

**Texas Commission on Environmental Quality  
Air Permit Division  
Site Operating Permit (SOP) Initial Application Guidance**

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**General:**

The following guidance is provided for owners or operators that have determined they are subject to [30 TAC Chapter 122](#) and are required to submit a SOP application.

**Multiple Permits at a Site:**

Owner/operators of very large and complex sites may request, in writing, more than one permit for a site. In situations where multiple permits are contemplated, permit applications will be submitted for areas of the site (application areas) and distinguished by an area name. Each of the multiple permits for the site must meet all [30 TAC Chapter 122](#) procedural requirements, including: public notice; affected state review; opportunity for notice and comment hearing; and EPA review. Staff and management of agency departments such as permitting, compliance, and enforcement will review the request and let the applicant know of approval. Therefore, applicants must communicate this request, including any needs for meetings, in sufficient time to prepare and submit applications prior to operations.

There is no form for requesting this approach. Applicants should submit their request in writing via a letter from the (proposed) Responsible Official, or someone in the applicant's organization that meets the qualification of R.O. The request should include sufficient justification and description of the proposed areas within the site, and the basic process(es) or business unit(s) that are contained within that area. Finally, the request needs to address those issues that cross over two or more proposed areas: shared control devices, regulated process or waste streams, and those regulations that are, by rule, applied at the site level. Submit the written request to the Operating Permits Section Manager.

The following special concerns should be noted during the request, approval, and application process:

- The splitting up of a site into multiple areas does not affect Title V applicability.
- The splitting-up of a site does not affect applicability of those regulations that are, by rule, applied to the site.

**Pre-application Meetings:**

Although not a routine requirement, a teleconference or preapplication meeting may be requested by either the applicant or the TCEQ to obtain clarification regarding permit application process.

**Required Forms and Documents:**

Each application for a SOP will consist of certain required documents, and other forms or documents depending on the site's characteristics.

A cover letter may be used to identify the applicant's special concerns or requests that are not covered by standard application forms.

The following forms or documents are required for review:

- [Form OP-1](#)

- [Form OP-CRO1](#)
- [Form OP-REQ1](#)
- [Form OP-ACPS](#)
- A non-confidential version of the following documents:
  - Area Map
  - Plot Plan
  - Process Flow Diagram
  - Process Description

The following forms or documents are needed depending on the site's characteristics:

- For a new site/area without a Regulated Entity Number (RN) or Customer Number (CN), or at a site/area where the Core Data requires changes:
  - [Core Data Form](#)
- Emissions units/points with potentially applicable requirements:
  - [Form OP-SUM](#)
  - [Form OP-REQ2](#)
  - [Form OP-REQ3](#)
  - [Appropriate OP-UA forms](#)
  - [Form OP-MON](#) (if additional monitoring including PM/CAM is required to assure compliance with applicable requirements)
- At sites with electric generating utility plants subject to Title IV Acid Rain rules:
  - [Form OP-AR1](#)
  - Certificate of Representation (COR)
- If there is a need to delegate the R.O.'s responsibilities to a Duly Authorized Representative:
  - Form [OP-DEL](#)

Additional details on the subject matter above can be found [here](#).

### **Submitting Applications to the Agency:**

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

### **Converting a GOP to an SOP:**

Owner/operators with an authorization to operate (ATO) under a GOP may find that their site no longer qualifies for the GOP, or they may elect to change their operating permit type to an SOP on a voluntary basis. Because the SOP is truly a completely different federal operating permit authorization, the SOP that replaces the GOP ATO is handled as an initial issuance permit project. Permit holders seeking this change should be aware of special requirements:

- The site and emission units contained therein must comply with the applicable requirements identified in the GOP until such time the SOP is issued.
- If submitted within the existing GOP's renewal window, the SOP application serves as the GOP renewal application. Be sure to note that in a cover letter as part of the SOP application package.