Statement of Basis of the Federal Operating Permit

Oil and Gas Sites Located in:

Gregg, Nueces, and Victoria counties

General Operating Permit

Permit Number 512

Standard Industrial Classification (SIC) Code:

1311 Crude Petroleum and Natural Gas
1321 Natural Gas Liquids
4922 Natural Gas Transmission
4923 Natural Gas Transmission and Distribution

This Statement of Basis sets forth the legal and factual basis for the permit conditions. It contains sections including a Facility Description, Federal Regulatory Applicability Determinations, Operational Flexibility, New Source Review Requirements, Compliance Assurance and Periodic Monitoring, and Compliance Status.

Operating Permit
Basis of Determination

Description of the Project

The Texas Commission on Environmental Quality (TCEQ) executive director issues a revised and renewed General Operating Permit (GOP) Number 512, for Oil and Gas Sites located in Gregg, Nueces, and Victoria counties. This GOP is issued by the TCEQ executive director under the requirements in Title 30 Texas Administrative Code (30 TAC) Chapter 122, Subchapter F (General Operating Permits). This GOP contains revisions resulting from new and amended federal and state rules, which will be applicable requirements under the Federal Operating Permit Program. The GOP also includes grammatical, stylistic and other non-substantive revisions to correct citation errors and to update language for administrative consistency. The specific revisions are described in the section "Description of the General Operating Permit Proposed Revisions". This GOP fulfills the obligation to renew the corresponding GOP Number 512 every five years as required by 30 TAC §122.501 (General Operating Permits).

Description of the General Operating Permit Procedural Requirements

Before the issuance of a renewal or significant revision to a GOP by the executive director, the GOP must comply with the procedural requirements specified in 30 TAC Chapter 122, Subchapter F including a 30-day public comment period with an opportunity to request a notice and comment hearing, an affected states review, and a 45-day United States Environmental Protection Agency (EPA) review. Once issued, the GOP is subject to a 60-day public petition period, during which members of the public may petition EPA to object to the GOP, discussed further below.

A notice of opportunity for public comment on the draft GOP was published in the *Texas Register*, on the TCEQ Air Permits Division (APD) web page at:

www.tceq.texas.gov/permitting/air/titlev/generalpermits/air-gop

and in a newspaper of the largest general circulation in the Austin, Dallas, and Houston metropolitan areas on February 28, 2025. The comment period was from February 28, 2025, through March 31, 2025, and offered the public an opportunity to review and submit comments on the draft GOP. A hybrid virtual and in-person public hearing on the draft GOP was held in Austin on March 31, 2025, at 2:00 p.m. in Building F, room 2210 at the commission's central office located at 12100 Park 35 Circle, Austin, Texas. Simultaneous with the public comment period, affected states (Arkansas, Colorado, Kansas, Louisiana, New Mexico, and Oklahoma) have the opportunity to comment on the draft GOP. One positive comment was received and is responded to in the Response to Comments section of this document.

Following the public comment period, the EPA 45-day review period began on April 21, 2025, and ended on June 5, 2025. During this time, EPA had the opportunity to comment on and object to the proposed GOP issuance. No comments or objections were received from EPA.

The GOP will be subject to public petition for 60 days from the date of issuance, as specified in 30 TAC §122.360 (Public Petition). Any person who will be affected by a decision of the executive director to issue the GOP may petition EPA to make an objection. Petitions shall be based only on objections to the GOP that are raised with reasonable specificity during the public comment period, unless the petitioner demonstrates in the petition to EPA that it was not possible to have raised the objections within the public comment period, or that the grounds for the objection arose after the public comment period. The petition shall identify all objections. A copy of the petition shall be provided to the executive director by the petitioner. After receiving the petition, EPA may object to the issuance of the GOP only if it is not in compliance with the applicable requirements or the requirements of 30 TAC Chapter 122 (Federal Operating Permits Program). The executive director shall have 90 days from the receipt of an EPA objection to resolve any objection and, if necessary, terminate or revise the GOP.

Applications for an authorization to operate (ATO) under a GOP (GOP applications) will be reviewed by the executive director to ensure that the site qualifies for the GOP. Individual GOP applications are not subject to public notice, affected state review, EPA review, and public petition requirements, because these procedural requirements occur during the development of the GOP by the executive director. After the application review process is complete, the executive director approves ATOs under a GOP without further public notice.

