

**CAR Correlation Table - Equipment Leaks**  
**(40 CFR Part 63, Subpart H (HON) - 63.160 through 63.182)**

Citations Part 63, Subpart H (HON Equipment Leaks)	Citations <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
63.160(a)	[Referencing Subpart]	Applicability: list of subject equipment	R	The CAR does not contain nor alter the list of equipment types subject to the referencing subparts (HON). See 65.100(a).
	65.100(c)	Applicability: less than 300 hours per year exemption	N	The CAR explicitly provides this exemption, along with a pointer to the associated identification requirements.
63.160(b), (c), and (d)	[Referencing Subpart]	Applicability: interaction with other rules (e.g., subpart V and VV)	R	The CAR consolidates provisions from the referencing subparts and thus has its own provisions regarding overlap and applicability. The HON provisions are not applicable.
63.160(e)	65.100(d)	Applicability: lines and equipment not containing process fluids	N	
63.160(f)	[Referencing Subpart]	Applicability: research and development facilities	R	The CAR does not contain this applicability provision.
63.161	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 definitions correlation table.
63.162(a)	65.3(b)	General standards: compliance determination	S	The CAR feature one consolidated set of general compliance determination procedures. The HON general standards are incorporated into the CAR general provisions along with all other general compliance provisions.
63.162(b)(1) and (b)(2)	65.102(b)	General standards: alternative means of emission limitation	C	The CAR language clarifies that if an owner or operator has obtained permission to use an alternative means of emission limitation, he or she may still choose to comply with the regulation as written.
63.162(c)	65.103(a)	Equipment identification: general	C	The CAR adds "or by other appropriate methods" to explicitly state the flexibility inherent to the HON. The CAR does not specify "each piece" of equipment, and therefore does not imply a requirement for individual identification numbers.
63.162(d)	65.100(b)	Applicability: vacuum service exemption	N	
63.162(e)	65.100(c)	Applicability: less than 300 hours per year exemption	N	

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63.162(f)	[Not Consolidated]	Leak identification: introduction	NC	This introductory language is not needed in the CAR structure.
63.162(f)(1)	65.104(e)(1)	Leak identification: weatherproof marker	BR	The CAR does not require identification numbers.
63.162(f)(2)	65.105(c)(1)	Leak identification: removal (valves and connectors)	C	The CAR clarifies the procedure by explicitly stating which monitoring must be performed prior to leak identification removal.
63.162(f)(3)	65.105(c)(2)	Leak identification: removal (other equipment)	N	
63.162(g)	65.3(d)	Compliance times: general	N	
63.162(g)(1)	[Not Consolidated]	Compliance times: interaction with initial compliance date	NC	The CAR does not contain this provision; it is applicable only to HON sources before opting into the CAR.
63.162(g)(2)	65.3(d)(1)	Compliance times: changing through mutual agreement	N	
63.162(g)(3)	65.3(d)(2)	Compliance Times: what to do if initial compliance date occurs after beginning of the period	N	
63.162(g)(4)	65.3(d)(3)	Compliance times: multiple successive periods	N	
63.162(h)	[Not Consolidated]	Statement of violation if a leak is not repaired	NC	
63.163(a)	65.107(a)	Standards: pumps: compliance schedule	S	The CAR does not contain phase-in, tiered compliance schedules, nor does it contain wastewater provisions.
63.163(b)(1)	65.107(b) and (b)(1)	Standards: pumps: monthly monitoring	N	
63.163(b)(2)	65.107(b)(2)	Standards: pumps: leak definition	S	The CAR does not contain phased-in leak definitions.

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63.163(b)(3)	65.107(b)(4), (b)(4)(i), and (b)(4)(ii)	Standards: pumps: weekly visual inspection	C, BR	Under the HON, visual indications of liquids dripping from the pump seal are considered leaks. Under the CAR, if such indications are found, the owner or operator can either monitor the pump to confirm a leak or fix ("eliminate the visual indications") the pump.
63.163(c)(1)	65.107(d) and 65.105(a)	Standards: pumps: leak repair	N	
63.163(c)(2), (c)(2)(i), and (c)(2)(ii)	65.105(a)	Standards: pumps: first attempt at repair	N	
63.163(c)(3)	65.107(b)(3)	Standards: pumps: leak repair exception	S	The CAR does not provide for a phased-in compliance schedule. This provision therefore applies to all pumps complying with the CAR. Under the HON, this provision was only applicable to "Phase III" pumps.
63.163(d)(1)	65.107(c)(1)	Standards: pumps: basis for percent leaking calculation	BR	The CAR allows for alteration of the percent leaking basis through permit modifications. It also allows the basis to be a "group of process units," which is more flexible than the HON (process unit or source-wide basis only).
63.163(d)(2)	65.107(c)(2)	Standards: pumps: QIP trigger	S	The CAR does not provide for a phased-in compliance schedule. This provision therefore applies to all pumps complying with the CAR. Under the HON, this provision was only applicable to "Phase III" pumps.
63.163(d)(3)	65.107(c)(3)	Standards: pumps: number of pumps (calculation procedure)	N	
63.163(d)(4)	65.107(c)(4)	Standards: pumps: percent leaking pumps (equation)	N	
63.163(e)	65.107(e)(1)	Standards: pumps: dual mechanical seal pumps (DMSP)	N	
63.163(e)(1)	65.107(e)(1)(ii)	DMSP: design and operation requirements	N	
63.163(e)(1)(i)	65.107(e)(1)(ii)(A)	DMSP requirements: barrier fluid pressure	C	The CAR clarifies that this requirement does not apply during startup, shutdown, or malfunction periods.

