

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

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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.

A revision to an application must be submitted when changes made by an owner/operator at an area or site need to be addressed in the ATO application or the promulgation of new State or Federal regulations. The permit holder must submit a revision application before the change is operated.

The change may be operated before a new authorization to operate is granted, except changes to deviation limits as defined in 30 TAC §122.10, if the following requirements are met:

- The permit holder complies with the following:
  - 30 TAC Chapter 116;
  - All applicable requirements;
  - All state-only requirements; and
  - The provisional terms and conditions
- The permit holder maintains, with the authorization to operate under the general operating permit, the application until a new authorization to operate is granted; and
- The permit holder operates under the representations in the general operating permit application.

A revision to an application must be submitted via a **revision** application when changes to the GOP affect an area or site (e.g. Revision or renewal of the MSW GOP). A revision application is required to be submitted no later than 90 days after the GOP is revised.

### Examples:

- A new tank is installed at an oil and gas site with applicability to 30 TAC Chapter 115, Subchapter B, Division 1, Storage of VOCs. Before the tank can be operated, an ATO application revision is required to be submitted for the site that includes the required forms and the applicable unit attribute form ([OP-UA03](#)).

- An Oil and Gas GOP is renewed and now includes additional periodic monitoring (PM) requirements; an ATO revision application is required for the site to account for the PM requirements.

### Required Forms and Documents

- Cover letter
- Form [OP-2](#) (Application for Permit Revision/Renewal) - Used to itemize revisions being made to the application.
- Form [OP-CRO1](#) (Certification By Responsible Official)

### Potentially Required Forms

The following forms are required depending on the revisions being made to the application or area/site information:

- Form [OP-CRO2](#) (Change of Responsible Official Information) - Submitted only if there is a change of Responsible Official or change of Responsible Official contact information.
- Form [OP-REQ1](#) (Application Area-wide Applicability Determinations)
- Appropriate [Unit Attribute forms](#)
- [OP-SUMR](#) (Individual Unit Summary for Revisions) - Submitted if units are being added, deleted, or revised via unit attribute forms.
- [OP-REQ3](#) (Applicable Requirements Summary) - Submit this form if establishing or revising [provisional terms and conditions](#).
- Form [OP-PBRSUP](#) (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

### Ownership/Name Change Applications

An application needs to be updated via a **change of ownership/name change** application when the customer reference number (CN) of the permit holder changes.

For an ATO **change of ownership/name change** application, the following forms need to be submitted:

- Cover letter
- [Change of Name/Ownership](#) Form
- [Core Data Form](#)

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