

CAR Correlation Table - Transfer Racks
(40 CFR Part 61, Subpart BB - 61.300 through 61.306)

| Citations Part 61, Subpart BB (Benzene Transfer) | Citations, Part 65 ^{a,b} | Description | Type of Change ^c | Comments |
|---|-----------------------------------|---|--------------------------------|---|
| 61.300 | [Referencing Subpart] | Applicability | R | The CAR does not include any provisions pertaining to applicability of the referencing subparts. However these provisions remain applicable to sources complying with the CAR. |
| 61.301 | 65.2 and [Referencing Subpart] | Definitions | R,S | All CAR definitions are in the CAR general provisions. Terms not used in the CAR and terms used only for applicability provisions are not defined in the CAR. See definitions correlation table for details. |
| 61.302(a) | 65.82(a), (a)(1), (a)(2) | Standards: equip each loading rack with a vapor collection system | C | <ul style="list-style-type: none"> - Subpart BB uses the term "loading rack." The CAR uses "transfer rack" to be consistent with the more recent HON terminology. This is a global change and is mentioned only here. There is no significant difference in the requirement. - Subpart BB uses the term "vapor collection system." The CAR uses the term "closed-vent system." - The CAR introduces the "process piping" concept for routing emissions to a process, fuel gas system, or vapor balance system. This concept is throughout the CAR with process piping provisions paralleling the provisions for CVS. |
| 61.302(a)(1) | 65.82(b) and (c) | Design: collect all vapors displaced during loading | N | <ul style="list-style-type: none"> - "Regulated material" is used in place of "benzene" here and throughout the CAR to generalize the CAR requirements for other rules. This is a global change mentioned only here. - Requirements for marine vessels found in subpart BB are not consolidated in the CAR. The CAR uses a parallel design paragraph and operating paragraph structure 65.82(b) and (c) contain only the design requirement from 61.302(a)(1) . |
| | 65.84(a) | Operate: collect all vapors displaced during loading | N | 65.84(a) contain only the operating requirement from 61.302(a)(1). |
| 61.302(a)(1) | 65.143(a)(1) | Standards: collect all vapors displaced during loading | N | This provision is also stated in subpart G for clarity depending on the audience. |

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|---|-----------------------------------|---|--------------------------------|--|
| 61.302(a)(2) | 65.143(a)(4) | Design and operating: vapors collected at one loading arm cannot pass through another arm of the rack to the atmosphere | N | |
| 61.302(b) | 65.83(a)(1) | Performance: control device performance (reduce emissions to the atmosphere by 98 weight-percent) | BR | The 20 ppmv exit concentration compliance option from process vent NSPS and the HON process vent and transfer provisions is allowed for subpart BB sources as a more updated procedure, providing a consolidation of requirements while reducing burden. The CAR specifies that control device performance will be calculated on a dry basis corrected to 3 percent oxygen. The CAR also allows any combination of combustion, recovery, and/or recapture devices. |
| | 65.149(a)(2) | Operating: Introduce stream into the flame zone of a boiler | N | |
| 61.302(c) | 65.83(a)(2) | Performance: flare | N | Subpart BB references 60.18 for the requirements of flares used to meet the 98 percent emission reduction specified in 61.302(b). The CAR references the flare as an alternative to reducing emissions by 98 percent and sends the reader to subpart G. The flare provisions of subpart G are the same as those in 60.18. |
| 61.302(d) | 65.84(c), (c)(1), (c)(2) | Standards: vapor tightness of tank trucks and railcars | BR | The CAR includes an alternative to vapor tightness testing. It allows the use of DOT records to prove vapor tightness. |
| 61.302(d)(1) | 65.85(a) | Procedures: vapor tightness | N | For sources that choose to use Method 27 for vapor tightness, the CAR specifies the vapor tightness procedures including the vapor tightness definition from subpart BB. |
| | 65.87 | Records: vapor tightness | BR | The CAR does not require the detailed records of vapor tightness verification that subpart BB does. |
| 61.302(d)(2) | 65.87 | Records: vapor tightness | BR | The CAR does not require the detailed records of vapor tightness verification that subpart BB does. |
| 61.302(d)(3) | 65.7(b) and (d) | Procedures: alternative procedures for vapor tightness | N | The CAR has provisions in subpart A which specifies how to apply for any type of alternative monitoring and recordkeeping provisions. |

