by completeness letter dated 8/24/2022.
CA	Western Mojave Desert	2008 Ozone: Rule 1160, Internal Combustion Engines	10/12/2021 <u>Limited Disapproval</u>	4/12/2023	10/12/2023	Yes	Interim final determination deferring sanctions was published on 4/7/2023 (88 FR 20776). NPRM proposing approval of revised rule was also published on 4/7/2023 (88 FR 20788).
CA	Antelope Valley	1-hr Ozone: section 185 fees (Rule 315)	10/31/2022 <u>Disapproval</u>	5/1/2024	10/31/2024	Yes	Proposed approval of revised rule and interim final determination deferring sanctions published 4/22/2024, 89 FR 29277 (NPRM) and 89 FR 29259 (IFD)
CA	Mojave Desert	1-hr Ozone: section 185 fees (Rule 315)	10/31/2022 <u>Disapproval</u>	5/1/2024	10/31/2024	Yes	Proposed approval of revised rule and interim final determination deferring sanctions published 4/22/2024, 89 FR 29277 (NPRM) and 89 FR 29259 (IFD)

State	Area	Required Element(s)	Effective Date and Type of Finding	Date of New Source Review 2:1 Offset Sanction	Date of Highway Sanction	Sanction Clock Stayed or Deferred?	Status
CA	Sacramento Metro AQMD	2008 and 2015 Ozone: 2016 Oil and Gas CTG	10/31/2022 <u>Disapproval</u>	5/1/2024	10/31/2024	Yes	Proposed approval and interim final determination deferring sanctions published 5/3/2024, <u>89 FR 36729</u> (NPRM) and <u>89 FR 36679</u> (IFD).
CA	San Joaquin Valley	2008 and 2015 Ozone: 2016 Oil and Gas CTG	10/31/2022 <u>Disapproval</u>	5/1/2024	10/31/2024	Yes	Proposed approval and interim final determination deferring sanctions published 5/3/2024, <u>89 FR 36729</u> (NPRM) and <u>89 FR 36679</u> (IFD).
CA	South Coast AQMD	2008 and 2015 Ozone: 2016 Oil and Gas CTG	10/31/2022 <u>Disapproval</u>	5/1/2024	10/31/2024	Yes	Proposed approval and interim final determination deferring sanctions published 5/3/2024, <u>89 FR 36729</u> (NPRM) and <u>89 FR 36679</u> (IFD).
CA	Ventura County	2008 and 2015 Ozone: 2016 Oil and Gas CTG	10/31/2022 <u>Disapproval</u>	5/1/2024	10/31/2024	Yes	Proposed approval and interim final determination deferring sanctions published 5/3/2024, <u>89 FR 36729</u> (NPRM) and <u>89 FR 36679</u> (IFD).
CA	Yolo-Solano	2008 and 2015 Ozone: 2016 Oil and Gas CTG	10/31/2022 <u>Disapproval</u>	5/1/2024	10/31/2024	Yes	Proposed approval and interim final determination deferring sanctions published 5/3/2024, <u>89 FR 36729</u> (NPRM) and <u>89 FR 36679</u> (IFD).
CO	Denver Metro/North Front Range 2008 Ozone nonattainment area.	Periodic reporting of records. Rule revisions related to RACT and control measures needed for demonstrating attainment.	6/8/2023 <u>Limited Disapproval</u>	12/8/2024	6/8/2025	Yes	Proposed conditional approval/approval and interim final determination on Aug. 6, 2024, <u>89 FR 63852</u> (NPRM) and <u>89 FR 63818</u> (IFD).
CA	San Joaquin Valley	2008 Ozone: Contingency Measures	11/2/2022 <u>Disapproval</u>	5/2/2024	11/2/2024	Yes	Proposed approval and interim final determination published on October 25, 2024 staying offset sanctions and deferring highway sanctions. <u>89 FR 85064</u> (IFD).

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CA	Mojave Desert AQMD	Rule 1157 Boilers and Process Heaters	7/17/2023 <u>Limited Approval/Disapproval</u>	1/17/2025	7/17/2025	Yes	Proposed approval and interim final determination to defer sanctions published 12/26/2024, <u>89 FR 104944</u> (NPRM) and <u>89 FR 104886</u> (IFD). NFRM was published on 5/19/2025, 90 FR 21236. The sanctions will permanently stop on NFRM effective date of 6/18/2025.
CA	San Joaquin Valley	NSR Rule 2201	8/9/2023 <u>Limited Disapproval</u>	2/9/2025	8/9/2025	Yes	Proposed rule and interim final determination to defer sanctions was published 1/21/2025, <u>90 FR 6928</u> (NPRM) and <u>90 FR 6809</u> (IFD).
AK	Fairbanks	2006 24-Hour PM2.5 Serious Area and 189(d) Plan	1/4/2024 <u>Partial Disapproval</u>	7/4/2025	1/4/2026	Yes	Proposed rule and interim final determination to defer sanctions was published 1/8/2025, 90 FR 1600 (NPRM) and 90 FR 1378 (IFD).
CA	Sacramento Metro Area	2008 Ozone: Contingency Measures	7/17/2023 <u>Disapproval</u>	1/17/2025	7/17/2025	Yes	Proposed rule for DAAD and interim final determination to stay offset sanctions and defer highway sanctions was published on 3/21/2025, 90 FR 13316 (NPRM) and 90 FR 13288 (IFD)
CA	Antelope Valley AQMD	NSR rules	8/2/2023 <u>Limited Disapproval</u>	2/2/2025	8/2/2025	Yes	Interim final determination to defer sanctions published 3/26/2025, <u>90 FR 13702</u> .
CA	Placer	Rule 502 NSR	10/26/2023 <u>Limited Disapproval</u>	4/26/2025	10/26/2025	Yes	Proposed rule and interim final determination to defer sanctions published 4/2/2025, <u>90 FR 14426</u> (NPRM) and 90 FR 14414 (IFD).

