



2026 New Hampshire Environmental
Regulatory Conference
September 9, 2026

Air Regulatory Update

Catherine Beahm, SIP Planning Administrator



NHDES Air Resources Division



**Director
Craig Wright**

Director's Office

**Assistant Director
Michael Fitzgerald**

Division Management

Atmospheric Science

**Planning & Rule
Development**

**Database and Business
Planning**

**Small Business
Technical Assistance**

Permitting & Environmental Health Bureau

**Gary Milbury
(6 vacancies)**

**Construction Permit
Program**

**Operating Permit
Program**

Environmental Health

Technical Assistance

Compliance Bureau

**Sheri Eldridge
(6 vacancies)**

Stack Testing

Emission Monitoring

**Inspections &
Compliance Assistance**

Inventory

Enforcement

Asbestos Program

Technical Services Bureau

**Jessica Wilcox
(5 vacancies)**

Ambient Monitoring

**Emissions Trading &
Other Market Based
Programs (RGGI)**

Clean Energy

Transportation Sector

2025 Updated NH Rules and SIP Actions



Effective Date	Rules	Impact	Further Information
11/1/2024	<u>Env-A 1800, Asbestos Management and Control</u>	Major rewrite of asbestos rule	<u>Asbestos Management</u> Karl Karlsson, Asbestos Program Manager
1/1/2026		Increase in existing fees	<u>Fee Summary</u>
1/8/2026	<u>Env-A 1400, Regulated Toxic Air Pollutants</u>	Covered ACGIH updates through 2023. Need to start 2024-2026 update.	<u>Air Toxics Compliance</u> Gary Milbury, PEHB Administrator

Submittal Date	State Implementation Plan (SIP) Action	Impact	Further Information
2/7/2025	<u>PM_{2.5} (primary) NAAQS</u>	Designation letter sent to EPA NH is in attainment for PM _{2.5} NAAQS	<u>State Implementation Plans</u> Lisa Camire, SIP Planning Analyst
12/10/2025	<u>SO₂ (secondary) NAAQS</u>	Designation letter sent to EPA NH is in attainment for SO ₂ NAAQS	<u>State Implementation Plans</u> Lisa Camire, SIP Planning Analyst
12/24/2025	SIP revision and 176A Petition	Remove the vehicle inspection program from NH SIP and remove the State of NH from the OTR	<u>Repeal of Motor Vehicle Inspection and Maintenance Program</u> Catherine Beahm, SIP Planning Administrator

2026 Updates to NH Rules



Date	Rules	Impact	Further Information
Final Effective 6/25/2026	<i>Env-A 3200, NO_x Budget Trading Program</i>	Readopt with little changes; updated form; 3 sources at 7 locations	<i>Air Emissions Trading Programs (Market Based)</i> NHDES contact: Brendan Wyman
Deadline 1/1/2027	<i>Env-A 4600, CO₂ Budget Trading Program (RGGI)</i> and <i>Env-A 4800, CO₂ Allowance Auction Program</i>	RGGI Third Program Review July 2025 – reduced CO ₂ cap and introduces 2 cost containment allowance levels	<i>Emission Reduction Strategies</i> NHDES contact: Brendan Wyman <i>HB 1738</i> relative to ratepayer benefits from RGGI
Rule Expiration 9/22/2027	<i>Env-A 500, Standards Applicable to Certain New or Modified Facilities and Sources of Hazardous Air Pollutants; State Plans for Designated Facilities and Pollutants</i>	Periodic update of delegation of federal regulations for NH to implement for state sources	<i>State Implementation Plans</i> Lisa Camire, SIP Planning Analyst
On hold	<i>Env-A 300, Ambient Air Quality Standards</i> *	PM _{2.5} (primary) and SO ₂ (secondary) NAAQS	<i>State Implementation Plans</i> Lisa Camire, SIP Planning Analyst

* Federal PM_{2.5} NAAQS uncertainty → Env-A 300 rulemaking paused → [*ARD-25-01 Guidance and Procedure for Performing Air Quality Impact Modeling in NH*](#)