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|---|-----------------------------------|---|--------------------------------|--|
| 61.302(e) | [Not Consolidated] | Standards: marine vessel vapor tightness | NC | The CAR does not consolidate requirements for marine vessels. |
| 61.302(f) | 65.84(e) | Operating: CVS must be compatible | N | |
| 61.302(g) | 65.84(f) | Standards: CVS must be connected | N | |
| 61.302(h) | [Not Consolidated] | Standards: not to exceed vapor tightness test pressure during loading | BR | The CAR uses the more recent HON provisions for vapor tightness which reference the DOT vapor tightness requirements. This is a significant burden reduction. Because the DOT requirements are referenced this provision is not necessary. |
| 61.302(i) | 65.84(d) and 65.143(a)(5) | Standards: pressure-vacuum vent | C | The CAR introduces the allowance that safety devices are not subject to this requirement. |
| 61.302(j) | [Not Consolidated] | Standards: marine vessel operating pressure | NC | The CAR does not consolidate requirements for marine vessels. |
| 61.302(k) | 65.143(b)-(d) | Standards: leak detection - inspection and repair for CVS | N | Subpart BB refers to 61.242-11(e) and (f) of subpart V while the CAR specifies the requirements in the same section where the inspection requirement is stated. The provisions are very similar, however see the Equipment Leaks (subpart V) correlation table for more detail on how the provisions of 61.242-11(e) and (f) match up to the CAR provisions. |
| | 65.143(c)(4) | Standards: inspect CVS for leaks during loading | N | |
| 61.302(l) | 65.143(a)(3) | Standards: bypass valves must be car-sealed closed | BR | The CAR adds flexibility by allowing lock-and-key configurations and reducing burden by allowing exemptions for safety equipment such as pressure relief valves, low leg drains, high point bleeds, analyzer vents, and open-ended valves or lines. |

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| Citations Part 61, Subpart BB (Benzene Transfer) | Citations, Part 65 ^{a,b} | Description | Type of Change ^c | Comments |
|---|-----------------------------------|--|--------------------------------|--|
| 61.303(a) | 65.156(c)(1) | Monitoring: incinerator: install, calibrate, etc. | BR | The CAR allows use of written procedures other than manufacturer's specifications, thereby providing flexibility to subpart BB sources. |
| | 65.2 | Monitoring: incinerator | BR | The CAR incorporates specifications for the temperature monitoring device into the definitions section to decrease redundancy throughout the document. The accuracy of the device was consolidated to ± 1.2 °C where subpart BB required $\pm .5$ °C. |
| | 65.148(c)(1) | Monitoring: temperature monitoring device | N | The CAR allows monitoring equipment to be installed, calibrated, monitored and operated according to written procedures that meet certain criteria, as well as according to manufacturers specifications as subpart BB requires. |
| 61.303(a)(1) | 65.148(c)(1)(i) | Monitoring: incinerator | BR | <ul style="list-style-type: none"> - The CAR increases flexibility by allowing the temperature monitoring device to be located in the firebox or downstream of the firebox before any substantial heat exchange occurs. - The CAR contains a clarifying edit, specifying that the device must provide a continuous record but that it does not have to be equipped with a continuous recorder. |
| 61.303(a)(2) | 65.148(c)(i)(ii) | Monitoring: catalytic incinerator | N | |
| 61.303(b) | 65.147(c) | Monitoring: flare | BR | The CAR contains a clarifying edit requiring the device to be capable of detecting the presence of at least one pilot flame continuously. The CAR also allows the option to monitor the flare flame as an alternative. |
| | 65.159(c) | Monitoring: flare - only during loading | N | |
| | 65.156(c)(1) | Monitoring: flare - install, calibrate, etc. | BR | The CAR allows monitoring equipment to be installed, calibrated, maintained and operated according to written procedures that meet certain criteria, as well as according to manufacturers specifications as subpart BB requires. |
| 61.303(c) | [Not Consolidated] | Monitoring: boiler and process heater - introductory paragraph | NC | The introductory paragraph is not needed in the CAR structure. |

