

**CAR Correlation Table - Process Vents**  
**(40 CFR Part 60, Subpart NNN - 60.660 through 60.668)**

Citations Part 60, Subpart NNN (SOCMI Distillation)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
60.660(a) and (b)	[Referencing Subpart]	Applicability and designation of affected facility	R	These paragraphs pertain to applicability. The CAR does not contain any provisions on applicability of the referencing subparts.
60.660(c)	[Not Consolidated]	Exemptions	NC	This is an introductory paragraph not needed in the CAR structure.
60.660(c)(1)	[Referencing Subpart]	Exempt: beverage alcohol	R	The CAR does not contain this applicability requirement.
60.660(c)(2)	[Referencing Subpart]	Exempt: reactor processes subject to subpart DDD	R	The CAR does not contain this applicability requirement.
60.660(c)(3)	[Referencing Subpart]	Exempt: batch processes	R	The CAR does not contain this applicability requirement.
60.660(c)(4)	65.2, 65.63(e), 65.64, 65.66(d), and 65.67(b)	Exempt: affected facilities with a TRE > 8.0	BR	<ul style="list-style-type: none"> <li>- The exemption level is consolidated from a TRE index value greater than 8.0 in subpart NNN to greater than 4.0 in the CAR. This was done for simplicity and conformity after analysis of the HON process vent data.</li> <li>- The difference in requirements for process vents where control is not required with a TRE index value below or above 4.0 is differentiated by Group 2A and Group 2B to add clarity to the rule. These are defined in the definition section of the General Provisions.</li> <li>- Subpart NNN specifically lists paragraphs that facilities must still comply with for process vent with a TRE index value of &gt;8.0. The CAR has the same requirements but they are communicated in the structure of the CAR rather than in one paragraph.</li> </ul>
60.660(c)(5)	[Referencing Subpart]	Exempt: design capacity	R	The CAR does not contain this applicability requirement.
60.660(c)(6)	65.2, 65.64(d), 65.66(b), 65.67(a) and (b)	Exempt: vent stream flowrate < 0.008 scmm	BR	<ul style="list-style-type: none"> <li>- The CAR uses a vent stream flow cut off of less than 0.008 scmm, while subpart NNN uses 0.011 scmm.</li> <li>- Subpart NNN specifically lists paragraphs that facilities must still comply with for vent streams below the flowrate cutoff. The CAR has the same requirements but they are communicated in the structure of the CAR rather than in one paragraph.</li> </ul>
60.661	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 the definition correlation table for details.

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60.662 introductory paragraph	[Referencing Subpart]	Compliance schedule	R	The provisions of the introductory paragraph of 60.662 are copied and edited to incorporate CAR specific differences, and included as a proposed additional paragraph [60.660(e)] in the proposed revisions to subpart NNN.
60.662(a)	65.149(a)(2)	Introducing stream into flame zone of a boiler	N	
	65.63(a)(2)	98 percent or 20 ppmv standard	BR	<ul style="list-style-type: none"> <li>- The CAR includes language on what types of devices can be used to achieve the 98% or 20 ppmv standard. The language specifies that any one or a combination of control devices can be used. It also specifies situations when a recovery device may be used.</li> <li>- The CAR language uses "TOC" where the NSPS language uses "TOC (minus methane and ethane)" explicitly. The CAR definition of TOC includes "minus methane and ethane" by referencing 65.64(c)(1) [Method 18], which specifies "minus methane and ethane."</li> <li>- "Regulated material" language added so that the provision can be more generic for application to rules with other regulated materials (i.e., organic HAP). Although occurring in many places, this change is only noted here.</li> <li>- The CAR will contain a link to the CVS section [65.142(b)] to reference the specific control device requirements.</li> </ul>
60.662(b)	65.63(a)(1)	Flare	C	<ul style="list-style-type: none"> <li>- When complying by using a flare, the CAR language specifies to "reduce emissions of regulated material" while the NSPS language specifies to "combust emissions."</li> <li>- Subpart NNN references 60.18 for the flare requirements; the CAR references subpart G. [Subpart G includes the same requirements as 60.18.]</li> </ul>

