Citations Part 63, Subpart G (HON - Process Vents)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.113(a)	65.63(a)	Group 1 process vent performance requirements	C	Clarifying language added to explain that there are additional requirements for Group 1 halogenated streams and that these streams must comply with other paragraphs. Language describing the characteristics of a Group 1 process vent consolidated into the applicable tables and the format of the CAR.
63.113(a)(1) and (a)(1)(i)	65.63(a)(1)	Flare	С	- "Organic HAP" was generalized to "regulated material." This occurs in several places but is only mentioned here. The CAR references the CVS section [65.142(b)] for flare requirements while the HON references 63.11(b) of the General Provisions.
63.113(a)(1)(ii)	65.63(b)(1)	Shall not flare halogenated streams	BR	The CAR allows the source to designate a vent stream as halogenated with out conducting tests.
63.113(a)(2)	65.63(a)(2)	98 percent or 20 ppmv standard	C	 In order to generalize this provision to HON or NSPS use, the standard was changed from "organic HAP" to "regulated material or TOC." The CAR references the CVS section [65.142(b)] for closed vent systems and control devices used to achieve the 98 percent or 20 ppmv standard. The CAR does not use the term recapture device for simplicity. Instead the CAR only uses the terms recovery and control device to describe the various control options.
	65.158(b)	98 percent or 20 ppmv standard: compliance determination, use TOC or HAP	N	
63.113(a)(3)	65.63(a)(3)	TRE index	C,S	- "Process vent" is used in place of "vent stream." This is a global change occurring in many places, but it is only mentioned here. The HON "Group 2" is split into Group 2A (process vents with TRE between 1.0 and 4.0) and Group 2B (process vents with a TRE greater than 4.0 or with flow/conc. below the appropriate exemption levels) in the CAR.
63.113(b)	65.149(a)(2)	Introducing stream into flame zone of a boiler	N	

Citations Part 63, Subpart G (HON - Process Vents)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.113(c)	65.63(b)	Halogenated Group 1 process vent performance requirements	N	 The CAR references the CVS section [65.142(b)] for scrubber requirements. The CAR references 65.64(g) for halogen mass emission rate determination procedures.
63.113(d)	65.63(c) and (d) and 65.153(b)(1)	Group 2A requirements	С	 Language describing the characteristics of a Group 2A process vent replaced with the term Group 2A for simplicity. The CAR references the CVS section [65.142(b)] for recovery device requirements. HON language specifying which paragraphs apply to Group 2A process vents is consolidated into the CAR format. The CAR specifically states that performance tests are not required for Group 2A process vents with recovery devices. The HON implies this by not listing 63.116 as an applicable section.
63.113(e), (f), and (g)	65.63(e)	Group 2B requirements	S,C	 Language describing the characteristics of a Group 2B process vent is replaced with the term Group 2B for simplicity. The low flowrate exemption level for Group 2B status was consolidated from 0.005 scm/min under the HON to 0.011 scm/min under the CAR. This was done after analysis of the HON process vent database showed that there were very few streams with a flowrate between 0.005 scm/min and 0.011 scm/min with a TRE between 1.0 and 4.0, and none of these streams had a TRE less than 1.0.
63.113(h)	65.62(b)(1)	Group determination not required for vents specified as Group 1	N	
63.114(a)	65.156(c)(1)	Monitoring equipment shall be installed, operated, etc.	N	
63.114(a)(1)	65.148(c)(1)	Incinerator monitoring requirements	N	The CAR does not specify a continuous recorder, but rather that the monitoring device must provide a continuous record. This change is made throughout the monitoring requirement but is only mentioned here.
63.114(a)(2)	65.147(c)	Flare monitoring requirements	BR	The CAR allows monitoring of the flare flame or pilot flames, while the HON requires monitoring of the pilot flames.
63.114(a)(3)	65.149(c)(1)	Boiler monitoring requirements	Ν	

