

**CAR Correlation Table - HON Storage Vessel Provisions
(40 CFR Part 63, Subpart G - 63.119 through 63.123)**

Citations Part 63, Subpart G (HON Storage Vessels)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.119(a)	[Not Consolidated]	Compliance options	NC	This introductory paragraph is not needed in the CAR structure.
63.119(a)(1)	65.42(b)	Compliance options for applicable storage vessels storing liquid with a vapor pressure <76.6 kPa	N	
63.119(a)(2)	65.42(c)	Compliance options for applicable storage vessels storing liquid with a vapor pressure ≥76.6 kPa	N	
63.119(a)(3)	[Not Consolidated]	Applicability (Group 2 storage vessel provisions, non-emissions averaging)	NC	The CAR does not cover Group 2 storage vessels, therefore it does not contain this provision.
63.119(a)(4)	[Not Consolidated]	Applicability (Group 2 storage vessel provisions, emissions averaging)	NC	The CAR does not cover Group 2 storage vessels, or emissions averaging, therefore it does not contain this provision.
63.119(b)	65.43(a) and 65.43(b)	IFR option: pointer to design and operational standards	N	The CAR formatting groups all design standards under 65.43(a) and all operational standards under 65.43(b).

**CAR Correlation Table - HON Storage Vessel Provisions
(40 CFR Part 63, Subpart G - 63.119 through 63.123)**

Citations Part 63, Subpart G (HON Storage Vessels)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.119(b)(1) - (b) (2)	65.43(a)(1) 65.43(b)(1) 65.43(b)(2)	IFR design: roof shall be designed to float IFR operation: roof shall be floating at all times IFR operation: filling or refilling	BR	- Subpart G requires the owner or operator to empty the tank once the roof rests on the leg supports and requires that the emptying be continuous and performed as soon as practical. This requirement reduces the amount of available storage space as facilities may not always have the capacity or ability to place liquids in other vessels. One industry representative stated that they had to lease a barge on occasion for extra storage capacity when this situation arose. Upon review, EPA determined that the intent of the provision is to avoid the emissions associated with raising and lowering the level of the liquid surface while the roof is resting on the support legs. The revised provisions in the CAR allow the surface level to be below the leg supports, but the liquid can only be drawn out of the tank in such a case. Then, when the tank is to be filled, the process of filling must be continuous until the roof has risen off of the leg supports. In addition, the CAR specifies, through language such as "fill...as soon as practical," that the owner or operator must try to avoid this type of situation. The CAR language clarifies the intent of these provisions so that the note included in the HON is not necessary.
63.119(b)(3)	65.43(a)(2)	IFR design: closure device	N	
63.119(b)(3)(i)	65.43(a)(2)(i)	IFR design: closure device: liquid-mounted	N	The definition of this type of seal is contained with all the definitions in 65.2 of the general provisions.
63.119(b)(3)(ii)	65.43(a)(2)(ii)	IFR design: closure device: metallic shoe	N	The definition of this type of seal is contained with all the definitions in 65.2 of the general provisions.
63.119(b)(3)(iii)	65.43(a)(2)(iii)	IFR design: two continuous seals	N	
	65.2	Continuous seal definition	N	The details regarding a continuous seal is included in the definitions section.
63.119(b)(3)(iv)	65.43(a)(3)	Timing for vessels that previously had a vacuum- mounted seal	N	
63.119(b)(4)	65.43(b)(3)	IFR operation: automatic bleeder vents must be set closed	N	The CAR specifies that the vents must be "set closed" where the HON requires "closed." This change is made in many places but is only mentioned here.
63.119(b)(5)	65.43(a)(4)	IFR design: introductory paragraph	N	