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60.662(c)	65.63(a)(3), (c), and (e)	TRE index	BR	<ul style="list-style-type: none"> <li>- The CAR requires "achieve and maintain" the TRE levels, while the NSPS only requires to "maintain" the TRE.</li> <li>- The CAR uses language on calculating the TRE "at the outlet of the final recovery device or prior to release to the atmosphere." The subpart NNN language specifies determining the TRE "without the use of VOC emission control devices."</li> <li>- The CAR refers to the specific provisions for Group 2A and 2B process vents, while for subpart NNN, applicable requirements must be determined by reviewing the complete rule.</li> </ul>
60.663(a)	65.156(c)(1)	For incinerators, monitoring equipment shall be installed, calibrated, maintained, and operated	BR	<ul style="list-style-type: none"> <li>- The CAR allows "other written procedures" to be used as an alternative to manufacturers specifications.</li> <li>- In the CAR, this requirement appears in one place instead of each time monitoring equipment is required.</li> </ul>
60.663(a)(1)	65.148(c)(1)	Incinerator monitoring requirements	BR	<ul style="list-style-type: none"> <li>- Subpart NNN requires the temperature monitoring device to be installed in the firebox. The CAR also allows the monitoring device to be immediately downstream of the fire box before any substantial heat exchange is encountered.</li> <li>- The CAR requires the monitoring device to be "capable of providing a continuous record." Subpart NNN requires the device to be "equipped with a continuous recorder." This change is made for all monitoring devices, but only mentioned here.</li> </ul>
	65.2	Temperature monitoring device definition	BR	The CAR requires temperature monitoring devices to be accurate to $\pm 1.2^{\circ}$ C while subpart NNN requires an accuracy of $\pm 0.5^{\circ}$ C.
60.663(a)(2)	65.143(a)(3)	Bypass line provisions for incinerators	C	As clarification, the CAR excepts certain equipment (pressure relief valves, low leg drains, etc.) from the bypass provisions.
	65.143(a)(3)(i)	Bypass line flow indicators	BI	<ul style="list-style-type: none"> <li>- Subpart NNN requires flow records at least once every hour. The CAR requires records at least once every 15 minutes.</li> <li>- A clarifying edit was made. Where NNN requires flow indicators on lines that could route the process vent away from the incinerator, the CAR requires flow indicators on lines that could route the process vent to the atmosphere.</li> </ul>

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60.663(a)(2)	65.143(a)(3)(ii)	Bypass line car-seal or lock-and-key type configuration	BR	Subpart NNN only allows flow indicators to monitor for bypass. The CAR also allows car-seals or lock-and-key type configurations.
60.663(b)	65.156(c)(1)	For flares, monitoring equipment shall be installed, calibrated, maintained, and operated	N	
60.663(b)(1)	65.147(c)	Flare monitoring requirements	BR	Subpart NNN currently requires a heat sensing device to detect the presence of a pilot flame. The CAR requirement is more general for flexibility; it requires a device to continuously detect the presence of at least one pilot flame or the flare flame.
60.663(b)(2)	65.143(a)(3)	Bypass line provisions for flares	C	As clarification, the CAR excepts certain equipment (pressure relief valves, low leg drains, etc.) from the bypass provisions.
	65.143(a)(3)(i)	Bypass line flow indicators	BI	- Subpart NNN requires flow records at least once every hour. The CAR requires records at least once every 15 minutes. - A clarifying edit was made. Where NNN requires flow indicators to provide records of vent stream flow to the incinerator, the CAR will require flow indicators on lines that could route the process vent to the atmosphere.
	65.143(a)(3)(ii)	Bypass line car-seal or lock-and-key type configuration	BR	Subpart NNN only allows flow indicators to monitor for bypass. The CAR also allows car-seals or lock-and-key type configurations.
60.663(c)	65.156(c)(1)	For boilers, monitoring equipment shall be installed, calibrated, maintained, and operated	N	