State	Area	Required Element(s)	Effective Date and Type of Finding	Date of New Source Review 2:1 Offset Sanction	Date of Highway Sanction	Sanction Clock Stayed or Deferred?	Status
CA	Eastern Kern APCD	Rule 425.3 Portland Cement Kilns (NOx)	7/5/2023 <u>Limited Approval/Disapproval</u>	1/5/2025	7/5/2025	Yes	Proposed approval of revised rule and interim final determination deferring sanctions published 6/4/2025, <u>90 FR 23653</u> (NPRM) and <u>90 FR 23616</u> (IFD)
CA	Eastern Kern APCD	Rule 425 Stationary Gas Turbines	7/17/2023 <u>Limited Approval/Disapproval</u>	1/17/2025	7/17/2025	Yes	Proposed approval and IFD (90 FR 26232 and 90 FR 26207) Proposed approval of revised rule and interim final determination deferring sanctions published 6/20/2025, <u>90 FR 26232</u> (NPRM) and <u>90 FR 26207</u> (IFD)
CO	Denver Metro/North Front Range	2008 Ozone CM	12/7/2023 <u>Disapproval</u>	6/7/2025	12/7/2025	Yes	On 5/8/2025, a proposed rule (90 FR 19447) for Colorado's Serious Area Contingency Measures SIP and a concurrent interim final determination (90 FR 19424) to defer sanctions published in the Federal Register.
CO	Denver Metro/North Front Range	2008 Ozone RACT SIP elements	1/8/2024 <u>Disapproval</u>	7/8/2025	1/8/2026	Yes	On 6/18/2025, a proposed rule (90 FR 25960) for Colorado's outstanding Serious Area RACT obligations as well as a concurrent interim final determination (90 FR 25901) to defer sanctions published in the Federal Register.
CA	Mojave Desert AQMD	NSR rules	7/31/2023 <u>Limited Disapproval</u>	1/31/2025	7/31/2025	Yes	Proposed approval of revised rule and interim final determination deferring sanctions published 7/24/2025, <u>90 FR 34785</u> (NPRM) and <u>90 FR 34785</u> (IFD).

State	Area	Required Element(s)	Effective Date and Type of Finding	Date of New Source Review 2:1 Offset Sanction	Date of Highway Sanction	Sanction Clock Stayed or Deferred?	Status
GU	Piti-Cabras	2010 SO2: Emission Inventory, SO2 Attainment Demonstration, SO2 Contingency Measures, SO2 Nonattainment NSR, SO2 RACM/RACT, SO2 RFP	12/3/2020 <u>Failure to Submit</u>	6/3/2022	12/3/2022	Yes	On 7/16/2025, the EPA issued a direct final rule finding complete and approving the base year emissions inventory originally required for the 2010 SO2 SIP. (90 FR 31877) On 9/18/2025, the EPA then issued a final rule approving Guam's NNSR program (90 FR 44987) and issued a Clean Data Determination for the Piti-Cabras 2010 SO2 nonattainment area (90 FR 44985). Upon the effective date of these final actions the sanctions will be permanently lifted with respect to NNSR and EI and stayed with respect to the remaining elements so long as the area continues to attain the 2010 SO2 NAAQS.

BACKGROUND INFORMATION

Section 179(b) of the Clean Air Act identifies two types of sanctions “clocks” that are triggered by certain EPA actions, including: a finding that a state failed to submit (FFS) a SIP or element thereof; a SIP disapproval action; or a finding that the state has failed to implement a SIP. The first two triggering actions also start a clock for EPA’s obligation to promulgate a Federal Implementation Plan (FIP) within two years of the effective date of the triggering action.

Sanctions and FIP Clocks

Nonattainment New Source Review (NSR) Sanctions

The first sanction clock that starts on the effective date of a triggering action relates to the emission offset requirement under the nonattainment new source review program. This sanction applies 18 months after the effective date of the triggering action if the SIP deficiency has not been resolved. Specifically, a ratio of at least 2-to-1 will be required for emissions reductions to be achieved within the nonattainment area to offset emissions from new or modified major facilities (as required under section 173).

Federal Highway Funding Sanctions

The second sanction clock that starts on the effective date of a triggering action relates to the imposition of certain restrictions on highway funding. This sanction applies 24 months after the effective date of the triggering action if the SIP deficiency has not been resolved. Specifically, EPA may impose a prohibition on the approval by the Secretary of Transportation of certain projects, or the awarding of certain grants.

Federal Implementation Plans (FIPs)

A Federal Implementation Plan (FIP) is an air quality plan that EPA is obligated to develop on behalf of a state or tribe under certain circumstances. EPA is required to promulgate a FIP within two years of a SIP disapproval action or a finding of failure to submit.

Clean Data Policy/Determinations

In designated nonattainment areas where monitored data (or modeling in limited instances) demonstrates that the NAAQS have been achieved, EPA interprets certain requirements of the CAA to no longer be applicable for so long as air quality continues to meet the relevant standard.

Under the Clean Data Policy, EPA may issue a determination of attainment (known informally as a Clean Data Determination (CDD)), after public notice and comment rulemaking, determining that a specific area is attaining the relevant NAAQS. For such areas the requirements to submit certain SIP elements related to attaining the NAAQS are suspended for so long as the area continues to attain the standard. A CDD will defer or stay the relevant sanctions clocks, based on the effective date of the final action.