CAR Correlation Table - Storage Vessels
(40 CFR Part 61, Subpart Y - 61.270 through 61.277)

Citations Part 61, Subpart Y	Citations, Part 65[a,b]	Description	Type of Change[c]	Comments
61.270	**[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.
61.271 (introductory paragraph)	**[Referencing Subpart]**	Standard: design capacity	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	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)]. - The CAR has different compliance options for storage vessels storing liquids with a vapor pressure of <76.6kPa and for ones ≥ 76.6 kPa. This difference is not necessary in subpart Y because a liquid with >70% benzene (an applicability level in subpart Y) assures that the vapor pressure is <76.6 kPa. Therefore, because the CAR makes this distinction, it does not reflect a change in requirements for subpart Y.
61.271(a)	65.42(b)(1)	Comply by using an IFR	N	
61.271(a)(1)	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 Y requires the owner or operator to empty the tank once the roof rests on the leg supports and requires the emptying to be continuous and to be performed as soon as possible. This requirement reduces 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, EPA determined that the intent of the provision is 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 such as "fill...as soon as practical," that the owner or operator must try to avoid this type of situation.

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(40 CFR Part 61, Subpart Y - 61.270 through 61.277)

Citations Part 61, Subpart Y	Citations, Part 65[a,b]	Description	Type of Change[c]	Comments
61.271(a)(2)	65.43(a)(2)	IFR design: closure devices	N	
	65.2	Continuous seal definition	C	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.
61.271(a)(2)	**[Not Consolidated]**	Exemption for older seals	NC	The CAR does not contain this exemption from having specific closure devices for existing storage vessels.
61.271(a)(2)(i)	65.2	Liquid-mounted seal definition	N	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	N	
	65.2	Continuous seal definition	C	The continuous seal language is clarified and is in the definition section of the general provisions. The new language more accurately reflects the intention of the requirement.
61.271(a)(2)(ii)	65.43(a)(2)(iii)	Two continuous seals as a seal option	N	
61.271(a)(2)(iii)	65.2	Metallic shoe seal definition	C	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)	Metallic shoe seal as a seal option	N	
61.271(a)(3)	65.43(b)(3)	IFR operation: automatic bleeder vents shall be set closed	N	
	65.43(a)(4)(iv)	IFR design: automatic bleeder vents shall be gasketed	BI	Subpart Y does not require the automatic bleeder vents to be gasketed; the CAR does.
61.271(a)(4)	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.
61.271(a)(5)	65.43(a)	IFR design: introductory paragraph	N	
	[Not Consolidated]	Time extension for existing IFRs with continuous seals	NC	The CAR does not contain this time extension for existing IFRs with continuous seals.

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Citations Part 61, Subpart Y	Citations, Part 65[a,b]	Description	Type of Change[c]	Comments
61.271(a)(5)(i)	65.43(a)(4)(ii)	IFR design: openings must have gasketed covers	N	
	65.43(a)(4)(vii)	IFR design: access hatches shall have bolted covers	N	
	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.
61.271(a)(5)(ii)	65.43(a)(4)(iii)	IFR design: sampling penetrations	N	
61.271(a)(5)(iii)	65.43(a)(4)(iv)	IFR design: automatic bleeder vents shall be gasketed	N	
61.271(a)(5)(iv)	65.43(a)(4)(iv)	IFR design: rim space vents shall be gasketed	N	
61.271(a)(5)(v)	65.43(a)(4)(v)	IFR design: ladder penetrations	N	
61.271(a)(5)(vi)	65.43(a)(4)(vi)	IFR design: column projections	N	
61.271(a)(6)	65.43(b)(4)	IFR operation: covers shall be closed and bolted when not in use; rim space vents open only when IFR is not floating or at manufacturer's setting	N	The CAR does not specify that hatches be bolted, just that they be set closed.
61.271(b)	65.42(b)(2)	Complying by using an EFR	N	
61.271(b)(1)	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.
61.271(b)(2)	65.44(a)(2)	EFR design: closure device	N	
61.271(b)(2)	65.44(a)(2)(i)	EFR design: consist of two seals	N	