**CAR Correlation Table - HON Storage Vessel Provisions
(40 CFR Part 63, Subpart G - 63.119 through 63.123)**

Citations Part 63, Subpart G (HON Storage Vessels)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.119(b)(5)(i)	65.43(a)(4)(i)	IFR design: openings must project below the liquid surface	C	The CAR clarifies that the openings must project below the "stored" liquid surface. This addition occurs in several places, but it is only mentioned here.
63.119(b)(5)(ii)	65.43(a)(4)(ii)	IFR design: openings must have gasketed covers	N	
63.119(b)(5)(iii)	65.43(a)(4)(iii)	IFR design: sampling penetrations	N	
63.119(b)(5)(iv)	65.43(a)(4)(iv)	IFR design: automatic bleeder vents must be gasketed	N	
63.119(b)(5)(v)	65.43(a)(4)(iv)	IFR design: rim space vents must be gasketed	N	
63.119(b)(5)(vi)	65.43(a)(4)(v)	IFR design: ladder penetrations	N	
63.119(b)(5)(vii)	65.43(a)(4)(vi)	IFR design: column projections	N	
63.119(b)(5)(viii)	65.43(a)(4)(viii)	Timing for updating existing tanks to the IFR specifications	N	
63.119(b)(6)	65.43(a)(4)(vii)	IFR design: covers designed to be bolted and fastened when they are closed	N	
	65.43(b)(4)	IFR operation: covers must be closed and bolted when not in use; rim space vents open only when IFR is not floating or at manufacture's setting	N	
63.119(c)	65.44(a) and (b)	EFR option: pointer to design and operational standards	N	No significant change in requirement, but reformatted in the CAR so that all design standards are grouped under 65.44(a) and all operational standards are grouped under 65.44(b).
63.119(c)(1)	65.44(a)(2)	EFR design: closure device	N	
63.119(c)(1)(i)	65.44(a)(2)(i)	EFR design: closure device consists of two seals	N	

**CAR Correlation Table - HON Storage Vessel Provisions
(40 CFR Part 63, Subpart G - 63.119 through 63.123)**

Citations Part 63, Subpart G (HON Storage Vessels)	Citations, Part 65^{a,b}	Description	Type of Change^c	Comments
63.119(c)(1)(ii)	65.44(a)(2)(ii)	EFR design: primary seal must be liquid mounted or metallic shoe	N	
63.119(c)(1)(iii)	65.44(b)(9)	EFR design: closure device must be continuous except during inspections	N	
63.119(c)(1)(iv)	65.44(a)(2)(iii)	Special case: Timing for installing secondary seal	N	
63.119(c)(1)(v)	65.44(a)(2)(iv)	Special case: Timing for installing liquid-mounted or metallic shoe seal	N	
63.119(c)(2)	65.44(a)(3)	EFR design: floating roof specs	N	
63.119(c)(2)(i)	65.44(a)(3)(i)	EFR design: openings must project below the liquid surface	N	
63.119(c)(2)(ii)	65.44(b)(3)	EFR operation: gasketed covers must be maintained closed	N	
	65.44(b)(4)	EFR operation: covers on access hatches and gauge float wells must be bolted or fastened closed	N	
	65.44(a)(3)(iii)	EFR design: openings must have gasketed covers	N	
	65.44(a)(3)(ii)	EFR design: access hatches and gauge float wells designed to be bolted or fastened closed	N	
63.119(c)(2)(iii)	65.44(b)(5)	EFR operation: automatic bleeder vents must be closed	N	
63.119(c)(2)(iv)	65.44(b)(6)	EFR operation: rim space vents must be closed	N	

**CAR Correlation Table - HON Storage Vessel Provisions
(40 CFR Part 63, Subpart G - 63.119 through 63.123)**

Citations Part 63, Subpart G (HON Storage Vessels)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.119(c)(2)(v)	65.44(a)(3)(iv)	EFR design: automatic bleeder and rim space vents must be gasketed	N	
63.119(c)(2)(vi)	65.44(a)(3)(v)	EFR design: roof drain	N	
63.119(c)(2)(vii)	65.44(a)(3)(vi)	EFR design: unslotted guide pole	N	
63.119(c)(2)(viii)	65.44(a)(3)(vii)	EFR design: gasketed cap on end of guide pole	N	
	65.44(b)(7)	EFR operation: gasketed cap on end of guide pole must be closed	N	
63.119(c)(2)(ix)	65.44(a)(3)(vi)	EFR design: slotted guide pole	N	
63.119(c)(2)(x)	65.44(a)(3)(viii)	EFR design: gasketed float	N	
63.119(c)(2)(xi)	65.44(a)(3)(ix)	EFR design: gasketed covers on sampling wells	N	
	65.44(b)(8)	EFR operation: gasketed covers on wells must be closed	N	
63.119(c)(2)(xii)	65.44(a)(3)(xiii)	Timing for updating to the EFR specifications	N	

