



Federal Operating Permits (Title V) Program Updates

Savannah Quiros

Air Permits Division

Environmental Trade Fair 2025

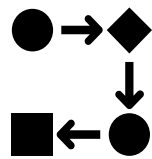
Title V Permitting Overview



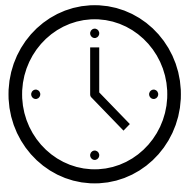
Hi again,
I'm Boo! 😊



Who needs a Title V Permit?



What is the Title V Permitting Process?



Recent Updates

Why is a Title V Permit Needed?

Two Permit System

Title V Federal Operating Permits:



- Site Operating Permits (SOPs)
- General Operating Permits (GOPs)

Pre-Construction Authorizations:

- Permits By Rule
- Standard Permits
- New Source Review (NSR) Permits
- Major NSR Permits [Prevention of Significant Deterioration (PSD) and Non-Attainment Permits (NA)]

What does a Title V Permit provide?

- **Documents Applicable Requirements for units**
 - Codifies previously authorized air emissions from units
 - Includes state and federal regulations for air emissions
 - Monitoring, Recordkeeping, Reporting, Testing (MRRT)
 - Additional Compliance Assurance Monitoring (CAM) and Periodic Monitoring (PM) if required
- **Public notification and participation**
- **Permit Compliance Certification (PCC) and deviation reporting**

Who needs a Title V Permit?

Federally Enforceable Potential to Emit (PTE) above Major Source Thresholds:

- 30 TAC §122.122
- Includes all Federally Enforceable Emission limits
- Lower thresholds for nonattainment areas

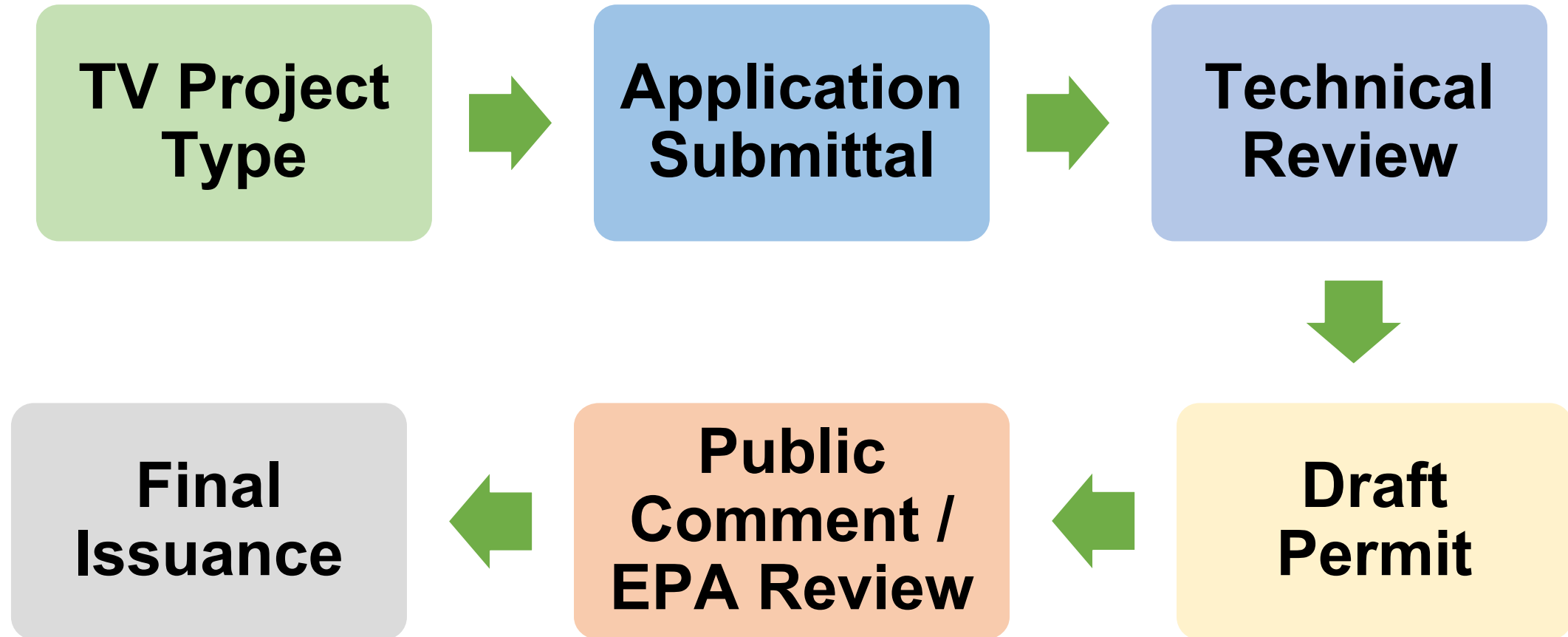
Other Sources Subject to 30 TAC Chapter 122:

- “Affected Sources” under acid rain rules
- Solid waste incineration units
- Specific non-major sources listed by EPA

Do I need
another
one?