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Citations Part 61, Subpart Y	Citations, Part 65[a,b]	Description	Type of Change[c]	Comments
61.271(b)(2)(i)	65.44(a)(2)(ii)	EFR design: primary seal shall be mechanical shoe or liquid-mounted	N	
	65.2	Definitions: liquid-mounted seal; mechanical shoe seal	N	The language defining liquid-mounted seals and mechanical shoe seals is consolidated in the definitions section of the general provisions.
	65.44(b)(9)	EFR operation: seals shall completely cover annular space	N	
61.271(b)(2)(ii)	65.44(a)(3)(xi)	EFR design: secondary 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	
61.271(b)(3)	65.44(a)(3)(i)	EFR design: openings must project below the liquid surface	N	
	65.44(a)(3)(ii), (a)(3)(iii), and (a)(3)(ix)	EFR design: openings must have gasketed 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 gasketed	N	
	65.44(a)(3)(v)	EFR design: emergency roof drain	N	
	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	N	
	65.44(b)(6)	EFR operation: rim space vents shall be set open only when roof is floated off	C	The CAR clarifies what "manufacturer's recommended settings" means.

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Citations Part 61, Subpart Y	Citations, Part 65[a,b]	Description	Type of Change[c]	Comments
61.271(b)(4)	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 "fill...as soon as practical", that the owner or operator must try to avoid this type of situation.
61.271(b)(5)	**[Not Consolidated]**	EFR design: secondary seal exclusion	NC	The CAR does not contain this exclusion for existing storage vessels.
61.271(c)	65.42(b)(4) and (b)(5)	Comply by using a CVS/CD	N	
61.271(c)(1)	65.143(a)(1)	Design: CVS to collect all benzene vapors from storage vessel	C	The CAR specifies that CVS will collect "the regulated material" vapors instead of specifying that all benzene 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	- Subpart Y 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. - 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.
61.271(c)(2)	65.42(b)(5)	Operation: reduce emissions by 95% or greater	N	
	65.42(b)(4)	Flare must follow 60.18	N	The CAR does not specify a flare follow 60.18, but it refers to subpart G of the CAR, which contains the requirements of 60.18.

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Citations Part 61, Subpart Y	Citations, Part 65[a,b]	Description	Type of Change[c]	Comments
61.271(c)(3)	65.42(b)(4) and (b)(5)(iii)	Requirements do not apply during routine maintenance	BR	- Subpart Y specifies that periods of routine maintenance shall not exceed 72 hours; the CAR allows 240 total hours per year for planned routine maintenance. - Subpart Y requires that the storage level not be raised during periods of routine maintenance; the CAR does not.
61.271(c)(4)	65.42(b)(5)(iv)	Requirements do not apply during routine malfunction	N	
	65.2	Malfunction definition	N	
61.271(d)	**[Referencing Subpart]**	Compliance dates	R	The proposed changes to subpart Y include revisions to this paragraph to make it work with the CAR.
61.272(a)	**[Not Consolidated]**	Each IFR owner shall do the following	NC	This introductory paragraph is not needed in the CAR structure.
61.272(a)(1)	65.43(c)(4)	IFR inspection: requirement to visually inspect initially	N	
61.272(a)(2)	65.43(c)(1)(i)	IFR inspection: single seal Type A failure inspection	C	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.
	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	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.
61.272(a)(3)	65.43(c)(1)(ii)	IFR inspection: single seal Type B failure	N	
	65.43(c)(2)(i)	IFR inspection: double seal Type B failure	N	

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Citations Part 61, Subpart Y	Citations, Part 65[a,b]	Description	Type of Change[c]	Comments
61.272(a)(3)(i)	65.43(c)(3)	IFR inspection: notification prior to refilling	N	
	65.48(c)(1)	IFR notification: procedures for notification prior to refilling	N	
61.272(a)(3)(ii)	65.43(d)(2)	IFR inspection: repair and notification upon failure	N	
61.272(a)(4)	65.43(c)(2)	IFR inspection: double seal system	N	
61.272(b)	65.44(c)	EFR inspections	N	Paragraphs 61.272(b) and 65.44(c) are introductory paragraphs to the EFR inspections.
61.272(b)(1)	65.44(c)(1) and (c)(2)	EFR inspections: determine gap areas and widths	N	
61.272(b)(1)(i)	65.44(c)(1)(i)	EFR inspection: frequency for primary seal gap measurements	N	
61.272(b)(1)(ii)	**[Not Consolidated]**	EFR inspection: late secondary seal installations	NC	The CAR does not allow the time extension for installing secondary seals; therefore, this provision is not needed in the CAR.
61.272(b)(1)(iii)	65.44(c)(2)	EFR inspection: frequency for secondary seal gap measurement	N	
61.272(b)(1)(iv)	65.44(c)(3)	EFR inspection: re-introduction of benzene	N	
61.272(b)(2)	65.44(c)(6)	EFR inspection: gap area measurement procedures	N	
61.272(b)(3)	65.44(c)(7) and (c)(8)	EFR inspection: seal gap measurement procedures	N	
61.272(b)(4)	65.44(d)(1)	EFR repair: repair within 45 days	BR	The CAR allows two 30-day extensions if the vessel can not be repaired or emptied in 45 days. Subpart Y allows one 30-day extension if approved.
61.272(b)(4)(i)	65.44(c)(7)	EFR inspection: primary seal gap criteria	N	