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60.663(c)(1)	65.143(a)(3)	Bypass line flow provisions for boilers	C	As clarification, the CAR excepts certain equipment (pressure relief valves, low leg drains, etc.) from the bypass provisions.
	65.143(a)(3)(i)	Bypass line flow indicators	BI	- Subpart NNN requires flow records at least once every hour. The CAR requires records at least once every 15 minutes. - A clarifying edit was made. Where NNN requires flow indicators to provide records of vent stream flow to the incinerator, the CAR will require flow indicators on lines that could route the process vent to the atmosphere.
	65.143(a)(3)(ii)	Bypass line car-seal or lock-and-key type configuration	BR	Subpart NNN only allows flow indicators to monitor for bypass. The CAR also allows car-seals or lock-and-key type configurations.
60.663(c)(2)	65.149(c)(1)	Boiler monitoring requirements	N	
	65.2	Temperature monitoring device definitions	BR	The CAR requires temperature monitoring devices to be accurate to $\pm 1.2^{\circ}$ C while subpart NNN requires an accuracy of $\pm 0.5^{\circ}$ C.
60.663(c)(3)	[Not Consolidated]	Monitor and record boiler periods of operation	BR	The CAR does not require this record. It is unsafe to route emissions to a boiler or process heater when it is not in operation, therefore, it is unnecessary to monitor for this event.
60.663(d)	65.156(b)(1)	Alternative monitoring parameters for listed recovery devices	C	The CAR provides different levels of monitoring changes (minor, intermediate, or major changes) and specifies procedures for approval of the alternative.
	65.156(c)(1)	For recovery devices, monitoring equipment shall be installed, calibrated, maintained, and operated	N	
60.663(d)(1)	[Not Consolidated]	Absorber monitoring requirements - introductory paragraph	NC	This introductory paragraph is not needed in the CAR structure.

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60.663(d)(1)(i)	63.153(c)(1)	Absorber monitoring requirements	N	
	65.2	Temperature monitoring device definitions	BR	The CAR requires temperature monitoring devices to be accurate to $\pm 1.2^{\circ}$ C while subpart NNN requires an accuracy of $\pm 0.5^{\circ}$ C.
	65.2	Specific gravity monitoring device definition	N	
60.663(d)(1)(ii)	65.153(c)(1)	Organic monitoring device as alternative to absorber	N	
	65.2	Organic monitoring device definition	N	
60.663(d)(2)	[Not Consolidated]	Condenser monitoring requirements - introductory paragraph	NC	This introductory paragraph is not needed in the CAR structure.
60.663(d)(2)(i)	65.153(c)(2)	Condenser monitoring requirements	N	
	65.2	Temperature monitoring device definitions	BR	The CAR requires temperature monitoring devices to be accurate to $\pm 1.2^{\circ}$ C while subpart NNN requires an accuracy of $\pm 0.5^{\circ}$ C.
60.663(d)(2)(ii)	65.153(c)(2)	Organic monitoring device as alternative to condenser	N	
	65.2	Organic monitoring device definition	N	
60.663(d)(3)	[Not Consolidated]	Carbon adsorber monitoring requirements - introductory paragraph	NC	The introductory paragraph is not needed in the CAR structure.
60.663(d)(3)(i)	65.153(c)(3)	Carbon adsorber monitoring requirements	N	
	65.2	Temperature monitoring device definitions	BR	The CAR requires temperature monitoring devices to be accurate to $\pm 1.2^{\circ}$ C while subpart NNN requires an accuracy of $\pm 0.5^{\circ}$ C.