Citations Part 63, Subpart G (HON - Process Vents)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.114(a)(4)	65.154(c)(1)	Scrubber monitoring requirements	N	
63.114(a)(5)	65.150(c)(1), 65.151(c)(1), and 65.152(c)(1)		N	This provision of the HON is incorporated into the structure of the CAR.
63.114(b)	65.156(c)(1)	Monitoring equipment shall be installed, operated, etc.	Ν	
63.114(b)(1)	65.153(c)(1)	Absorber monitoring requirements	N	
63.114(b)(2)	65.153(c)(2)	Condenser monitoring requirements	N	
63.114(b)(3)	65.153(c)(3)	Carbon adsorber monitoring requirements	N	
63.114(c)	65.65(a), 65.155(c)(1), and 65.156(e)	Alternative monitoring: procedures	N	The HON contained these procedures in 63.157(f) and 63.152(e). Under the CAR, the alternative monitoring procedures are consolidated and contained in 65.162(e).
63.114(c)(1)	65.155(c)(1)	Alternative monitoring: unlisted control device	N	
63.114(c)(2)	65.65(a) and 65.153(c)(4)	Alternative monitoring: monitoring process vents that are Group 2A	N	
63.114(c)(3)	65.156(e)	Alternative monitoring: listed control or recovery device but unlisted parameter to monitor	N	
63.114(d)	65.143(a)(3)	Requirements for CVS bypass lines	N	 The HON defines bypass line as a line that could route the process vent "away from a control device." The CAR defines bypass line as any line that could divert the process vent to the atmosphere. Requirement to take a reading every fifteen minutes was generalized to take a reading at least every fifteen minutes.

Citations Part 63, Subpart G (HON - Process Vents)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.114(e)	65.148(c)(2), 65.149(c)(2), 65.150(c)(2), 65.151(c)(2), 65.152(c)(2), 65.153(c)(5), 65.154(c)(3), 65.155(c)(2)	Owner or operator establishes the operating range for recovery and control devices	Ν	Monitoring requirements in the CAR are grouped under the type of recovery or control device and are not contained in a separate monitoring requirements section like they are in the HON.
	65.157(b)(1)	Prior performance tests	Ν	
63.115(a)	65.64(b)(1)	Sampling site	Ν	
63.115(a)(1) - (a)(2)	65.64(b)(3)	Sampling site selection method	Ν	
63.115(b)	65.64(d)	Volumetric flowrate	BR	 The CAR allows engineering assessment to determine flowrate. The CAR requires the flowrate to be corrected to 2.3% moisture under certain conditions. The HON does not require this for determination of the flowrate when demonstrating the flowrate is less than the cutoff (0.005 scmm in the HON). The HON does require this correction for the flowrate used in the TRE calculation. By consolidating these two flowrates the CAR simplifies the flowrate determination.
63.115(c)	Table 1	TOC or HAP concentration	Ν	The table that presents the concentration exemption limit also specifies concentration can be measured in TOC or HAP.
63.115(c)(1)	65.64(b)	Sampling site	Ν	
63.115(c)(2)	65.64(c)	TOC or HAP concentration	BR	- The CAR allows engineering judgement to be used in determining the concentration for comparison with the low concentration exemption limit.
63.115(c)(3)	65.64(c)(1)	Method 18	Ν	
63.115(c)(4)	65.64(c)(2)	Method 25A	Ν	
63.115(d)	65.64(h)	TRE index value determination	С	The TRE index value determination procedure is reformatted and edited for clarity and consolidation. While the procedure and the equations appear to be different, the results of the CAR approach are identical to the results of the HON approach.