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Citations Part 61, Subpart Y	Citations, Part 65[a,b]	Description	Type of Change[c]	Comments
61.272(b)(4)(i)(A)	65.44(a)(3)(x)	EFR design: metallic shoe seal must penetrate the surface and rise 61 cm above the surface	C	CAR language clarifies that this design requirement applies only to metallic shoe seals used as primary seals.
61.272(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.
61.272(b)(4)(ii)	**[Not Consolidated]**	Secondary seal to meet the following requirements	N	Introductory paragraph not needed in CAR structure.
61.272(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	N	
61.272(b)(4)(ii)(B)	65.44(c)(8)	EFR inspection: secondary seal gap measurement procedures	N	
61.272(b)(4)(ii)(C)	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	
61.272(b)(4)(ii)(C)	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.

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Citations Part 61, Subpart Y	Citations, Part 65[a,b]	Description	Type of Change[c]	Comments
61.272(b)(4)(iii)	65.44(d)(1)	EFR repair: shall either repair in 45 days or obtain an extension	BR	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.
61.272(b)(5)	65.44(c)(5)	EFR inspection: notification requirement for seal gap measurement	N	
	65.48(c)(2)	R&R: report: seal gap measurement notification procedures	C	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 measurements.
61.272(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.
61.272(b)(6)(i)	65.44(d)(2)	EFR inspection: must repair failures prior to filling or refilling	N	
61.272(b)(6)(ii)	65.48(c)(1)	R&R: report: refilling notification procedures	N	
61.272(c)	65.145(b)	CVS/CD (non-flare) introductory paragraph	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)].
61.272(c)(1)	65.145(b)(1) and 65.165(b)(1)-(b)(3)	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 Y requires this information to be submitted with the notification of the commencement of construction.
61.272(c)(1)(i)	65.145(b)(1)(i)	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 °C (instead of 816 °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.

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Citations Part 61, Subpart Y	Citations, Part 65[a,b]	Description	Type of Change[c]	Comments
61.272(c)(1)(ii)	65.145(c)(1)	CVS/CD (non-flare): include parameters to be monitored.	N	
61.272(c)(1)(iii)	65.166(d)	CVS/CD (non-flare): maintenance plan	BR	The CAR does not require a maintenance plan in order to be eligible for the 240 hour per year out of compliance requirement. However, it does require information to be provided in the periodic report on the down time due to routine maintenance within the 6 month period and any planned routine maintenance in the next 6-month period.
61.272(c)(2)	65.145(a) and (c)(2)	CD (non-flare): operate according to plan	N	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.
61.272(d)	65.147	CVS/CD (flare): must meet the general control device requirements of 60.18(e) and (f)	N	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.
61.273	65.46	Alternative means of emission limitation	N	
61.273(a)	65.8(a)	Alternative means: written application	N	
61.273(b)	65.8(b)(3)	Alternative means: application for approval must include results of actual emission tests	N	
61.273(c)	65.8(a)(1)	Alternative means: Administrator may condition approval of equivalency	N	
61.273(d)	65.8(a)	Alternative means: approved alternative means will be published in the Federal Register	C	The CAR clarifies that this provision does not pertain to performance standards.
	65.8(a)(2)	Alternative means: Administrator allows notices and hearings	N	

