

How to Read a General Operating Permit

A general operating permit (GOP) provides a streamlined application and permitting process for sites that are similar in terms of operations, emission units, and applicable requirements. GOPs provide an alternative permitting mechanism under Title 30 Texas Administrative Code (30 TAC) Chapter 122 (Federal Operating Permits Program). A GOP contains many operating scenarios at a site, although the permit holder may not be operating under all of these scenarios. The information provided in the GOP application will indicate the scenarios under which the permit holder may operate. The permit holder will receive an authorization to operate, however the GOP application is federally enforceable. A GOP contains five sections which are explained below. In addition, the statement of basis and cover letter of the GOP are also explained.

Qualification Criteria

Section (a) of a GOP establishes the qualification criteria that owners or operators of sites must meet in order to be eligible to operate under the GOP. All GOPs will contain qualification criteria. The qualification criteria specify the limitations of a GOP. Qualification criteria are also 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 than many other sites. Owners or operators of emission units excluded by qualification criteria or having applicable requirements not codified in the GOP must apply for a site operating permit (SOP) for those emission units or the entire site.

Site-wide Requirements

Section (b) of a GOP contains site-wide requirements. All GOPs will contain site-wide requirements. A site-wide requirement is a requirement that applies uniformly to the emission units at the site. For example, the executive director has designated certain requirements of 30 TAC Chapter 111 (Control of Air Pollution from Visible Emissions and Particulate Matter), such as the opacity limits for stationary vents, 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. Not all site-wide requirements may be applicable to the site. A completed Form OP-REQ1 (Application Area-Wide Applicability Determinations and General Information) specifies which site-wide requirements apply.

Permit Tables

Section (c) of a GOP contains permit tables that provide a codification of applicable requirements, including regulatory monitoring, testing, recordkeeping, and reporting requirements, for specific units authorized by a GOP. Most GOPs will contain permit tables. The permit tables include the applicability determinations for the emission units based on the index number(s) and all relevant unit application information contained in unit attribute forms and/or checklists. The unit application information forms the basis of the applicability determination. The unit application information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must

comply. 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, and monitoring, recordkeeping, reporting and testing requirements.

Each permit table can be interpreted as a series of "paths" for achieving applicable regulatory requirements. Starting on the left-hand 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, which are unique to the attribute path, are reached. The index number is entered on the unit attribute form next to the corresponding unit identification number or chosen on the checklist.

Compliance Assurance Monitoring (CAM)

Section (d) includes CAM applicability criteria and section (e) contains the CAM Option Tables. Most GOPs will contain CAM. An emission unit is subject to CAM if all of the following are met:

- the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;
- the emission unit uses a control device to achieve compliance with the emission limitation or standard; and
- the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year required for a site to be classified as a major source.

There are some exemptions, which may be found in the CAM guidance document at http://www.tceq.state.tx.us/permitting/air/guidance/titlev/tv_monitoring_guidance.html. If the emission unit meets one of the exemptions listed, then the emission unit is exempt from the monitoring requirements of CAM. If the emission unit is not subject to an exemption, the appropriate monitoring option in the CAM Option Tables must be identified.

The permit holder selects the control device used to comply with the underlying emission limitation or standard for that pollutant. Different control devices are identified in shaded rows throughout the table. The monitoring options appropriate for each control device are listed below the shaded row identifying the control device. *If multiple control devices are needed to comply with an emission limitation or standard for a unit, a monitoring option must be selected for each control device.*

After the appropriate control device has been identified, the permit holder selects the indicator(s) that will be monitored. Any monitoring option, appropriate for the type of control device and size of the emission unit, can be utilized to meet the CAM requirements. Permit holders often select monitoring requirements which are also contained in other applicable requirements.

The indicator(s) are located in the first column of the table. Each indicator or combination of indicators begins with a new number. For further clarification, a dotted line is placed in between multiple indicators to represent a combination of indicators that must be monitored together. For example, one of the options for a wet scrubber specifies monitoring both pressure drop and liquid flow rate. This item represents one monitoring option that has two indicators that need to be monitored. The pressure drop and liquid flow rate are separated by a dotted line to represent that the combination of pressure drop and liquid flow rate must be monitored.

Once the indicator(s) is selected, the permit holder determines if the monitoring options for small emission units or large emission units are appropriate. A small unit is not a major source after emission controls. A large unit is a major source after emission controls. A "Small" designation in the cell to the right of the indicator identifies monitoring options for small units subject to CAM. If a designation of "Small/Large" appears in the cell to the right of the indicator, the option is appropriate for both small and large units subject to CAM. Large units should always use the monitoring options with the designation of "Small/Large." Small units have the option of using monitoring options with either a "Small" or "Small/Large" designation.