**CAR Correlation Table - HON Storage Vessel Provisions
(40 CFR Part 63, Subpart G - 63.119 through 63.123)**

Citations Part 63, Subpart G (HON Storage Vessels)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.119(c)(3) and (c)(4)	65.44(a)(1) 65.44(b)(1) 65.44(b)(2)	EFR design: roof must be designed to float EFR operation: roof must be floating at all times EFR operation: filling or refilling	BR	Subpart G requires the owner or operator to empty the tank once the roof rests on the leg supports and requires that the emptying be continuous and performed as soon as possible. This requirement reduces the amount of available storage space as facilities may not always have the capacity or ability to place liquids in other vessels. One industry representative stated that they had to lease a barge on occasion for extra storage capacity when this situation arose. Upon review, EPA determined that the intent of the provision is to avoid the emissions associated with raising and lowering the level of the liquid surface while the roof is resting on the support legs. The revised provisions in the CAR allow the surface level to be below the leg supports, but the liquid can only be drawn out of the tank in such a case. Then, when the tank is to be filled, the process of filling must be continuous until the roof has risen off of the leg supports. In addition, the CAR specifies, through language such as "fill...as soon as practical," that the owner or operator must try to avoid this type of situation.
63.119(d)	65.45	Provisions for EFR converted into an IFR	N	
63.119(e)	65.42(b)(5)	CVS/CD option	N	
63.119(e)(1)	65.42(b)(5)(i)	CVS/CD design and operation: reduce emissions by 95 percent or greater	N	
	65.42(b)(4)	CVS/CD design and operation: flare must follow 63.11(b)	N	The CAR refers to the flare requirements in subpart G of the CAR, while the HON refers to the flare requirements in 63.11(b). These provisions are relatively the same. See the part 63 General Provisions correlation table for a detailed comparison of the provisions.
63.119(e)(2)	65.42(b)(5)(ii)	CVS/CD: if before applicable date, can control to 90 percent	N	
63.119(e)(3)	65.42(b)(5)(iii)	CVS/CD: planned routine maintenance cannot exceed 240 hours per year	C	The CAR clarifies the requirement by explicitly requiring the associated recordkeeping and reporting from 65.166(b).

**CAR Correlation Table - HON Storage Vessel Provisions
(40 CFR Part 63, Subpart G - 63.119 through 63.123)**

Citations Part 63, Subpart G (HON Storage Vessels)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.119(e)(4)	65.42(b)(4) and 65.42(b)(5)(iv)	CVS/CD: planned routine maintenance exemption	N	
63.119(e)(5)	65.42(b)(4) and 65.42(b)(5)(iv)	CVS/CD: control system malfunction exemption	N	
63.119(e)(6)	65.2	Combination of control devices	N	The CAR does not contain this specific HON paragraph, but it includes the intent in the definition of control device. This definition clarifies that a control device can mean a combination of devices.
63.119(f)	[Not Consolidated]	Route to a process or fuel gas system-introductory paragraph	NC	This introductory paragraph is not needed in the CAR structure.
63.119(f)(1)	65.144(b)(1) and (b)(2)	Route to a process or fuel gas system: operation	N	
63.119(f)(2)	[Not Consolidated]	Non-hard piping systems under pressure	BR	The CAR does not require these systems to perform the CVS inspection procedures as the HON does. Since this piping is considered part of the process, it is covered by the equipment leak inspection procedures.
63.119(f)(3)	65.42(b)(6)	Route to a process or fuel gas system: bypassing	N	
	65.144(a)(1)	Operate process or fuel gas system when emissions are routed to it	N	
63.120(a)	[Not Consolidated]	IFR inspection: introductory paragraph	NC	This introductory paragraph is not needed in the CAR structure.
63.120(a)(1)	65.43(c)	IFR inspection: must inspect	N	
63.120(a)(2)	65.43(c)(1) and (c)(4)	IFR inspection: single-seal	C	The CAR clarifies that an inspection must be conducted initially after installing the control equipment prior to filling. The HON has the same requirement in the provisions that state "inspect...each time the storage vessel is emptied..."
63.120(a)(3)	65.43(c)(2) and (c)(4)	IFR inspection: double-seal	C	The CAR clarifies that an inspection must be conducted initially after installing the control equipment prior to filling. The HON has the same requirement in the provisions that state "inspect...each time the storage vessel is emptied..."