Permitting Process (SOPs)



Project Types

Initial Permit Issuance:

- New Site that is applicable to Title V
- Existing Site that becomes subject to Title V

Permit Renewal:

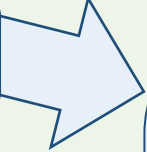
- Required every 5 years for effective Title V permit

Permit Revision:

- Changes to an existing Title V Permit

SOP Document Sections

- **Permit face**
- **General terms and conditions**
- **Special terms and conditions**
- **Attachments**
- **Appendices**

- 
- Applicable Requirements Summary
 - Additional Monitoring Requirements
 - Permit Shield(s)
 - NSR Authorization References
 - Compliance Schedule(s)
 - Alternative Requirement(s)

SOP Sections and Forms

Form	Generated Section
OP-1, OP-2, Core Data	Permit Face
OP-REQ1.....	Terms and Conditions
OP-SUM, OP-UA forms	Applicable Requirements
OP-MON	PM / CAM
OP-REQ1, OP-REQ2	Permit Shield
OP-REQ1, OP-SUM.....	PSD / NA / GHG / NSR / PBR
OP-ACPS	Compliance Schedule
OP-REQ1	Alternative Requirement
NSR Permits	Major NSR Summary Table

OP-REQ1 Form



- **Required for initial and renewal applications**
- **Required for revision applications only if site-wide requirements change in the permitted area**
- **Special Terms and Conditions:**
 - Site-wide requirements for permitted area
 - State and Federal regulations for air emissions
 - Acid rain, cross-state air pollution rule (CSAPR) and Texas SO2 trading program
- **NSR Pre-Construction Authorizations**

Applicable Requirements – OP-UA Forms

- Submit forms for initial, renewal, and revision applications
- 63 types of unit-specific OP-UAXX forms
- 1 generic OP-UA1 form
- Follow all form instructions



Applicable Requirements – Additional Monitoring

- OP-MON Form allows documentation of monitoring requirements for items subject to compliance assurance monitoring (CAM) and periodic monitoring (PM).
- CAM and PM are evaluated on a rule-by-rule and pollutant-by-pollutant basis



Wait...
what's the
difference?

Additional Monitoring cont.

PM (Periodic Monitoring)

- Does rule specify monitoring?
- Does rule also specify “sufficient” monitoring frequency?

If **NO** to EITHER of the above, then PM is required.

CAM (Compliance Assurance Monitoring)

- Is unit subject to an emission limit or standard?
- Is unit using a control device to achieve compliance with the emission limit or standard?
- Is unit a major source PRE-control?
- If **YES** to ALL the above, then CAM is required.**

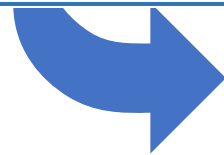
**Certain exemptions to CAM requirements exist

Applicable Requirements – Permit Shields

- Permit shields document negative applicability
 - Requested on OP-REQ1, documented on OP-REQ2
 - May be granted for potentially applicable regulations only
 - Regulatory basis where an emission unit is not subject to a regulation

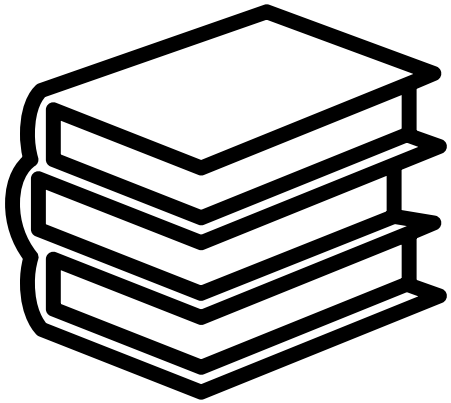
Reasoning should match language in rule:

§60.110b(a): Applies to each storage vessel with a capacity greater than or equal to 75 m³



OP-REQ2: “Storage vessel has a storage capacity of less than 75 m³”

Applicable Requirements – NSR Authorization References



- Incorporated by reference in OP-REQ1 form
- Major NSR Authorizations
- Minor NSR Authorizations
- Permits-by-Rule
- NSR authorizations must be effective for Title V public notification and permit issuance