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60.663(d)(3)(ii)	65.153(c)(3)	Organic monitoring device as alternative to carbon adsorber	N	
	65.2	Organic monitoring device definition	N	
60.663(e)	65.153(c)(4)	Alternative monitoring parameters for non-listed recovery devices - submit information	N	
	65.155(c)	Alternative monitoring parameters for non-listed control devices - submit information	N	
	65.162(e)	Alternative monitoring parameters - the information that must be submitted	C	The CAR provides a more detailed list of the items that must be included in the information submitted to the Administrator.
60.664(a)	65.158(a)(1)	Run at full operating rate during a performance test	C	<ul style="list-style-type: none"> <li>- The CAR consolidates on the more general "maximum representative conditions" language instead of "full operating rate." For clarity, the CAR also contains text from the General Provisions concerning testing at alternate conditions.</li> <li>- The CAR clarifies the requirement by specifying the performance test at conditions representing the lowest emission reduction.</li> <li>- The CAR specifies that startup, shutdown, and malfunction periods are not considered representative conditions.</li> </ul>
60.664(b)	65.148(b)(1), 65.149(b)(1), and 65.155(b)	Methods for determining compliance	C	The CAR states that a performance test is required in a more direct way.
60.664(b)(1)	65.158(b)(1)	Sampling site (for performance testing)	C	The CAR provides clarification on where the sampling shall be located when a vent stream is introduced with the combustion air or as a secondary fuel into a boiler or process heater with a design capacity less than 44 MW.

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60.664(b)(2)	65.158(b)(2)	Volumetric flowrate procedure (for performance and compliance testing)	N	
60.664(b)(3)	65.158(b)(3)(iii)	Concentration limit procedure (for performance and compliance testing)	N	
60.664(b)(4)	65.158(b)(3)	Concentration of TOC - Method 18	C	The CAR specifies Method 301 as the method to be used to validate another method or data. This is a clarification because these are the procedures used by EPA when approving another method.
60.664(b)(4)(i)	65.158(b)(3)(i) and (b)(4)(i)	Sampling time	N	
60.664(b)(4)(ii) - (iii)	65.158(b)(4)	Percent reduction procedure (for performance and compliance testing)	C	The CAR specifies Method 301 as the method to be used to validate another method or data. This is a clarification because these are the procedures used by EPA when approving another method.
60.664(b)(4)(iv)	65.158(b)(3)(ii)(A)	Concentration of TOC	N	
60.664(b)(5)	65.149(b)(2)	Performance test exemption for boilers and process heaters greater than 44 MW and vent streams introduced with the primary fuel	BR	The CAR also exempts boilers or process heaters where the vent stream is introduced with the primary fuel and ones that burn hazardous waste.
	[Not Consolidated]	Administrator reserves the right to require testing	NC	The CAR does not specifically state that the Administrator reserves the right to require testing because the Administrator has this right whether it is stated in the CAR or not.
60.664(c)	65.63(a)(1)	Reference to General Provisions with respect to required flare characteristics	N	Subpart NNN references 60.18 for the flare requirements; the CAR references subpart G. [Subpart G includes the same requirements as 60.18.]
60.614(d)	65.147(b)(1) and 65.153(b)(1)	Flare compliance determination and TRE determination	C	The CAR states clearly that a flare compliance determination and TRE determination are required.
60.664(d)(1)	65.64(b)	Sampling site introduction	N	

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60.664(d)(1)(i)	65.64(b)(1)	Sampling site prior to control device (for TRE determination)	N	The CAR does not specify that the sampling site be located prior to any post-reactor dilution of the stream with air, or prior to any post-reactor introduction of halogenated compounds into the process stream.
	65.64(b)(3)	Sampling site selection method	N	
60.664(d)(1)(ii)	<b>[Not Consolidated]</b>	Sampling site and special calculation for mixed streams	BR	The CAR does not require the special calculation to isolate the concentration from just the affected stream when mixed with nonaffected or nonreactor vent streams.
60.664(d)(2)	65.64(e)(2)	Molar composition of the process vent determination procedures	N	
60.664(d)(3)	65.64(d)	Volumetric flowrate (for TRE determination)	BR	<ul style="list-style-type: none"> <li>- The CAR clarifies that, for process vents that pass through a final steam ejector but are not condensed, the volumetric flowrate must be corrected to 2.3% moisture.</li> <li>- The CAR contains a specific engineering assessment allowance for determining volumetric flowrate, where subpart NNN does not specifically allow engineering assessment in the flowrate procedures.</li> </ul>
60.664(d)(4)	65.64(e)(1)	Net heating value determination procedures	N	
60.664(d)(5)	65.64(f)	TOC emission rate	N	The CAR text includes "E <sub>HAP</sub> and/or E <sub>TOC</sub> " language to accommodate HON users of this paragraph.
60.664(d)(6)	65.64(g)	Concentration of compounds containing halogens	S	<ul style="list-style-type: none"> <li>- The CAR bases the determination of vent stream halogen concentration on the mass emission rate of halogen atoms. In subpart NNN, determination of the halogen status is based on total concentration of halogens. The procedure in the CAR may yield different results on halogen status than the procedure in subpart NNN.</li> <li>- The CAR allows engineering judgement to be used in determining the halogen status.</li> </ul>