**CAR Correlation Table - HON Storage Vessel Provisions
(40 CFR Part 63, Subpart G - 63.119 through 63.123)**

Citations Part 63, Subpart G (HON Storage Vessels)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.120(a)(4)	65.43(d)(1)	IFR repair: Type A failure	C	
	65.47(d)(1)	Reporting: Periodic Report (extension records report, content)	N	
63.120(a)(5)	65.43(b)(3) and 65.48(c)(1)(i)	Reporting: Special Notifications (refilling notification)	N	
63.120(a)(6)	65.48(c)(1)(ii)	Reporting: Special Notifications (refilling notification)	N	
63.120(a)(7)	65.43(d)(2)	IFR repair: Type B failure	C	
63.120(b)	[Not Consolidated]	EFR inspection: introductory paragraph	NC	This introductory paragraph is not needed in the CAR structure.
63.120(b)(1)	65.44(c)	EFR inspection: frequencies	N	
63.120(b)(1)(i)	65.44(c)(1)(i)	EFR inspection: primary seal gap measurement frequency	N	
63.120(b)(1)(ii)	65.44(c)(1)(ii)	EFR inspection: perform by the compliance date, upon addition of a secondary seal, etc.	N	
63.120(b)(1)(iii)	65.44(c)(2)	EFR inspection: secondary seal gap measurement frequency	C	The CAR clarifies when the gap measurements are to be performed under certain situations.
63.120(b)(1)(iv)	65.44(c)(3)	EFR inspection: gap measurement within 90 days if reactivate tank as a regulated material tank	N	
63.120(b)(2)	65.44(c)(6)	EFR inspection: seal gap measurement procedures	N	
63.120(b)(3)	65.44(c)(7)	EFR inspection: primary seal gap standard	N	

**CAR Correlation Table - HON Storage Vessel Provisions
(40 CFR Part 63, Subpart G - 63.119 through 63.123)**

Citations Part 63, Subpart G (HON Storage Vessels)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.120(b)(4)	65.44(c)(8)	EFR inspection: secondary seal gap standard	N	
63.120(b)(5)	[Not Consolidated]	EFR design: introductory paragraph	NC	This introductory paragraph is not needed in the CAR structure.
63.120(b)(5)(i)	65.44(a)(3)(x)	EFR design: metallic shoe seal specifications	N	
63.120(b)(5)(ii)	65.44(a)(3)(xii)	EFR: no holes or tears in the primary seal	N	
63.120(b)(6)	[Not Consolidated]	EFR: secondary seal	NC	This introductory paragraph is not needed in the CAR structure.
63.120(b)(6)(i)	65.44(a)(3)(xi)	EFR design: secondary seal must completely cover the annular space	N	
63.120(b)(6)(ii)	65.44(a)(3)(xii)	EFR: no holes or tears in the secondary seal	N	
63.120(b)(7)	65.44(c)(9)	EFR inspection: unsafe to inspect	N	
63.120(b)(7)(i)	65.44(c)(9)(i)	EFR inspection: inspect 30 days after determination of unsafe	N	
63.120(b)(7)(ii)	65.44(c)(9)(ii)	EFR inspection: 2 extensions if vessel cannot be emptied	N	
	65.47(d)(2)	EFR inspection: documentation for use of extensions	N	