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Citations Part 61, Subpart Y	Citations, Part 65[a,b]	Description	Type of Change[c]	Comments
61.274(a)	**[Referencing Subpart]**	Initial report, requirement to report	R	The CAR does not contain this provision. This paragraph was revised in the proposed subpart Y to reference the CAR.
61.274(b)	65.159(b) and 65.164(a)(3)(i)	Flare compliance determination initial report	BR	- The CAR requires the flare compliance determination to be included in the initial compliance status report which is due 240 days after startup. Subpart Y requires this report within 90 days of initially filling the storage vessel. - The CAR specifies that the informaiton must be recorded [65.159(d)] and reported [65.164(a)(3)(i)]. Subpart Y just states the information must be reported.
61.275(a)	65.48(b)(1)	Periodic reports: IFR annual inspections	BR	Subpart Y requires annual periodic reports documenting the IFR annual inspections. The CAR specifies that the information be included in the site's semi-annual periodic report, if the inspection was carried out in the 6 month period. Subpart Y requires the annual report 60 days after the inspection. Since the CAR requires the information in the semi-annual report for the site, it would be submitted anywhere between 60 and 240 days after the inspection depending on what part of the 6 month period the inspection was done.
61.275(a)(1)	65.48(b)(1)(i)	Periodic reports: IFR: contents of report	N	
	65.47(c)(1)(i)	IFR inspection records	BR	The CAR does not require a report for storage vessels that do not have a failure, records are only required for these vessels.
61.275(a)(2)	65.47(c)(1)(ii) and 65.48(b)(1)(i)	Periodic reports: IFR: contents of report; nature of repair	C	The CAR clarifies that this information must be recorded before it is reported.
61.275(a)(3)	**[Not Consolidated]**	Periodic reports: IFR: extension	BR	The CAR does not require this additional report. The information that the storage vessel has been repaired is included in the semi-annual report.
61.275(b)	65.48(b)(1)	Periodic reports: IFR: 5 or 10 year inspection	N	
61.275(b)(1)	65.48(b)	Periodic reports: IFR: timing of submittal	BR	Subpart Y requires the inspection report 60 days after the inspection. The CAR requires the information in the semi-annual report which means the information is submitted 60 to 240 days after the inspection depending on when in the 6-month period the inspection was done.

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Citations Part 61, Subpart Y	Citations, Part 65[a,b]	Description	Type of Change[c]	Comments
61.275(b)(2)	65.47(c)(1) and 65.48(b)(1)(ii)	Periodic reports: IFR: contents of report; nature of defect and repair	BI	The CAR clarifies that this information must be recorded before it is reported. The CAR also requires a record stating that the inspections were performed for vessels where no failure was observed.
61.275(c)	**[Not Consolidated]**	Report: notification of refilling for storage vessels using the time extension	NC	The CAR does not allow the compliance extension for existing storage vessels, therefore, this paragraph is not included in the CAR.
61.275(d)	65.48(b)(2)	Report (EFR): results of seal gap measurements	BR	Subpart Y requires the inspection report 60 days after the inspection. The CAR requires the information in the semi-annual report which means the information is submitted 60 to 240 days after the inspection depending on when in the 6-month period the inspection was done.
61.275(d)(1)	65.48(b)(2)	Reports (EFR): contents of report	BR	Subpart Y requires raw data and calculations for all seal gap measurements. The CAR only requires a summary report of results of measurements for storage vessels that did not meet the seal gap requirements. The CAR requires only a list of the measurements that were conducted on the storage vessels meeting the seal gap measurements.
	65.47(c)(2)	Reports (EFR): report seal gap measurements	BR	The CAR does not require a report of the information on the date the storage vessel was emptied, the measures taken to correct the seal gaps, and the date the storage vessel was brought into compliance. The CAR does require this information to be recorded.
61.275(d)(2)	**[Not Consolidated]**	Periodic reports: supplemental report submitted within 15 days of extension request	BR	The CAR does not require this supplemental report. All information regarding extensions are reported in the semi-annual report.
61.275(e)	**[Not Consolidated]**	Periodic reports: excess emissions	NC	This introductory sentence is not needed in the CAR structure.
61.275(e)(1)	65.166(c) and (e)	Periodic reports: report each occurrence of excess emissions	BR	Subpart Y requires quarterly reports of excess emissions for storage vessels with a control device. The CAR requires semi-annual reports that include periods when the control parameters are outside the required boundaries.