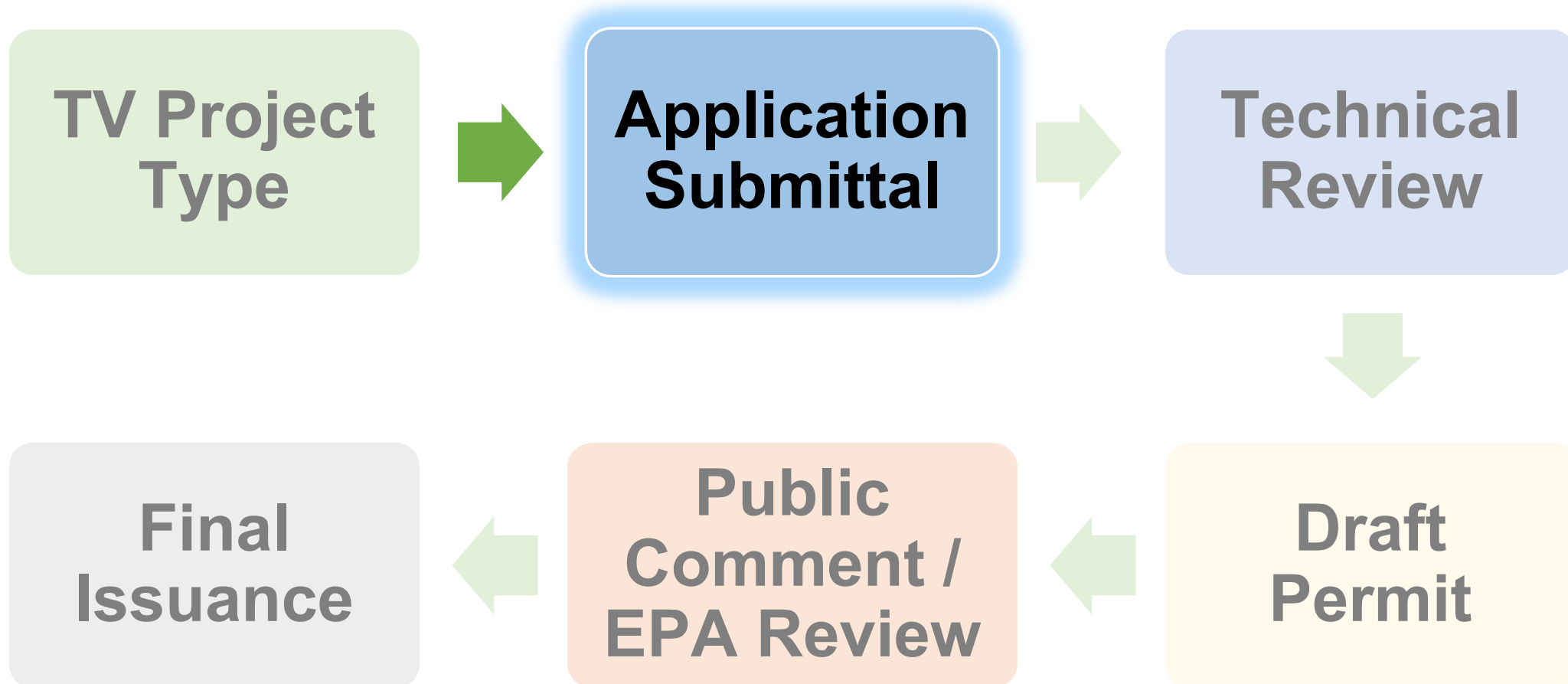
Appendices

- Appendix A – Acronym List
- Appendix B – Major NSR Summary Table for NSR PSD/NA/GHG/PAL permits



Appendix B isn't
Appendix Boo? ☹️

Permitting Process (SOPs)