Citations Part 63, Subpart G (HON - Process Vents)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.115(d)(1)	65.64(d)(2) and (i)	Engineering assessment	BR	 As a burden reduction, the CAR will allow engineering assessment to be used for the initial determination of flow or concentration. The language is clarified to explicitly state that engineering assessment can be used for all subsequent determinations except for process vents with a TRE between 1.0 and 4.0.
63.115(d)(2)	[Not Consolidated]	Introductory paragraph for TRE determination methods	NC	This introductory language is not needed in the CAR structure.
63.115(d)(2)(i)	65.64(d)(1)	Volumetric flowrate	N	
63.115(d)(2)(ii)	65.64(e)(2)	Molar composition of the process vent determination	Ν	
63.115(d)(2)(iii)	65.64(e)(1)	Net heating value determination procedures	C	As a clarifying edit, "Dj" is used in the CAR in place of "Cj" in the heating value equation to differentiate the term from another "Cj" term used elsewhere.
63.115(d)(2)(iv)	65.64(f)	TOC or HAP emission rate	Ν	Language generalized to apply to the HON and to the NSPS referencing this provision.
63.115(d)(2)(v)	65.64(g)	Halogenated vent determination	N	
63.115(d)(3)	65.64(h)	TRE index value determination	С	The TRE index value determination procedure is reformatted and edited for clarity and consolidation. While the procedure and the equations appear to be different, the results of the CAR approach are identical to the results of the HON approach.
63.115(e)	65.63(f)	Group 2A or 2B process change requirements	C	Reorganized and edited for clarity.
63.115(e)(1)	65.63(f)(1) - (f)(3)	Flowrate; concentration; and TRE index value	C,S	The CAR splits this language into three subparagraphs for clarity and specifically allows engineering assessment to flowrate, concentration, and TRE calculation procedures. The HON listed all of these allowances in one subparagraph.
63.115(e)(2)	65.63(f)(4) and (f)(5)	Provisions for a Group status change to a Group 1 or Group 2A	S	The CAR incorporates the provisions on compliance schedule in the text of this paragraph while the HON refers to the compliance schedule provisions in subpart F.
63.116(a)	65.142(b)(1)	Flare provisions	Ν	The HON refers to 63.11(b), while the CAR refers to 65.147. The CAR provisions have the same requirements, of 63.11(b) in 65.147.

Citations Part 63, Subpart G (HON - Process Vents)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.116(a)(1)	65.147(b)(3)(i)	Flare compliance determination	С	In consolidating the flare provisions from 63.11(b) in the CAR there are more components of the flare compliance determination than those outlined by the HON. There are no additional provisions because these requirements apply to HON through the General Provisions. The CAR structure adds clarity because all of the requirements are located in one place.
63.116(a)(2)	65.147(b)(1)	Performance test waiver for flares	N	
63.116(b)	65.148(b)(2) and 65.149(b)(2)	Introductory paragraph for exempting combustion devices from performance tests in certain situations	N	
63.116(b)(1)	65.149(b)(2)(i)	Performance test exemption for boilers at or greater than 44 MW	N	
63.116(b)(2)	65.149(b)(2)(ii)	Performance test exemption for boilers where the process vent is introduced with the primary fuel	N	
63.116(b)(3)	65.157(b)(1)	Performance test exemption where a prior performance test has been conducted	BR	The CAR does not require that the prior performance test be conducted for determining compliance with "a regulation promulgated by EPA."
63.116(b)(4)	65.149(b)(2)(iii)	Performance test exemption for boilers with a hazardous waste permit	N	
63.116(b)(5)	65.148(b)(2)	Performance test exemption for permitted hazardous waste incinerator	N	