**CAR Correlation Table - HON Storage Vessel Provisions
(40 CFR Part 63, Subpart G - 63.119 through 63.123)**

Citations Part 63, Subpart G (HON Storage Vessels)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.120(b)(8)	65.44(d)(1)	EFR repair: must either repair in 45 days or obtain an extension	N	
	65.47(d)(1)	R&R: report: extension exemption notification	N	
63.120(b)(9)	65.44(c)(5)	Reporting: special notifications (seal gap measurement, in writing 30 days prior to measurement)	N	
63.120(b)(10)	65.44(c)(10)	EFR inspection: inspect each time the vessel is emptied	N	
63.120(b)(10)(i)	65.44(d)(2)	EFR inspection: must repair failures prior to filling or refilling	N	
63.120(b)(10)(ii)	65.48(c)(1)(i)	EFR: refilling notification procedures	N	
63.120(b)(10)(iii)	65.48(c)(1)(ii)	EFR inspection: notification procedures for unplanned inspection	N	
63.120(c)	65.45	EFR converted to an IFR	N	
63.120(d)	65.145(b)	CVS/CD	N	
63.120(d)(1)	65.145(b)	CVS/CD: options	BR	The CAR allows a performance test instead of a design evaluation [in 65.145(b)(1)(ii)] even for control devices that are not shared.
63.120(d)(1)(i)	65.145(b)(1)(i)	CVS/CD: design evaluation		The CAR clarifies that the autoignition temperature and the affinity for carbon are to be estimated and that exact measurements are not necessary.
63.120(d)(1)(ii)	65.145(b)(1)(iii)	CVS/CD: performance test	N	
63.120(d)(2)	65.145(c)(1)	CVS/CD: monitoring plan	N	
63.120(d)(2)(i)	65.165(b)(1)	CVS/CD: description of parameters to be monitored	N	
63.120(d)(2)(ii)	65.165(b)(3)	CVS/CD: design evaluation documentation	N	

**CAR Correlation Table - HON Storage Vessel Provisions
(40 CFR Part 63, Subpart G - 63.119 through 63.123)**

Citations Part 63, Subpart G (HON Storage Vessels)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.120(d)(2)(iii)	65.165(b)(6)	CVS/CD: identification of storage vessel and emission point sharing the control device	N	
63.120(d)(3)	65.165(b)	CVS/CD: notification of compliance status contents	N	
63.120(d)(3)(i)	65.165(b)(2)	CVS/CD: report the operating range	N	
63.120(d)(3)(ii)	65.165(b)(5)	CVS/CD: report the performance test results	N	
63.120(d)(4)	65.166(d)(3)	CVS/CD: report planned routine maintenance	BR	The CAR does not require a report of the routine maintenance that was performed during the previous 6 months only the routine maintenance planned in the next 6 month period.
63.120(d)(5)	65.145(a) and (c)(2)	CVS/CD: must monitor	N	
63.120(d)(6)	65.143(c)	CVS: inspection	BR	The CAR does not contain the HON requirement to do inspections during filling.
63.120(d)(7)	65.143(b)(1)	CVS: inspection, negative pressure exemption	N	
63.120(d)(8)	65.145(b)(2)	CVS/CD: performance test and design evaluation exemption	N	
63.120(e)	[Not Consolidated]	Flare compliance determination - introductory paragraph	NC	This introductory paragraph is not needed in the CAR structure.
63.120(e)(1)	65.147(b)	Flare compliance determination	S	The CAR contains all the flare provisions while the HON refers to 63.11(b) of subpart A for the flare compliance determination provisions.
63.120(e)(2)	65.159(b)	Flare compliance determination records	BR	CAR specifies to record all periods when all pilot flames are absent rather than when the pilot flame is absent. The CAR also allows monitoring of the flare flame.
	65.164(a)(3)(i)	Flare compliance determination report	N	