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|---|-----------------------------------|---|--------------------------------|--|
| 61.303(c)(1) | 65.156(c)(1) | Monitoring: boiler (< 44 MW): install, calibrate, etc. | BR | The CAR allows use of written procedures other than manufacturer's specifications, thereby providing flexibility to subpart BB sources. |
| | 65.149(c)(1) | Monitoring: boiler (< 44 MW) | BR | <ul style="list-style-type: none"> - The CAR specifies that monitoring devices must be capable of providing a continuous record, whereas subpart BB requires monitoring devices to be equipped with continuous recorders. This is a clarification. - In the CAR, boilers and process heaters (<44 MW) that have the process vent introduced with the primary fuel or used as the primary fuel are not required to monitor. |
| 61.303(c)(1) | 65.2 | Monitoring: boiler (< 44 MW) | N | The specifications for the temperature monitoring device are incorporated into the definitions section so as to decrease redundancy throughout the document. The accuracy of the device was consolidated to ± 1.2 °C where subpart BB required ± 0.5 °C. |
| 61.303(c)(2) | [Not Consolidated] | Monitoring: boiler (≥ 44 MW) record periods of operation | NC | This requirement is not found in the CAR because safety considerations prevent the venting of emissions to a boiler when it is not operating. Therefore, this record is not necessary. |
| 61.303(d) | 65.156(c)(1) | Monitoring: carbon adsorber: install, calibrate, etc. | BR | The CAR allows use of written procedures other than the manufacturer's specifications, thereby providing flexibility to subpart BB sources. |
| | 65.152(c)(1) | Monitoring: carbon adsorber | BR | Subpart BB requires an organic monitor to be used as the monitoring device for carbon adsorption systems. The CAR provides an option of a organic monitor or an integrating regeneration steam flow monitor and a carbon-bed temperature monitoring device. |
| 61.303(e) | 65.155(c) | Monitoring: non-listed control device | N | <ul style="list-style-type: none"> - Subpart BB requires the owner or operator to provide a description of the operation of the control device and the process parameters that indicate proper operation and maintenance. Under subpart BB, the Administrator specifies the monitoring. The CAR requires the owner or operator to submit a description of the planned monitoring, record keeping, and reporting procedures for approval. - The CAR also requires parameter monitoring ranges indicating whether the control device is operating adequately |

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|---|---|--|--------------------------------|--|
| 61.303(f) | [Not Consolidated] | Monitoring: pressure measurement (for marine vessels only) | NC | The CAR does not consolidate requirements for marine vessels. |
| 61.303(g) | 65.143(a)(3) | Monitoring: bypass lines | BR | The CAR adds flexibility by allowing lock-and-key configurations and reducing burden by allowing exemptions for safety equipment such as pressure relief valves, low leg drains, high point bleeds, analyzer vents, and open-ended valves or lines. |
| 61.303(g)(1) | 65.143(a)(3)(i) | Monitoring: bypass lines: flow indicators | BR | Under the CAR, flow indicators are located at the inlet to all bypass lines. This is a burden reduction compared to subpart BB, which requires flow indicators downstream of every valve. Only the indicators installed under subpart BB at the inlet to the bypass line would be required. Any additional flow indicators in the bypass line would no longer be required if the source complies in the CAR. |
| 61.303(g)(2) | 65.143(a)(3)(ii) | Monitoring: bypass lines: monthly inspection of car seals | N | |
| 61.303(g)(2) | 65.163(a)(1)(ii) | Monitoring: bypass lines: monthly inspection results | N | |
| 61.304(a) | 65.148(b)(1), 65.149(b)(1), 65.152(b)(1), 65.155(b) | Performance tests (non-flare): required to conduct test | C | Subpart BB does not specifically state that a performance test must be conducted, however, procedures are given on how to conduct a performance test. |
| | 65.158(a) | Performance tests: procedures (non-flare): introduction | N | |
| 61.304(a)(1) | 65.158(a)(2) | Performance tests: testing equipment installed according to appropriate method | N | The CAR parallel requirement is stated more generally: "Performance tests shall be conducted...in accordance with the test methods..." |