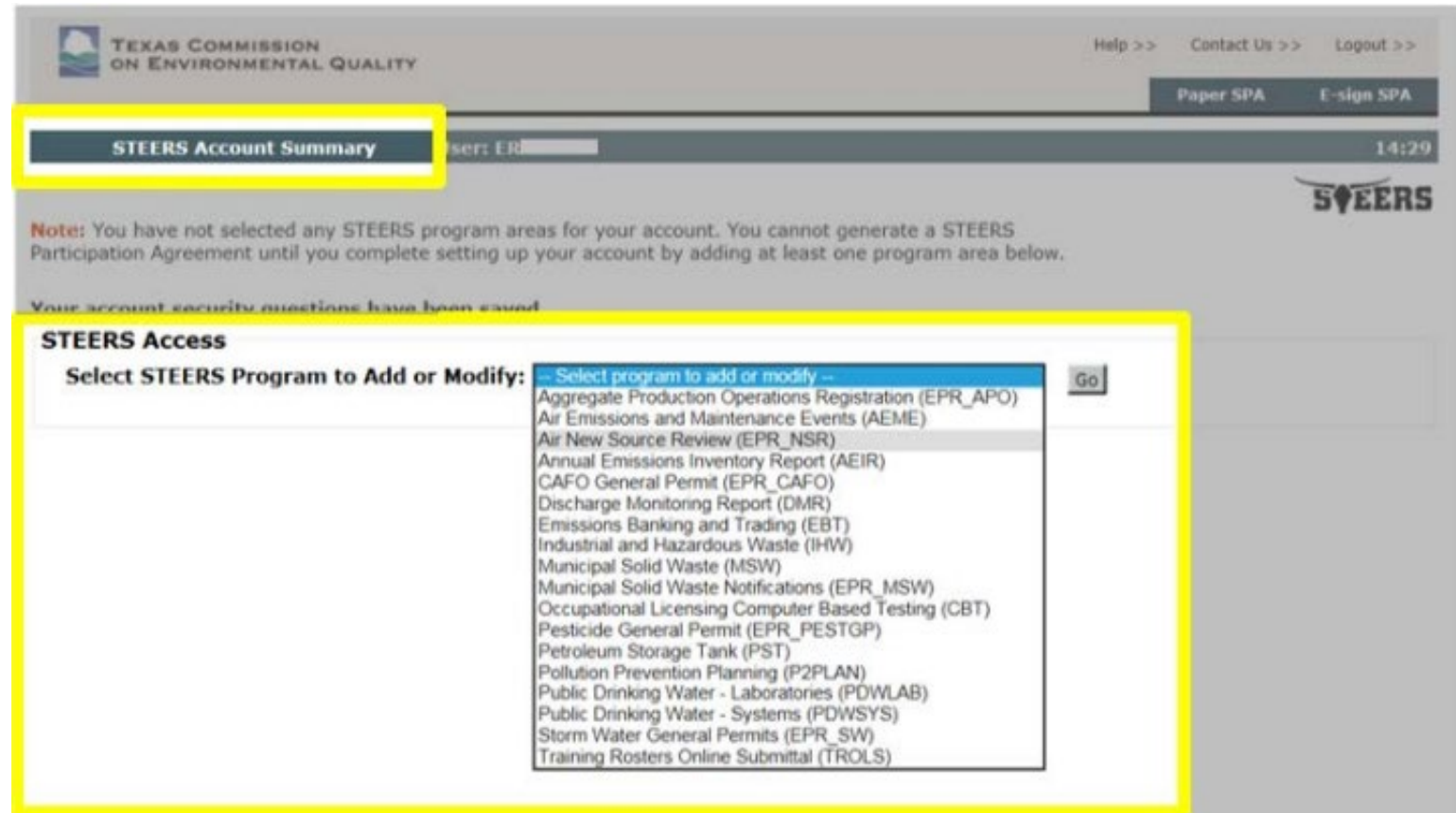


Getting Started with STEERS

Create STEERS Account

Add Air Title V Program to your STEERS Account

- Air Title V Operating Permits (EPR_TV)



The screenshot shows the 'STEERS Account Summary' page of the Texas Commission on Environmental Quality. The page header includes the agency name, navigation links (Help, Contact Us, Logout), and links for Paper SPA and E-sign SPA. The user is logged in as 'User: ER' at 14:29. A note states: 'Note: You have not selected any STEERS program areas for your account. You cannot generate a STEERS Participation Agreement until you complete setting up your account by adding at least one program area below.' Below this, a section titled 'STEERS Access' contains the prompt 'Select STEERS Program to Add or Modify:'. A dropdown menu is open, displaying a list of program areas: Aggregate Production Operations Registration (EPR_APO), Air Emissions and Maintenance Events (AEME), Air New Source Review (EPR_NSR), Annual Emissions Inventory Report (AEIR), CAFO General Permit (EPR_CAFO), Discharge Monitoring Report (DMR), Emissions Banking and Trading (EBT), Industrial and Hazardous Waste (IHW), Municipal Solid Waste (MSW), Municipal Solid Waste Notifications (EPR_MSW), Occupational Licensing Computer Based Testing (CBT), Pesticide General Permit (EPR_PESTGP), Petroleum Storage Tank (PST), Pollution Prevention Planning (P2PLAN), Public Drinking Water - Laboratories (PDWLAB), Public Drinking Water - Systems (PDWSYS), Storm Water General Permits (EPR_SW), and Training Rosters Online Submittal (TROLS). A 'Go' button is located to the right of the dropdown.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Help >> Contact Us >> Logout >>

Paper SPA E-sign SPA

User: ER 14:29

STEERS Account Summary

Note: You have not selected any STEERS program areas for your account. You cannot generate a STEERS Participation Agreement until you complete setting up your account by adding at least one program area below.

Your account security questions have been saved.

STEERS Access

Select STEERS Program to Add or Modify:

-- Select program to add or modify --

- Aggregate Production Operations Registration (EPR_APO)
- Air Emissions and Maintenance Events (AEME)
- Air New Source Review (EPR_NSR)
- Annual Emissions Inventory Report (AEIR)
- CAFO General Permit (EPR_CAFO)
- Discharge Monitoring Report (DMR)
- Emissions Banking and Trading (EBT)
- Industrial and Hazardous Waste (IHW)
- Municipal Solid Waste (MSW)
- Municipal Solid Waste Notifications (EPR_MSW)
- Occupational Licensing Computer Based Testing (CBT)
- Pesticide General Permit (EPR_PESTGP)
- Petroleum Storage Tank (PST)
- Pollution Prevention Planning (P2PLAN)
- Public Drinking Water - Laboratories (PDWLAB)
- Public Drinking Water - Systems (PDWSYS)
- Storm Water General Permits (EPR_SW)
- Training Rosters Online Submittal (TROLS)

Go

Filling Out the Application

New Initial Issuance permits

- Enter Title V General Information

Title V General Information - New

★ 1. Permit Latitude Coordinate: Deg Min Sec

★ 2. Permit Longitude Coordinate: Deg Min Sec

★ 3. Is this submittal a new application or an update to an existing application?

★ 3.1. What type of Federal Operating Permit are you applying for?

★ 3.2. Is this submittal an abbreviated or a full application?
If this submittal is a follow-up to an abbreviated application, please change your response to the above question 3 to "Update".

★ 3.3. Is this application for a portable facility?

★ 3.4. Is the site a non-major source subject to the Federal Operating Permit Program? No

★ 3.5. Are there any permits that should be voided upon issuance of this permit application through permit conversion?

★ 3.6. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?

★ 4. Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?

Filling Out the Application

Existing permits

- Enter Title V General Information

Title V General Information - Existing

★ 1. Permit Type: SOP

2. Permit Latitude Coordinate: Deg Min Sec

3. Permit Longitude Coordinate: Deg Min Sec

★ 4. Is this submittal a new application or an update to an existing application? New Application

★ 4.1. What type of permitting action are you applying for?

Change of Ownerships and Company Name Change requests are not processed through ePermits at this time. If such a request is needed, please contact the Air Permits Division for further guidance.

--Select One--

★ 5. Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements? No

Activities Next/Save

Filling Out the Application

? Title V Attachments New

Attach OP-1 (Site Information Summary)

Allowed file types: pdf, doc, wpd, txt, docx

+ Choose..

Attach OP-ACPS (Application Compliance Plan and Schedule)

Allowed file types: pdf, doc, wpd, txt, docx

+ Choose..

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

Allowed file types: pdf, doc, wpd, txt, docx

+ Choose..

