Citations Part 60, Subpart Kb (Storage Vessels)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
60.110b	[Referencing Subpart]	Applicability and designation of affected facility	R	The CAR does not include any provisions pertaining to applicability of referencing subparts. However, these provisions remain applicable to sources complying with the CAR.
60.111b	65.2 and [ <b>Referencing Subpart</b> ]	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.
60.112b(a)	[Referencing Subpart]	Standard: design capacity and true vapor pressure criteria	R	The applicability criteria for storage vessels required to be controlled are in the referencing subparts. These provisions remain applicable to sources complying with the CAR.
	65.42(b)	Compliance options for applicable storage vessels storing liquid with a vapor pressure <76.6kPa	BR	The CAR allows an additional compliance option for routing to a fuel gas system or process $[65.42(b)(6)]$ . The CAR also provides clarification for those cases where an EFR is converted to an IFR $[65.42(b)(3)]$ .
60.112b(a)(1)	65.42(b)(1)	Comply by using an IFR	N	
60.112b(a)(1)(i)	65.2	IFR defined	S	The language defining what is meant by "internal floating roof" is consolidated and contained in the definitions section of the general provisions.
	65.43(a)(1) 65.43(b)(1) 65.43(b)(2)	IFR design: roof shall be designed to float IFR operation: roof shall be floating at all times IFR operation: filling or refilling	BR	Subpart Kb required the owner or operator to empty the tank once the roof rested on the leg supports and required the emptying to be continuous and to be performed as soon as possible. This requirement reduced the amount of available storage space as facilities may not have the capacity or ability to place liquids in other vessels. One industry representative stated that they had to lease a barge on occasion for extra storage when this situation arose. Upon review, the EPA determined that the intent of the provision was to avoid emissions associated with raising and lowering the level of the liquid surface while the roof is resting on the support legs. The revised provisions in the CAR allow the surface level to be below the leg supports, but the liquid can only be drawn out of the tank in such a case. When the tank is to be filled, the process of filling must be continuous until the roof has risen off of the leg supports. In addition, the CAR specifies, through language like "fillas soon as practical", that the owner or operator must try to avoid this type of situation.

Citations Part 60, Subpart Kb (Storage Vessels)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
60.112(a)(1)(ii)	65.43(a)(2)	IFR design: closure devices	N	
60.112b(a)(1)(ii)(A)	65.2	Liquid-mounted seal definition	Ν	The language defining what constitutes a liquid-mounted seal is in the definitions section of the general provisions for clarity.
	65.43(a)(2)(i)	Liquid mounted seal as a seal option	Ν	
60.112b(a)(1)(ii)(B)	65.2	Continuous seal definition	С	The continuous seal language is clarified and is in the definitions section of the general provisions. The new language more accurately reflects the intention of the requirement.
	65.43(a)(2)(iii)	Two continuous seals as a seal option	Ν	
60.112b(a)(1)(ii)(C)	65.2	Mechanical shoe seal definition	С	The CAR uses the term metallic shoe instead of mechanical shoe seal. The terminology and the language defining what constitutes a metallic shoe seal is consolidated and contained in the definitions section of the general provisions for clarity.
	65.43(a)(2)(ii)	Mechanical shoe seal as a seal option	Ν	
60.112b(a)(1)(iii)	65.43(a)(4)(i)	IFR design: openings must project below the liquid surface	C	The CAR clarifies that the openings must project below the "stored" liquid surface.
60.112b(a)(1)(iv)	65.43(a)(4)(ii)	IFR design: openings must have gasketed covers	Ν	
	65.43(a)(4)(vii)	IFR design: access hatches shall have bolted covers	Ν	
	65.43(b)(4)	IFR operation: access hatches shall be bolted closed	BR	The CAR does not specify that hatches be bolted, just that they be set closed.