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|---|-----------------------------------|--|--------------------------------|--|
| 61.304(a)(2) | 65.158(a)(3) and (a)(3)(i) | Performance tests: procedures (non-flare): time period (length) of test and throughput criteria | BR | <ul style="list-style-type: none"> - Subpart BB requires a sampling period of at least 6 hours during which at least 300,000 liters of benzene are loaded. - The CAR allows for 3 separate sampling runs with compliance determination based on the arithmetic mean of the runs. The CAR also provides an option if one of the sample runs is lost or discontinued for certain reasons. In these cases, the CAR allows the performance test to consist of 2 runs. - The CAR does not specify a minimum of 6 hours and 300,000 liters of throughput for the sampling run, but instead, specifies that each sampling run will represent at least one complete loading period. |
| 61.304(a)(3) | 65.158(a)(3)(ii) | Performance tests: procedures (non-flare): introductory paragraph for intermittent control devices | BR | <ul style="list-style-type: none"> - In subpart BB, the performance test lasts until the vapor holder returns to its original level. The CAR requires the test to cover at least one complete control device cycle. - Subpart BB requires at least 2 startups and shutdowns during the test of the intermittent control device. The CAR does not require startups and shutdowns for the intermittent control device test. |
| 61.304(a)(4) | 65.158(b)(4)(i) | Performance tests: procedures (non-flare): emissions testing interval | BR | Subpart BB requires samples at 5-minute intervals. The CAR requires an integrated sample or four grab samples taken at equal intervals per hour. |
| 61.304(a)(4)(i) | 65.158(b)(4)(v)(B) | Performance tests: procedures (non-flare): record readings of each measurement instrument | N | |
| 61.304(a)(4)(ii) | 65.158(b)(1) | Performance tests: procedures (non-flare): selection of sampling site using Method 1 or 1A | N | |
| 61.304(a)(4)(iii) | 65.158(b)(2) | Performance tests: procedures (non-flare): determination of volumetric flow rate | N | |

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|---|-----------------------------------|--|--------------------------------|---|
| 61.304(a)(4)(iv) | 65.158(b)(4) 65.158(b)(4)(v) | Performance tests: procedures Method 25A or 25B | N | Subpart BB allows use of Method 25A or 25B. The CAR allows Method 18 or 25A. |
| | 65.158(b)(4)(v)(A) | Performance tests: procedures (non-flare): calibration gas | N | Subpart BB requires the use of benzene as the calibration gas. The CAR provides flexibility by specifying the principal regulated material as the calibration gas. |
| | 65.158(b)(4)(v)(C) | Performance tests: procedures (non-flare): organic concentration and volume measurement correspond to same emissions test interval | N | |
| 61.304(a)(5) | 65.158(b)(4)(v)(D) | Performance tests: procedures (non-flare): mass emission rate per test interval | N | The CAR tests for total organic compounds whereas subpart BB tests for benzene. |
| 61.304(a)(6) | 65.158(b)(4)(ii) | Performance tests: procedures (non-flare): mass emission rate | N | The CAR equation is expressed differently, however, the results would be the same. |
| 61.304(a)(7) | 65.158(b)(4)(iii) | Performance tests: procedures (non-flare): percent reduction equation | N | |
| 61.304(b) | 65.147(b)(1) | Compliance determination requirement | C | The CAR refers to the flare test as a compliance determination while subpart BB calls it a performance test. This is a clarification because not all performance test requirements apply to the flare test. |