Enter Title V Applicable Attachments



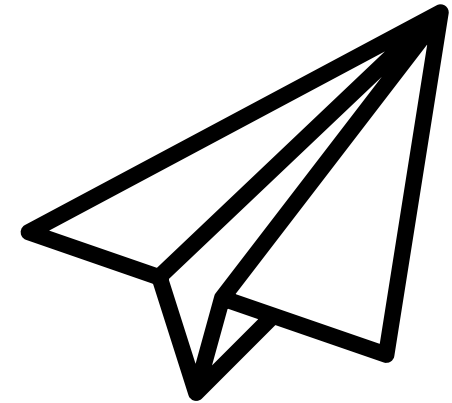
Submitting Application Updates

Using STEERS

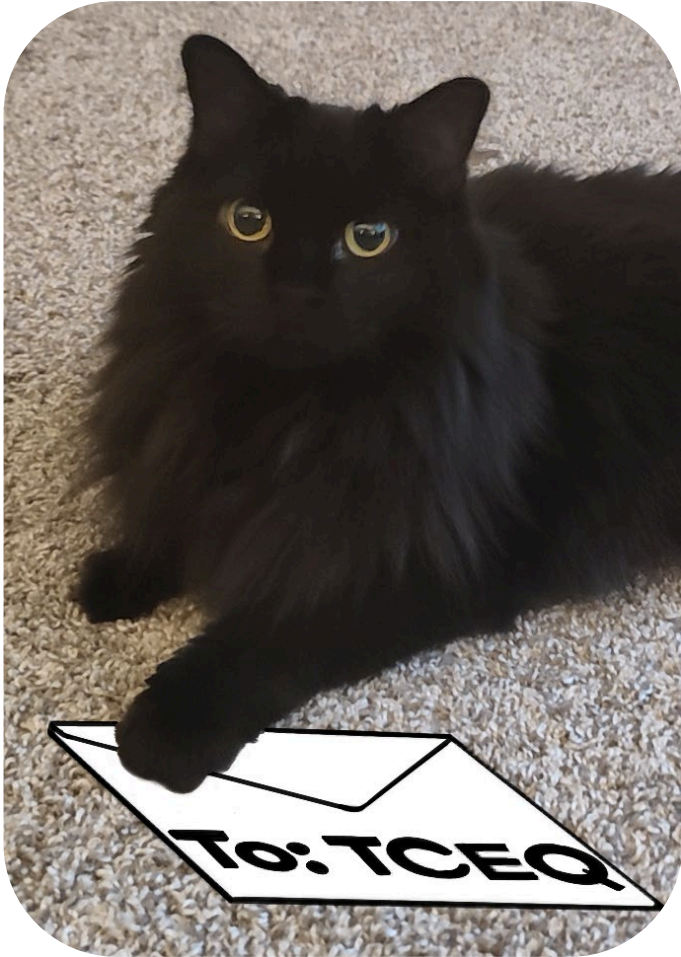
- All follow-ups to abbreviated applications must be submitted through STEERS

Using Email/Physical Mail

- Updates submitted via this method must be certified



Application and Application Update Certification



New Application Submittals

- Must be submitted and signed through STEERS by either the Responsible Official or Duly Authorized Representative

Application Updates

- Submitted via STEERS
- Submitted via Email or Physical Mail

Common STEERS Questions

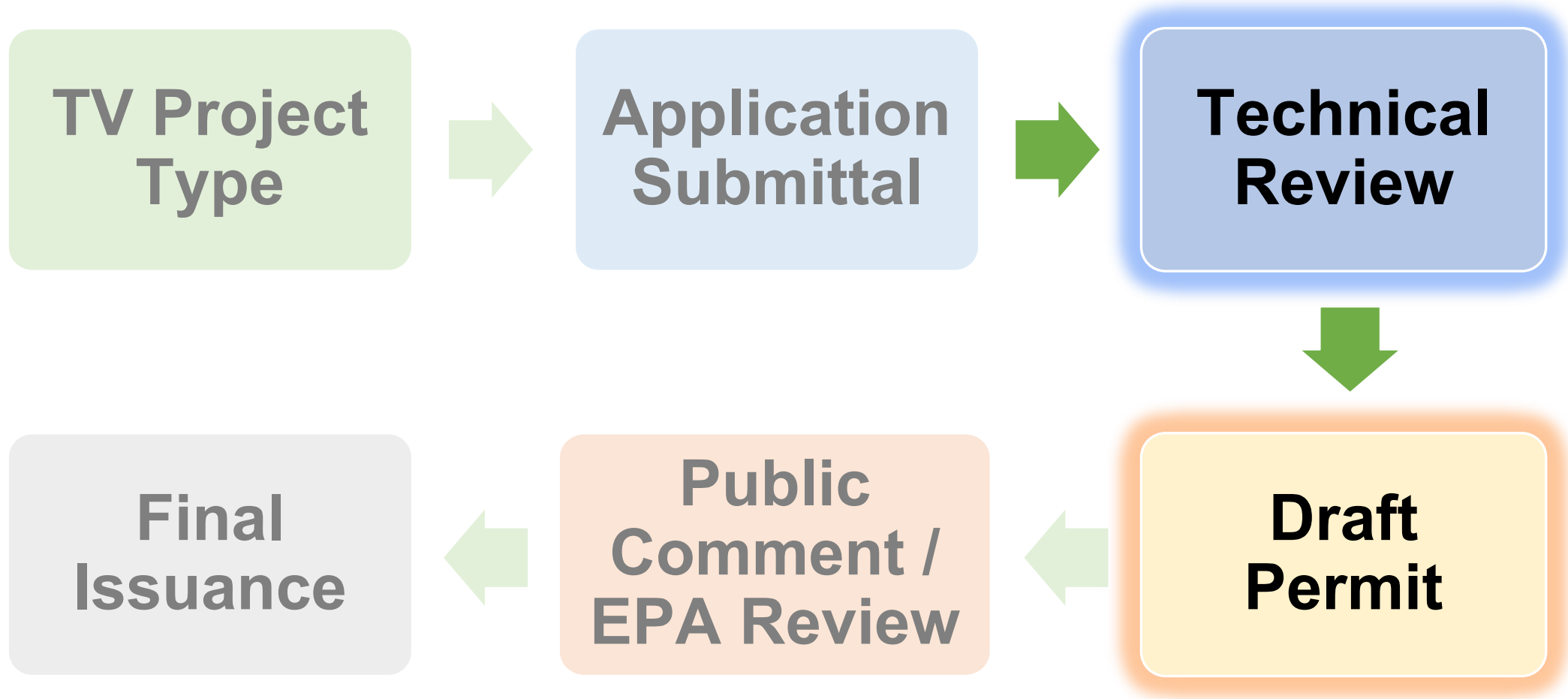
I have a document/form to submit that does not have its own attachment field. How do I send it?