**CAR Correlation Table - HON Storage Vessel Provisions
(40 CFR Part 63, Subpart G - 63.119 through 63.123)**

Citations Part 63, Subpart G (HON Storage Vessels)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.120(e)(3)	65.166(d)	Flares: report planned routine maintenance	N	
63.120(e)(4)	65.147	Flares: must follow flare general provisions	N	The CAR contains all flare control device requirements in 65.147. See the part 63 general provisions table for a more detailed comparison of 63.11(b) to 65.147.
63.120(e)(5)	65.143(b)(1)	Flares: inspection	BR	The CAR does not have the HON requirement to do inspections during filling.
63.120(e)(6)	65.143(b)(1)	Flares: inspection, negative pressure exemption	N	
63.120(f)	65.144(b)(3)	Route to a process: design evaluation or engineering assessment	N	
63.121	65.46	Alternative means of emission limitation	N	
63.121(a)	65.8(a)	Alternative means of emission limitation - requirements	N	
63.121(b)	65.8(b)(3)	Alternative means of emission limitation: storage vessels must include full-size or scale models or else use engineering analysis	N	
63.122(a)	[Not Consolidated]	Reporting: (introductory paragraph)	NC	This introductory paragraph is not needed in the CAR structure
63.122(a)(1)	65.5(b) and 65.48(a)	Reporting: Initial Notification (requirement to submit)	N	The parallel requirement in the CAR is the Notification of Initial Startup. The CAR only requires this information at initial startup, because existing sources would have submitted this information under the HON before the CAR was applied.
63.122(a)(2)	[Not Consolidated]	Reporting: reserved paragraph	NC	This is a reserved paragraph in the HON.
63.122(a)(3)	65.5(d)(1)	Reporting: Notification of Compliance Status (requirement to submit)	N	

**CAR Correlation Table - HON Storage Vessel Provisions
(40 CFR Part 63, Subpart G - 63.119 through 63.123)**

Citations Part 63, Subpart G (HON Storage Vessels)	Citations, Part 65^{a,b}	Description	Type of Change^c	Comments
63.122(a)(4)	65.5(e)(1) and 65.48(b)	Reporting: Periodic Report (requirement to submit)	N	
63.122(a)(5)	65.48(c)	Reporting: other reports (requirement to submit)	N	
63.122(b)	65.145(c)	Reporting: CVS and non-flare CD (requirement to submit monitoring plan)	N	
63.122(c)	65.165(a)	Reporting: Notification of Compliance Status (contents, route to a process or fuel gas system)	N	
	65.165(b)	Reporting: Notification of Compliance Status (contents when using a control device)	N	
63.122(c)(1)	65.165(b)(2) and (b)(5)	Reporting: Notification of Compliance Status (contents, non-flare control devices)	N	
63.122(c)(2)	65.164(a)(3)	Reporting: Notification of Compliance Status (contents, flares)	N	
63.122(c)(3)	65.144(c) and 65.165(a)	Reporting: Notification of Compliance Status (contents, route to a process or fuel gas system)	N	
63.122(d)	65.48(b)(1)	Reporting: Periodic Report (contents, report each inspection where a failure is detected)	N	
63.122(d)(1)	65.48(b)(1)	Reporting: Periodic Report for vessels with annual inspections	N	

**CAR Correlation Table - HON Storage Vessel Provisions
(40 CFR Part 63, Subpart G - 63.119 through 63.123)**

Citations Part 63, Subpart G (HON Storage Vessels)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.122(d)(1)(i)	65.2	Reporting: Periodic Report (contents, procedures for IFR Type A or EFR failures)	S	There is significant consolidation gained by defining the failure types in the definitions section of the general provisions.
63.122(d)(1)(ii)	65.48(b)(1)(i)	Reporting: Periodic Report (inspection records, requirement to submit)	N	
	65.47(c)(1)(ii)	Reporting: Periodic Report (inspection records report, content)	N	
63.122(d)(1)(iii)	65.48(b)(3)	Reporting: Periodic Report (extension request contents)	N	
63.122(d)(2)	65.48(b)(1)	Reporting: Period Report (report for IFR Type B failure, introductory paragraph)	N	
63.122(d)(2)(i)	65.2	Definition of failure	S	There is significant consolidation gained by defining the failure types in the definitions section of the general provisions.
63.122(d)(2)(ii)	65.48(b)(1)(ii)	Reporting: Periodic Report (report for IFR Type B failure, requirement to submit)	N	
	65.47(c)(1)(ii)	Reporting: Periodic Report (report for IFR Type B failure, content)	N	
63.122(e)	65.48(b)	Reporting: Periodic Report (seal gap report, introductory paragraph)	N	

