

# Texas Commission on Environmental Quality

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## INTEROFFICE MEMORANDUM

**To:** Title V Site Operating Permit Reviewers      **Date:** February 16, 2006

**From:** Richard A. Hyde, P.E., Director  
Air Permits Division

**Subject:** OP-REQ1 Submittals for Minor and Significant Revisions

To improve efficiency in processing and reduce the review time for Site Operating Permits Minor and Significant revision applications, the Texas Commission on Environmental Quality (TCEQ) Air Permits Division is clarifying its policy regarding revisions for site wide requirements. When an applicant submits an OP-REQ1 form during the revision process for changes in area wide applicability determinations and general information, it will be required to submit the entire OP-REQ1 form (most recent version). The applicant should no longer submit only revised sections of the OP-REQ1. The only exception is when the applicant is only revising OP-REQ1 Section XII E-J for New Source Review authorizations. As long as the change to Section XII E-J does not result in a change to Section XII A-D, then the applicant may submit only the changes in Section XII E-J. However, any changes outside Section XII E-J will result in the requirement to submit a complete OP-REQ1 form.

As a result of an OP-REQ1 update submittal, TCEQ will be updating the revised permit with the most recent version of the terms and conditions. This could result in the inclusion of new terms and conditions such as Title 30 Texas Administrative Code (30 TAC) Chapter 101, additional periodic monitoring for 30 TAC Chapter 111, or wording and format changes.

The applicant should also be aware that changing previously submitted responses on their OP-REQ1 could change a minor revision to a significant revision (such as changing the permit shield request).

If there are special circumstances where there are changes required to the OP-REQ1 form that preclude completion of the most recent form in its entirety, the applicant may call Air Permits Division management to discuss the rationale for not submitting the completed form. Please call Jesse Chacon at (512) 239-1570 if you have any questions.