

Texas Commission on Environmental Quality

General Operating Permit (GOP) Renewal Application Guidance

Topics

- [Background and Definitions](#)
- [Example](#)
- [Required Forms and Documents](#)
- [Revision Items](#)
- [Submitting Applications to the Agency](#)
- [Table - Forms for Revisions](#)

Background and Definitions

- Authorization to Operate (ATO) - Authorizes an owner/operator to operate under a general operating permit.
- General Operating Permit (GOP) - Refers to the documents that contain all permit requirements for the industry type.
- Permit - The documents required to be maintained at a location specified in the application. These documents include: the ATO grant letter, a copy of the application, and the GOP for which the ATO is being granted.

An ATO under a GOP needs to be renewed via a timely **renewal** application if a permit holder wants to maintain authorization to operate under a GOP. For a timely application, the renewal application must be submitted at least six months, but no earlier than 18 months, before the expiration of authorization to operate under a GOP. An authorization to operate expires five years from the letterhead date on the initial issuance authorization letter or the reauthorization letter. The expiration date is also identified in authorization letter. Application revisions and new authorizations to operate do not affect the time line for the expiration.

Written notice shall be provided to the permit holder that the authorization to operate under the general operating permit is scheduled for review no later than 12 months before the expiration of the authorization to operate under the general operating permit. Failure to receive this notice does not affect the expiration date of the authorization to operate.

Example:

The authorization to operate for an oil and gas site expires in 9 months. The company has added units to the site and has received written approval from the TCEQ for the necessary permit by rule registrations for the additional units. Information concerning the new units needs to be added to the GOP permit for the site. The company decides to submit a renewal application and include the revisions concerning the new units as part of the renewal application.

Required Forms and Documents

- Cover letter - May be used to:
 - Briefly summarize changes since the last executed permit action;
 - Identify or clarify the applicant's special concerns;
 - Provide the name of project contacts in addition to the persons identified in the Form [OP-1](#); or
 - Submit additional information not included in the standard application forms.
- Form [OP-1](#) (Site Information Summary)

- Form [OP-2](#) (Application for Permit Revision/Renewal) - Requests a renewal of the permit and includes any changes not already incorporated into the application through a previous revision.
- Form [OP-CRO1](#) (Certification By Responsible Official)
- Form [OP-ACPS](#) (Application Compliance Plan and Schedule) - page 1
- Form [OP-REQ1](#) (Application Area-wide Applicability Determinations)

Revision Items

Along with the required forms, revision items can also be included with a renewal application. In addition, the following forms or documents should be submitted depending on the site or area characteristics:

- [Core Data Form](#) (if any company information has changed);
- [OP-SUMR](#) (Individual Unit Summary for Revisions);
- [Form OP-MON](#) (Monitoring Requirements) - Complete this form to include or revise periodic monitoring or compliance assurance monitoring;
- [OP-REQ3](#) (Applicable Requirements Summary) - Complete this form to establish [provisional terms and conditions](#).
- [OP-UA \(Unit Attribute forms\)](#) - Include any changes or other updates required by the current version of the unit attribute forms that have not previously been submitted;
- Any changes or updates can be included in the renewal application by submitting only changes and new data required by the updated GOP rather than complete replacements.

Submitting Applications to the Agency:

Mailing/physical delivery addresses for submitting permit applications can be found [here](#).

Forms for Revisions

Change Category	Potentially Affected Forms	Comment
Change in Responsible Official (RO) (not in conjunction with other changes)	OP-CRO2	Include OP-CRO2 in any revision project where the RO information has changed.
Delegation of Responsible Official (not in conjunction with other changes)	OP-DEL	Include OP-DEL in any revision project where the RO has delegated authority.
Change of Ownership or Legal Company Name	TCEQ Form Number 20405 (APD Change of Name/Ownership Form), Core Data Form	Use company name as registered with the Texas Secretary of State (SOS).
Changes affecting specific units	OP-2 , OP-CRO1 , OP-SUMR , OP-UA , OP-REQ2 , OP-REQ3 , OP-MON	
Changes affecting the permit area (non-unit specific)	OP-2 , OP-CRO1 , OP-1 , OP-REQ1	