Citations Part 63, Subpart G (HON - Process Vents)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.116(c)	65.148(b)(1); 65.149(b)(1); 65.150(b)(1); 65.151(b)(1); 65.152(b)(1); and 65.155(b)(1)	Requirement to perform a performance test	Ν	
	65.158(b)	Performance test procedures		While substantively the same, these provisions have been generalized to apply to any use where subpart G of the CAR is referenced. The CAR also allows use of Method 25A of 40 CFR part 60 for determining compliance for transfer racks.
63.116(d)	65.154(b)(1)	Requirement to perform a performance test on scrubber	Ν	
63.116(d)(1) - (d)(4)	65.158(c)(1) - (c)(4)	Scrubber performance test requirements	Ν	
63.116(d)(5)	65.158(a)(2)(ii)	Scrubber performance test requirements: Method 301	BR	The CAR requires only major changes to a test method to be validated using Method 301. Minor and intermediate changes are not required to be validated using Method 301.
63.116(e)	65.64(b)(2)	Halogen emission rate determination when using a halogen reduction device prior to a combustion device	Ν	
63.117(a)	[Not Consolidated]	Introductory paragraph specifying the following requirements are applicable to Group 1 or Group 2A process vents subject to the control provisions	NC	This introductory paragraph is not necessary in the CAR structure.
63.117(a)(1)	65.160(b)	Introductory paragraph requiring performance test records to be kept up-to-date and readily accessible	Ν	

Citations Part 63, Subpart G (HON - Process Vents)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.117(a)(2)	65.160(b) and 65.164(a)(3)	Data to include in Notification of Compliance Status	Ν	
63.117(a)(3)	65.164(b)(2)	Submit data following the notification with the next periodic report	Ν	The CAR requires subsequent performance test reports to be submitted within 60 days of completing the test, while the HON requires the performance test reports to be included in the next periodic report.
63.117(a)(4)	65.160(b)(1)	Non-flare combustion device data to record	C	The CAR incorporates in text the provisions outlined in Table 3 of the HON.
63.117(a)(5)	65.159(b)	Flare data to record	C	The data to record is clarified from recording all times when THE pilot flame is out to recording all times when ALL pilot flames are out.
63.117(a)(6)	65.160(b)(3)	Scrubber data to record	N	
63.117(a)(7)	65.160(c)	Group 2A process vents data to record	C	The CAR incorporates in text the provisions outlined in table 4 of the HON.
63.117(a)(8)	65.160(d) and 65.165(d)	Halogenated process vents data to record	Ν	
63.117(b)	65.66(a)	Maintain records associated with determining the TRE	Ν	
	65.67(a)	Report records associated with determining the TRE	C	The CAR specifies that a record of the flowrate needs to be made prior to reporting the value.
63.117(c)	65.66(b), and 65.67(a)	Report flowrate measurements	C	The CAR specifies that a record of the concentration needs to be made prior to reporting the value.
63.117(d)	65.66(c) and 65.67(a)	Report records associated with determining the concentration	Ν	
63.117(e)	65.155(c)(1)	Alternate device/parameter data to record and report		

Citations Part 63, Subpart G (HON - Process Vents)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.117(f)	65.148(c)(2), 65.149(c)(2), 65.150(c)(2), 65.151(c)(2), 65.152(c)(2), 65.153(c)(5), and 65.154(c)(3)	Owner or operator establishes operating range	N	In the modular format of the CAR, this provision is included under the requirements for each specific type of control or recovery device.
63.118(a)	[Not Consolidated]	Keep control device records- introductory paragraph	NC	This introductory paragraph is not needed in the CAR structure.
63.118(a)(1)	65.162(b)(1), and 65.159(c) and (d)	Keep continuous records of equipment operating parameters for combustion control devices	N	
63.118(a)(2)	65.159(b)(3) 65.162(b)(2), and 65.162(c)(2)	Keep daily average values for control devices	N	
63.118(a)(3)	65.163(a)(1)(i)	Hourly records of bypass flow indicator	N	
63.118(a)(4)	65.163(a)(1)(ii)	No hourly bypass records required if bypass line is sealed	N	
63.118(b)	[Not Consolidated]	Product recovery device requirements-introductory paragraph	NC	This introductory paragraph is not needed in the CAR structure.
63.118(b)(1)	65.162(c)(1)	Keep continuous records of equipment operating parameters for recovery devices	N	
63.118(b)(2)	65.162(c)(2)	Keep daily average values for recovery devices	N	
63.118(c), (d), and (e)	65.66(d)	Process change recordkeeping requirements		