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|---|-----------------------------------|--|--------------------------------|--|
| 61.304(b) | 65.147(b)(3)(i) | Compliance determination: procedures (flare, Method 22 for visibility) | BR | <ul style="list-style-type: none"> - The CAR clarifies that the observation period is to be 2 hours except when the loading cycle is less than 2 hours. Subpart BB refers to a flare performance test, where the CAR refers to a flare compliance determination. This is done for clarity so that the flare compliance determination will not be confused with a performance test which would involve emission measurement. - The CAR does not contain the following provisions: at least 3 complete loading cycles with a separate test run for each must be performed; the observation period shall encompass each loading cycle; and continuous measurement of vent stream flow rate. |
| 61.304(c) | [Not Consolidated] | Compliance determination: gauge pressure in system | BR | The CAR does not have the provision that the gauge pressure in the tank truck or railcar tank can not exceed the vapor tightness test pressure. Therefore, it is unnecessary for the CAR to include the testing procedures for this requirement. |
| 61.304(d) | [Not Consolidated] | Compliance determination: pressure measurement (marine vessels only) | NC | The CAR does not consolidate requirements for marine vessels. |
| 61.304(e) | [Not Consolidated] | Compliance determination: leak detection and repair | BR | The requirement to perform leak detection and repair immediately prior to conducting a performance test is not incorporated into the CAR. |
| 61.304(f) | [Not Consolidated] | Compliance determination: marine vessel vapor tightness | NC | The CAR does not consolidate requirements for marine vessels. |
| 61.305(a) | 65.160(b) | R&R: performance test data | N | The CAR clarifies that the same data are to be recorded for all subsequent performance tests. |
| 61.305(a)(1) | 65.160(b)(1) | R&R: performance test data: introductory paragraph | N | |

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|---|-----------------------------------|---|--------------------------------|---|
| 61.305(a)(1)(i) | 65.160(b)(1)(i) and (b)(1)(ii) | R&R: performance test data: incinerators | BR | <ul style="list-style-type: none"> - The CAR does not contain the subpart BB provisions requiring that the temperature be measured every 2 minutes for short loading cycles. The CAR requires 15 minute measurements regardless. - The temperature is averaged over the loading cycle in subpart BB, but it is averaged over the performance test time period in the CAR. - The CAR does not contain the subpart BB provision to record the duration of the loading cycle. |
| 61.305(a)(1)(ii) | 65.160(b)(1)(iii) | R&R: performance test data: incinerators | N | |
| 61.305(a)(1)(iii) | [Not Consolidated] | R&R: performance test data: incinerators | BR | The CAR does not require the duration of the loading cycle to be recorded. |
| 61.305(a)(2) | 65.159(b)-(d) | R&R: performance test data: flares | BR | <ul style="list-style-type: none"> - The CAR contains a clarifying edit by requiring a record of all periods when the flame is out instead of the subpart BB requirement to keep continuous records of the presence of a flame and records of all loading cycles when the pilot flame is absent for each vent stream. - Subpart BB does not require a record of the flare design, but the CAR does. - The CAR does not contain the provision to record any maximum permitted velocity calculation, as subpart BB does. - The CAR does not contain the subpart BB provision to record the duration of the loading cycle. |
| 61.305(a)(3) | 65.160(b)(1) | R&R: performance test data: boilers or process heaters - introductory paragraph | N | |
| 61.305(a)(3)(i) | 65.160(b)(1)(iv) | R&R: performance test data: boilers and process heaters location of vent stream | N | |

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|---|--|---|--------------------------------|--|
| 61.305(a)(3)(ii) | 65.160(b)(1)(v), 65.160(b)(1)(vi) | R&R: performance test data: boilers and process heaters less than 44 MW | BI | - For boilers or process heaters smaller than 44 MW, the CAR provisions require the percent reduction or the outlet concentration and the average combustion temperature. Subpart BB requires only the average combustion temperature. - The CAR requires measurements every 15 minutes while subpart BB requires measurements every 2 minutes. |
| 61.305(a)(4) | 60.160(b)(2)(iii), (b)(2)(iv), and (b)(2)(v) | R&R: performance test data: carbon adsorbers | C | The CAR requires results of parametric monitoring (steam mass flow) or the use of an organic monitor during a performance test, while subpart BB requires a record of the control efficiency of the system plus all performance test data and calculations used to determine that efficiency. |
| 61.305(a)(5) | [Not Consolidated] | R&R: performance test data: description of the vent system | BR | The CAR does not require a description of the vent stream. |
| 61.305(b) | 65.162(b)(1), (b)(3), (c)(1), (c)(3) and 65.163(e) | R&R: records of operating parameter continuous records and exceedances | BR | Subpart BB requires records of excursions beyond parameter boundaries which were established during the most recent performance test. The CAR allows the operating parameter boundaries to be established based on the performance test and/or engineering judgement or based on limits previously established under a referencing subpart. |
| 61.305(b)(1) | 65.148(c)(2) | R&R: out-of-bounds periods for thermal incinerators | BR | Subpart BB specifies the parameter boundary ranges that define when the parameter boundaries are exceeded. The CAR requires site specific parameter boundaries to be set and allows an option of basing the operating parameter boundaries on performance test results or on the parameter boundaries established in the referencing subpart. |
| 61.305(b)(2) | 65.148(c)(2) | R&R: out-of-bounds periods for catalytic incinerators | BR | Subpart BB specifies the parameter boundary ranges that define when the parameter boundaries are exceeded. The CAR requires site specific parameter boundaries to be set and allows an option of basing the operating parameter boundaries on performance test results or on the parameter boundaries established in the referencing subpart. |