Citations Part 60, Subpart Kb (Storage Vessels)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
60.112b(a)(1)(v)	65.43(a)(4)iv)	IFR design: automatic bleeder vents shall be gasketed	Ν	
	65.43(b)(3)	IFR operation: automatic bleeder vents shall be set closed	Ν	
60.112b(a)(1)(vi)	65.43(a)(4)(iv)	IFR design: rim space vents shall be gasketed	Ν	
	65.43(b)(4)	IFR operation: rim space vents shall be set closed	C	The CAR clarifies the meaning of "manufacturer's recommended settings."
60.112b(a)(1)(vii)	65.43(a)(4)(iii)	IFR design: sampling penetrations	N	
60.112b(a)(1)(viii)	65.43(a)(4)(vi)	IFR design: column projections	N	
60.112b(a)(1)(ix)	65.43(a)(4)(v)	IFR design: ladder penetrations	N	
60.112b(a)(2)	65.2	EFR defined	S	The language defining what is meant by "external floating roof" is consolidated and contained in the definitions section of the general provisions.
	65.42(b)(2)	Complying by using an EFR	N	
60.112b(a)(2)(i)	65.44(a)(2)	EFR design: closure device	N	
	65.44(a)(2)(i)	EFR design: consist of two seals	N	
60.112b(a)(2)(i)(A) and (a)(2)(i)(B)	65.44(a)(2)(ii)	EFR design: primary seal shall be mechanical shoe or liquid-mounted	Ν	
	65.44(a)(3)(xi)	EFR design: seal shall completely cover the space between the roof and the vessel wall	N	
	65.44(b)(9)	EFR operation: seals shall completely cover annular space	N	

Citations Part 60, Subpart Kb (Storage Vessels)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
60.112b(a)(2)(ii)	65.44(a)(3)(i)	EFR design: openings must project below the liquid surface	Ν	
	65.44(a)(3)(ii), (a)(3)(iii), and (a)(3)(ix)	EFR design: openings must have covers	BI	The CAR specifies that covers on access hatches and gauge floats be designed to be bolted or fastened.
	65.44(a)(3)(iv)	EFR design: auto bleed & rim space vents shall be gaskets	Ν	
	65.44(a)(3)(v)	EFR design: emergency roof drain	Ν	
	65.44(b)(3), (b)(4), and (b)(8)	EFR operation: covers on openings must be kept closed	BI	The CAR specifies that covers on access hatches and gauge floats be bolted or fastened when they are closed.
	65.44(b)(5)	EFR operation: automatic bleeder vents shall be set closed	Ν	
	65.44(b)(6)	EFR operation: rim space vents shall be set closed	С	The CAR clarifies what "manufacturer's recommended settings" means.
60.112b(a)(2)(iii)	65.44(a)(1) 65.44(b)(1) 65.44(b)(2)	EFR design: roof shall be designed to float EFR operation: roof shall be floating at all times EFR operation: filling or refilling	BR	Subpart Kb required the owner or operator to empty the tank once the roof rested on the leg supports and required the emptying to be continuous and to be performed as soon as possible. This requirement reduced the amount of available storage space as facilities may not have the capacity or ability to place liquids in other vessels. One industry representative stated that they had to lease a barge on occasion for extra storage capacity when this situation arose. Upon review, the EPA determined that the intent of the provision was to avoid emissions associated with raising and lowering the level of the liquid surface while the roof is resting on the support legs. The revised provisions in the CAR allow the surface level to be below the leg supports, but the liquid can only be drawn out of the tank in such a case. When the tank is to be filled, the process of filling must be continuous until the roof has risen off of the leg supports. In addition, the CAR specifies, through language like "fillas soon as practical", that the owner or operator must try to avoid this type of situation.
60.112b(a)(3)	65.42(b)(4) and (b)(5)	Comply by using a CVS/CD	Ν	