2026 - 2027 Updates to NH State Plans/SIPs



Date	State Plans/SIPs	Impact	Further Information
Readopted 5/20/2025; Starting rulemaking process	<u>Env-A 4300, Other Solid Waste Incineration</u>	EG final June 2025; update to state plan with changes to rule; 1 source	<u>State Implementation Plans</u> Lisa Camire, SIP Planning Analyst
Due to EPA 1/22/2027	State Plan for GHG emissions from Oil & NG Facilities (<u>40 CFR 60, Subpart OOOOoc</u>)	EG final January 2026; proposing to adopt federal plan; backup plan is to write state plan if no action on federal plan	<u>State Implementation Plans</u> Lisa Camire, SIP Planning Analyst
Due to EPA 3/10/2027	<u>Env-A 3300, Municipal Waste Combustion (MWC)</u>	EG final March 2026; update to state plan with changes to rule; will require other rulemaking in addition; 1 source	<u>State Implementation Plans</u> Lisa Camire, SIP Planning Analyst
Due 9/20/2027	Second 10-year Maintenance Plan for 2010 SO ₂ NAAQS	NH interested in removing Pembroke SO ₂ monitor; need SIP revision; combine with maintenance plan	<u>State Implementation Plans</u> Lisa Camire, SIP Planning Analyst
Due 2/7/2027 and 12/1/2027	Infrastructure SIPs for PM _{2.5} (primary) and SO ₂ (secondary) NAAQS	Waiting for EPA guidance	<u>State Implementation Plans</u> Lisa Camire, SIP Planning Analyst

2027 – 2028 NH Rules Upcoming Expiration Dates



Expiration Date

Regulation

Impact

9/22/2027

[Env-A 500, Standards Applicable to Certain New or Modified Facilities and Sources of Hazardous Air Pollutants; State Plans for Designated Facilities and Pollutants](#)

Looking to readopt in 2026

8/15/2028

[Env-A 1300, NOx RACT](#)

Currently reviewing as part of MWC state plan in 2026 – 2027

9/26/2028

[Env-A 3300, Municipal Waste Combustion](#)

Currently reviewing as part of MWC state plan in 2026 – 2027

10/24/2028

[Env-A 700, Permit Fee System](#)

Looking to conduct stakeholder meeting(s)

12/22/2028

[Env-A 2800, Sand-Gravel-Cement Sources](#)

Review permit-by-notification online permitting

Air Permitting Program Improvement Project

Step 1

- SB 449 – Air Permit Issuance Timeline for State Air Permits
- SB 74 – Annual Reporting Requirements for Department-wide Permitting Programs
- Loss of DoIT staff/database support; and transition from OneStop

Step 2

- LEAN – Air Permitting Processes

Step 3

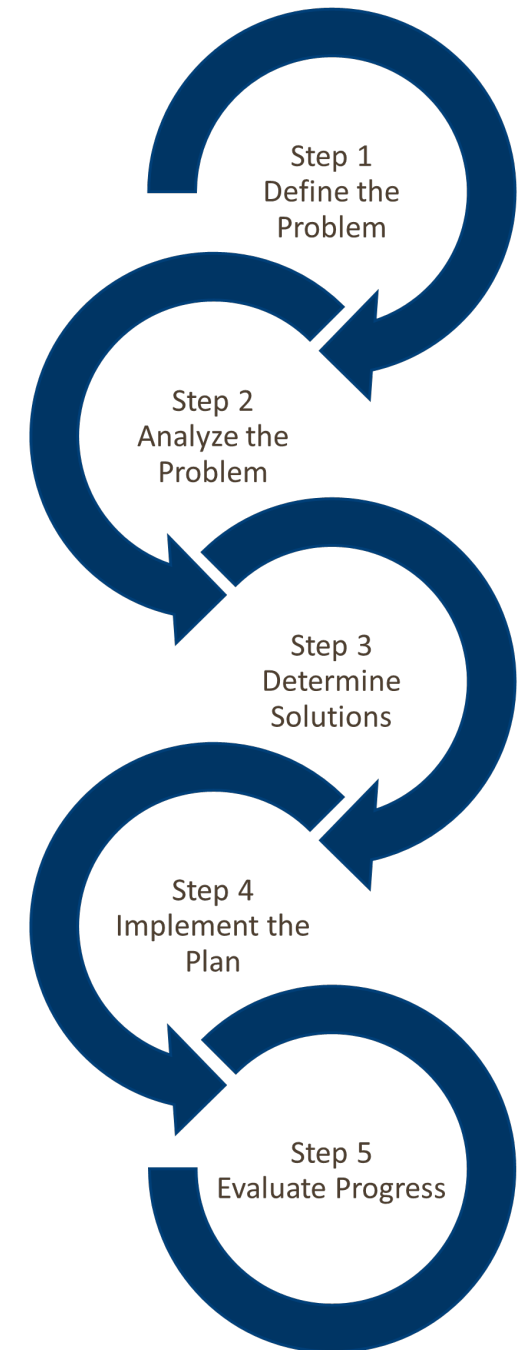
- Update SOPs and Work Instructions
- Identify Opportunities for Rulemaking/Statutory Changes

