

**CAR Correlation Table - Recordkeeping and Reporting
(40 CFR Part 63, Subpart G (HON) - 63.151 and 63.152)**

| Citations Part 63, Subpart G (HON General Standards) | Citations, Part 65 ^{a,b} | Description | Type of Change ^c | Comments |
|--|-----------------------------------|--|--------------------------------|---|
| 63.151(a) | 65.5(a) | Introductory paragraph laying out the reporting system | BR | Paragraphs 63.151(a) and 65.5(a) both outline the various reports that are required. The CAR's reporting requirements are very similar to the HON. The CAR does not require an Initial Notification or implementation plan. Also, there are no requirements in the CAR for compliance extensions since facilities not complying would have no need for the CAR. |
| 63.151(b) | 63.5(i) | Initial Notification | NC | The CAR does not contain this report. This information will be submitted with the title V permit application or application to construction. An application to construct is still an applicable requirement for CAR sources. |
| 63.151(c) | [Not Consolidated] | Implementation plan | NC | The CAR does not require an implementation plan. This information will be submitted as part of the title V permit application or application to construct. An application to construct is still an applicable requirement for CAR sources. |
| 63.151(d) | [Not Consolidated] | Contents of implementation plan for emissions averaging | NC | The CAR does not contain emissions averaging provisions. |
| 63.151(e) | [Not Consolidated] | Contents of implementation plan | NC | Introductory paragraph not needed in CAR format. |
| 63.151(e)(1) | 65.5(i)(1) | Implementation plan contents: list of each emission point subject to the rule | N | The CAR does not require an implementation plan, therefore the items listed as contents in an implementation plan are listed as contents of a title V application. |
| 63.151(e)(2) | 65.5(i)(2) | Implementation plan contents: control technologies being applied | N | |
| 63.151(e)(3) | 65.5(i)(3) | Implementation plan contents: statement that monitoring inspections, recordkeeping and reporting will be implemented beginning on the date of compliance | N | |
| 63.151(e)(4) | 65.145(c)(1) | Implementation plan contents: operating plan for storage tanks | BR | The CAR requires the operating plan for storage to be submitted with the Initial Compliance Status Report. If the information is submitted with the operating permit it would not have to be submitted with the Initial Compliance Status Report. |

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| Citations Part 63, Subpart G (HON General Standards) | Citations, Part 65^{a,b} | Description | Type of Change^c | Comments |
|---|---|--|---------------------------------------|---|
| 63.151(e)(5) | 65.5(i)(4) | Implementation plan contents: proposed monitoring parameters for control technologies other than those listed | N | |
| 63.151(f) | 65.162(e) | Requesting different monitoring parameter | N | |
| 63.151(g) | 65.162(d) | Request for alternative CPMS and recordkeeping provisions | N | |
| 63.151(h) | 65.147(b)(2), 65.148(b)(3), 65.149(b)(3), 65.150(b)(2), 65.151(b)(2), 65.152(b)(2), 65.153(b)(2), | Supplement to the implementation plan | N | The CAR does not require an implementation plan. However, changes in control methods used must be reported in a title V permit application or other notification. |
| 63.151(i) | [Not Consolidated] | Implementation plan: updates for sources using emissions averaging | NC | The CAR does not contain emissions averaging provisions. |
| 63.151(j) | [Not Consolidated] | Submission of an implementation plan update | NC | The CAR does not require an implementation plan however reports of changes are required. This introductory paragraph is not needed in the CAR structure. |
| 63.151(j)(1) | 65.67(b) | Report group status changes | N | The CAR only applies to Group 2A and 2B process vents. It does not apply to Group 2 storage tanks or transfer racks. Therefore Group status change reporting only applies to process vents under the CAR. |
| 63.151(j)(2) | 65.167(a) | Report change of the control device used to comply | N | |
| 63.151(j)(3) | [Not Consolidated] | Report addition of CMPU | NC | The CAR does not have a provision requiring a report when a new source is added. This would be reported in a title V permit application. |