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60.664(e)	65.64(h)	TRE index	N	The format of the TRE index value equation is completely different. The change was made to improve clarity by consolidating the various provisions into a single equation with one table of coefficients. The equations were not changed, only the format of the presentation of the equations changed. The new format yields the same results as the old format.
60.664(f)	65.63(f)	Process changes	C	<ul style="list-style-type: none"> <li>- The CAR specifies that actions be taken when "...process changes are made that could reasonably be expected to change a Group 2A or 2B process vent..." Subpart NNN requires these actions when "...process changes are made."</li> <li>- The CAR list of examples of process changes includes a change in production rate where the subpart NNN list did not.</li> <li>- The CAR language contains examples of what is not a process change; subpart NNN text does not contain such a list.</li> <li>- The CAR states that the flowrate must be recalculated as well as the TRE, subpart NNN does not. Subpart NNN does not have a flowrate exemption like the CAR does.</li> </ul>
60.664(f)(1)	65.63(f)(4)	Group status change to a Group 1	BR	The CAR allows more time for compliance if the owner or operator demonstrates that achieving compliance will take longer than making the process change.
	65.67(b)	Process change notification	BR	The CAR does not include the provision to notify within one week of a process change. Instead, the owner/operator must specify that the performance test is now required because of a process change in the notification to the administrator that a performance test is being conducted.
60.664(f)(2)	65.63(f)(5)	Group status change to a Group 2A	N	<ul style="list-style-type: none"> <li>- The CAR allows the facility to propose a compliance schedule when a change is made requiring an additional process vent to be controlled. Subpart NNN requires the performance test to be conducted in 180 days.</li> <li>- The CAR also adds clarity by specifying what must be done if the group status changes to a Group 2B. It also gives a list of situations where a process change report is not required. This is a burden reduction because all process changes require reporting under subpart NNN.</li> </ul>
60.664(g)	65.64(d)	Volumetric flowrate (for low flow exemption)	S	Subpart NNN references the volumetric flowrate methods in three separate places, while the CAR only references the methods in 65.64(d).

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60.665(a)	[Referencing Subpart]	Notification of the specific provision the owner or operator has elected to comply with (initial and after any changes)	R	The CAR does not contain this notification. In the proposed revisions to subpart NNN this paragraph has been revised to refer to applicable CAR citations.
	65.147(b)(2), 65.148(b)(3), 65.149(b)(3), 65.153(b)(2), and 65.167(a)	Notification of a change in provisions being followed	BR	The CAR requires the notification of a change using title V amendment or by including a notification in the periodic report. The notification shall be prior to implementing the change. Under subpart NNN the notification must be submitted 90 days before implementing the change.
60.665(b)	65.67(a) and 65.160(b)	Data to include in records and reports of nonflare control device performance tests	N	
	65.160(c)	Data to include in records and reports of recovery device performance tests	N	
	65.149(b)(2)	Reporting exemptions for boilers and process heaters	BR	The CAR exempts these boilers and process heaters from performance tests and therefore, a performance test report is not required. The CAR also exempts boilers and process heaters where the vent stream is introduced as the primary fuel and ones burning hazardous wastes from performance tests.
60.665(b)(1)	65.160(b)(1)(i)-(b)(1)(iii)	Incinerator as combustion device recordkeeping and reporting	N	
60.665(b)(2)	65.160(b)(1)(iv)-(b)(1)(v)	Boiler as combustion device recordkeeping and reporting	S	The CAR clarifies that these records are not required for boilers or process heaters where the vent stream is introduced with or as the primary fuel.
60.665(b)(3)	65.159(b)	Flare data to record and report	BR	- The CAR does not have the requirement to keep continuous records of pilot flame monitoring; instead, it requires records of all periods when all pilot flames are out. - The requirement has been generalized to keep records of times when all pilot flames or the flare flames are out, rather than times when a pilot flame is out.