Description of the Facility

Oil and gas sites that meet or exceed major source thresholds are required to obtain a federal operating permit, in accordance with 30 TAC Chapter §122.120 (Applicability). To find the thresholds by which sources are classified as major, see the Texas State Implementation Plan web page located at www.tceq.texas.gov/airquality/sip. Different thresholds apply to different sites, based on the attainment status of the county in which the site is located.

GOP Number 512 is developed for use by crude petroleum and natural gas, natural gas liquids, natural gas transmission, and natural gas transmission and distribution industry sites that are similar in operation and subject to the applicable requirements codified in this GOP.

Crude petroleum and natural gas industry sites are primarily engaged in operating oil and gas field properties. Such activities may include the operation of separators, emulsion breakers, desilting equipment, field gathering lines for crude petroleum, and all other activities in the preparation of oil and gas up to the point of shipment from the producing property. This industry includes the production of oil and the production of gas and hydrocarbon liquids through gasification, liquid faction, and pyrolysis of coal at mine sites. Also included are owners or operators that have complete responsibility for operating oil and gas wells for another group or company on a contract or fee basis.

Natural gas liquids industry sites are primarily engaged in producing liquid hydrocarbons from oil and gas field gases. The hydrocarbon production from these sites include butane production, casing-head butane and propane production, cycle condensate production, ethane production, fractionating natural gas liquids, isobutane production, liquefied petroleum gases production, natural gas liquids production, natural gasoline production, and propane production.

Natural gas transmission industry sites are primarily engaged in the transmission or storage of natural gas for sale.

Natural gas transmission and distribution industry sites are primarily engaged in both the transmission and distribution of natural gas for sale.

Description of the General Operating Permit Revisions

Punctuation, acronyms, numbering, title references, typographical errors, and other changes for clarification or improved readability are updated throughout the documents and are not specifically listed below. These administrative changes do not require permit holders to apply for a new ATO.

The qualification criteria that sites must meet to be eligible to operate under this GOP are established under section (a) of the GOP. The qualification criteria specify the limitations of a GOP. Qualification criteria are used to exclude the types of emission units that are not commonly found at sites that would use the GOP or for emission units with applicable requirements slightly different from many of the other sites. Owners or operators of emission units excluded by qualification criteria must apply for a site operating permit (SOP) for those emission units or the entire site. Alternative means of compliance, alternative means of control, alternative emission limitations or standards, alternative monitoring, compliance plans, or equivalent requirements that must be approved by the executive director or the administrator of EPA, typically are not codified in a GOP due to the need for specific provisions.

Specific amendments for section (a):

- 512(a)(3), (a)(4), (a)(5), (a)(9)(F)(i), (a)(10), (a)(11), (a)(12), and (a)(13) are amended to update language for administrative consistency.

- 512(a)(19) is added to exclude emission units subject to the regulatory requirements of 40 CFR Part 60, Subpart XXa (Standards of Performance for Bulk Gasoline Terminals That Commenced Construction, Modification, or Reconstruction After June 10, 2022) to operate under this GOP.

The site-wide requirements for sites eligible to operate under this GOP are established in section (b) of the GOP. A site-wide requirement applies uniformly to the emission units at the site covered by this GOP. For example, the executive director has designated the opacity limits for stationary vents in 30 TAC Chapter 111 (Control of Air Pollution from Visible Emissions and Particulate Matter) as site-wide requirements. These requirements were designated as site-wide since many sites have numerous stationary vents and each must comply with the appropriate opacity limit. Additional information relating to site-wide requirements may be found in the APD document entitled “How to Read a General Operating Permit” located at www.tceq.texas.gov/permitting/air/titlev/generalpermits/gop_no_512.

Specific amendments for section (b):

- 512(b)(3) and (b)(5) are amended to update language for administrative consistency.

- 512(b)(6) is amended to clarify that the ATO permit holders shall submit reports to the appropriate TCEQ regional office.

- 512(b)(7)(A) is amended for administrative consistency and to clarify that emission units under the GOP shall have all applicable requirements codified in this GOP.

- 512(b)(9)(H) is amended for administrative consistency and to clarify that the monitoring of control device performance or general work practice standards shall be made in accordance with the Periodic Monitoring Tables included in this permit.

- 512(b)(10) is amended to update language for administrative consistency.

- 512(b)(10)(A) is amended with minor administrative changes throughout to update language for administrative consistency.

