Texas Commission on Environmental Quality General Operating Permit (GOP) Renewal Application Guidance

Topics

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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.

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
 - o Submit additional information not included in the standard application forms.
- Form OP-1 (Site Information Summary)

- Form <u>OP-2</u> (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 <u>OP-ACPS</u> (Application Compliance Plan and Schedule) page 1
- Form OP-REQ1 (Application Area-wide Applicability Determinations)
- Form OP-PBRSUP (Instructions Permits by Rule Supplemental Table) Required with the first renewal submitted after August 1, 2020

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);
- <u>Form OP-MON</u> (Monitoring Requirements) Complete this form to include or revise periodic monitoring or compliance assurance monitoring;
- <u>OP-REQ3</u> (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.
- Form <u>OP-PBRSUP</u> (Instructions Permits By Rule Supplemental Table) used to
 provide supplemental information for all the Permits by Rule (PBRs) under which the
 site or application area is operating.

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)	<u>OP-DEL</u>	Include OP-DEL in any revision project where the RO has delegated authority.
Change of Ownership or Legal Company Name	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, OP-ACPS, OP-PBRSUP	
Changes affecting the permit area (non-unit specific)	OP-2, OP-CRO1, OP-1, OP-REQ1, OP-ACPS, OP-PBRSUP	