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| Citations Part 63, Subpart G (HON General Standards) | Citations, Part 65^{a,b} | Description | Type of Change^c | Comments |
|---|---|--|---------------------------------------|--|
| 63.152(a) | [Not Consolidated] | Intro. paragraph laying out the reporting system | NC | This introductory paragraph is not needed in the CAR structure. |
| 63.152(b) | 65.4(d) | Notification of Compliance Status (NCS) | BR | The CAR requires submission of the Initial Compliance Status Report within 240 days from the compliance date while the HON requires the Notification of Compliance Status Report submitted within 150 days of the compliance date. |
| 63.152(b)(1) | 65.165 | NCS: performance test report | C | The CAR lists out all information that must be contained in an Initial Compliance Status Report specifically. The HON's list is more general. |
| 63.152(b)(1)(i) | 65.164(a)(1) and 65.165(b)(5) | NCS: send one complete test report | N | |
| 63.152(b)(1)(ii) | 65.164(a)(2) | NCS: test report shall include | N | |
| 63.152(b)(2) | 65.165(c) | NCS: monitored parameter information | C | CAR clarifies that these provisions apply to recovery devices when used to maintain the TRE. |
| 63.152(b)(3) | [Not Consolidated] | NCS: emissions averaging requirements | NC | The CAR does not contain emissions averaging provisions. |
| 63.152(b)(4) | [Not Consolidated] | NCS: overlap issues | NC | Issues relating to overlap of different rules to the same emission points are not a concern under the CAR because all rules are consolidated to one set of provisions. |
| 63.152(b)(5) | [Not Consolidated] | NCS: wastewater | NC | The CAR does not contain wastewater provisions. |
| 63.152(c) and (c)(1) | 65.5(e)(1) and (e)(2) | Periodic reports: timing of submittals | N | |
| 63.152(c)(2) | [Not Consolidated] | Periodic reports: contents, introductory paragraph | NC | This introductory paragraph is not necessary in the CAR structure. |
| 63.152(c)(2)(i) | 65.165(c) | Owner/operator establishes the range | C | The CAR clarifies that the operating range is required for recovery and halogen reduction devices. |

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| Citations Part 63, Subpart G (HON General Standards) | Citations, Part 65 ^{a,b} | Description | Type of Change ^c | Comments |
|--|---|---|--------------------------------|--|
| 63.152(c)(2)(ii) | 65.3(b)(1) and (b)(2), and 65.156(d) | Parameter monitoring determines compliance with the required operating conditions and definition of excursion | N | The CAR allows one excused excursion while the HON allows more in the first five semiannual reporting periods and then one in all subsequent semiannual reporting periods. The CAR does not allow more than one excused excursion since the majority of sources that will comply with the CAR will be sources that have already gone through their first five semiannual reporting periods under the HON. Therefore, it is not necessary to include it in the CAR. |
| 63.152(c)(2)(iii) | 65.166(f)(1) | Periodic reports: must include daily average values for excursions | N | |
| 63.152(c)(2)(iv) | 65.165(b)(4) | Does not apply to storage unless in the monitoring plan | N | |
| 63.152(c)(3) | 65.164(a)(1) | Periodic reports: reports of performance tests | N | |
| 63.152(c)(4) | [Not Consolidated] | Periodic reports: additional contents | NC | This introductory paragraph is not necessary in the CAR structure. |
| 63.152(c)(4)(i) | 65.67(b) | Periodic reports: reports of process change, for process vents | N | |
| 63.152(c)(4)(ii) | 65.67(b) and 65.167(a) | Periodic reports: supplements to the implementation plan | BR | The CAR does not require an implementation plan therefore supplements to it are not required. However, the CAR requires the information that would be included in a supplement to be included in a periodic report. |
| 63.152(c)(4)(iii) | 65.67(b) (1) | Periodic reports: Group 2's become Group 1's | N | The CAR only contains provisions for a Group 2A or 2B process vent becoming Group 1. There are no provisions in the CAR regarding Group 2 storage tanks or transfer racks. |
| 63.152(c)(4)(iv) | [Not Consolidated] | Periodic reports: wastewater | N | The CAR does not contain provisions for wastewater. |
| 63.152(c)(5) | [Not Consolidated] | Periodic reports: emissions averaging requirements | NC | The CAR does not contain emissions averaging provisions. |
| 63.152(c)(6) | [Not Consolidated] | Quarterly reports in some situations | BR | The CAR does not contain any quarterly reporting under any circumstances. |