- 512(b)(10)(B)(iii)(IV)(a) is amended to clarify applicable citations.

- 512(b)(13) and (b)(14)(B)-(C) are amended to update language for administrative consistency.

- 512(b)(21)(A) is amended to correct an error in the estimated sulfur feed rate formula to match the 40 CFR 60, Subpart LLL rule text.

- 512(b)(21)(B), (b)(39), (b)(40), and (b)(44)(E)(i) are amended to update language for administrative consistency.

- 512(b)(22) is added to include a term for 40 CFR 60, Subpart OOOOb (Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After December 6, 2022). Succeeding items under 512(b)(22) are renumbered.

Section (c) of GOP Number 512 contains permit tables that provide a codification of applicable requirements including regulatory monitoring, testing, recordkeeping, and reporting requirements for units covered by the GOP. Additional information relating to permit tables may be found in the APD guidance document entitled “How to Read a General Operating Permit” located at www.tceq.texas.gov/permitting/air/titlev/generalpermits/gop_no_512.

The applicable requirements codified in section (c) of GOP Number 512 are revised due to newly promulgated or amended regulations, or corrections; and tables are updated to incorporate amendments to regulations, correct errors, and for consistency with the existing decision support system.

Permit holders operating under an index number in a permit table that is revised may need to update their applications if applicability determinations and the determination of basis affecting the emission units have changed.

The following permit tables are updated for consistency with the existing decision support system updates to applicable requirements.

- 512(c)(2) for Glycol Dehydrators affected by 40 CFR 63, Subpart HH (National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities) is updated to correct citation errors.

- 512(c)(4) for Storage Vessels affected by 30 TAC Chapter 115, Subchapter B, Division 1 and located in Gregg, Nueces, or Victoria County is updated to incorporate the amendments to the regulation;

- 512(c)(6) for VOC Loading and Unloading Operations affected by 30 TAC Chapter 115, Subchapter C, Division 1 (Loading and Unloading of Volatile Organic Compounds) and located in Gregg, Nueces, or Victoria County is updated to incorporate the amendments to the regulation;

- 512(c)(7) for VOC Water Separators affected by 30 TAC Chapter 115, Subchapter B, Division 3 and located in Gregg, Nueces, or Victoria County is updated to incorporate the amendments to the regulation;

- 512(c)(8) for Flares affected by 30 TAC Chapter 111 (Control of Air Pollution from Visible Emissions and Particulate Matter) is updated to add Periodic Monitoring text;

- 512(c)(9) for Cold Cleaning Degreasing Operations affected by 30 TAC Chapter 115, Subchapter E, Division 1 and located in Gregg, Nueces, or Victoria County is updated to incorporate the amendments to the regulation;

- 512(c)(13) for Storage Vessels affected by 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984) is updated to incorporate the amendments to the regulation;

- 512(c)(22) for Stationary Combustion Turbines affected by 40 CFR Part 63, Subpart YYYY (National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines) is updated to correct citation errors and incorporate amendments to the regulation;

- 512(c)(23) for Stationary Reciprocating Internal Combustion Engines affected by 40 CFR Part 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) is updated to incorporate amendments to the regulation;

- 512(c)(25) for Compression Ignited Internal Combustion Engines affected by 40 CFR Part 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines) is updated to incorporate amendments to the regulation;

- 512(c)(26) for Stationary Spark Ignited Internal Combustion Engines affected by 40 CFR Part 60, Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines) is updated to incorporate amendments to the regulation;

- 512(c)(27) for Stationary Gas Turbines affected by 40 CFR Part 60, Subpart KKKK (Standards of Performance for Stationary Combustion Turbines) is updated to incorporate amendments to the regulation;

- 512(c)(28) for Boilers affected by 40 CFR Part 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters) is updated to correct citation errors and to incorporate amendments to the regulation;

- 512(c)(30) for Process Heaters affected by 40 CFR Part 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Major Sources: Institutional, Commercial, and Industrial Boilers and Process Heaters) is updated to correct citation errors and to incorporate amendments to the regulation;

- 512(c)(32) for Storage Vessels affected by 40 CFR Part 63, Subpart OOOO (Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or Before After September 18, 2015) is updated to correct citation errors and incorporate amendments to the regulation;

- 512(c)(33) for Storage Vessels affected by 40 CFR Part 63, Subpart OOOOa (Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After September 18, 2015) is updated to correct citation errors and incorporate amendments to the regulation;