**CAR Correlation Table - HON Storage Vessel Provisions
(40 CFR Part 63, Subpart G - 63.119 through 63.123)**

Citations Part 63, Subpart G (HON Storage Vessels)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.122(e)(1)	65.48(b)(2)	Reporting: Periodic Report (seal gap report, requirement to submit)	BR	The HON and the CAR requires a report of seal gap measurements that do not meet the specifications. The CAR also requires the identification of each seal gap measurement that was made - not all measurement data when the specifications were met. The HON requires that all raw data be reported when specifications were not met; the CAR does not.
63.122(e)(1)(i) - (iv)	65.47(c)(2) and 65.48(b)(2)(ii)	Reporting: Periodic Report (seal gap report, contents)	N	
63.122(e)(2)	65.48(b)(3)	Reporting: Extension Report, requirement to submit	N	
63.122(e)(3)	65.48(b)(1)(i)	Reporting: Periodic Report (EFR failure report, requirement to submit)	N	
63.122(e)(3)(i)	65.2	Failure Definition	N	
63.122(e)(3)(ii)	65.47(c)(1)(ii)	Reporting: Periodic Report (EFR failure report, content)	N	
63.122(f)	65.45	Reporting: Periodic Report (EFR converted to IFR must meet IFR reporting requirements)	N	
63.122(g)	[Not Consolidated]	Reporting: Periodic report	NC	This introductory paragraph is not needed in the CAR structure.
63.122(g)(1)	65.166(d)	Reporting: Periodic Report (planned routine maintenance, introductory paragraph)	N	
63.122(g)(1)(i)	65.166(d)	Reporting: Periodic Report (planned routine maintenance, actual maintenance)	N	
63.122(g)(1)(ii)	[Not Consolidated]	Reporting: Periodic Report (planned routine maintenance, future plans)	NC	The CAR does not require a report of future plans of maintenance.

**CAR Correlation Table - HON Storage Vessel Provisions
(40 CFR Part 63, Subpart G - 63.119 through 63.123)**

Citations Part 63, Subpart G (HON Storage Vessels)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.122(g)(2)	65.166(e)	Reporting: Periodic Report (parametric monitoring)	N	
63.122(g)(3)	65.159(c) and (d), and 65.166(c)	Reporting: Periodic Report (flare pilot flame outages)	C	The CAR explicitly states that the flare outage information must be recorded [65.159(d)] and reported [65.166(c)]. The HON only states it shall be reported.
63.122(h)	65.48(c)	Reporting: other reports - introductory paragraph	N	
63.122(h)(1)	65.48(c)(1)	Reporting: Special Notifications (refilling notification)	N	
63.122(h)(2)	65.48(c)(2)	Reporting: Special Notifications (seal gap measurement)	C	The CAR allows for situations when the seal gap measurements are not planned enough in advance to give the Administrator notification 30 days prior to the measurements.
63.123(a)	65.47(b)	Recordkeeping: vessel dimensions and capacity (record contents)	N	
	65.47(a)	Recordkeeping: record retention	N	
	[Not Consolidated]	Recordkeeping: vessel dimensions and capacity (Group 2 provisions)	NC	The CAR does not contain Group 2 storage vessel provisions.
63.123(b)	[Not Consolidated]	Recordkeeping: reserved paragraph	NC	This is a reserved paragraph in HON.
63.123(c)	65.47(c)(1)	Recordkeeping: keep records of inspections performed	C	The CAR language is generalized; instead of specifying "inspections required by 63.119(b)," the CAR uses descriptive text of the provisions requiring inspections. This edit adds clarity and allows the provision to be applicable to the other rules.
63.123(d)	65.47(c)(2)	Recordkeeping: seal gap measurement results	N	
63.123(e)	65.45	Recordkeeping: keep records of inspections performed (for EFR converted to IFR)	N	

