

**CAR Correlation Table - Closed-Vent System Leak Inspection Provisions
(40 CFR Part 63, Subpart G (HON) - 63.148)**

Citations Part 63, Subpart G (CVS Leak Inspection)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
63.148(a)	[Not Consolidated]	Leak inspection provisions introductory paragraph	NC	This introductory paragraph is not necessary in the CAR structure.
63.148(b)	65.143(b)(1)	Perform inspection: schedule	N	The CAR does not contain provisions for the inspection, of the kind found in 63.148, for fixed roofs, covers, or enclosures. These provisions in 63.148 are for equipment used with wastewater or process water and the CAR does not include any wastewater or process water provisions. This effects language throughout this section, but is only mentioned here.
63.148(b)(1)	65.143(b)(1)(i)	CVS inspection: hard piping	N	
63.148(b)(2)	63.143(b)(1)(ii)	CVS inspection: ductwork	N	
63.148(b)(3)	[Not Consolidated]	Inspections of fixed roofs, covers, and enclosures	NC	These provisions apply to equipment used with wastewater. There are no wastewater provisions in the CAR.
63.148(c)	65.143(c)(1)	CVS inspection: procedures	C	<ul style="list-style-type: none"> - The CAR clarifies that a "representative stream response factor shall be determined" while the HON states that "the coverage stream response factor shall be calculated." - The CAR also clarifies how a detection instrument with multiple calibration scales shall be calibrated.
63.148(d)	65.143(d)(1)	CVS leak repair provisions: leak detected by visual indication	BR	The CAR requires that a leak detected by visual, audible, or olfactory indications be monitored first to verify it is leaking before it is repaired.
	65.143(d)(2)	CVS leak repair provisions: leak detected by monitoring	BR	The CAR allows the HON transfer exception to apply in all cases. Under the CAR, the repair can be delayed until introduction of vapors to the system
63.148(e)	65.143(d)(3)	Delay of repair	N	
63.148(f)	65.143(a)(3)	Bypass monitoring	N	

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63.148(g)	65.143(b)(2)	Unsafe to inspect	C	The CAR clarifies that inspection of unsafe to inspect components is not required more than once annually.
63.148(h)	65.143(b)(3)	Difficult to inspect	N	
63.148(i)	65.163(a)	Inspection records CVS	N	
63.148(i)(1)	65.163(a)(2)	CVS inspection records: unsafe to inspect	N	
63.148(i)(2)	65.163(a)(2)	CVS inspection records: difficult to inspect	N	
63.148(i)(3)	65.163(a)(1)	Bypass records	N	
63.148(i)(4)	65.163(a)(3)	Records when leak is detected	BR	<ul style="list-style-type: none"> - The CAR does not require the identification of the person who decides not to repair the equipment without a shutdown, the expected date of successful repair, and the dates of shutdown that occur while the equipment is unrepaired. - The CAR allows the facility to develop a written procedure to identify the conditions that justify a delay of repair. - The CAR also requires that copies of the periodic reports be kept if a database is not maintained that can generate summary reports of the records.
63.148(i)(5)	65.163(a)(4) and (a)(5)	Records when no leak is detected using instrument monitoring	C	The CAR clarifies that records be maintained of the engineering assessment that identifies the representative composition of the process fluid for instrument response factor criteria determinations.
63.148(i)(6)	65.163(a)(4)	Records when no leak is detected by visual inspection	N	

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63.148(j)	65.166(b)	CVS inspection reports	N	
63.148(k)	[Not Consolidated]	Overlap with 63.172	BR	Because the CAR is a consolidated rule, CVS provisions do not exist in two places. Therefore, a paragraph specifying which of the two sets of provisions override is not necessary.

^a[Not Consolidated] - Provisions that are not consolidated in the CAR because they are not relevant to SOCFI 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.