- 512(c)(34) for Gas Sweetening Units affected by 40 CFR Part 63, Subpart OOOO (Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or Before After September 18, 2015) is updated to correct citation errors and incorporate amendments to the regulation;

- 512(c)(35) for Gas Sweetening Units affected by 40 CFR Part 63, Subpart OOOOa (Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After September18, 2015) is updated to correct citation errors and incorporate amendments to the regulation;

- 512(c)(36) for Fugitive Emissions affected by 40 CFR Part 63, Subpart OOOO (Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or Before After September 18, 2015) is updated to correct citation errors and incorporate amendments to the regulation;

- 512(c)(37) for Fugitive Emissions affected by 40 CFR Part 63, Subpart OOOOa (Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After September 18, 2015) is updated to correct citation errors and incorporate amendments to the regulation;

- 512(c)(38) for Well Affected Facilities affected by 40 CFR Part 63, Subpart OOOO (Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or Before After September 18, 2015) is updated to correct citation errors and incorporate amendments to the regulation; and

- 512(c)(39) for Well Affected Facilities affected by 40 CFR Part 63, Subpart OOOOa (Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After September 18, 2015) is updated to correct citation errors and incorporate amendments to the regulation.

No previously existing permit tables are removed from the GOP. No new permit tables are added in the GOP.

Compliance Assurance Monitoring (CAM)

Section (d) includes CAM applicability criteria and section (e) contains the CAM Option Tables. The executive director included pre-approved CAM options from the "Compliance Assurance Monitoring" (APDG 5824) guidance document appropriate for an oil and gas site. This guidance is available on the website:
www.tceq.texas.gov/permitting/air/guidance/titlev/tv_fop_guidance.html.

No revisions are made to CAM applicability criteria or the CAM Option Tables.

Periodic Monitoring (PM)

Section (f) includes PM applicability criteria and additional monitoring requirements, and section (g) contains the PM Option Tables. The executive director included PM options from the "Periodic Monitoring" (APDG 5241) guidance document appropriate for an oil and gas site. This guidance is available on the website:
www.tceq.texas.gov/permitting/air/guidance/titlev/tv_fop_guidance.html.

The following changes are made to the PM Option Tables (g):

- PM option PMG-OG-V-052 for cold solvent cleaners is amended to revise 30 TAC §115.412(1)(A)-(F) to 30 TAC §115.412(a)(1)(A)-(F) in the Periodic Monitoring Requirement column to be consistent with the May 16, 2024, rule amendment to 30 TAC Chapter 115, Subchapter E, Division 1, Degreasing Processes. The words "cold cleaner" are revised to "cold solvent cleaner" to provide clarity as the requirements in 30 TAC §115.412(a)(1)(A)-(F) are specific to cold solvent cleaning.

Origin of Monitoring Options

The CAM and PM options developed by the executive director are based on federal and state regulations, historical New Source Review (NSR) permits, and EPA guidance and training.

Federal Regulatory Applicability Determinations

The following table summarizes the applicability of the principal air pollution regulatory programs that may apply to facilities in areas permitted under GOP Number 512:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment NSR	No
Minor NSR	Yes
40 CFR Part 60 Standards of Performance for New Stationary Sources	Yes
40 CFR Part 61 National Emission Standards for Hazardous Air Pollutants	Yes
40 CFR Part 63 National Emission Standards for Hazardous Air Pollutants for Source Categories	Yes
Federal Clean Air Act (FCAA), Title IV Acid Deposition Control	No
FCAA, Title V Permits	Yes
FCAA, Title VI Stratospheric Ozone Protection	Yes

The permit tables include applicability determinations for the emission units based on the index number(s) and all relevant unit attribute information. Each combination of index numbers and unit attributes information forms the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit that is used to determine the requirements with which the permit holder must comply. For more information about the descriptions of the unit attributes, specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/forms/titlev/unit-attributes/air-all-ua-forms.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. TCEQ APD has developed the GOP permit tables for determining applicability of state and federal regulations based on the unit attribute information.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. Each permit table can be interpreted as a series of paths for determining applicable regulatory requirements and monitoring, reporting, recordkeeping, and testing requirements. Starting on the left side of a permit table, proceed down the first column to the attribute describing the unit. After finding the correct attribute, move directly to the right and into the next attribute column. This move will provide a subset of attributes based on the previous attribute. Choose the correct attribute from this subset and, again, move directly to the right, into the next attribute column, and choose the next correct attribute subset.