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63.163(e)(1)(ii)	65.107(e)(1)(ii)(B)	DMSP requirements: barrier fluid degassing reservoir	N	
63.163(e)(1)(iii)	65.107(e)(1)(ii)(C)	DMSP: barrier fluid purge system	N	
63.163(e)(2)	65.107(e)(1)(iii)	DMSP: barrier fluid is not in light liquid service	N	
63.163(e)(3)	65.107(e)(1)(iv)	DMSP: sensor	N	
63.163(e)(4)	65.107(e)(1)(v)	DMSP: visual inspection	N	
63.163(e)(4)(i)	65.107(e)(1)(v), (e)(1)(v)(A), and (e)(1)(v)(B)	DMSP: indications of liquids dripping	BR	The CAR allows either instrument monitoring to confirm the presence of a leak or elimination of the visual indications of liquids dripping.
63.163(e)(4)(ii)	65.107(e)(1)(v)(A)	DMSP: leak definition	N	
63.163(e)(5)	65.107(e)(1)(vii)	DMSP: sensor daily checks	N	
63.163(e)(6)(i)	65.107(e)(1)(i)	DMSP: failure criteria	N	
63.163(e)(6)(ii)	65.107(e)(1)(vi)	DMSP: failure criteria exceeded	N	
63.163(e)(6)(iii)	65.107(e)(1)(viii) and 65.105(a)	DMSP: leak repair	N	
63.163(e)(6)(iv)	65.105(a)	DMSP: first attempt at repair	N	
63.163(f)	65.107(e)(2)	Standards: pumps: no externally actuated shaft	N	
63.163(g)	65.107(e)(3)	Standards: pumps: closed-vent systems	N	
63.163(h)	65.107(e)(4)	Standards: pumps: unmanned plant site	N	
63.163(i)	65.107(e)(5)	Standards: pumps: 90 percent exemption	N	

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63.163(j)	65.107(e)(6)	Standards: pumps: unsafe-to-monitor pumps	C	The CAR clarifies that the owner or operator shall monitor according to the written plan, not just shall have a written plan.
63.163(j)(1)	65.103(c)(1)	Standards: pumps: criteria for unsafe-to-monitor	N	
63.163(j)(2)	65.103(c)(4)(i)	Standards: pumps: written plan for unsafe-to-monitor	N	
63.164(a)	65.112(b)	Standards: compressors: seal system standard	N	
63.164(b)	65.112(b)	Standards: compressors: seal system requirements	N	
63.164(b)(1)	65.112(b)(1)	Standards: compressors: seal system design and operation: barrier fluid pressure	C	The CAR clarifies that this requirement does not apply during periods of startup, shutdown, or malfunction
63.164(b)(2)	65.112(b)(2)	Standards: compressors: seal system design and operation: control device	N	
63.164(b)(3)	65.112(b)(3)	Standards: compressors: seal system design and operation: purge system	N	
63.164(c)	65.112(c)	Standards: compressors: barrier fluid	N	
63.164(d)	65.112(c)	Standards: compressors: barrier fluid sensor	N	
63.164(e)(1)	65.112(c)	Standards: compressors: daily observation of the barrier fluid sensor	N	
63.164(e)(2)	65.112(d)(1)	Standards: compressors: failure criterion	N	

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63.164(f)	65.112(d)(1)	Standards: compressors: failure criterion exceeded	N	
63.164(g)(1)	65.112(d)(1) and 65.105(a)	Standards: compressors: leak repair	N	
63.164(g)(2)	65.105(a)	Standards: compressors: first attempt at repair	N	
63.164(h)	65.112(e)	Standards: compressors: control device control option	N	
63.164(i), (i)(1), and (i)(2)	65.112(f)(1)	Standards: compressors: 500 ppm option	N	
63.165(a)	65.111(b)	Standards: pressure relief devices (PRD)	N	
63.165(b)(1)	65.111(c)(1)	PRD: return to less than 500 ppm	N	
63.165(b)(2)	65.111(c)(2)	PRD: monitor within 5 days	N	
63.165(c)	65.111(d)	PRD: control device	N	
63.165(d)(1) and (d)(2)	65.111(e)	PRD: rupture disk exemption	N	
63.166(a)	65.113(b)	Standards: sampling connection systems (SCS)	N	
63.166(b), (b)(1), (b)(2), (b)(3), and (b)(4)	65.113(c), (c)(1), (c)(2), (c)(3), and (c)(4)	SCS: design and operation	N	
63.166(c)	65.113(d)	SCS: in-situ sampling systems	N	
63.167(a)(1) and (a)(2)	65.114(b)(1)	Standards: open-ended valves or lines: equipment requirements	N	

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63.167(b)	65.114(b)(2)	Standards: open-ended valves or lines: second valves	N	
63.167(c)	65.114(b)(3)	Standards: open-ended valves or lines: double block and bleed systems	N	
63.167(d)	65.114(c)	Standards: open-ended valves or lines: emergency shutdown exemption	N	
63.167(e)	65.114(d)	Standards: open-ended valves or lines: polymerizing materials exemption	N	
63.168(a)	65.106 [title]	Standards: valves: standards for valves in gas/vapor service or light liquid service	N	
63.168(a)(1) and (a)(2)	[Not Consolidated]	Standards: valves: phased compliance schedule	S	The CAR does not provide for a phase-in compliance schedule.
63.168(a)(3)	65.106(b)(3)(ii)	Standards: valves: use of existing monitoring data	C	The CAR provides the same intent as the HON by allowing pre-existing data to be used to initially qualify for extended monitoring periods. See 63.180(b)(6) for details.
63.168(b)	65.106(b)	Standards: valves: instrument monitoring	N	
63.168(b)(1)	65.106(b)(1)	Standards: valves: monitoring method	N	
63.168(b)(2)	65.106(b)(2)	Standards: valves: leak definition	C	The CAR does not provide for a phased-in approach to leak definitions.
63.168(c)	[Not Consolidated]	Standards: valves: monitoring period for Phase I and II	NC	The CAR does not provide for phased-in monitoring periods.