Citations Part 60, Subpart Kb (Storage Vessels)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
60.112(a)(3)(i)	65.143(a)(1)	Design: CVS to collect all VOC from storage vessel	C	The CAR specifies that CVS will collect the "regulated material" vapors instead of specifying that "all" vapors be collected.
	65.143(b), (c), and (d), 65.163(a)(2)-(a)(5) and 65.166(a)(1)	Operation: CVS with no detectable emissions	S	<ul> <li>Subpart Kb requires there to be no detectable emissions. The CAR requires that an inspection and repair procedure be performed. If an inspection discovers a leak, it must be repaired. This change simplifies the enforcement of a "no detectable emissions" provision.</li> <li>There are also specific provisions depending on whether the CVS is hardpiping or ductwork and the CAR also contains the records and reports associated with the CVS monitoring.</li> </ul>
60.112b(a)(3)(ii)	65.42(b)(5)	Reduce emissions by 95% or greater	BR	The CAR allows 240 total hours per year of planned routine maintenance when the control device does not meet the specification. This adds flexibility for maintenance.
	65.42(b)(4)	Flare must follow 60.18	BR	<ul> <li>The CAR does not specify a flare follow 60.18 but refers to subpart G of the CAR which contains the requirements of 60.18.</li> <li>The CAR allows 240 total hours per year for planned routine maintenance when the flare does not meet the specifications. This adds flexibility for maintenance.</li> </ul>
60.112b(a)(4)	65.42(b)(7)	Equivalent system for control	N	
60.112b(b)	65.42(c)	Compliance options for applicable storage vessels storing liquid with a vapor pressure ≥76.6kPa	BR	The CAR allows an additional compliance option for routing to a fuel gas system or process.
60.113b (intro paragraph)	[Not Consolidated]	Testing and procedures, general	NC	This introductory paragraph is not needed in the CAR structure.
60.113b(a)	[Not Consolidated]	Each IFR owner shall do the following	NC	This introductory paragraph is not needed in the CAR structure.
60.113b(a)(1)	65.43(c)(4)	IFR inspection: requirement to visually inspect initially	Ν	
60.113b(a)(2)	65.43(c)(1)(i)	IFR inspection: single seal Type A failure inspection	С	Significant consolidation and clarity is provided by defining IFR Type A and Type B failures instead of listing in many places all of the items that constitute the failures. This consolidation occurs in several places, but is only mentioned here.

Citations Part 60, Subpart Kb (Storage Vessels)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
	65.43(d)(1)	IFR repair: if a Type A failure is discovered, shall repair	BR	Significant reduction in burden is granted by allowing two 30-day extensions without obtaining prior approval.
	65.47(d)(1)	R&R: record: emptying extension	Ν	
	65.48(b)(1)(i)	R&R: report: emptying extension	BR	Although it is not necessary to wait for approval, these extensions need to be reported in the next periodic report.
60.113b(a)(3)	65.43(c)(2)	IFR inspection: double seal Type A failure inspection	С	Significant clarity is gained through reformatting; all inspection options are stated in $65.43(c)(2)$ instead of residing in three paragraphs (as in subpart Kb).
60.113(b)(a)(4)	65.43(c)(1)(ii)	IFR inspection: single seal Type B failure inspection	Ν	
	65.43(c)(2)(i) and 65.43(c)(2)(ii)(B)	IFR inspection: double seal Type B failure inspection	Ν	
	65.43(d)(2)	IFR inspection: repair and notification upon failure	Ν	
60.113b(a)(5)	65.43(c)(3)	IFR inspection: notification prior to refilling	Ν	
	65.48(c)(1)	IFR notification: procedures for notification prior to refilling	Ν	
60.113b(b)	65.44(c)	EFR inspections	Ν	Paragraphs 60.113b(b) and 65.44(c) are introductory paragraphs to the EFR inspections.
60.113b(b)(1)	65.44(c)(1) and (c)(2)	EFR inspections: determine gap areas and widths	Ν	
60.113b(b)(1)(i)	65.44(c)(1)	EFR inspection: frequency for primary seal gap measurements	BR	Subpart Kb requires the measurements to be performed during hydrostatic testing or within 60 days of initial fill. The CAR requires the measurements to be performed during hydrostatic testing or within 90 days of initial fill.
60.113b(b)(1)(ii)	65.44(c)(2)	EFR inspection: frequency for secondary seal gap measurements	BR	Subpart Kb requires this inspection within 60 days of the initial fill. The CAR requires it within 90 days of the initial fill.