What happens if I have an untimely renewal?

I was able to sign the STEERS submission, why isn't the information certified?

What is an OP-NOTIFY?

Permitting Process (SOPs)



Working Draft Permit (WDP)

TCEQ Permit Reviewer

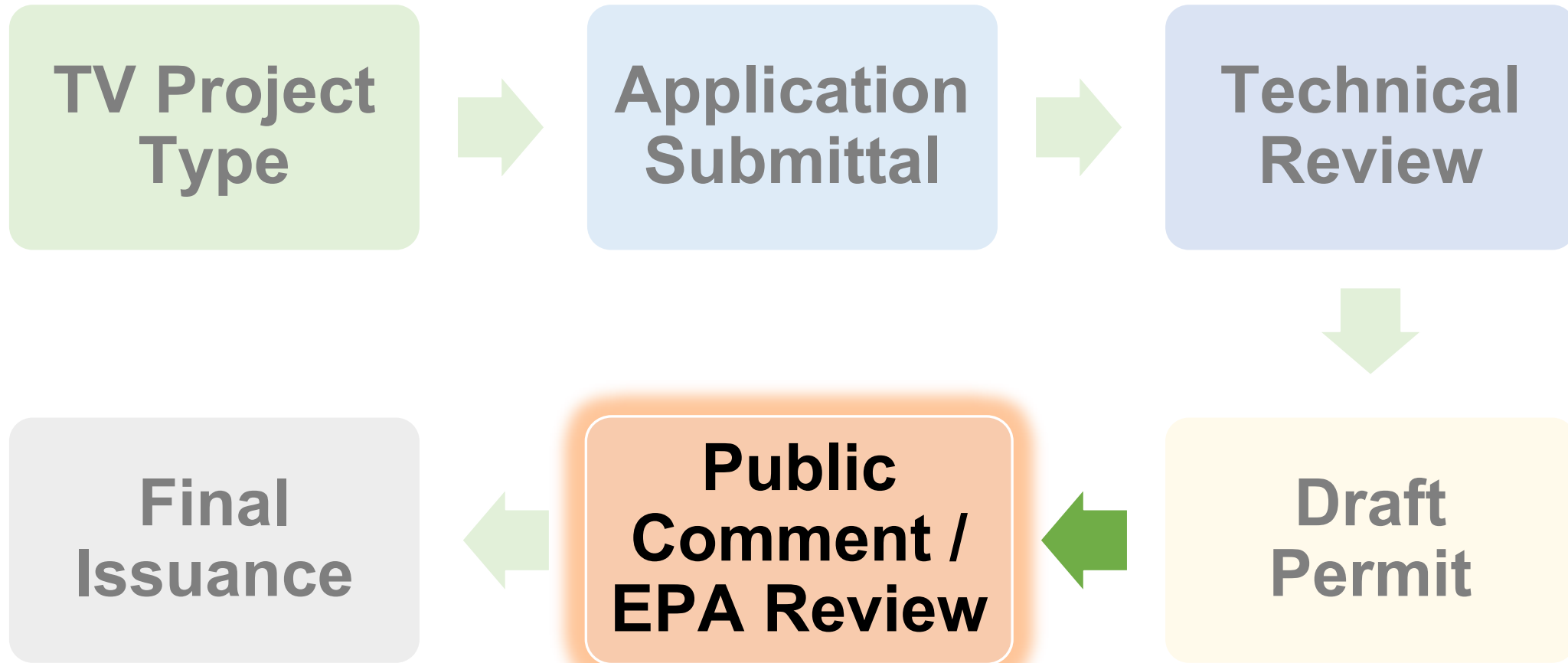
- Send deficiencies
- Review responses
- Prepare WDP
- Prepare PA/PNAP



Applicant

- Address deficiencies
- Provide necessary updated forms
- Review WDP
- Certify updates prior to PA/PNAP