Continue this process until the index number and corresponding applicable requirements, unique to the attribute path, are reached. The index number will be entered on the UA form next to the corresponding unit identification number.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. Therefore, the tank may need to comply with two distinct sets of requirements, depending on the products that are stored. Both sets of unit attributes are included in the application, so that the ATO holder may store either product in the tank.

NSR Requirements

NSR authorizations are incorporated by reference in the GOP application and are enforceable under it. Each individual application to operate under a GOP can be accessed electronically at the TCEQ Central Office, Office of Chief Clerk, Building F, First Floor, 12100 Park 35 Circle, Austin, Texas. Individual applications to operate under a GOP may also be obtained from the TCEQ records webpage, also called Central File Room Online, at

records.tceq.texas.gov/cs/idcplg?IdcService=TCEQ_SEARCH

GOP Number 512 only covers sites containing emission units that are authorized by permits by rule (PBR) or standard permits and codified into this GOP. The PBRs codified into GOP Number 512 include:

- 30 TAC §106.102 (Comfort Heating);
- 30 TAC §106.122 (Bench Scale Laboratory Equipment);
- 30 TAC §106.124 (Pilot Plants);
- 30 TAC §106.148 (Material Unloading);
- 30 TAC §106.183 (Boilers, Heaters, and Other Combustion Devices);
- 30 TAC §106.227 (Soldering, Brazing, Welding);
- 30 TAC §106.244 (Ovens, Barbecue Pits, and Cookers);
- 30 TAC §106.261 (Facilities [Emission Limitations]);
- 30 TAC §106.262 (Facilities [Emission and Distance Limitations]);
- 30 TAC §106.263 (Routine Maintenance, Start-up, and Shutdown of Facilities, and Temporary Maintenance Facilities);
- 30 TAC §106.264 (Replacements of Facilities);

- 30 TAC §106.265 (Hand-held and Manually Operated Machines);
- 30 TAC §106.266 (Vacuum Cleaning Systems);
- 30 TAC §106.351 (Salt Water Disposal [Petroleum]);
- 30 TAC §106.352 (Oil and Gas Handling and Production Facilities);
- 30 TAC §106.353 (Temporary Oil and Gas Facilities);
- 30 TAC §106.354 (Iron Sponge Gas Treating Unit);
- 30 TAC §106.355 (Pipeline Metering, Purging, and Maintenance);
- 30 TAC §106.359 (Planned Maintenance, Startup, and Shutdown [MSS] at Oil and Gas Handling and Production Facilities);
- 30 TAC §106.371 (Cooling Water Units);
- 30 TAC §106.372 (Industrial Gases);
- 30 TAC §106.373 (Refrigeration Systems);
- 30 TAC §106.411 (Steam or Dry-Cleaning Equipment);
- 30 TAC §106.412 (Fuel Dispensing);
- 30 TAC §106.433 (Surface Coat Facility);
- 30 TAC §106.434 (Powder Coating Facility);
- 30 TAC §106.451 (Wet Blast Cleaning);
- 30 TAC §106.452 (Dry Abrasive Cleaning);
- 30 TAC §106.453 (Washing and Drying of Glass and Metal [Previously SE 42]);
- 30 TAC §106.454 (Degreasing Units);
- 30 TAC §106.471 (Storage or Holding of Dry Natural Gas);
- 30 TAC §106.472 (Organic and Inorganic Liquid Loading and Unloading);
- 30 TAC §106.473 (Organic Liquid Loading and Unloading);
- 30 TAC §106.474 (Hydrochloric Acid Storage);
- 30 TAC §106.475 (Pressurized Tanks or Tanks Vented to a Firebox);
- 30 TAC §106.476 (Pressurized Tanks or Tanks Vented to Control);

- 30 TAC §106.478 (Storage Tank and Change of Service);
- 30 TAC §106.491 (Dual-Chamber Incinerators);
- 30 TAC §106.492 (Flares);
- 30 TAC §106.496 (Air Curtain Incinerators);
- 30 TAC §106.511 (Portable and Emergency Engines and Turbines);
- 30 TAC §106.512 (Stationary Engines and Turbines);
- 30 TAC §106.531 (Sewage Treatment Facility);
- 30 TAC §106.532 (Water and Wastewater Treatment); and
- 30 TAC §106.533 (Remediation).