Citations Part 60, Subpart Kb (Storage Vessels)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
60.113b(b)(1)(iii)	65.44(c)(3)	EFR inspection: re-introduction of VOL	BR	Subpart Kb treats re-introduction of volatile organic liquids as an initial fill, therefore inspection is required within 60 days. The CAR consolidates on 90 days to do the tests after refilling occurs.
60.113b(b)(2)	65.44(c)(6)	EFR inspection: gap area measurement procedures	Ν	
60.113b(b)(3)	65.44(c)(7)	EFR inspection: primary seal gap measurement procedures	Ν	
	65.44(c)(8)	EFR inspection: secondary seal gap measurement procedures	C	The CAR explicitly allows the secondary seal gap requirements to be exceeded during a primary seal gap measurement.
60.113b(b)(4)	65.44(d)(1)	EFR repair: repair within 45 days	С	
60.113b(b)(4)(i)	65.44(c)(7)	EFR inspection: primary seal gap criteria	N	
60.113b(b)(4)(i)(A)	65.44(a)(3)(x)	EFR design: mechanical shoe seal must penetrate the surface and rise 61 cm above the surface	C	CAR language clarifies that this design requirement applies only to mechanical shoe seals used as primary seals.
60.113b(b)(4)(i)(B)	65.44(a)(3)(xii)	EFR design: initial inspection for holes, tears, or other openings in primary seal	N	
	65.44(c)(10) and 65.44(d)(2)	EFR inspection and repair: inspection for and repair of holes, tears, or other openings in primary seal	S	
	65.2	EFR: holes or tears in the primary seal	N	The CAR defines "Failure, EFR." Significant consolidation of text is gained by using one term to mean the various failures that can happen to an EFR.
60.113b(b)(4)(ii)	[Not Consolidated]	Secondary seal to meet the following requirements	Ν	Introductory paragraph not needed in CAR structure.
60.113b(b)(4)(ii)(A)	65.44(a)(3)(xi)	EFR design: secondary seal must completely cover the space between the roof edge and the vessel wall	Ν	

Citations Part 60, Subpart Kb (Storage Vessels)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
60.113b(b)(4)(ii)(B)	65.44(c)(8)	EFR inspection: secondary seal gap measurement procedures	C	The CAR clarifies that the secondary seal gap requirements can be exceeded during seal gap measurement.
60.113b(b)(4)(iii)	65.44(d)(1)	EFR repair: shall either repair in 45 days or obtain an extension	BR	Significant reduction in burden is granted by allowing two 30-day extensions without obtaining prior approval.
	65.47(d)(1)	R&R: record: emptying extension	N	
	65.48(b)(1)(i)	R&R: report: emptying extension	BR	Although it is not necessary to wait for approval, these extensions need to be reported in the next periodic report.
60.113b(b)(5)	65.44(c)(5)	EFR inspection: notification requirement for seal gap measurement	Ν	
	65.48(c)(2)	R&R: report: seal gap measurement notification procedures	С	The CAR allows for situations when the seal gap measurements are not planned enough in advance to give the Administrator notification 30 days prior to the measurement.
60.113b(b)(6)	65.44(c)(10)	EFR inspection: must inspect each time the tank is emptied	C	The CAR does not specify that the vessel be "degassed." There is a definition for "empty" in the CAR to add clarity.
60.113b(b)(6)(i)	65.44(d)(2)	EFR inspection: must repair failures prior to filling or refilling	Ν	
60.113b(b)(6)(ii)	65.48(c)(1)	R&R: report: refilling notification procedures	Ν	
60.113b(c)	65.145(b)	CVS/CD (non-flare): exempt from performance test requirement	BR	The CAR allows a facility to perform a performance test or a design evaluation on a storage vessel control device. The CAR also provides a list of several control devices where neither a performance test nor design evaluation is required [65.145(b)(2)].
60.113b(c)(1)	65.145(b)(1)	CVS/CD (non-flare): submit an operating plan	BR	The CAR consolidates the contents of the operating plans into a "design evaluation" required under 65.145(b)(1). The CAR requires the design evaluation to be submitted with the Initial Compliance Status Report, which is due 240 days after the compliance date. Subpart Kb requires this information to be submitted with the notification of the commencement of construction.