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63.168(d)	65.106(b)(3)	Standards: valves: monitoring frequency	N	
63.168(d)(1), (d)(1)(i), and (d)(1)(ii)	65.106(b)(3)(i)	Standards: valves: monitoring frequency (>2 percent leakers)	S, BR	The CAR simply requires monthly monitoring in this situation; it does not feature a QIP program for valves. Instead, the CAR's subgrouping program captures the intent of the QIP by focusing attention on poorly performing valves.
63.168(d)(2), (d)(3), and (d)(4)	65.106(b)(3)(ii), (b)(3)(iii), (b)(3)(iv), and (b)(3)(v)	Standards: valves: extended monitoring frequencies	BR	The CAR extends the monitoring period for well performing process units (or subgroups). For process units with less than 0.25 percent leaking valves, the monitoring period is once every two years.
63.168(e)(1)	65.106(c)(1)(ii)	Standards: valves: percent leaking valves (equation)	S	The CAR does not include the optional credit for removed valves. This complicated credit involves additional recordkeeping and is seldom used in the industry.
63.168(e)(2)	65.106(c)(2)	Standards: valves: monitoring frequency calculation	BR	The CAR specifies how to average the monitoring period leak percentages in order to determine the new monitoring frequency. The CAR provisions are simpler and are established to coordinate with the valve subgrouping provisions and the extended monitoring periods.
63.168(e)(3)(i) and (e)(3)(ii)	65.106(c)(3)(i) and (c)(3)(ii)	Standards: valves: nonrepairable valves	N	
63.168(f)(1)	65.106(d)(1) and 65.105(a)	Standards: valves: leak repair	N	
63.168(f)(2)	65.105(a)	Standards: valves: first attempt at repair	N	
63.168(f)(3)	65.106(d)(2)	Standards: valves: follow-up monitoring	N	
63.168(g), and (g)(1) through (g)(4)	65.105(a)	Standards: valves: examples of first attempt at repair	N	
63.168(h)	65.106(e)(1)	Standards: valves: unsafe-to-monitor valves	C	The CAR clarifies that the owner or operator shall monitor according to the written plan, not just shall have the plan



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63.168(h)(1)	65.103(c)(1)	Standards: valves: criteria for unsafe-to-monitor	N	
63.168(h)(2)	65.103(c)(4)(i)	Standards: valves: written plan for unsafe-to-monitor	N	
63.168(i)	65.103(c)(2)	Standards: valves: difficult-to-monitor valves	C	The CAR clarifies that the owner or operator shall monitor according to the written plan, not just shall have the plan
63.168(i)(1)	65.103(c)(2)(i)(A)	Standards: valves: criteria for difficult-to-monitor valves	N	
63.168(i)(2)	65.103(c)(2)(i)(B) and (c)(2)(i)(C)	Standards: valves: number of difficult-to-monitor valves	C	The CAR uses general language instead of the HON term "new source."
63.168(i)(3)	65.103(c)(4)(ii)	Standards: valves: written plan for difficult-to-monitor valves	C	The CAR clarifies that the written plan should specify that all leaks detected shall be repaired.
63.168(j)	65.106(e)(3)	Standards: valves: less than 250 valves exemption	N	
63.169(a)	65.110(b)(1)	Standards: heavy liquid service, et. al. monitoring	N	
63.169(b)	65.110(b)(2)	Standards: heavy liquid service, et. al: leak definition	N	
63.169(c)(1)	65.110(b)(2) and 65.105(a)	Standards: heavy liquid service, et. al.: leak repair	N	
63.169(c)(2)	65.105(a)	Standards: heavy liquid service, et. al.: first attempt at repair	N	
63.169(c)(3)	65.110(c)	Standards: heavy liquid service, et. al.: leak repair (if no instrument monitoring)	N	
63.169(d)	65.105(a)	Standards: heavy liquid service, et. al.: examples of first attempt at repair	N	

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63.170	Subpart C	Standards: surge control vessels and buttons receivers	BR	These equipment more closely resemble storage vessels. They are treated as storage vessels under the CAR; they are not specifically included under the CAR equipment leak provisions. This extends several compliance options beyond the HON requirement for a control device.
63.171(a)	65.105(d)(1)	Delay of repair: technically infeasible	N	
63.171(b)	65.105(d)(2)	Delay of repair: isolated equipment	N	
63.171(c), (c)(1), and (c)(2)	65.105(d)(3), (d)(3)(i), and (d)(3)(ii)	Delay of repair: valves	C	The CAR allows purged material to be routed to a process or fuel gas system.
63.171(d)	65.105(d)(4)	Delay of repair: pumps	N	
63.171(d)(1), (d)(1)(i), (d)(1)(ii), and (d)(1)(iii)	65.105(d)(4)(i), (d)(4)(i)(A), (d)(4)(i)(B), and (d)(4)(i)(C)	Delay of repair: pumps: upgrading the seal design	BR	The CAR allows routing to a fuel gas system or process as an alternative to routing to a control device.
63.171(d)(2)	65.105(d)(4)(ii)	Delay of repair: pumps: 6 month limit	N	
63.171(e)	65.105(d)(5)	Delay of repair: valve assembly replacement	N	
63.172(a)	<b>[Not Consolidated]</b>	Standards: CVS/CD: introductory paragraph	NC	This introductory paragraph is not needed in the CAR structure.
63.172(b)	65.115(b)(1)	Standards: CVS/CD: recovery or recapture devices	N	
63.172(c)	65.115(b)(1)	Standards: CVS/CD: enclosed combustion devices	S	The CAR does not feature a correction to 3 percent oxygen for comparison to the 20 ppmv standard.
63.172(d)	65.115(b)(2)	Standards: CVS/CD: flares	N	The flare requirements of the part 63 general provisions [see 63.11(b)] are correlated to the CAR flare requirements (see 65.147) in the correlation table for the part 63 general provisions.