Permitting Process (SOPs)



Public Notification

Public Notice (PNAP)

- Initial, Renewal, Significant Revision
- Applicant publishes notice
- 30-day public comment period
- 45-day EPA review starts after notification of publication

Public Announcement (PA)

- Minor Revision
- TCEQ posts announcement online
- 30-day public comment period
- 45-day EPA review starts with public comment period

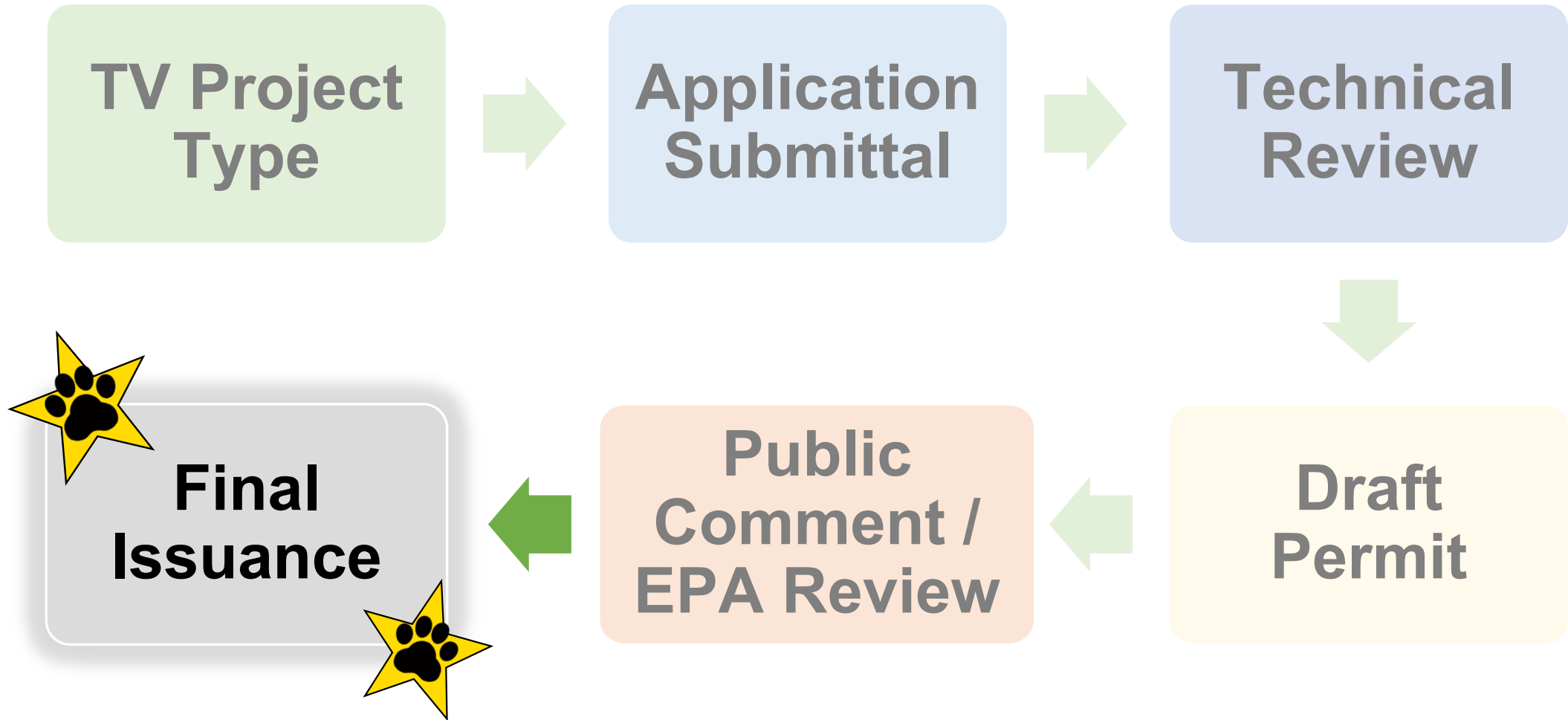
Administratively complete applications (determined by APIRT) and technically complete applications for SOPs get posted online