Citations Part 60, Subpart Kb (Storage Vessels)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
60.113b(c)(1)(i)	65.145(b)(1)(i) and 65.165(b)(3)	CVS/CD (non-flare): contents of operating plan	BR	Under the CAR, enclosed combustors with a minimum residence time of 0.5 seconds (instead of 0.75 seconds) and a minimum temperature of 760 $^{\circ}$ C (instead of 816 $^{\circ}$ C) only have to document residence time and temperature in the design evaluation. The CAR also specifies certain information that must be provided in design evaluations for enclosed combustors, carbon adsorbers, and condensers.
60.113b(c)(1)(ii)	65.145(c)(1) 65.165(b)(1) and (b)(2)	CVS/CD (non-flare): include parameters to be monitored.	Ν	The CAR specifically requires parameter ranges to be established while subpart Kb requires that the monitoring parameter be identified.
60.113b(c)(2)	65.145(a) and (c)(2)	CD (non-flare): operate according to plan	Ν	The CAR does not specifically say that if the Administrator modifies the plan, then the modified plan is in effect.
	65.143	CVS: operate according to plan	S	The CAR contains specific requirements for the operation of the CVS. The design evaluation in the CAR is only for the control device, it does not contain requirements for the CVS.
60.113b(d)	65.147	CVS/CD (flare): must meet the general control device requirements of 60.18(e) and (f)	Ν	The CAR contains all flare control device requirements in 65.147. See the part 60 general provisions table for a more detailed comparison of 60.18(e) and (f) to 65.147.
60.114b	65.46	Alternative means of emission limitation	Ν	
60.114b(a)	65.8(a)	Alternative means: approved alternative means will be published in the Federal Register	С	The CAR clarifies that this provision does not pertain to performance standards.
60.114b(b)	65.8(a)(2)	Alternative means: approved alternatives will only be published after notices and hearings	Ν	
60.114b(c)	65.8(b)(3)	Alternative means: application for approval must include results of actual emission tests	Ν	
60.114b(d)	65.8(a)(1)	Alternative means: Administrator may condition the permission to use alternative means	Ν	

Citations Part 60, Subpart Kb (Storage Vessels)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
60.115b (intro paragraph)	65.4(a) and 65.47(a)	R&R: retention period	С	The records for subpart Kb tanks that are not subject to title V are still required to be kept for 2 years. Title V tanks subject to subpart Kb must keep the records for 5 years. The CAR also specifies records that must be kept longer then the 2 or 5 years.
60.115b(a)	[Not Consolidated]	Meet the following requirements for IFR	NC	Introductory paragraph is not needed in CAR structure.
60.115b(a)(1)	[Referencing Subpart]	R&R: information to include as an attachment to the notification of initial startup required by 60.7(a)(3)	R	The CAR does not require these content in the notification, however sources must still provide this information under the referencing subpart.
60.115b(a)(2)	65.47(c)(1)(i)	R&R: records: records to keep upon inspection (no failure)	BR	This is a new combined paragraph based on similar concepts in HON and subpart Kb that requires records showing that an inspection was done. The record must contain the identification of the vessels, the dates, and a reference of what was inspected. (Instead of all the details required by subpart Kb, the CAR now requires just an indication that the inspection was done, unless there is a failure.)
	65.47(c)(1)(ii)	R&R: record: records to keep upon inspection (failure)	Ν	
60.115b(a)(3)-(a)(4)	65.48(b)(1)	R&R: report: requirement to report	BR	Under the CAR, this report can be included with the next periodic report. Under subpart Kb, this report is required within 30 days.
60.115b(b)(1)	[Referencing Subpart]	R&R: information to include as an attachment to the notification of initial startup required by 60.7(a)(3)	R	The CAR does not require these contents in the notification, however sources must still provide this information under the referencing subpart.
60.115b(b)(2)	65.47(c)(2)(i) 65.48(b)(2)(i)	R&R: report: seal gap measurement results (no failure)	BR	Under the CAR, this report can be included with the next periodic report. Under subpart Kb, this report is required within 60 days. The CAR does not require the raw data or calculations.
60.115b(b)(3)	65.47(c)(2)	R&R: record: seal gap measurement results	Ν	
60.115b(b)(4)	65.47(c)(2)(ii) 65.48(b)(2)(ii)	R&R: reports seal gap measurement results (failure)	BR	Under the CAR, this report can be included with the next periodic report. Under subpart Kb, this report is required within 30 days.