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Citations Part 61, Subpart Y	Citations, Part 65[a,b]	Description	Type of Change[c]	Comments
61.275(e)(2)	65.166(c) and (e)	Periodic reports: contents of excess emissions report	S	- The CAR requires that the control device and storage vessel be identified but does not specifically require that the stack be identified. - The CAR does not specifically require the facility to make a statement of whether the out-of-range measurement was caused by a control system malfunction.
61.275(e)(3)	65.6(c)	Malfunction records	N	The CAR requires similar information to be reported semi-annually. These provisions are in the CAR's start-up, shutdown, and malfunction requirements. These requirements in subpart Y are associated with control devices being out-of-range.
61.276(a)	65.47(a)	Record: retention period	N	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 vessel dimension and capacity records.
61.276(a)	65.4(a)	Record retention period	C	The records of subpart Y tanks that are not subject to Title V are still required to be kept for 2 years. Title V tanks subject to subpart Y must keep the records for 5 years. The CAR also specifies records that must be kept longer than the 2 or 5 years.
61.276(b)	65.47(b)	Record: vessel capacity	N	The exemption for tanks > 38 m^3 vessels will be left in the referencing subpart.
	[Not Consolidated]	Vessel capacity record for vessels <38m^3	NC	The CAR does not contain provisions for storage vessels where control is not required. Therefore, this provision is not included in the CAR.
61.276(c)	**[Not Consolidated]**	CVS/CD records	NC	This introductory paragraph is not needed in the CAR structure.
61.276(c)(1)	65.4(a)	CVS/CD record retention: operating plan	BR	The CAR requires 5 year record retention for title V sources and 2 years for non-title V sources. Subpart Y requires the operating plan as long as the control device is still being used. The CAR also specifies records that must be kept longer than the 2 or 5 years.
61.276(c)(2)	65.163(b)(1)	CVS/CD records: parametric monitoring	N	
61.276(c)(3)	65.163(b)(2)	CVS/CD records: maintenance	BR	The CAR does not require a maintenance plan as part of the design evaluation. It does require information on when the control device is down due to maintenance. The CAR does not require liquid level records or pumping records.
61.277	65.12	Delegation of authority	N	

CAR Correlation Table - Storage Vessels
(40 CFR Part 61, Subpart Y - 61.270 through 61.277)

Citations Part 61, Subpart Y	Citations, Part 65[a,b]	Description	Type of Change[c]	Comments
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.
New	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.
New	65.42(c)	Requirements for vessels storing high vapor pressure liquids	C	The CAR does not allow EFRs or IFRs to be on storage vessels containing liquids with a maximum true vapor pressure of 10.9 psi or greater. Although this is a new requirement for subpart Y sources and would apply to subpart Y sources under the CAR, it has no effect. It is very unlikely that vessels subject to subpart Y would ever contain a liquid having a vapor pressure this high. Therefore this provision does not affect subpart Y sources.
New	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	C	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.
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 61.271(a)(1) and 61.271(b)(4).
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.

CAR Correlation Table - Storage Vessels
(40 CFR Part 61, Subpart Y - 61.270 through 61.277)

Citations Part 61, Subpart Y	Citations, Part 65[a,b]	Description	Type of Change[c]	Comments
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	C	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) and 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)(1)	Must perform a flare compliance determination	C	The CAR specifically states that a flare compliance determination must be conducted. This is implicit is subpart Y.
New	65.147(b)(2) and 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.
New	65.157(b)(1)	Prior performance tests acceptable	BR	The CAR allows prior performance tests and compliance determinations under certain situations.
New	65.159(c) and (d)	Flare records	C	The CAR adds clarity by explicitly stating the monitoring and compliance records that must be kept.
New	65.163(c) and 65.167(b)	Startup, shutdown, and malfunction plan and associated requirements	BR	- 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. - The SSM plan acts to reduce burden because less reporting is required when there is a startup, shutdown, or malfunction. See the part 61 General Provisions correlation table for more discussion on the SSM requirements and the differences with the corresponding General Provisions of part 61.

CAR Correlation Table - Storage Vessels
(40 CFR Part 61, Subpart Y - 61.270 through 61.277)

Citations Part 61, Subpart Y	Citations, Part 65[a,b]	Description	Type of Change[c]	Comments
New	65.163(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. Subpart Y 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	65.165(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.

[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.