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60.665(b)(4)	65.66(a) and 65.160(c)	Group 2A process vents data to record and report	BR	- The CAR does not refer to the test of TRE index value as a performance test. - The CAR does not require a record of the duration of the carbon bed steaming cycle for carbon adsorbers, whereas subpart NNN does.
60.665(c)	65.162(b)	Keep parameter monitoring records for control devices	BR	Subpart NNN requires that continuous records be kept, while the CAR provides several options for information that can be kept. Depending on the option chosen, the data kept under the CAR is much less than data kept under subpart NNN.
	65.163(e)	Records of periods when parameter boundaries are exceeded	N	
60.665(c)(1)	65.148(c)(2)	Parameter ranges for thermal incinerators	BR	The CAR does not specify the parameter ranges. It requires the owner or operator to set site specific ranges. The subpart NNN specified ranges may be used if the owner or operator chooses to.
60.665(c)(2)	65.148(c)(2)	Parameter ranges for catalytic incinerators	BR	The CAR does not specify the parameter ranges. It requires the owner or operator to set site specific ranges. The subpart NNN specified ranges may be used if the owner or operator chooses to.
60.665(c)(3)	65.149(c)(2)	Parameter ranges for boilers and process heaters	BR	The CAR does not specify the parameter ranges. It requires the owner or operator to set site specific ranges. The subpart NNN specified ranges may be used if the owner or operator chooses to.
60.665(c)(4)	[Not Consolidated]	Change in the location of the introduction of the vent stream into a boiler or process heater	BR	The CAR requires that the vent stream be introduced into the flame zone of the boiler or process heater, but does not require that a change in location be defined as a parameter boundary exceedance.
60.665(d)	65.163(a)(1)	Records for flow indicators or car-seals on control device bypass lines	BR	The CAR requires "hourly records of whether... a diversion was detected at any time during the hour." Subpart NNN requires "continuous records."
60.665(e)	[Not Consolidated]	Records for boilers and process heaters periods of operation	BR	The CAR does not require this record. It is unsafe to route emissions to a boiler or process heater when it is not in operation, therefore, it is unnecessary to monitor for this event.

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60.665(f)	65.159(c) and (d)	Continuous records for flame pilot flare monitoring	BR	The CAR requires "hourly records of whether the flare flame or pilot flame monitors are continuously operating." Subpart NNN requires "continuous records."
60.665(g)	65.162(c)	Keep parameter monitoring records for recovery devices	BR	Subpart NNN requires that the continuous records be kept, while the CAR provides several options for information that can be kept. Depending on the option chosen, the data kept under the CAR is much less than data kept under subpart NNN.
	65.163(e)	Records of periods when parameter boundaries are exceeded	N	
60.665(g)(1)-(g)(4)	65.153(c)(5)	Parameter ranges for recovery devices	BR	The CAR does not specify the parameter ranges. It requires the owner or operator to set site specific ranges. The subpart NNN specified ranges may be used if the owner or operator chooses.
60.665(h), (h)(1), and (h)(2)	65.66(d)	Process change recordkeeping requirements	BR	<ul style="list-style-type: none"> <li>- Subpart NNN requires records of all process changes. The CAR requires records of process changes only when group status changes.</li> <li>- The CAR clarifies that records of new determinations of the flowrate and concentration must be kept. Subpart NNN only specifies that recalculations of TRE index value must be kept.</li> </ul>
60.665(h)(3)	65.160(b) and (c)	Records of performance tests after a change	S	The CAR does not have a separate requirement for keeping records of performance tests and TRE index value determination records. It relies on the general requirement to keep these records.
60.665(i)	65.66(b)	Records associated with determining the flowrate	BR	Subpart NNN has a vent stream flowrate cutoff of less than 0.008 scmm. The CAR has a vent stream flowrate cutoff of less than 0.011 scmm.
	65.66(d)(1)	Records of flowrate after a change	N	
60.665(j)	[Not Consolidated]	Records associated with determining the design capacity	NC	This provisions only applies to facilities that are exempt from subpart NNN. Sources would not be complying with the CAR if they are exempt.
60.665(k)	[Not Consolidated]	Exemption from the NSPS General Provisions quarterly reporting requirement	NC	All periodic reports are required semi-annually by the CAR. It is not necessary to provide a specific exemption from the NSPS General Provisions.