The standard permits codified into GOP Number 512 include:

- 30 TAC §116.617 (State Pollution Control Project Standard Permit);
- 30 TAC §116.620 (Installation and/or Modification of Oil and Gas Facilities);
- Air Quality Standard Permit for Electric Generating Units;
- Air Quality Standard Permit for Boilers;
- Air Quality Standard Permit for Oil and Gas Handling and Production Facilities; and
- Air Quality Standard Permit for Pollution Control Projects.

Compliance Status

To be eligible to qualify for an authorization to operate under a GOP, all units operating under a GOP must be certified to be in compliance at the time of initial issuance of the authorization to operate (ATO) and at a renewal of the ATO. After the initial issuance of an ATO under a GOP, the owner or operator must certify compliance with the terms and conditions of the permit for at least every 12-month period following the initial issuance of the ATO. Annual compliance certifications should be submitted to the executive director and the EPA administrator no later than 30 days after the end of the certification period.

Additionally, the owner or operator shall report, in writing, all instances of deviations, the probable cause of the deviations, and any corrective actions or preventative measures taken for the deviations for each emission unit covered by a GOP. A deviation report shall be submitted for at least each six-month period after the ATO issuance or at the frequency required by any applicable requirement which requires more frequent reporting. However, no report is required if no deviations occurred during the six-month reporting period. Deviation reports shall be submitted no later than 30 days after the end of each reporting period. Reports submitted under 30 TAC §101.201 (Emissions Event Reporting and Recordkeeping Requirements) or 30 TAC

§101.211 (Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements) do not substitute for deviation reports. Annual compliance certification and deviation reporting forms were developed and are maintained by the TCEQ Office of Compliance and Enforcement. These forms are available at www.tceq.texas.gov/publications/search_forms.html.

Owners or operators needing information regarding annual compliance certifications or deviation reports should contact the TCEQ Office of Compliance and Enforcement, Program Support Section at 512-239-0400 or the Small Business and Local Government Assistance program at 1-800-447-2827. Additional resources can also be found at www.tceq.texas.gov/assistance/industry/oil-and-gas/oilgas.html.

Available Unit Attribute Forms

The following is a list of unit attribute forms applicable to GOP Number 512 applications, which are located at www.tceq.texas.gov/permitting/air/forms/titlev/unit-attributes/air-all-ua-forms:

- OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes
- OP-UA3 - Storage Tank/Vessel Attributes
- OP-UA4 - Loading/Unloading Operations Attributes
- OP-UA5 - Process Heater/Furnace Attributes
- OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes
- OP-UA7 - Flare Attributes
- OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes
- OP-UA11 - Stationary Turbine Attributes
- OP-UA12 - Fugitive Emission Unit Attributes
- OP-UA14 - Water Separator Attributes
- OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
- OP-UA16 - Solvent Degreasing Machine Attributes
- OP-UA35 - Incinerator Attributes
- OP-UA57 - Cleaning/Depainting Operation Attributes
- OP-UA62 - Glycol Dehydration Unit Attributes
- OP-UA65 - Gas Well Affected Facilities

Hearing and Commenters

The draft GOP was subject to a 30-day comment period from February 28, 2025, through March 31, 2025, during which time, any person was eligible to submit written comments on the draft GOP. A hybrid virtual and in-person public hearing on the draft GOP was held in Austin on March 31, 2025, at 2:00 p.m., in Building F, room 2210 at the commission's central office located at 12100 Park 35 Circle, Austin, Texas. No attendees made formal comments during the hearing. TCEQ received one positive comment from Elizabeth Lieberknecht, Environmental Defense Fund.

Simultaneous with the public comment period, affected states (Arkansas, Colorado, Kansas, Louisiana, New Mexico, and Oklahoma) had the opportunity to comment on the draft GOP. No comments were received from affected states.

The EPA 45-day review period began on April 21, 2025, and ended on June 5, 2025, during which time the EPA had the opportunity to comment on and object to the GOP's issuance. No comments were received from EPA.

Response to Comments

COMMENT: Environmental Defense Fund expressed appreciation for TCEQ's ongoing efforts to implement the requirements of EPA's revised New Source Performance Standards (NSPS) and new emission guidelines for crude oil and natural gas facilities regulated under the Quad O series.

RESPONSE: TCEQ appreciates the support. No changes were made to the GOP in response to this positive comment.