

**Texas Commission on Environmental Quality
Air Permit Division
Site Operating Permit (SOP) Renewal Application Guidance**

Topics

- Purpose
- Time Requirements for SOP Renewal Applications
- Submittal Requirements for SOP Renewal Applications
- A cover letter may be used to
- The following forms or documents are required for all applications
- The following forms or documents are needed depending on the site or area characteristics
- SOP Renewals are subject to the requirements of 30 TAC § 122.201 which include

Purpose

This document assists SOP holders to complete and submit a renewal application. SOP holders must complete an SOP renewal application and submit it to the TCEQ in accordance with [Title 30 Texas Administrative Code Chapter 122](#) (30 TAC Chapter 122).

Time Requirements for SOP Renewal Applications

- SOPs generally expire five years after initial issuance or renewal. The expiration time frame is detailed on the front page of the SOP.
- A timely and complete SOP renewal application submission allows the permit holder to continue operating until final action is taken on the SOP renewal application
- Timely SOP renewal applications must be submitted between 18 and 6 months prior to the existing SOP expiration date. See [30 TAC §§ 122.133](#) and [122.134](#).
- The TCEQ will submit a written notification to SOP holders 12 months prior to expiration of the SOP. Failure to receive a notice from TCEQ does not affect the expiration date of the SOP or the requirement to submit a timely and complete application.

Submittal Requirements for SOP Renewal Applications

An SOP renewal application will consist of a cover letter, certain required documents, and other forms or documents depending on the site or area characteristics.

A cover letter may be used to:

- Briefly summarize changes since the last executed SOP revision;
- 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
- Submit additional information not included in the standard application forms.

The following forms or documents are required for all applications:

- [Form OP-2](#) (Application for Permit Revision/Renewal) to include any changes not already incorporated into the SOP through a previous revision. After the renewal application is submitted and before the permit is renewed, the SOP holder:
 - may operate the changes in accordance with 30 TAC § 122.241(f) provided that the change meets the criteria for a minor revision and renewal application includes any provisional terms and conditions reflecting the pertinent applicable requirements;
 - may not operate the change until the permit is renewed if the change meets the criteria for a significant revision;
- [Form OP-1](#) (Site Information Summary);

- [Form OP-REQ1](#) (Application Area-wide Applicability Determinations and General Information);
- [Form OP-ACPS](#) (Application Compliance Plan and Schedule);
- [Form OP-CRO1](#) (Certification By Responsible Official).

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

- [Core Data Form](#) (if any company information has changed);
- [OP-SUMR](#) (Individual Unit Summary for Revisions) Any units that had high-level terms included in the existing SOP must also be included;
- [Form OP-MON](#) (Monitoring Requirements) Complete this form to include or revise periodic monitoring or compliance assurance monitoring;
- [OP-REQ3](#) (Applicable Requirements Summary)
- [OP-REQ2](#) (Negative Applicable Requirement Determinations) Complete this form for additions or deletions as per the form instructions. However, if a permit shield was not previously requested during the permit initial issuance but is being requested for the permit renewal, then the entire [Form OP-REQ2](#) must be completed;
- Any supporting application data necessary to incorporate any changes identified in previously submitted [OP-NOTIFY](#) forms;
- [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 form updates can be included in the initial renewal application by submitting only changes and new data required on the updated forms rather than complete replacements. However, many forms have undergone several updates since the initial permit application and therefore it may be easier for the applicant to submit fully completed updated forms. Any initial renewal application form that includes changes or updates from previous submittals must be visually indicated on the newly submitted form. Changes or updates that are not visually indicated may not be incorporated;
- Any changes to the initial renewal application should be submitted as a renewal application update. Please review the “SOP Technical Review Fact Sheet” located at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf. This guidance contains important information regarding the review process and application update procedures;
- For Acid Rain Permits include:
 - [OP-AR1](#) (Acid Rain Permit Application);
 - [OP-CRO1](#) (Certification by the Designated Representative); and
 - A copy of the Certificate of Representation (COR) submitted to EPA.

SOP Renewals are subject to the requirements of 30 TAC § 122.201 which include:

- a 30-day Public Notice period;
- an Affected States review (if applicable);
- a Notice and Comment Hearing (if requested);
- a 45-day U.S. Environmental Protection Agency (EPA) review; and
- a 60-day Public Petition period.