Citations Part 60, Subpart Kb (Storage Vessels)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
65.115b(c)	[Not Consolidated]	R&R: keep the following information	NC	This introductory paragraph is not needed in the CAR structure.
65.115b(c)(1)	65.4(a)	R&R: CVS/CD (non-flare): keep a copy of the plan	Ν	The CAR does not explicitly require that the plan be kept, however, the plan is included in the initial compliance status report which is required to be kept.
60.115b(c)(2)	65.163(b)(1)	R&R: CVS/CD (non-flare): keep a record of the monitored parameters	Ν	
60.115b(d)	[Not Consolidated]	Meet the following requirements for flares	NC	Introductory paragraph not needed in the CAR structure.
	65.159(b) and 65.164(a)(3)(i)	R&R: CVS/CD (flare): report measurements required by the general provisions	C	The CAR specifies that the information must be recorded $[65.159(d)]$ and reported $[65.164(a)(3)(i)]$ . Subpart Kb just states the information must be reported.
60.115b(d)(2)	65.159(c)	R&R: CVS/CD (flare): record periods when pilot flame is absent	BR	The CAR uses clearer language regarding whether at least one pilot flame was present. The CAR refers to hourly records where Subpart Kb refers to records of "all periods." The CAR also allows monitoring of the flare flame
· / · /	65.159(d) and 65.166(c)	R&R: CVS/CD (flare): periodic report contents: flare pilot flame outages	С	The CAR specifies that the information must be recorded [65.159(d)] and reported [65.166(c)]. Subpart Kb just states the information must be reported.
60.116b(a)	65.47(a)	R&R: retention period	Ν	This is a pointer paragraph in the CAR requiring all records to be kept for the period specified in 65.4 except for the lifetime retention of records of vessel dimension and capacity.
	65.4(a)	R&R: retention period	С	The records for subpart Kb tanks that are not subject to Title V are still required to be kept for 2 years. Title V tanks subject to subpart Kb must keep the records for 5 years. The CAR also specifies records that must be kept longer than the 2 or 5 years.
60.116b(b)	65.47(b)	R&R: record: vessel capacity	Ν	
60.116b(c)	[Referencing Subpart]	R&R: record: design capacity, true vapor pressure, etc.	R	This provision is not in the CAR, however, it still applies to the source.

Citations Part 60, Subpart Kb (Storage Vessels)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
60.116b(d)	[Not Consolidated]	R&R: report: notify when a storage vessel becomes subject to control	NC	This provision is not in the CAR because it applies to storage vessels where control is not required. The CAR only contains provisions for storage vessels where control is required.
60.116b(e)	[Referencing Subpart]	Procedures for determining maximum true vapor pressure	R	This paragraph pertains to applicability. The CAR does not contain applicability provisions.
60.116b(f)	[Not Consolidated]	Requirements for storage vessels containing waste mixtures	NC	This introductory paragraph is not needed in the CAR structure.
60.116b(f)(1)	[Referencing Subpart]	Procedures for determining maximum true vapor pressure for waste mixtures	R	This paragraph pertains to applicability. The CAR does not contain applicability provisions.
60.116b(f)(2)	[Not Consolidated]	Physical test of vapor pressure	NC	This provision is not in the CAR because it applies to storage vessels where control is not required. The CAR only contains provisions for storage vessels where control is required.
60.116b(g)	[Referencing Subpart]	Storage vessels equipped with CVS/CD exempt for 60.116b(c) and (d)	R	The CAR does not contain the requirements that this paragraph exempts storage vessels from, therefore, this paragraph is also not in the CAR.
60.117b	65.12	Delegation of authority	Ν	
New	65.42(b)(3), and 65.45	EFR converted to an IFR	C	The CAR clarifies what provisions to follow when an EFR has been converted to an IFR and is being used to comply.
	65.42(b)(4), (b)(5)(iii), (b)(5)(iv), 65.163(b)(2), and 65.166(d)	Planned routine maintenance	BR	The CAR allows up to 240 hours per year for routine maintenance during which the control device does not have to meet the specification.
	65.42(b)(6), 65.144, 65.163(b)(3), and 65.165(a)	Allowance for routing to the fuel gas system or process as a control option	BR	The CAR allows storage vessel vent streams to be routed to a fuel gas system or to the process as compliance options.
	65.44(a)(3)(vi)-(a)(3)(viii), and 65.44(b)(7)	Guide pole requirements	BI	The CAR includes fitting requirements for guide poles.
New	65.44(c)(4)	When measurements require the removal or dislodging of the secondary seal	С	The CAR clarifies that when measurements require the removal or dislodging of the secondary seal, the secondary seal shall be replaced as soon as possible.

