

## **Assistance for Applicants Revising or Renewing a General Operating Permit (GOP)**

1. The oil and gas GOPs and the bulk fuel terminal GOP residing in Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122) became effective on October 21, 1996. According to 30 TAC Chapter 122, a GOP must be renewed every 5 years. The oil and gas GOPs and the bulk fuel terminal GOPs were renewed to fulfill this obligation on October 19, 2001. The GOPs also contain revisions to codified applicable requirements and new applicable requirements (i.e., minor New Source Review [NSR]) as a result of amended regulations or the adoption of new regulations.
2. The revision/renewal of these GOPs does not affect the date with which permit holders must renew their authorization to operate (ATO). Permit holders must still submit a renewal application at least six months, but no earlier than 18 months, before the date of expiration of the ATO.
3. Permit holders operating under GOPs must determine if an updated application should be submitted by comparing their current applications with the revised/renewed GOPs. An updated application should be submitted if index numbers have changed with relation to a set of unit attributes or if there are NSR authorization numbers that do not appear on the original application. An updated application is not required if the permit holder is not affected by the changed requirements of the revised/renewed GOP. A permit holder needing to update a GOP application as a result of a revised/renewed GOP must complete the following forms, as appropriate.

**Form OP-2 (Application for Permit Revision/Renewal)** - The Form OP-2 is required for the revision or renewal of an application. If the updated application is being submitted 6-18 months prior to the ATO expiration, then the applicant may simultaneously request a renewal of the ATO by checking the "RENEWAL" box.

**Form OP-CRO1 (Certification by Responsible Official)** - The Form OP-CRO1 serves to certify the application is true, accurate, and complete.

**Form OP-REQ1 (Application Area-wide Applicability Determinations and General Information)** - Permit holders are encouraged to update Form OP-REQ1 to the latest version (August 2001) because there have been substantive changes made since the original form was developed in 1996. By updating the Form OP-REQ1 the permit holder will be specifying which site wide terms of the GOP actually apply to the site. The applicant only needs to complete the questions for GOPs as indicated. If the applicant is listing new or changed NSR authorization numbers since the last application then complete Sections XII. E. The NSR authorization numbers on existing applications need not be re-listed since the GOP will make these authorizations referenced by those numbers an applicable requirement enforceable under the operating permits program.

**Form OP-SUMR (Individual Unit Summary for Revisions)** - The Form OP-SUMR is used for adding or deleting units, or updating the existing unit's NSR authorization number, if changed from the previous application. If adding units, be sure to include the appropriate unit attribute (UA) form. Do not use Form OP-SUM since this form is only for initial applications.

**Form OP-UAX (Unit Attribute Forms)** - Permit holders operating under GOPs must determine if an updated application should be submitted by comparing their current applications with the revised/renewed GOPs. When comparing the current index numbers versus the index numbers found in the revised/renewed GOPs, citations should be checked and changed requirements should be noted because they will affect compliance certifications. However, index numbers only have to be updated if they have changed with relation to a set of unit attributes. If a unit's attributes have changed since the original application than a new UA form should be submitted. No update of a UA form is required if the index number stays the same for a given set of unit attributes.

For further details see the section describing the changes to the tables in each related technical summaries, which can be found at [www.tnrcc.state.tx.us/permitting/airperm/opd/g\\_o\\_gops.htm](http://www.tnrcc.state.tx.us/permitting/airperm/opd/g_o_gops.htm)