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Department of the Navy
U. S. Naval Hospital, Pensacola, Florida
Facility ID No.: 0330086
Escambia County

Air Operation Permit
Permit No.: 0330086-002-AO

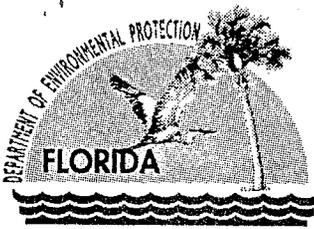
Permitting and Compliance Authority
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Air Operation Permit
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Jeb Bush
Governor

Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

David B. Struhs
Secretary

Permittee:
Department of the Navy

Permit No.: 0330086-002-AO
Facility ID No.: 0330086
SIC Nos.: 80
Project: Air Operation Permit

This permit is for the operation of a biological waste incinerator and three dual fuel steam boilers located at the U.S. Naval Hospital, 6000 West Highway 98, Pensacola, Escambia County; UTM Coordinates: Zone 16, 471.2 km East, and 3362.3 km North; Latitude: 30° 23' 55" North and Longitude: 87° 18' 02" West.

STATEMENT OF BASIS: This air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix G-1, General Conditions
Naval Hospital Instruction 6280.1B

Effective Date: September 9, 1999
Renewal Application Due Date: April 12, 2004
Expiration Date: June 11, 2004

**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

Ed K. Middleswart, P.E.
Air Program Administrator

EKM/rvk

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of the U. S. Naval Hospital, Pensacola, Florida, which includes emission units (EUs) 002, and 006. Emission unit 002 is a Consumat Systems, model C-120-1, natural gas fired biological waste incinerator with a maximum allowable operating rate of 93 pound of biological waste per hour. Emission unit 006 includes boilers 1, 2, and 3, which are dual fuel fired boilers (NG with FO as back up) with a maximum heat input of 20.9 MMBtu per hour.

Based on the permit application received April 30, 1999, this facility is not a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U.

ID No. Brief Description

002	Biological Waste Incinerator
006	Boilers 1, 2, and 3 respectively; three dual fuel steam boilers (primarily natural gas, with fuel oil as back up) each rated at 20.9 MMBtu/hr heat input

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s) on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are on file with permitting authority:

Permit Application received April 30, 1999 for the Biological Waste Incinerator

Permit Application received August 4, 1999 for the three steam boilers

Additional information Request dated August 19, 1999

Additional Information Response received August 26, 1999

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX G-1, GENERAL CONDITIONS, is a part of this permit.
2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants, which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b) 1. & 4., F.A.C.]
4. Prevention of Accidental Releases (Section 112(r) of CAA).
 - a. As required by rule, inspection, or change in process the owner or operator shall submit an updated Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center.
 - b. The owner or operator shall report to the Department of Community Affairs (DCA) within one working day of discovery of an accidental release of a regulated substance from the stationary source, if the owner or operator is required to report the release to the USEPA/Chemical Safety Hazard Investigation Board or the National Response Center under Section 112(r)(6).
 - c. The owner or operator shall submit the required annual registration fee to the DCA on or before June 21, 1999 and on April 1 annually thereafter, in accordance with Part IV, Chapter 252, F.S. and Rule 9G-21, F.A.C.
5. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]
6. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit two permit renewal applications using the current version of the renewal form along with the processing fee established in Rule 62-4.050(4), F.A., to the Northwest District office of the Department.
[Rule 62-4.090, F.A.C.]

7. The permittee shall submit all compliance-related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, Florida 32501-5794
Telephone: 850/595-8364; Fax: 850/595-8096

8. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (850) 595-8364, extension 1220, day or night, and for emergencies involving a significant threat to human health or the environment is (800) 320-0519. For routine business, telephone (850) 595-8364, then press 7, during normal working hours.
[Rules 62-210.700 and 62-4.130, F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U.

<u>ID No.</u>	<u>Brief Description</u>
002	Biological Waste Incinerator

This permit allows operation of a Consumat systems, model C-120-1, natural gas fired biological waste incinerator with a maximum allowable operating rate of 93 pounds of biological waste per hour and a secondary chamber residence time greater than one second at 1800°F.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Capacity. The maximum allowable operating rate is 93 pounds of biological waste per hour consisting of approximately 14% Type "O" waste (plastic), 71% Type II waste (refuse), 10% Type III waste (garbage) and 5% Type IV waste (pathological). The maximum heat input rate is 0.876 MMBtu/hr.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Permit AC17-237971 issued December 3, 1993]

A.2. Methods of Operation - (i.e., Fuels). The biological waste incinerator may be operated only using natural gas.

[Rules 62-4.160(2) and 62-213.440(1), F.A.C.; Permit AC17-237971 issued December 3, 1993]

A.3. Hours of Operation. The hours of operation for this emissions unit shall not exceed 12 hours/day, and 3120 hours/year. The permittee shall maintain an operation log available for Department inspection certifying the hours of operation.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Permit AC17-237971 issued December 3, 1993]

Emission Limitations and Standards

A.4. Emissions shall not exceed the following:

(a) No visible emission (5 percent opacity) except that visible emissions not exceeding 20 percent opacity are allowed for up to three minutes in any one hour period..

(b) No objectionable odor allowed.

(c) Particulate matter emissions shall not exceed 0.100 grains per dry standard cubic foot of flue gas, corrected to 7% O₂.

(d) Hydrochloric Acid (HCl) emissions shall not exceed 4.0 pounds per hour.