Citations Part 60, Subpart Kb (Storage Vessels)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
New	65.44(c)(9), 65.47(d)(2), and 65.48(b)(3)	Unsafe to perform seal gap measurement	BR	The CAR clarifies what to do when it is unsafe to perform seal gap measurements or to inspect a vessel. It allows an extension for the seal gap measurement or the inspection for as much as 105 days.
New	65.47(e)	Record of floating roof resting on the legs	BI	The CAR contains an additional record of the date and duration when the floating roof is rested on the legs. This record must also indicate whether the refloating was a continuous operation. This record is in conjunction with the clarification on this provision in $65.43(a)(1)$ , (b)(1), and (b)(2), and $65.44(a)(1)$ , (b)(1), and (b)(2). These provisions are also discussed in this table under $60.112b(a)(1)(i)$ and $60.112b(a)(2)(iii)$ .
New	65.48(a)	Additional contents of the Notification of Initial Startup	BI	The CAR also requires identification of each storage vessel, its capacity, and the types of regulated material stored to be included in the initial startup notification.
New	65.48(c)(3)	Notification waiver	BR	The CAR does not require a notification to be sent to the Administrator if it is sent to the delegated authority. The CAR also allows the delegated authority to waive receipt of the notifications.
New	65.48(d)	Compliance certification	C	The CAR provides clarity by specifying that the annual inspections can be used to base the Title V recertification of continuous compliance.
New	65.143(a)(2) and 65.147(a)(1)	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	65.143(a)(3), 65.163(a)(1), and 65.166(b)(2) and (b)(3)	Bypass monitoring	BI	The CAR requires bypass monitoring.
New	65.145(b)(1)(ii) and (b)(1)(iii), 65.164(b)(1), 65.165(b)(5) and (b)(6)	Performance test in place of a design evaluation	BR	The CAR allows a performance test to be conducted as an alternative to performing a design evaluation. The CAR also has provisions for situations where a control device is shared between a storage vessel and another emission point and a performance test is required. A design evaluation is not required in this situation.
New	65.145(b)(2)	Exempt from design evaluation or performance test	BR	The CAR exempts several types of control devices from design evaluations or performance tests.
New	65.147(b)(2), 65.167(a)	Procedures when control devices are replaced	C	The CAR outlines the procedures to follow when one control device is replaced with another control device.

Citations Part 60, Subpart Kb (Storage Vessels)	Citations, Part 65 <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
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 and flare compliance determination waiver	BR	The CAR provides for waivers of performance tests and flare compliance determinations.
New	65.163(e) and 65.166(e)	Occurrence and cause of parameters outside range	BI	The CAR requires the occurrence and cause of monitored parameters outside the parameter ranges to be recorded and reported. The subpart Kb requires only the values to be reported.
New	65.164(a)(1) and (a)(2)	Flare compliance determination notifications and reports	BI	The CAR requires the same type of report for the flare compliance determination as for the performance test. This includes a brief process description, descriptions of the sampling site and analysis procedures, record of operating conditions during the test, etc.
New	65.164(b)(2)	Submission of subsequent flare compliance determinations	C	The CAR specifies that a report for a performance test conducted after the Initial Compliance Status Report is due 60 days after completing the test.
New	65.165(b)(4)	Continuous records not required unless specified by monitoring plan	C	The CAR clarifies that continuous monitoring of control devices used on storage vessels (and therefore the continuous monitoring requirements) are not applicable unless specified by the monitoring plan.
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.
New	65.163(c) and 65.167(b)	Startup, shutdown, and malfunction plan and associated requirements	BR	<ul> <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 General Provisions of part 60.</li> </ul>

<sup>a</sup>[Not Consolidated] - Provisions that are not consolidated in the CAR because they are not relevant to SOCMI 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.