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Citations Part 60, Subpart NNN (SOCMI Distillation)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
60.665(l)	65.5(e)	Requirement to submit a Periodic Report	BR	The CAR contains new, more flexible timing as well as procedures for changing the timing to correlate with other reporting.
60.665(l)(1)	65.166(f)(1) and (f)(2)	Report parameter monitoring exceedances	N	The requirement to report when there are exceedances is the same in the CAR and subpart NNN. There are differences, however, in what is an exceedance and the length of time over which monitoring data is averaged to determine an exceedance (daily averages in the CAR versus 3-hour averages in subpart NNN).
60.665(l)(2)	65.166(b)(2) and (b)(3)	Report vent stream diversions	BR	The CAR allows car-seals or lock-and-key type configurations as well as flow indicators. Therefore, the CAR includes the records associated with these devices.
60.665(l)(3)	[Not Consolidated]	Report periods when boiler or process heater not operating	BR	The CAR does not require this report.
60.665(l)(4)	65.166(c)	Report pilot flame outages	BR	The CAR allows flare or pilot flame monitoring. Also, the CAR only requires this report when all pilot flames are absent or the flare flame is absent.
60.665(l)(5)	65.67(b)(1)	Report process changes increasing flowrate	C	<ul style="list-style-type: none"> <li>- The CAR requires a report 60 days after the performance test while subpart NNN requires the report 180 days after the change.</li> <li>- Throughout the CAR a clarifying distinction is made between performance tests, group determination tests, and flare compliance determinations. Subpart NNN uses the term performance test for all of these actions.</li> </ul>
60.665(l)(6)	[Not Consolidated]	Report process changes increasing design capacity	NC	This provisions only applies to facilities that are exempt from subpart NNN. Sources will not be complying with the CAR if they are exempt.
60.665(l)(7)	65.67(b)(1)(ii)	Report results of any recalculations	N	
60.665(m)	65.7(d)(1) and (d)(2)	Approval of alternative recordkeeping and reporting on a State basis	C	The CAR does not contain specific provisions for the approval of State recordkeeping and reporting provisions to replace the provisions in the rule. It contains the provisions for regulated source to initiate alternate recordkeeping and reporting.
60.665(n)	[Not Consolidated]	Reports of design capacity	NC	The CAR does not contain this applicability report.
60.665(o)	65.67(a)	Report flowrate determination	N	

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Citations Part 60, Subpart NNN (SOCMI Distillation)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
60.665(p)	65.162(e)	Alternate device/parameter data to record and report	BR	Subpart NNN requires the Administrator to determine the recordkeeping and reporting when a different device other than one listed in the rule is used. The CAR requires the owner or operator to submit a plan and the Administrator will approve or deny it.
60.666	[Referencing Subpart]	Reconstruction	R	The CAR does not contain this applicability provision.
60.667	[Referencing Subpart]	Chemicals affected by subpart NNN	R	The CAR does not contain this applicability provision.
60.668	65.12	Delegation of authority	BR	The CAR does not list the provision for alternative monitoring and recordkeeping as a requirement that is not delegated.
New	65.63(b), 65.64(b)(2) and (g), 65.154, 65.158(c), 65.160(b)(3), 65.160(d), and 65.166(d)	Halogenated vent stream requirements	BI	The CAR contains control, recordkeeping, and reporting requirements for halogenated vent streams.
New	65.63(d), 65.66(e), and 65.67(c)	Group 2A process vents without recovery devices	BR	The CAR provides provisions for when process vents are Group 2A "naturally" where no recovery device is used. The CAR outlines the items to include in the monitoring recordkeeping and reporting plan submitted for approval, and states that the facility must monitor based on the plan.
New	65.63(f)(6) and 65.67(b)(3)	Group status change to Group 2B	C	The CAR clarifies what must be done when the group status changes to Group 2B.
New	65.64(c)	TOC or HAP concentration	C	The CAR specifies how the concentration used in the TRE equation shall be calculated. Subpart NNN does not specify; one is left to assume that the same procedure that is used for the percent reduction or outlet concentration determinations are to be used.
New	65.64(d)(2) and (i)	Engineering Assessment	BR	The CAR allows engineering assessment in more situations than subpart NNN. What constitutes engineering judgement is also specified in the CAR.