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63.172(e)	65.146(c)	Standards: CVS/CD: control devices must be monitored to ensure operation and maintenance in conformance with their design.	N	
63.172(f)	65.143(b)(1)	Standards: CVS/CD: inspection requirement	N	
63.172(f)(1), (f)(1)(i), and (f)(1)(ii)	65.143(b)(1)(i), (b)(1)(i)(A), and (b)(1)(i)(B)	Standards: CVS/CD: inspection (hard-piping)	N	
63.172(f)(2), (f)(2)(i), and (f)(2)(ii)	65.143(b)(1)(ii)	Standards: CVS/CD: inspection (ductwork)	N	
63.172(g)	<b>[Not Consolidated]</b>	Standards: CVS/CD: reference to the inspection procedures	C	The CAR references the inspection procedures of 65.143(c) whenever they are applicable; this avoids potential confusion where visual inspection methods are appropriate.
63.172(h), (h)(1), and (h)(2)	65.143(d)(1), (d)(2), (d)(2)(i), and (d)(2)(ii)	Standards: CVS/CD: leak repair	BR	The CAR allows more than 15 days for repair to occur as long as repair is completed before the next introduction of vapors to the system. The CAR also provides for eliminating the indications of a leak instead of requiring instrument monitoring to confirm the presence or absence of a leak.
63.172(i)	65.143(d)(3)	Standards: CVS/CD: delay of repair	C	The CAR removes a disincentive to repair by clarifying that "delay of repair" is allowed if repair within 15 days after a leak is detected is technically infeasible.
63.172(j), (j)(1), (j)(2), and (j)(3)	65.143(a)(3), (a)(3)(i), (a)(3)(ii) and 65.163(a)(1)	Standards: CVS/CD: bypass monitoring	N	
63.172(k), (k)(1), and (k)(2)	65.143(b)(2)	Standards: CVS/CD: unsafe-to-inspect	N	
63.172(l), (l)(1), and (l)(2)	65.143(b)(3)	Standards: CVS/CD: difficult-to-inspect	N	

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63.172(m)	65.143(a)(2)	Standards: CVS/CD: period of operation	N	
63.172(n)	<b>[Not Consolidated]</b>	Standards: CVS/CD: overlap with other rules	BR	The CAR does not contain this HON-specific provision regarding CVS monitoring, recordkeeping, and reporting overlap.
63.173(a)(1)	65.109(b)(1)	Standards: agitators: monitoring requirement	C	The CAR specifies that the equipment leak requirements apply to the agitator seal, and not to the agitator itself. This change is made throughout the CAR but is only mentioned here.
63.173(a)(2)	65.109(b)(2)	Standards: agitators: visual inspection	N	
63.173(b)(1) and (b)(2)	65.109(b)(3), (b)(3)(i), and (b)(3)(ii)	Standards: agitators: visual inspection	BR	The CAR allows owners and operators, upon discovering visual indications of a leak, to either instrument monitor to confirm a leak or eliminate the indications of liquids dripping.
63.173(c)(1) and (c)(2)	65.109(d) and 65.105(a)	Standards: agitators: leak repair	N	The CAR allows owners and operators, upon discovering visual indications of a leak, to either instrument monitor to confirm a leak or eliminate the indications of liquids dripping.
63.173(d)	65.109(e)(1)	Standards: agitators: dual mechanical seal system (DMSS)	N	
63.173(d)(1), (d)(1)(i), (d)(1)(ii), and (d)(1)(iii)	65.109(e)(1)(i), (e)(1)(i)(A), (e)(1)(i)(B), and (e)(1)(i)(C)	DMSS: design and operation	C	The CAR clarifies that the barrier fluid pressure operation requirement does not apply during periods of startup, shutdown, or malfunction.
63.173(d)(2)	65.109(e)(1)(ii)	DMSS: not in light liquid service	N	
63.173(d)(3)	65.109(e)(1)(iii)	DMSS: sensor	N	
63.173(d)(4), (d)(4)(i), and (d)(4)(ii)	65.109(e)(1)(iv), (e)(1)(iv)(A), and (e)(1)(iv)(B)	DMSS: visual inspections	BR	The CAR allows owners and operators, upon discovering visual indications of a leak, to either instrument monitor to confirm a leak or eliminate the indications of liquids dripping.
63.173(d)(5)	65.109(e)(1)(v)	DMSS: sensor daily checks	N	