Step 4

- Update Forms
 - ADA compliance done; content changes need rulemaking first
- Update Rules
 - Env-A 600, Env-A 1700 (IBR), Env-A 200 and Env-C 200

Step 5

- Stakeholder Groups/Feedback



Challenges – Overall and Specific to the Air Permitting Program Improvement Project



1. Staffing

- Challenge to post externally
- Internal staffing results in new open position to fill

2. Training

- New staff need to be trained
- Takes time away from experienced staff

3. Funding

- Current funding keeps existing programs running
- Need new funding source to invent something new

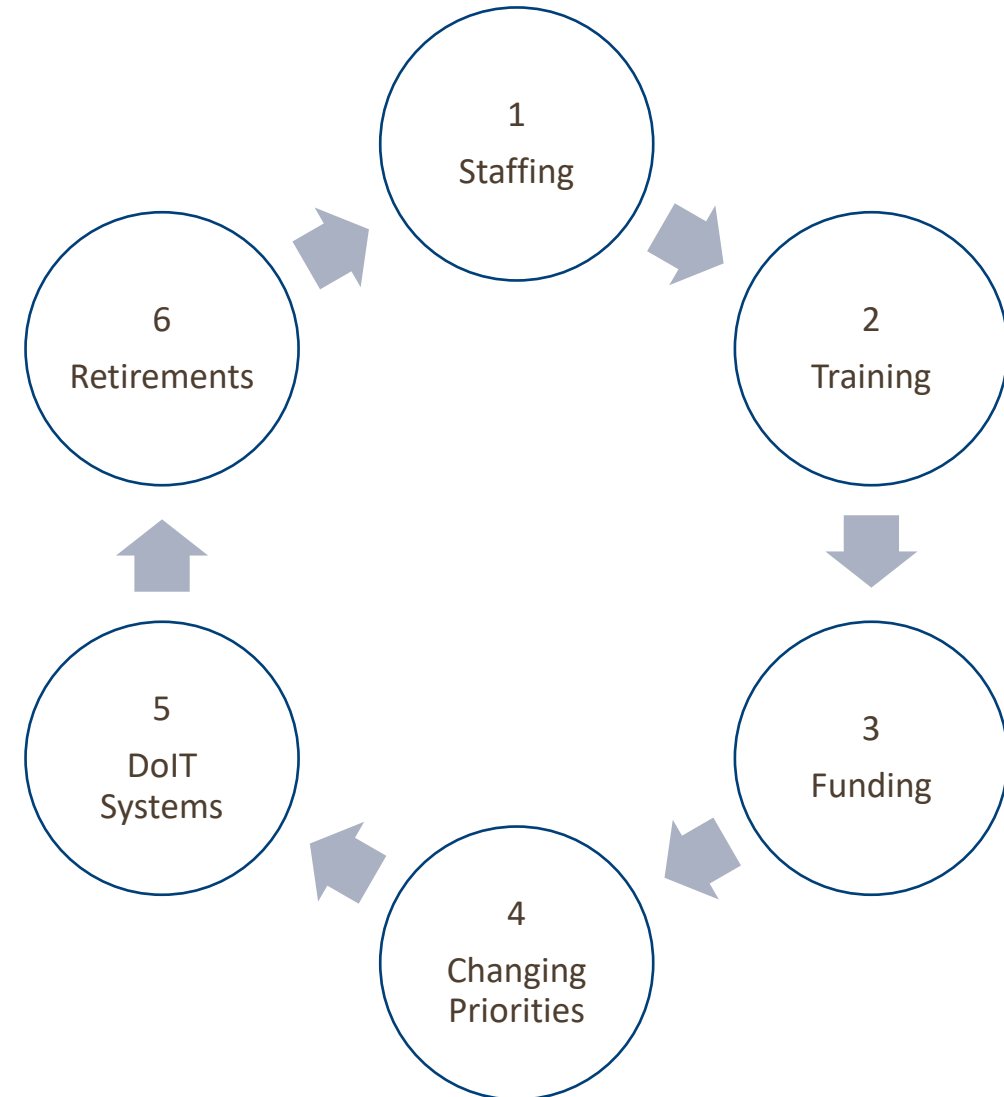
4. Changing Rulemaking Priorities

- Federal changes (new and rescinded emission guidelines)
- State changes (new or repealed statutes)

5. DoIT Staffing/Programming Challenges

6. Retirements

- Experienced staff covering multiple jobs
- Loss of institutional knowledge





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Contact Information

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