**CAR Correlation Table - HON Storage Vessel Provisions
(40 CFR Part 63, Subpart G - 63.119 through 63.123)**

Citations Part 63, Subpart G (HON Storage Vessels)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.123(f)	65.163(b), (b)(1), and (b)(2)	Recordkeeping: CVS/CD records (parametric monitoring and planned routine maintenance)	N	
63.123(g)	65.47(d)	Recordkeeping: emptying extension	C	The CAR provision clarifies that the record must be prepared "by the initiation" of the extension.
63.123(h)	65.163(b)(3)	Recordkeeping: bypassing process or fuel gas system	N	
New	65.44(c)(4)	When measurements require the removal or dislodging of the secondary seal	C	The CAR clarifies that when measurements require the removal or dislodging of the secondary seal, the secondary seal shall be replaced as soon as possible.
New	65.47(c)(1)(i)	A record showing that inspection was performed	BI	The CAR requires a record that the IFR and EFR inspections were performed. This record is to identify the storage vessel, the date of the inspection, and references indicating which items were inspected.
New	65.47(e)	Record of floating roof resting in on the legs	BI	The CAR contains an additional record of the date and duration of when the floating roof is rested on the legs. This record must also indicate whether the refloating was a continuous operation. This record is in conjunction with the clarification on this provision in 65.43(a)(1), (b)(1), and (b)(2), and 65.44(a)(1), (b)(1), and (b)(2). These provisions are also discussed in this table under 63.119(b)(1)-(b)(2) and 63.119(c)(3) and (c)(4).
New	65.48(c)(3)	Notification waiver	BR	The CAR does not require a refilling or seal gap measurement notification be sent to the Administrator if it is sent to the delegated authority. The CAR also allows the delegated authority to waive receipt of the notifications.
New	65.48(d)	Compliance certification	BR	The CAR provides clarity by specifying that the annual inspections can be used to base the Title V recertification of continuous compliance.
New	65.143(a)(1)	CVS must collect emissions and route to a control device	C	The CAR clarifies that the CVS must be designed and operated to collect the regulated material emissions and route it to a control device.

**CAR Correlation Table - HON Storage Vessel Provisions
(40 CFR Part 63, Subpart G - 63.119 through 63.123)**

Citations Part 63, Subpart G (HON Storage Vessels)	Citations, Part 65^{a,b}	Description	Type of Change^c	Comments
New	65.143(a)(2)	CVS and control device must be operating when emissions are vented to them	C	The CAR clarifies that the CVS and control devices must be in operation when emissions are vented to them.
New	65.143(c)(2), and (c)(3)	Leak detection procedures for CVS	C	The CAR provides more details on how to perform the leak detection measurements. These details include specifying transversing the potential leak interface, and the equipment should be in regulated material service when test is performed.
New	65.147(b)(1)	Requirement to perform a flare compliance determination	C	The CAR explicitly states the require to perform a flare compliance determination. This is not as clearly stated in the HON.
New	65.147(b)(2), 65.167(a)	Procedures when control devices are replaced	C	The CAR outlines the procedures to follow when one control device is replaced with another control device.
New	65.147(b)(3)(iv)	Flame monitors must be operating during flare compliance determination	C	The CAR makes it clear that either the flare flame or pilot monitors must be in operation during a flare compliance determination.
New	65.157(a), (b), and (c), and 65.164(b)(3)	Flare compliance determination requirements	C	The CAR clarifies that waivers apply to the flare compliance determinations as well as performance tests. The CAR also clarifies that the schedule for performance tests applies to flare compliance determinations.
New	65.163(e) and 65.166(e)	Occurrence and cause of parameters outside range	BI	The CAR requires the occurrence and cause of monitored parameters outside the parameter ranges to be recorded and reported. The HON requires only the values to be reported.
New	65.164(a)(1) and (a)(2)	Flare compliance determination notifications and reports	BI	The CAR requires the same type of report for the flare compliance determination as for the performance test. This includes a brief process description, descriptions of the sampling site and analysis procedures, record of operating conditions during the test, etc.
New	65.164(b)(2)	Submission of subsequent flare compliance determinations	C	The CAR specifies that a report for a performance test conducted after the Initial Compliance Status Report is due 60 days after completing the test.

CAR Correlation Table - HON Storage Vessel Provisions (40 CFR Part 63, Subpart G - 63.119 through 63.123)

Citations Part 63, Subpart G (HON Storage Vessels)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
New	65.166(a)	General information in a periodic report	C	The CAR adds clarity by specifying some general information that must be in a periodic report, including reporting dates and total source operating period.

^a[**Not Consolidated**] - Provisions that are not consolidated in the CAR because they are not relevant to SOCMI sources or needed in the CAR.

^b[**Referencing subpart**] - Provisions that are not consolidated in the CAR but remain in the Referencing subpart and remain applicable to sources complying with the CAR.

^c Letters in this column indicate the following:

C - clarification

S - simplification

BR - burden reduction

BI - burden increase

N - no significant change

NC - not consolidated

R - provisions retained in referencing subpart.