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63.173(d)(6)(i), (d)(6)(ii), and (d)(6)(iii)	65.109(e)(1)(vi) and (e)(1)(vi)(A)	DMSS: failure criteria	N	
63.173(d)(6)(iii) and (d)(6)(iv)	65.105(a)	DMSS: leak repair	N	
63.173(e)	65.109(e)(2)	Standards: agitators: no external shaft	N	
63.173(f)	65.109(e)(3)	Standards: agitators: CVS/CD	N	
63.173(g)	65.109(e)(4)	Standards: agitators: unmanned plant site	N	
63.173(h)	65.109(e)(5)	Standards: agitators: difficult-to- monitor	C	The CAR clarifies that the owner or operator shall monitor according to the written plan, not just shall have a plan.
63.173(h)(1)	65.103(c)(2)(ii)(A)	Standards: agitators: difficult-to- monitor: criteria	N	
63.173(h)(2)	<b>[Not Consolidated]</b>	Standards: agitators: difficult-to- monitor: number	N	
63.173(h)(3)	65.103(c)(4)(ii)	Standards: agitators: difficult-to- monitor: written plan	N	
63.173(i)	65.109(e)(6)	Standards: agitators: equipment obstructions	N	
63.173(j)	65.109(e)(7)	Standards: agitators: unsafe-to- monitor	C	The CAR clarifies that the owner or operator shall monitor according to the written plan, not just shall have a plan.
63.173(j)(1)	65.103(c)(1)	Standards: agitators: unsafe-to- monitor: criteria	N	
63.173(j)(2)	65.103(c)(4)(i)	Standards: agitators: unsafe-to- monitor: written plan	N	

**CAR Correlation Table - Equipment Leaks**  
**(40 CFR Part 63, Subpart H (HON) - 63.160 through 63.182)**

Citations Part 63, Subpart H (HON Equipment Leaks)	Citations <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
63.174(a)	65.108(a)	Standards: connectors: compliance schedule	C	The CAR only requires initial connector monitoring if it has not been previously performed. The CAR language elaborates on this concept.
63.174(a)(1)	65.108(b) and (b)(1)	Standards: connectors: monitoring method	N	
63.174(a)(2)	65.108(b)(2)	Standards: connectors: leak definition	N	
63.174(b)	65.108(b)(3)	Standards: connectors: monitoring periods	BR	The CAR provides for the same concept as the HON (i.e., better performing process units can be monitored less frequently). The CAR, however, expands the concept out to an 8-year monitoring period.
63.174(c)	<b>[Not Consolidated]</b>	Standards: connectors: nonrepairable and screwed connector alternative	S, BI	The CAR does not contain these complicated burdensome options. Instead, the CAR presents a very simple procedure for determining percent leakers: number leaking divided by number monitored.
63.174(d)	65.108(d) and 65.105(a)	Standards: connectors: leak repair	N	
63.174(e)	<b>[Not Consolidated]</b>	<b>[Reserved]</b>	NC	
63.174(f)	65.108(e)(1)	Standards: connectors: unsafe- to-monitor	C	The CAR clarifies that the owner or operator shall monitor according to the written plan, not just shall have the plan.
63.174(f)(1)	65.103(c)(1)	Standards: connectors: unsafe- to-monitor: criteria	N	
63.174(f)(2)	65.103(c)(4)(i)	Standards: connectors: unsafe- to-monitor: written plan	N	
63.174(g), (g)(1), and (g)(2)	65.103(d)(1), and 65.105(e)	Standards: connectors: unsafe- to-repair	N	
63.174(h), (h)(1), and (h)(2)	65.108(e)(2), (e)(2)(i), and (e)(2)(ii)	Standards: connectors: inaccessible, ceramic, or ceramic- lined	C, BR	The CAR institutes "visual inspection repair" (i.e., eliminate the indicators of a leak) rather than the detailed leak repair provisions associated with leaks confirmed through instrument monitoring.

**CAR Correlation Table - Equipment Leaks**  
**(40 CFR Part 63, Subpart H (HON) - 63.160 through 63.182)**

Citations Part 63, Subpart H (HON Equipment Leaks)	Citations <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
63.174(h)(2) and (h)(3)	[Not Consolidated]	Standards: connectors: inaccessible, ceramic, or ceramic- lined: leak repair	BR	The CAR institutes "visual inspection repair" (i.e., eliminate the indicators of a leak) rather than the detailed leak repair provisions associated with leaks confirmed through instrument monitoring.
63.174(i)	65.108(c)	Standards: connectors: percent leaking (equation)	S, BI	The CAR greatly simplifies the percent leaking calculation by removing complicated, burdensome options which are infrequently used in the industry. See also 63.174(c).
63.174(j)	[Not Consolidated]	Standards: connectors: credit for removed connectors	S, BI	The CAR greatly simplifies the percent leaking calculation by removing complicated, burdensome options which are infrequently used in the industry. See also 63.174(c).
63.175	[Not Consolidated]	QIP for valves	BR	The CAR does not feature a QIP for valves. The valve subgrouping provisions of the CAR provide for the same intent --focusing attention on poorly performing valves.
63.176	65.116	QIP for pumps	N	The CAR applies the pump QIP to all pumps (instead of Phase III pumps) because the CAR does not feature a phased-in approach to compliance.
63.177(a)	65.102(b)	Alternative means of emission limitation	N	
63.177(b), (b)(1), (b)(2), and (b)(3)	65.102(d)(1), (d)(1)(i), (d)(12)(ii), and (d)(1)(iii)	Alternative means of emission limitation: equipment, design, or operational requirements	N	
63.177(c) and (c)(1) through (c)(6)	65.102(d)(2) and (d)(2)(i) through (d)(2)(iv)	Alternative means of emission limitation: work practice standards	S	The CAR language is simpler but the provisions are the same.
63.177(d)	65.102(d)(3)	Alternative means of emission limitation: unique approach	N	
63.177(e)(1) and (e)(2)	65.102(c)(1) and (c)(2)	Alternative means of emission limitation: requests by manufacturers	N	
63.178(a)	65.117(a)	Batch processes: general	N	