Citations Part 63, Subpart G (HON - Process Vents)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.118(f)	65.166(f)	Periodic report: introductory paragraph	Ν	
63.118(f)(1) - (f)(2)	65.166(f)(1)	Periodic report: daily average values out of bounds	Ν	
63.118(f)(3)	65.166(b)(2)	Periodic report: vent stream diversion	Ν	
63.118(f)(4)	65.166(b)(3)	Periodic report: broken seals, etc.	Ν	
63.118(f)(5)	65.166(c)	Periodic report: flare flame outages	Ν	
63.118(f)(6)	65.166(f)(2)	Periodic report: contents (carbon bed cycles out of range)	Ν	
63.118(g) - (k)	65.67(b)(1) and (b)(4)	Process change recordkeeping requirements	S	This provision applies to a process change causing a process vent to change from either a Group 2A or Group 2B to a Group 1 OR to change from a Group 2B to a Group 2A. All these group change requirements have been consolidated into a single paragraph. The CAR requires the report of the change to be submitted within 60 days of the performance test and the HON requires the report within 180 days of the process change. They both allow the report to be included in the next periodic report.
New	65.64(f)(6) and 65.67(b)(3)	Group status change to Group 2B or from a Group 1 to a Group 2A	С	The CAR provides guidance on actions to be taken when a process vent changes to a Group 2B from a Group 1 or 2A, and to a Group 2A from a Group 1.
New	65.66(e) and 65.67(c)	Records and reports for Group 2A process vents with no recovery device	С	The CAR adds clarity by specifically stating that Group 2A process vents with no recovery device must be monitored as specified in the approved plan and reports must be submitted as specified.
New	65.67(b)(2)	Specify performance test is necessary because of a process change	BI	The CAR requires that the facility indicate when a performance test has become necessary due to a process change. This shall be indicated in the notification to the Administrator of the intent to conduct a performance test.

Citations Part 63, Subpart G (HON - Process Vents)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
New	65.143(a)(1)	CVS must collect emissions and route to a control device	С	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), 65.150(a)(2), 65.151(a)(2), 65.152(a)(2), 65.153(a)(2), 65.154(a)(2), and 65.155(a)(2)	CVS and control device must be operating when emissions are vented to them	С	The CAR clarifies that the CVS and control devices must be in operation when emissions are vented to them.
New	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),	Procedure when control device is replaced	С	The CAR outlines the procedures to follow when one control device is replaced with another control device.
New	65.147(b)(3)(iv)	Operate flare flame or pilot monitors during a flare compliance determination	С	The CAR clarifies that the flare flame or pilot flame monitors must be operated during a flare compliance determination.
New	65.154(c)(2)	Halogen reduction device other than a scrubber	C	The CAR clarifies what procedures to follow if a halogen reduction device other than a scrubber is used.
New	65.158(a)(3)	Performance test runs	BR	This paragraph was modeled after 60.8(f) and 63.7(e)(3) which is a general provision requirement overridden by the HON. This paragraph [65.158(a)(3)] specifies that the performance shall consist of three runs and that each run shall be for at least 1 hour, which is the same as the HON. However, this paragraph specifies what to do in a situation where one sample is accidentally lost. The CAR allows averages of two runs to be used.

Citations Part 63, Subpart G (HON - Process Vents)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
New	65.160(b)(2)	Control device data to record for absorbers, condensers and carbon adsorbers	C	The CAR specifically lists the data to record when absorbers, condensers and carbon adsorbers are used as control devices.
New	65.161(d)	Valid data	С	The CAR specifically defines valid data for clarity.
New	65.162(a)(1) and (a)(2)(ii)	CPMS calibration records	С	HON specifies the records that must be kept as "records documenting the completion of calibration checks" The CAR clarifies specifically which calibration records are required.
New	65.163(e) and 65.166(e)	Occurrence and cause of parameters outside range		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	65.166(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

- ${\bf S}$ simplification
- BR burden reduction
- BI burden increase
- N no significant change
- NC not consolidated
- R provisions retained in referencing subpart.