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Citations Part 60, Subpart NNN (SOCMI Distillation)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
New	65.66(c) and 65.67(a)	Concentration records and reports	BR	The CAR requires records and a report of the concentration that subpart NNN does not. However, this is because of the additional exemption from control for low flowrate process vents that the CAR includes.
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
New	65.143(a)(2), 65.148(a)(2), 65.149(a)(3), 65.153(a)(2), and 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	65.147(b)(2)	Procedures when control devices are replaced with flares	C	The CAR outlines the procedures to follow when one control device is replaced with a flare.
New	65.147(b)(3)(iv)	Flame monitors to be operated during flare compliance determinations	C	The CAR clarifies that the pilot flame or flare flame monitor must be in operation during the flare compliance determinations.
New	65.148(b)(2)	Incinerator performance test exemption	BR	The CAR exempts hazardous waste incinerators from performance tests.
New	65.150, 65.151, 65.152, and 65.160(b)(2)	Condensers, absorbers, and carbon adsorbers used as control devices	BR	The CAR allows condensers, absorbers, and carbon absorbers to be used as control devices in certain situations. Subpart NNN gives provisions for condensers, absorbers and carbon adsorbers to be used as recovery devices only.
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)(i) and (c)(5)	Common sense CPMS requirements	C	The CAR specifically states some common sense CPMS requirements, including ensuring immediate repair of CPMS and the CPMS must be continuously operating when emissions are routed to the monitoring device.

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Citations Part 60, Subpart NNN (SOCMI Distillation)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
New	65.156(c)(2)(ii), 65.162(a)(2)(iii) - (a)(2)(v) and (a)(3), 65.163(c) and 65.167(b)	Startup, shutdown, and malfunction plan and associated requirements	BR	<ul style="list-style-type: none"> <li>- 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.</li> <li>- The SSM plan acts to reduce burden because less reporting is required when there is a startup, shutdown, or malfunction. See the part 60 General Provisions correlation table for more discussion on the SSM requirements and the differences with the corresponding provisions of part 60.</li> </ul>
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), and 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.
New	65.156(e), and 65.162(e)	Alternative monitoring parameter	C	Subpart NNN 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	65.157(b)(2) and (b)(3) and 65.164(b)(3)	Performance test waiver	BR	The CAR allows a performance test waiver in certain situations.

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Citations Part 60, Subpart NNN (SOCMI Distillation)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
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"> <li>- The CAR specifies that the sample site shall be at the outlet of the control device.</li> <li>- 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.</li> </ul>
New	65.159(a) and 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	65.160(b)(1)(vi)	Record percent reduction determined during performance test	C	The CAR clarifies that the percent reduction must be recorded for a small boiler (less than 44 MW) with the vent stream introduced with the combustion air or used as a secondary fuel.
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.
New	65.164(b)(2)	Submission of subsequent performance tests	C	The CAR clarifies when performance test reports must be submitted when they are not submitted as part of the Initial Compliance Status Report.

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- <sup>a</sup> **[Not Consolidated]** - Provisions that are not consolidated in the CAR because they are not relevant to SOCOMI sources or needed in the CAR.
- <sup>b</sup> **[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.
- <sup>c</sup> 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.