**CAR Correlation Table - Equipment Leaks**  
**(40 CFR Part 63, Subpart H (HON) - 63.160 through 63.182)**

Citations Part 63, Subpart H (HON Equipment Leaks)	Citations <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
63.178(b)	65.117(b)	Batch processes: pressure testing	N	
63.178(c)	65.117(c)	Batch processes: equipment monitoring	N	
63.178(d)	65.117(e)	Batch processes: delay of repair	N	
63.179	65.118(a)	Enclosed-vented processes: general	C	The CAR clarifies that emissions from equipment leaks can be vented to a process or fuel gas system.
63.180(a)	[Not Consolidated]	Test methods and procedures: general statement	NC	This introductory language is not necessary under the CAR structure.
63.180(b)	65.104(b)	Monitoring	C	The CAR clarifies that these procedures are to be followed for instrument monitoring but not for visual checks.
63.180(b)(1)	65.104(b)(1)	Monitoring: Method 21	N	
63.180(b)(2)(i) and (b)(2)(ii)	65.104(b)(2)(i) and (b)(2)(ii)	Monitoring: detection instrument performance criteria	C	The CAR references the "representative" composition of the process stream, for cases where the "average" composition is not representative.
63.180(b)(3)	65.104(b)(3)	Monitoring: calibrate the instrument	N	
63.180(b)(4), (b)(4)(i), (b)(4)(ii), and (b)(4)(iii)	65.104(b)(4), (b)(4)(i), and (b)(4)(ii)	Monitoring: calibration gas	S	The CAR does not feature phased-in requirements for leak definitions. Therefore, it does not incorporate the HON phased-in requirements for calibration gases.
63.180(b)(5)	65.104(b)(5)	Monitoring: when to perform	S	The CAR does not include the redundant allowance for a non-HAP surrogate VOC.
63.180(b)(6)	65.104(b)(6)	Monitoring: use of historical data	N	The CAR language is generalized, but the intent and the requirement are the same as the HON.
63.180(c) and (c)(1) through (c)(4)	65.104(c) and (c)(1) through (c)(4)	Monitoring: background adjustments	N	
63.180(d)(1) through (d)(4)	[Referencing Subpart]	Procedures: "in organic NAP service"	R	The CAR does not alter which equipment are subject to control. This provision is not needed.
63.180(e)	65.147(b)(3)(i)	Flares: visible emissions	C	The CAR explicitly states that the observation period should be 2 hours.



**CAR Correlation Table - Equipment Leaks**  
**(40 CFR Part 63, Subpart H (HON) - 63.160 through 63.182)**

Citations Part 63, Subpart H (HON Equipment Leaks)	Citations <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
63.180(f)	65.117(b)(5)	Batch processes: gas pressure test procedure	N	
63.180(g)	65.117(b)(6)	Batch processes: liquid pressure test procedure	N	
63.181(a)	65.119(a)	Recordkeeping: one system	N	
63.181(b)	<b>[Not Consolidated]</b>	Recordkeeping: requirement	NC	This introductory language is not necessary under the CAR structure.
63.181(b)(1)(i)	65.103(b)(1)	Recordkeeping: connectors	N	
	65.119(b)(1)	Recordkeeping: equipment identification	BR	The CAR does not require identification numbers.
63.181(b)(1)(ii)	65.119(c)(1)(i) and (c)(3)	Recordkeeping: valve and connector monitoring schedules	N	
63.181(b)(1)(iii)	65.103(a)	Recordkeeping: physical tagging is not necessary	N	
63.181(b)(2)(i)	65.103(b)(3)	Recordkeeping: CVS/CD	BR, C	The CAR clarifies that this applies to routing to processes and fuel gas systems. The CAR does not require identification numbers.
63.181(b)(2)(ii)	65.103(e)	Recordkeeping: less than 500 ppm	BR	The CAR does not require identification numbers.
63.181(b)(2)(iii)	<b>[Not Consolidated]</b>	Recordkeeping: surge control vessels or bottoms receivers	NC	The CAR treats these equipment as storage vessels, and the HON equipment leak provisions do not apply.
63.181(b)(3)(i)	<b>[Not Consolidated]</b>	Recordkeeping: pressure relief devices	BR	The CAR does not call out "standard" pressure relief devices for special identification or recordkeeping
63.181(b)(3)(ii)	65.103(b)(4)	Recordkeeping: pressure relief devices with rupture disks	BR	The CAR does not require identification numbers.
63.181(b)(4)	65.103(b)(5)	Recordkeeping: instrumentation systems	N	
63.181(b)(5)	<b>[Not Consolidated]</b>	Recordkeeping: screwed connectors	BR	The CAR does not contain special provisions for screwed connectors.