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|---|-----------------------------------|--|--------------------------------|---|
| 61.305(b)(3) | 65.149(c)(2) | R&R: parametric monitoring data and out-of-bounds periods for boilers or process heaters | BR | Subpart BB specifies the parameter boundary ranges that define when the parameter boundaries are exceeded. The CAR requires site specific parameter boundaries to be set and allows an option of basing the operating parameter boundaries on performance test results or on the parameter boundaries established in the referencing subpart. |
| 61.305(b)(4) | 65.149(c)(2) | R&R: out-of-bounds periods for boilers and process heaters | BR | Subpart BB specifies the parameter boundary ranges that define when the parameter boundaries are exceeded. The CAR requires site specific parameter boundaries to be set and allows an option of basing the operating parameter boundaries on performance test results or on the parameter boundaries established in the referencing subpart. |
| 61.305(b)(5) | 65.152(c)(2) | R&R: out-of-bounds periods for carbon adsorbers | BR | Subpart BB specifies the parameter boundary ranges that define when the parameter boundaries are exceeded. The CAR requires site specific parameter boundaries to be set and allows an option of basing the operating parameter boundaries on performance test results or on the parameter boundaries established in the referencing subpart. |
| 61.305(c) | 65.163(a)(1) | R&R: bypass lines | C | <ul style="list-style-type: none"> - Subpart BB specifies bypass records for all periods when flow is indicated. The CAR clarifies that hourly records will be kept indicating whether the flow indicator was operating and whether a diversion was detected, as well as all periods when the vent stream is diverted from the control device or the flow indicator is not operating. - The CAR allows lock-and-key type configurations as well as car-seals. |
| | 65.4(a) | Record retention | C | The CAR clarifies that for sources subject to title V, records must be kept for 5 years. All other sources are subject to 2 years record retention. |
| 61.305(d) | [Not Consolidated] | R&R: periods of operation for boilers with design capacity greater than 44 MW | BR | The CAR does not require the periods of operation to be recorded because venting a process vent to an idle combustion device is a safety hazard. |
| 61.305(e) | 65.159(c) and (d)(1) | R&R: flare pilot flame monitoring | N | |

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|---|-----------------------------------|---|--------------------------------|---|
| 61.305(f) | 65.166(a) | R&R: periodic report | BR | The CAR requires semiannual periodic reports while subpart BB requires quarterly reports. |
| 61.305(f)(1) | 65.166(f)(1) and (f)(2) | R&R: periodic report: excursions | BR | <ul style="list-style-type: none"> - The CAR requires periods when the daily averages are outside the ranges to be reported while subpart BB requires a report when the 3-hour averages are outside the range. - The CAR requires that other records are kept other than the daily average for carbon adsorbers when regenerative stream flow and carbon bed regeneration temperature are monitored. Subpart BB does not allow these parameters to be monitored for carbon adsorbers; an organic monitoring device is required. |
| 61.305(f)(2) | 65.166(b)(2) | R&R: periodic report: vent stream diversions | N | |
| 61.305(f)(3) | [Not Consolidated] | R&R: periodic report: boiler or process heater not operating | BR | The CAR does not require the operation of the boiler or process heater to be monitored, therefore this report is not included in the CAR. |
| 61.305(f)(4) | 65.166(c) | R&R: periodic report: absence of pilot or flare flame | BR | The CAR allows monitoring of the pilot flames or the flare flames, while subpart BB allows monitoring of the pilot flames only. |
| 61.305(f)(5) | 65.166(b)(3) | R&R: periodic report: valve maintenance, broken seals, valve position change | BR | The CAR also allows lock-and -key type configurations. Subpart BB allows only car-seals. |
| 61.305(g)-(h) | 65.87 | R&R: vapor-tightness documentation | BR | The CAR does not require as much detail in the vapor tightness records as subpart BB does. |
| 61.305(i) | [Referencing Subpart] | R&R: general notification report and subsequent general record keeping requirements | R | This applicability record is not included in the CAR. |
| 61.306 | 65.12 | Delegation of authority | N | |