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|--|--|--|--------------------------------|---|
| 63.152(d) | [Not Consolidated] | Other reports: introductory paragraphs | NC | This introductory paragraph is not needed in the CAR structure. |
| 63.152(d)(1) | 65.6(c)(1) | Other reports: startup, shutdown and malfunction | N | |
| 63.152(d)(2) | 65.48(c) | Other reports: storage vessel notifications of inspections | N | |
| 63.152(d)(3) | [Not Consolidated] | Other reports: request approval of nominal control efficiency | NC | The CAR does not contain emissions averaging provisions. |
| 63.152(e) | [Not Consolidated] | Operating permit application submitted instead of an implementation plan | NC | This introductory paragraph is not needed in the CAR structure. |
| 63.152(e)(1) | 65.162(d)(1) and (e) | Operating permit application: request for approval of unique parameter or alternative system | N | |
| 63.152(e)(2) | [Not Consolidated] | Operating permit application: emissions averaging | NC | The CAR does not contain emissions averaging provisions. |
| 63.152(e)(3) | 65.5(i) and 65.162(e) | Operating permit application: various contents | N | |
| 63.152(e)(4) | 65.147(b)(2), 65.148(b)(3), 65.149(b)(3), 65.150(b)(2), 65.151(b)(2), 65.152(b)(2), and 65.153(b)(2) | Operating permit application: changes in control devices | N | |

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| Citations Part 63, Subpart G (HON General Standards) | Citations, Part 65^{a,b} | Description | Type of Change^c | Comments |
|---|---|---|---------------------------------------|--|
| 63.152(f) | 65.161(a) | Continuous records | N | |
| 63.152(f)(1) | 65.161(a)(1) | Monitor at least once every 15 minutes | N | |
| 63.152(f)(2) | 65.161(a) | Record of monitored data | BR | The HON allows for continuous records to be discarded at the end of the day, if the daily averages are within the ranges; hourly averages of all data are retained. The CAR provides a burden reduction and allows the continuous records to be discarded after 3 hours, while keeping the hourly averages, if the most recent 3 valid hours of continuous records are kept. |
| 63.152(f)(3) | 65.161(a) | Daily average within the range | N | |
| 63.152(f)(4) | 65.161(a), 65.162(b)(3) and (c)(3) | Daily averages outside the range | BR | The CAR includes an additional option for records to be kept. This additional option allows block hourly averages to be kept, even when daily averages are outside the range. |
| 63.152(f)(5) | 65.161(c)(1) | Calculation of daily averages | N | |
| 63.152(f)(6) | 65.161(c)(2) | Records when all values are within the ranges. | N | |
| 63.152(f)(7) | 65.161(b) | Monitoring data during system breakdowns, etc. not to be included in average. | N | Preventative maintenance is included in the list of situations in the CAR when monitoring data can not be used in a data average. |
| | 65.162(a)(2)(iii) | Records when CPMS is inoperative | N | |
| 63.152(g) | 65.161(e) | Alternative monitoring data recordkeeping | N | |
| | 65.165(e) and 65.166(f)(4) | Notify the Administrator that alternative is being implemented | N | |

CAR Correlation Table - Recordkeeping and Reporting (40 CFR Part 63, Subpart G (HON) - 63.151 and 63.152)

- 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.