

How to Read General Operating Permit 518

A general operating permit (GOP) provides a streamlined application and permitting process for sites that are similar in terms of operations, emission units, and applicable requirements. GOPs provide an alternative permitting mechanism under Title 30 Texas Administrative Code (30 TAC) Chapter 122 (Federal Operating Permits Program). A GOP contains many operating scenarios at a site, although the permit holder may not be operating under all of these scenarios. The information provided in the GOP application will indicate the scenarios under which the permit holder may operate. The permit holder will receive an authorization to operate, however the GOP application is federally enforceable. GOP 518 contains three sections which are explained below. In addition, the statement of basis and cover letter of the GOP are also explained.

Qualification Criteria

Section (a) of a GOP establishes the qualification criteria that owners or operators of sites must meet in order to be eligible to operate under the GOP. All GOPs will contain qualification criteria. The qualification criteria specify the limitations of a GOP. They are also used to exclude the types of emission units that are not commonly found at sites that would use the GOP or emission units with applicable requirements that are slightly different from many other sites. Owners or operators of emission units excluded by qualification criteria or having applicable requirements not codified in the GOP must apply for a site operating permit (SOP) for those emission units or the entire site.

Site-wide Requirements

Section (b) of a GOP contains site-wide requirements. All GOPs will contain site-wide requirements. A site-wide requirement is a requirement that applies uniformly to the emission units at the site. For example, the executive director has designated certain requirements of 30 TAC Chapter 111 (Control of Air Pollution from Visible Emissions and Particulate Matter) as being site-wide, such as the opacity limits for other sources. These requirements were designated as site-wide, since many sites have numerous other sources and each must comply with the appropriate opacity limit. Not all site-wide requirements may be applicable. A completed Form TCEQ 20410 (ACI GOP 518 - Application for an Authorization to Operate) specifies which site-wide requirements apply. Site-wide requirements begin under Site-wide Applicabilities (Section IX) of that form.

Permit Tables (for Stationary Engines only)

Section (c) of a GOP contains permit tables that provide a codification of applicable requirements, including regulatory monitoring, testing, recordkeeping, and reporting requirements for specific internal combustion engines, which are a stationary source, and are authorized by a GOP. 30 TAC

§122.10(30) and 40 CFR §89.2, for Non Road Engines, define Stationary Sources engines as “engines which will remain at a location for more than 12 consecutive months.” If your engine does not qualify as a stationary source under this definition, do not use the permit table. The permit tables include the applicability determinations for the emission units based on the index number(s) and all relevant unit application information contained in Form TCEQ 20410 beginning under Engine Applicabilities (Section XIII). The unit application information forms the basis of the applicability determination. The unit application information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. The attributes for each unit and corresponding index number provide the basis for determining the applicable requirements, including emission limitations or standards, and monitoring, recordkeeping, reporting and testing requirements.

Each permit table can be interpreted as a series of “paths” for achieving applicable regulatory requirements. Starting on the left-hand side of a permit table, proceed down the first column to the attribute describing the unit. After finding the correct attribute, move directly to the right and into the next attribute column. This move will provide a subset of attributes based on the previous attribute. Choose the correct attribute from this subset, and again, move directly to the right, into the next attribute column, and choose the next correct attribute subset. Continue this process until you reach the index number and corresponding applicable requirements, which are unique to the attribute path. Enter the index number on the unit attribute form or checklist next to the corresponding unit identification number.

Statement of Basis

The statement of basis sets forth the legal and factual basis for the draft permit conditions. A statement of basis is issued for all new, revised, or renewed GOPs. The statement of basis will explain the permitting action and opportunity for public comment. It contains sections including a facility description, federal regulatory applicability determinations, operational flexibility, new source review requirements, compliance assurance and periodic monitoring, and compliance status.

Cover Letter

The cover letter states the underlying authority under which the GOP is issued, as well as underlying requirements of the GOP. The cover letter is signed by the executive director of the Texas Commission on Environmental Quality and specifies the effective date of the GOP.