**CAR Correlation Table - Equipment Leaks**  
**(40 CFR Part 63, Subpart H (HON) - 63.160 through 63.182)**

Citations Part 63, Subpart H (HON Equipment Leaks)	Citations <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
63.181(b)(6), (b)(6)(i), and (b)(6)(ii)	65.107(e)(1)(i), 65.109(e)(1)(vi)(B), 65.112(d)(2), 65.119(c)(2)(iii), (c)(4), and (c)(6)(i)	Recordkeeping: dual mechanical seal systems	N	
63.181(b)(7), (b)(7)(i), and (b)(7)(ii)	65.103(c)(3) and 65.163(a)(2)	Recordkeeping: unsafe or difficult-to-monitor	BR	The CAR does not require identification numbers.
63.181(b)(7)(iii)	65.103(d)(2)	Recordkeeping: unsafe-to-repair	BR	The CAR does not require identification numbers.
63.181(b)(8)(i) and (b)(8)(ii)	<b>[Not Consolidated]</b>	Recordkeeping: removed valves and welded connectors	BR	The CAR does not feature these programs, so the associated records are not necessary.
63.181(b)(9)(i) and (b)(9)(ii)	65.117(d)(1) and (d)(2)	Recordkeeping: added equipment in batch processes	N	
63.181(c)	65.107(b)(4) and 65.107(e)(1)(v)	Recordkeeping: documentation of visual inspections	N	
63.181(d), (d)(1), and (d)(2)	65.104(e)(2), (e)(2)(i), and (e)(2)(ii)	Recordkeeping: leak is detected	C	The CAR clarifies that records should be kept for 5 years beyond the date of the data's use, if title V is applicable.
63.181(d)(2), (d)(3), (d)(4), (d)(5), (d)(5)(i), (d)(5)(ii), and (d)(6)	65.105(f) and (f)(1) through (f)(5)	Recordkeeping: leak is repaired	N	
63.181(d)(7)(i) and (d)(7)(ii)	<b>[Not Consolidated]</b>	Recordkeeping: connectors with seal broken	BR	The CAR does not have requirements for monitoring or recordkeeping for opened or seal broken connectors.
63.181(d)(8)	65.117(d)(3)	Recordkeeping: tests for equipment added to a batch process	N	
63.181(d)(9)	<b>[Not Consolidated]</b>	Recordkeeping: copies of periodic reports	BR	The CAR does not require copies of periodic reports to be maintained.

**CAR Correlation Table - Equipment Leaks**  
**(40 CFR Part 63, Subpart H (HON) - 63.160 through 63.182)**

Citations Part 63, Subpart H (HON Equipment Leaks)	Citations <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
63.181(e)	65.117(b)(7)	Recordkeeping: batch processes: pressure testing	N	
63.181(f), (f)(1), and (f)(2)	65.111(c)(3) and 65.112(f)(2)	Recordkeeping: less than 500 ppm (PRD and compressors)	N	
63.181(g), (g)(1), and (g)(2)... except (g)(1)(iii)	65.163(d), (d)(1), and (d)(2)	Recordkeeping: equipment leak CVS	N	
63.181(g)(1)(iii)	65.159(b)(1)	Recordkeeping: flare design	N	
63.181(g)(3) and (g)(3)(i)	65.163(a)(4)	Recordkeeping: CVS inspection, no leaks detected	BI	The CAR requires a record to be maintained of the engineering assessment that identifies the representative composition of the process fluid for instrument response factor criteria determinations.
63.181(g)(3)(ii)	65.163(a)(3)	Recordkeeping: CVS inspection, leak detected	N	
63.181(h), (h)(1), and (h)(2)	<b>[Not Consolidated]</b>	Recordkeeping: valve QIP	BR	The CAR does not feature a QIP for valves
63.181(h)(3) through (h)(9)	<b>[Not Consolidated]</b>	Recordkeeping: valve QIP	BR	The CAR does not feature a QIP for valves
	65.116(e)	Recordkeeping: pump QIP	N	
63.181(i), (i)(1), (i)(2), and (i)(3)	65.103(f), (f)(1), (f)(2), and (f)(3)	Recordkeeping: heavy liquid service	N	
63.181(j)	65.103(b)(6)	Recordkeeping: less than 300 hours per year	N	
63.181(k), (k)(1), (k)(2), and (k)(3)	65.118(b), (b)(1), (b)(2), and (b)(3)	Recordkeeping: enclosed-vented process units	N	
63.182(a) and (a)(1) through (a)(3)	65.5(a) and (a)(1) through (a)(6)	Reports: list of required reports	S	The CAR list is more general because it applies to all sorts of emission points, not just equipment leaks. Reporting is similar to that required by the HON, but the single, consolidated set of reporting requirements is simpler to implement.

**CAR Correlation Table - Equipment Leaks**  
**(40 CFR Part 63, Subpart H (HON) - 63.160 through 63.182)**

Citations Part 63, Subpart H (HON Equipment Leaks)	Citations <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
63.182(a)(4) and (a)(5)	[Not Consolidated]	[Reserved]	NC	
63.182(a)(6) and (a)(6)(i) through (a)(6)(iii)	[Not Consolidated]	Reports: request for extension to the compliance date	NC	This provision applies to the HON compliance date and is not necessary for the CAR. Compliance with the CAR is optional and a compliance schedule is established by the owner or operator.
63.182(b)	[Not Consolidated]	Reports: Initial Notification	NC	While the CAR contains a similar notice when an owner or operator decides to opt-in to the CAR, there is not direct correlation to the HON Initial Notification. This report is not necessary in the CAR and is not consolidated.
63.182(c)	65.5(d)(2)	Reports: Initial Compliance Status Report (ICSR): due date	BR	The CAR provides for this report to be submitted up to 240 days after the compliance date of the referencing subpart (or 60 days after completion of initial testing). The HON required this report within 90 days of the compliance date.
	65.120(a)	ICSR: requirement to submit	BR	The CAR does not require an ICSR if the information has previously been submitted.
63.182(c)(1) and (c)(1)(i) through (c)(1)(iii)	65.120(a)(1) and (a)(1)(i) through (a)(1)(iii)	ICSR: contents (general)	N	
63.182(c)(1)(iv)	[Not Consolidated]	ICSR: phase status	NC	The CAR does not provide for a phased-in compliance schedule.
63.182(c)(2), (c)(2)(i), and (c)(2)(ii)	65.120(a)(2), (a)(2)(i) and (a)(2)(ii)	ICSR: contents (batch process units)	N	
63.182(c)(3), (c)(3)(i), and (c)(3)(ii)	65.120(a)(3), (a)(3)(i), and (a)(3)(ii)	ICSR: contents (enclosed-vented process units)	N	
63.182(c)(4)	[Not Consolidated]	ICSR: due date if subpart F of the HON is applicable	NC	The CAR provides for this report to be submitted up to 240 days after the compliance date of the referencing subpart (or 60 days after completion of initial testing). The HON required this report within 90 days of the compliance date.
63.182(d)	65.5(e)	Reports: periodic reports: requirement to submit	N	