The CAM Option Table defines the remaining monitoring requirements for the different size units and indicators. The column "Monitoring Specifications and Procedures" may establish the calibration frequency and the accuracy requirements for the control device. This column may also specify procedures or test methods to be used in collecting the monitoring data. Therefore, this particular column will specify all the quality assurance and control procedures, verification procedures, and specifications for obtaining data that is representative of the indicator being monitored to satisfy the CAM requirements. In addition, the deviation limit or procedures for establishing a deviation can also be found in the "Monitoring Specifications and Procedures" column. The deviation limit may be expressed as a value, a range, or a condition. Unless the deviation limit is specifically defined by the monitoring option, a proposed deviation limit and a justification for the proposed deviation limit must be submitted in the application using the Form OP-MON (Monitoring Requirements).

The minimum frequency for collecting the monitoring data is specified in the next column as once per day, four times per hour, six times per minute, and so forth. The permit holder may elect to collect monitoring data on a more frequent basis than is required by the monitoring option and average the data, consistent with the averaging time specified in the monitoring option, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances to avoid reporting deviations.

If appropriate, an averaging time is provided in the column entitled "Average." An "n/a" in this column indicates that an averaging time is not appropriate. An "n/a*" in this column indicates that the permit holder may elect to collect monitoring data on a more frequent basis than is required by the monitoring option and calculate a daily average for purposes of determining whether a deviation has occurred.

The final column in the table is the "CAM Option Number" and is used to define the monitoring option(s) selected. Each monitoring option has a unique number that is submitted on Form OP-MON. It is important to note that the Option Numbers listed may not be in sequential order.

Periodic Monitoring

Section (f) includes the periodic monitoring applicability criteria and additional monitoring requirements. Most GOPs will contain periodic monitoring. Section (g) contains the Periodic Monitoring Option Tables. All index numbers and their correlating applicable requirements in the GOP tables have been evaluated to determine if they provide sufficient periodic monitoring. Index numbers determined to have insufficient periodic monitoring have been identified by placing the words "Periodic Monitoring" in the "Monitoring and Testing" column of the permit tables contained in section (c) of the GOP.

The permit holder identifies if each emission unit is subject to periodic monitoring under 30 TAC §122.602 (Periodic Monitoring Applicability) for all applicable requirements. The permit holder must identify the type of contaminant associated with each of the underlying standards subject to periodic monitoring and locate that contaminant type in the first column of the Periodic Monitoring Option Table labeled "Emission."

Once the appropriate contaminant has been identified, the permit holder shall select the control device (if appropriate) used to comply with the emission limitation or standard. Different control devices are identified in shaded rows throughout the table. The monitoring options appropriate for each control device are listed below the shaded row identifying the control device. Some rows are for "All Emission Units," meaning these monitoring options may be used for any type of unit, regardless of control device. *If multiple control devices are needed to comply with an emission limitation or standard for a unit, a monitoring option must be selected for each control device.* If a control device is not utilized to comply with an emission limitation or standard or the emission limit or standard is for fugitive emissions, the permit holder selects the appropriate monitoring option below the shaded row titled "All Emission Units."

After the appropriate control device has been identified, the permit holder selects the indicator(s) that will be monitored. A dotted line between indicators represents a combination of parameters that must be monitored together. In addition, each separate indicator or combination of indicators begins with a new number (1, 2, and so forth). All indicators associated with a number must be monitored. For example, one of the options for a wet scrubber specifies monitoring both pressure drop and liquid supply pressure. Generally, any monitoring option(s) provided for an emission limitation or standard for a particular control device will be appropriate.

Once the indicator(s) is selected, the monitoring requirements are presented in the column entitled "Periodic Monitoring Requirement" and may include the deviation limit or procedures for establishing a deviation limit, procedures or test methods to be used in collecting the monitoring data, or quality assurance and quality control requirements.

The minimum frequency for collecting the monitoring data is specified in the column entitled "Min Freq." as once per day, six times per minute, and so forth. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time specified in the Periodic Monitoring Option Tables for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances to avoid reporting deviations.

If appropriate, an averaging time is provided in the column entitled "Average." An "n/a" in this column indicates that an averaging time is not appropriate. An "n/a*" in this column indicates that the permit holder may elect to collect monitoring data on a more frequent basis than is required by the Periodic Monitoring Option Tables and calculate the specified average for purposes of determining whether a deviation has occurred.

The final column in the Periodic Monitoring Option Tables is entitled "PM Option Number." These numbers are used to define the monitoring option(s) selected. Each monitoring option has a unique option number that is submitted in the application on Form OP- MON.

Statement of Basis

The statement of basis sets forth the legal and factual basis for the draft permit conditions. A statement of basis is issued for all new GOPs and any revision to or renewal of a GOP. The statement of basis will explain the permitting action and opportunity for public comment. 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.

Cover Letter

The cover letter states the underlying authority under which the GOP is issued, as well as underlying requirements of the GOP. The cover letter is signed by the executive director of the Texas Commission on Environmental Quality and specifies the effective date of the GOP.