

Texas Commission on Environmental Quality

Initial General Operating Permit (GOP) Application Guidance

Topics

- [Background and Definitions](#)
- [Required Forms and Documents](#)
- [Potentially Applicable Forms](#)
- [Submitting Applications to the Agency](#)
- [Table - Forms for Issuance](#)

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 GOP is available for qualifying sites that are similar in terms of operations, emission units, and applicable requirements for the following industries: Oil and Gas (GOPs 511 – 514), Municipal Solid Waste Landfill (GOP 517) and Air Curtain Incinerator (GOP 518).

Sites classified as a major source are required to obtain a Federal Operating Permit (FOP). If the site meets the qualification criteria of the GOP, then an ATO under the GOP for which the site qualifies can be submitted via an **initial issuance** application. Currently, the major source thresholds for a site can be determined by referring to 30 TAC Chapter 122, Subchapter A, §122.10 (General Definitions) and the Texas State Implementation Plan website www.tceq.texas.gov/airquality/sip.

Additionally, sites at which municipal solid waste (MSW) landfills are operated require a FOP. If the qualification criteria are met, an initial issuance application for the applicable GOP can be submitted. An **initial issuance** application needs to be submitted when:

- Subject to 40 CFR Part 60 Subpart WWW (Standards of Performance for Municipal Solid Waste Landfills) and the design capacity is greater than 2.5 million mega grams and 2.5 million cubic meters;
- Subject to 40 CFR Part 60 Subpart XXX (Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 1, 2014);
- Subject to 40 CFR Part 63 Subpart AAAA (National Emission Standards for Hazardous Pollutants: Municipal Solid Waste Landfills); or
- Subject to 30 TAC CH113, Subchapter D, Division 1 (Municipal Solid Waste Landfills).

Any air curtain incinerator (ACI) is required to obtain an FOP, regardless of whether the ACI is a major or minor source of air pollutants and regardless of whether the ACI is temporary or permanent at a site. If the ACI meets the qualification criteria of the ACI GOP, the owner or operator can request an ATO under a GOP.

Required Forms and Documents

- Cover letter - may be used to identify the applicant's special concerns or requests that are not covered by standard application forms
- Area map
- Plot plan
- Process description
- Process flow diagram
- Form [OP-1](#) (Site Information Summary)
- Form [OP-CRO1](#) (Certification By Responsible Official)
- Form [OP-ACPS](#) (Application Compliance Plan and Schedule) - used to indicate the compliance status of the site or application area with the applicable regulations.
- Form [OP-REQ1](#) (Area-Wide Applicability Determination) - ATO applicants only need to answer the "starred" (diamond) questions as per form instructions
- 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

Potentially Required Forms

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

- The [Core Data](#) Form - 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.
- Form [OP-DEL](#) (Delegation of Responsible Official Authority) - For delegation of authority by the Responsible Official to a Duly Authorized Representative(s). The form is actually an optional form. A General Operating Permit does not have to have a Duly Authorized Representative(s).
- Form [OP-SUM](#) (Individual Unit Summary) - For individual unit summaries and needs to be submitted if units with unit specific applicable requirements (UA forms) are included in the application. Note that there are no longer any "Grandfathered" units.
- [Unit Attribute forms](#) (UA forms) - Need to be submitted for units that have specific applicable requirements. Most likely, oil and gas sites and municipal solid waste landfill sites can be covered under [relevant UA forms for GOPs](#). Some of the unit attribute forms may not need to be completed as per form instructions (e.g. crude oil condensate storage tanks each less than 210,000 gallons capacity in an attainment county). Some unit attribute forms may need to be completed to show non-applicability (e.g. storage tanks; flares for 40 CFR 60 Subpart A, 40 CFR 63 Subpart A, and 30 TAC Chapter 111).
- Form [OP-MON](#) (Monitoring Requirements) - If additional monitoring, periodic monitoring or compliance assurance monitoring is required to assure compliance with applicable requirements.
- Form [OP-REQ3](#) (Applicable Requirements Summary) - Complete this form to establish [provisional terms and conditions](#).

Submitting Applications to the Agency:

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

Forms for Issuance

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)	OP-DEL	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).
Incorporating specific units	OP-2 , OP-CRO1 , OP-SUMR , OP-UA , OP-REQ2 , OP-REQ3 , OP-MON , OP-ACPS , OP-PBRSUP	
Incorporating requirements affecting the permit area (non-unit specific)	OP-2 , OP-CRO1 , OP-1 , OP-REQ1 , OP-ACPS , OP-PBRSUP	