**CAR Correlation Table - Equipment Leaks**  
**(40 CFR Part 63, Subpart H (HON) - 63.160 through 63.182)**

Citations Part 63, Subpart H (HON Equipment Leaks)	Citations <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
63.182(d)(1)	65.5(e)(2)	Periodic reports: due date	BR	The CAR provides for initial testing to be completed before the 6 month periodic reporting schedule begins. The CAR explicitly allows 60 days for completion of tests and writing the report; the reports are due 60 days after the end of each semi-annual period.
63.182(d)(2)(i) through (d)(2)(xii)	<b>[Not Consolidated]</b>	<b>[Reserved]</b>	NC	
	65.120(b)(1) and (b)(1)(i) through (b)(1)(v)	Periodic reports: contents: number of equipment and number of leaks detected	N	
63.182(d)(2)(xiii)	65.120(b)(2)	Periodic reports: contents: delay of repair	N	
63.182(d)(2)(xiv)	65.120(b)(4)	Periodic reports: contents: less than 500 ppm	N	
63.182(d)(2)(xv)	65.120(b)(5) and (b)(6)	Periodic reports: contents: initiation of monthly monitoring or pump QIP	BR	The CAR does not feature a QIP for valves.
63.182(d)(2)(xvi) and (d)(2)(xvii)	<b>[Not Consolidated]</b>	Periodic reports: contents: connector monitoring alternatives	NC	The CAR does not feature these compliance alternatives, so no reporting is necessary.
63.182(d)(3) and (d)(3)(i) through (d)(3)(v)	65.117(f) and 65.120(b)(8)	Periodic reports: contents: batch process units	N	
63.182(d)(4)	65.120(b)(9)	Periodic reports: contents: change in method of compliance	N	
New	65.102(a)	Alternative means of emission limitation is not applicable to performance standards	C	The CAR clarifies that alternative means of emission limitation are inapplicable to performance standards.

**CAR Correlation Table - Equipment Leaks  
(40 CFR Part 63, Subpart H (HON) - 63.160 through 63.182)**

Citations Part 63, Subpart H (HON Equipment Leaks)	Citations <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
New	65.103(b)(3)(vi)	Records of process unit monitoring schedule for valves	BI	This minimal record is designed to aid inspectors and owner/operators by tracking the appropriate schedule for each process unit or subgroup. It is an integral part of the burden reducing allowance to subgroup valves.
New	65.104(a), (a)(1), and (a)(2)	Outline of instrument and sensory monitoring	C	This paragraph provides a roadmap to the standards by referencing each citation where either instrument or sensory monitoring occur.
New	65.104(d)	Sensory monitoring methods	C	The CAR clarifies that sensory (non-instrument) monitoring includes visual, audible, olfactory, or any similar detection method. The CAR makes distinctions, in terms of requirements, between sensory and instrument monitoring.
New	65.106(b)(4)	Valve subgrouping	BR	The CAR provides for the creation of subgroups of valves, within or across process unit boundaries. Each subgroup is eligible for performance-based reductions in monitoring frequency independently. The benefits, burden reductions, and safeguards are discussed in detail in the preamble to the proposed rule and in the enabling manual.
New	65.106(c)	Percent leaking valves calculation	BR	To implement the burden reducing valve subgrouping program, the CAR provides a percent leaking calculation procedure for valves. Included in this procedure is a correction for "nonrepairable" valves.
New	65.113(c)(5)	Closed-purge system containers must be kept closed	BI	The CAR adopts the common sense provision that when not in use, containers that are part of a closed-purge system must be covered or closed.
New	65.115(b)(3)	Routing emissions to a process or fuel gas system	BR	The CAR adds flexibility by providing for this additional compliance option.
New	65.119(b)and (c)	Recordkeeping provisions, general and specific	C,S	The CAR is structured to be of use to difficult readers. For the operators of the equipment, all applicable requirements (including recordkeeping) are included in the standards sections. Section 65.119 is a compiled list of all the previously appearing recordkeeping requirements. This list is to aid the personnel responsible for recordkeeping.
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.

**CAR Correlation Table - Equipment Leaks**  
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Citations Part 63, Subpart H (HON Equipment Leaks)	Citations <sup>a,b</sup>	Description	Type of Change <sup>c</sup>	Comments
New	65.144 and 65.165(a)	Routing to a fuel gas system or process	BR	The CAR adds flexibility by adopting routing to a fuel gas system or process as a compliance option.
New	65.146(a)(2)	Control device must be operating when emissions are vented to it	C	The CAR clarifies that a control device must be in operation when emissions are vented to it.
New	65.146(b)	Performance test not required	C	The CAR explicitly states that a performance test is not required for a control device that is only controlling emissions from equipment leaks.
New	65.157(a), (b), and (c), and 65.164(b)(3)	Flare compliance determination requirements	C	The CAR clarifies that waivers apply to the flare compliance determinations as well as performance tests. The CAR also clarifies that the schedule for performance tests applies to flare compliance determinations.
New	65.164(a)	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	65.166(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.

**CAR Correlation Table - Equipment Leaks**  
**(40 CFR Part 63, Subpart H (HON) - 63.160 through 63.182)**

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