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|---|---|---|--------------------------------|---|
| New | 65.82(e), 65.83(a)(3) | Allowance for vapor balancing as a control option | BR | <ul style="list-style-type: none"> - The CAR allows vapor balancing as a compliance option. - The paragraphs listed are those that were added to make this compliance option possible. They include the statement of the compliance option, any necessary procedures, and reporting and recordkeeping requirements. |
| New | 65.82(f), 65.83(a)(4), 65.144, 65.165(a) | Allowance for routing to the fuel gas system or process as a control option | BR | <ul style="list-style-type: none"> - The CAR allows transfer vent streams to be routed to a fuel gas system or to the process as compliance options. - The paragraphs listed are those that were added to make this compliance option possible. They include the statement of the compliance option, any necessary procedures, and reporting and recordkeeping requirements. |
| New | 65.83(b), 65.85(b), 65.85(c), 65.154, 65.158(c), 65.160(b)(3), 65.165(d) | Halogenated vent stream requirements | BI | <ul style="list-style-type: none"> - The CAR requires that halogenated vent streams be controlled, subpart BB does not. Although these are additional requirements being applied to subpart BB sources, the EPA does not believe that this will effect many subpart BB regulated sources because very few of the subpart BB vent streams are halogenated. - The paragraphs listed are those that were added to make the control of halogenated vent streams possible. They include the statement that these streams must be controlled, necessary procedures, and reporting and recordkeeping requirements. |
| New | 65.84(b), 65.143(a)(2), 65.147(a)(1), 65.148(a)(2), 65.149(a)(3), 65.152(a)(2), 65.155(a)(2) | CVS and control devices must be operating when emissions are vented to them | C | The CAR clarifies that CVS and control devices must be in operation when emissions are vented to them. |
| New | 65.150, 65.160(b)(2)(i) | Absorbers used as control devices | BR | The CAR specifically lists carbon absorbers as an acceptable control device. |
| New | 65.151, 65.160(b)(2)(ii) | Condensers used as control devices | BR | The CAR specifically lists condensers as an acceptable control device. |
| New | 65.145, 65.163(b)(1), 65.165(b), 65.166(e), 65.166(f)(3) | Nonflare control devices used to control emissions from low-throughput transfer racks | BR | The CAR allows control devices used on low-throughput transfer racks to have a design evaluation submitted instead of a performance test. Also, the facility can submit a monitoring plan specifying what will be monitored. |

CAR Correlation Table - Transfer Racks
(40 CFR Part 61, Subpart BB - 61.300 through 61.306)