EPA Review



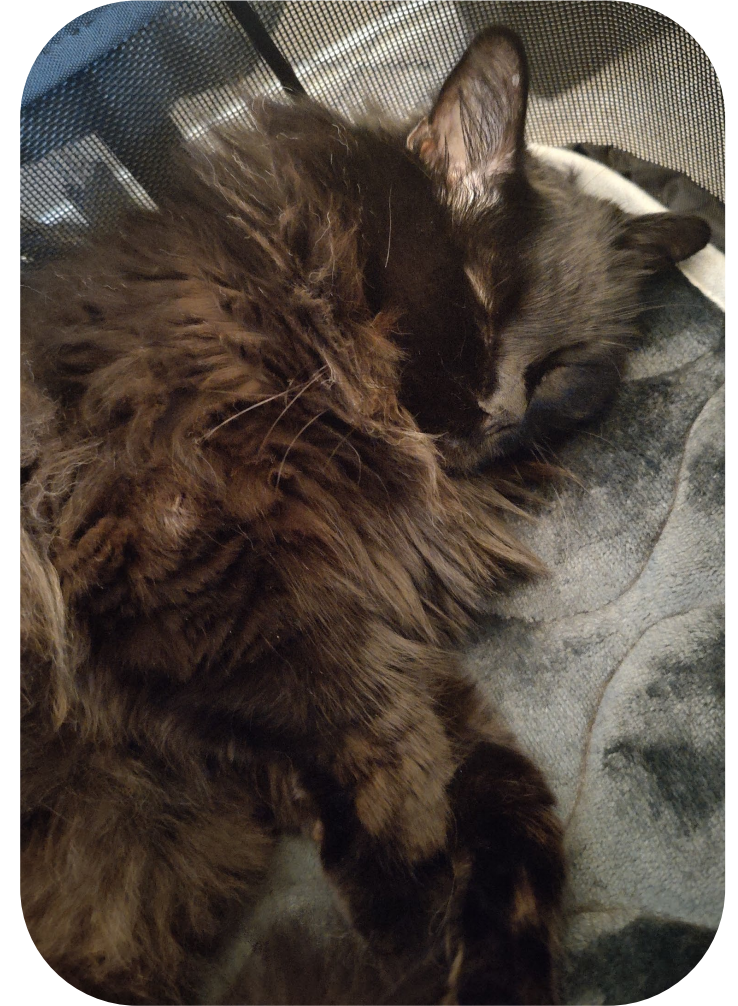
- 45-day review is concurrent with public notice or public announcement
- Stops if public comments are received
- 45-day review starts over after comments are addressed

Permitting Process (SOPs)



Final Action – Next Steps

- **TCEQ issues permit**
- **60-day public petition period**
 - EPA may receive petition to object to issued permit
 - EPA may grant or deny the petition in full or in part by an order
 - TCEQ works with applicants to resolve granted objection items
 - Permit, permit record, or both may be modified



SOPs vs GOPs

Site Operating Permits

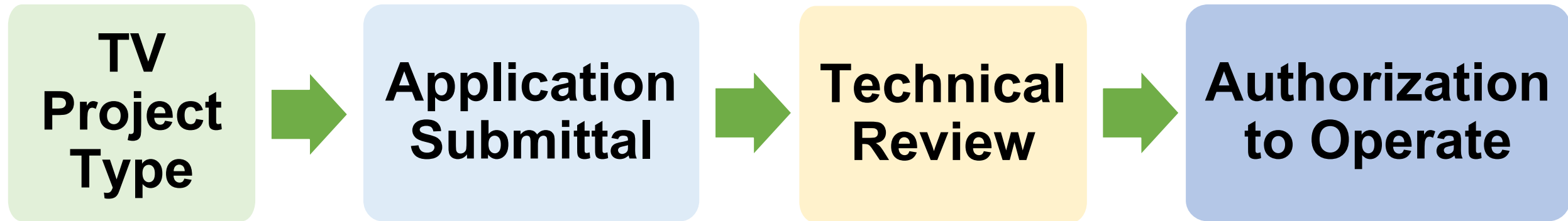
- Site specific permits - Sites can vary considerably
- Involves a Working Draft Permit (WDP) cycle
- Has Public Comment and EPA Review periods
- Applicant receives an individual federal operating permit

General Operating Permits

- General permits - Sites are similar in terms of operation, emission units, and applicable requirements
- Applicant receives an Authorization to Operate (ATO); the GOP application is federally enforceable
- GOPs go to public notice and EPA review but ATOs do not



Permitting Process (GOPs)



Title V Updates

GOP Renewals

San-Antonio Non-Attainment Area Classification

UA Forms in Excel

GOP Renewals

GOP 517 (MSW) was renewed on Feb 24, 2025

Applications were due end of May if your site was affected by changes/revisions

GOPs 511, 512, 513, 514 – Oct 15, 2025

Public Comment Period: 2/28/25 - 3/31/25

GOP 518 (ACI) – April 30, 2026

Proposed Public Comment Period: Fall 2025

NAAQS Non-Attainment Area Reclassification

San Antonio Non-Attainment Area was reclassified from "Moderate" to "Serious" on July 24, 2024

- Threshold for criteria pollutants changed from 100 tpy to 50 tpy
- Deadline for affected areas to submit Title V action is 1 year from the effective date of the change (July 24, 2025)



UA Forms in Excel

- OP-UA Forms are being converted to an Excel format
- Forms OP-SUM and OP-REQ2 are being consolidated into each OP-UA form.
- Standalone OP-REQ2 being created.

UA Forms in Excel



UA Forms in Excel

	A	B	C	D	E	F	G	H	I	J	K
1	Form OP-SUM - Individual Unit Summary										
2	Table 1										
3											
4	Unit AI	Revision No.	Unit ID No.	Group ID No.	Unit Name/Description	CAM	PCA AI	Preconstruction Authorization (PCA) Category	Authorization/Registration Number	Permit By Rule (PBR) Number	PBR Effective Date
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OP-SUM Table 2
OP-REQ2
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UA Forms in Excel

	A	B	C	D	E	F
1	Form OP-REQ2 - Negative Applicable/Superseded Requirement Determinations					
2						
3						
4	Unit AI	Revision No.	Unit ID No.	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
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UA Forms in Excel

	A	B	C	D	E	F
1	Negative Applicable/Superseded Requirement Determinations					
2	Form OP-REQ2					
3	Federal Operating Permit Program					
4	Texas Commission on Environmental Quality					
5						
6	Unit AI	Revision No.	Unit ID No.	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
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[OP-REQ2 Instructions](#)
[OP-REQ2](#)



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