| Citations Part 61, Subpart BB (Benzene Transfer) | Citations, Part 65 ^{a,b} | Description | Type of Change ^c | Comments |
|---|---|---|--------------------------------|---|
| New | 65.147(b)(2), 65.148(b)(3), 65.149(b)(3), 65.152(b)(2), and 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 | 65.148(b)(2), 65.149(b)(2) | Performance test exemptions | BR | The CAR lists certain incinerators, boilers, and process heaters that are exempt from performance tests. |
| New | 65.156(b)(2) | Procedures for a backup CPMS | C | The CAR clarifies how to handle the results from a backup CPMS |
| New | 65.156(c)(2)(ii), 65.167(b), 65.162(a)(2)(iii) - (a)(2)(v), 65.163(c) | Startup, shutdown, and malfunction plan and associated requirements | BR | <ul style="list-style-type: none"> - The CAR incorporates the startup, shutdown, and malfunction (SSM) plan from the part 63 general provisions. These paragraphs are a necessary part of the SSM plan scheme. - The SSM plan acts to reduce burden because less reporting is required when there is a startup, shutdown, or malfunction. See the part 61 general provisions correlation table for more discussion on the SSM requirements and the differences with the corresponding provisions of part 61. |
| New | 65.156(c)(3), (c)(4), and (c)(5) | Common sense CPMS requirements | C | The CAR specifically states some common sense CPMS requirements, including making sure the CPMS is working properly, that it is giving representative measurements, and that the CPMS is continuously operating when emissions are routed to the monitoring device. |
| New | 65.156(d), 65.161(a), 65.161(c), 65.161(d), 65.161(e), 65.162(b)(2), 65.162(c)(2), 65.165(c), 65.165(e), 65.166(f)(4) | Monitoring, recordkeeping, and reporting | BR | The CAR incorporates the HON scheme of allowing facilities to set site-specific parameter monitoring ranges. These site-specific parameter monitoring ranges are a measure of compliance with the rule. Also, part of the HON scheme is reduced recordkeeping -- sources do not have to keep every monitored value if all data is within the parameter ranges. This scheme was incorporated into the CAR as a whole program. The paragraph 65.156(d) is the portion of the scheme that states that the CPMS data is used to determine compliance with the rule. The paragraphs in 65.161 are the requirements that set up the various recordkeeping options. The paragraphs of 65.162 require the daily average value to be recorded. The paragraphs of 65.165 and 65.166 are the associated recordkeeping and reporting. These paragraphs are marked as a burden reduction because the whole program is a burden reduction. |

CAR Correlation Table - Transfer Racks
(40 CFR Part 61, Subpart BB - 61.300 through 61.306)

| Citations Part 61, Subpart BB (Benzene Transfer) | Citations, Part 65 ^{a,b} | Description | Type of Change ^c | Comments |
|---|-----------------------------------|--|--------------------------------|--|
| New | 65.156(e), 65.162(e) | Alternative monitoring parameter | C | Subpart BB allows monitoring parameters for control devices not listed to be proposed to the Administrator, but does not specifically allow alternative monitoring parameters for the control devices listed; the CAR does. |
| New | 65.157(b)(1) | Prior performance tests acceptable | BR | The CAR allows prior performance tests and compliance determinations under certain situations. |
| New | 65.158(b)(1)(i) and (b)(4)(iv) | Sampling site and measurement of compliance for certain boilers and process heaters | C | <ul style="list-style-type: none"> - The CAR specifies that the sample site shall be at the outlet of the control device. - The CAR clarifies for boilers and process heaters with a capacity less than 44 MW and when the vent stream is introduced with the combustion air or as a secondary fuel, the calculation of percent reduction must take into account the reduction of regulated material from all fuel sources. This requires the sampling site to be located so that all vent streams are measured. |
| New | 65.159(a), 65.160(a) | Have available records to determine the conditions of flare compliance and performance tests | C | The CAR requires that records be available to determine the conditions of the flare compliance determinations and performance tests. This clarifies the requirement that these data must be available although records are required to be kept for 2 or 5 years depending on Title V source status regardless. Also, records of performance tests and compliance determinations are probably kept indefinitely anyway because of their importance to the facility. |
| New | 65.162(d) | Alternatives to the CPMS and recordkeeping provisions | BR | The CAR allows facilities to request alternative systems for monitoring and recordkeeping. Alternatives such as nonautomated systems and data compression systems are specifically mentioned as systems that could be approved. |
| New | 65.164(a) | Performance test reports | C | These provisions in the CAR clarify the contents of performance tests and compliance determinations. They also clarify what to submit when multiple emission points of the same kind are tested using the same methods. |

CAR Correlation Table - Transfer Racks
(40 CFR Part 61, Subpart BB - 61.300 through 61.306)

| Citations Part 61, Subpart BB (Benzene Transfer) | 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 SOCOMI 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.