(e) Carbon monoxide (CO) shall not exceed 100 parts per million by volume, dry basis, corrected to 7% O₂ on an hourly average basis.

[Permit AC17-237971 issued December 3, 1993; Rule 62-296.401(4), F.A.C.]

Test Methods and Procedures

A.5. Visible Emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. The visible emissions tests shall be conducted in accordance with DEP Method 9 for one hour. When applicable, the VE test shall be conducted during one on the P.M. test runs. Such tests shall be conducted annually between January 1 and February 28. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing. [Rules 62-4.070, 62-296.401(4), 62-297.310(7), and 62-297.401(9), F.A.C.]

A.6. Emissions tests for particulate matter, carbon monoxide, and hydrochloric acid are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Such tests shall be conducted annually between January 1 and February 28, 2004. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing. [Rules 62-4.070, 62-296.401(4), 62-297.310(7), and 62-297.401(9), F.A.C.]

A.7. Test methods are as follows:

- a. The test method for carbon monoxide shall be EPA Method 10, incorporated and adopted by reference in Chapter 62-297, F.A.C.
- b. The test method for particulate emissions shall be EPA Method 5 or ~~26A~~, incorporated and adopted by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet.
- c. The test method for hydrochloric acid shall be EPA Method 26 or 26A, incorporated and adopted by reference in Chapter 62-297, F.A.C.

[Rules 62-4.070, 62-296.401(4), F.A.C.]

A.8. The test reports shall comply with applicable portions of F.A.C. Rule 62-297.310, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.310(7). Other test methods and alternate compliance procedures may be used only after prior departmental approval has been obtained in writing. [Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

A.9. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department. [Rules 62-297.310(2) and 62-4.070, F.A.C.]

Operation

A.10. The primary chamber shall not be charged unless the secondary chamber combustion zone temperature is equal to or greater than 1800°F. The unit shall be operated to provide a minimum 1.0 second gas residence time in the secondary chamber combustion zone of no less than 1800°F throughout the combustion process in the primary chamber.

[Rule 62-296.401(4), F.A.C; Permit AC 17-236971 issued December 3, 1993]

A.11. The permittee shall operate and continuously monitor performance of the biological waste incinerator in accordance with Naval Hospital Instruction 6280.1B, copy attached.

[Permit AC 17-236971 issued December 3, 1993; Permit AO17-253195, issued July 22, 1994]

A.12. This permit does not allow the incineration of radioactive or hazardous waste unless the waste is of such quantity to be exempt in accordance with DHRS Rule 10D91 or 10D-104.003, F.A.C., or Department Rule 62-730, F.A.C.

[Rule 62-296.401(4), F.A.C.]

A.13. The manufacturer's operating instructions shall be clearly posted and accessible to the facility operators.

[Permit AC 17-236971 issued December 3, 1993]

Monitoring of Operations

A.14. A continuous monitor shall be maintained and operated in accordance with the manufacturer's instructions to record the temperature where the 1.0 second gas residence time is obtained in the secondary combustion zone. A complete file of all measurements, including continuous emissions monitoring system, monitoring device, and performance testing measurements; all continuous emissions monitoring system performance evaluations; all continuous emissions monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required, shall be recorded in a permanent legible form available for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports and records.

[Rule 62-296.401(4), F.A.C.]

Training Requirements

A.15. Any operator of this biological waste incinerator shall be trained by the equipment manufacturer's representative or an equivalent organization using a state-approved training program.

a. The content of the training program shall be submitted to the Department for approval. Construction permit applicants shall submit a training program, or reference a previously submitted training program, with the construction permit application. The training shall provide a basic understanding of the principles of the combustion process, provide instruction on proper operating practices and procedures, and increase awareness of regulation

requirements and safety concerns. Training programs shall be minimum of 16 hours of instruction. The Department shall approve training programs which meet, at a minimum, the criteria set forth in the EPA Medical Waste Incinerator Operator Training Program Course Handbook EPA 453/B-93-018 and Instructor's Guide EPA 453/B-93-019.

b. A copy of the training certificate for each operator having satisfactorily completed the Department-approved training program must be submitted to the Department within 15 days of training. If the incinerator is modified to the extent that a Department construction permit is required, the operators shall be retrained to operate the modified incinerator. Owners of new and modified incinerators shall submit copies of the operator training certificates within 15 days after completion of the initial compliance test.

c. An operator's certificate must be kept on file at the facility for the duration of the operator's employment and for an additional two years after termination of employment. The owner shall not allow the incinerator to be operated unless it is operated by an operator who has satisfactorily completed the required training program.

[Rule 62-296.401(4), F.A.C.]

Recordkeeping and Reporting Requirements

A.16. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) **General.**

1. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal did not operate.

2. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) **Special Compliance Tests.** When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

[Rule 62-297.310(7), F.A.C.; and, SIP approved]

Section III. Emissions Unit(s) and Conditions.

Subsection B. This section addresses the following emissions unit(s).

E.U.

ID No. Brief Description

006 Three 20.9 MMBtu/hr heat input dual fuel (NG/FO) boilers

This emission unit includes three 20.9 MMBtu/hr dual fuel boilers (nos. 1, 2, and 3; previously emission units 003, 004, and 005) located at the Naval Hospital, Corry Field, Pensacola. The primary fuel for these boilers is natural gas; however, No. 2 fuel oil with a maximum of 0.5% sulfur may be used as backup in the event of natural gas unavailability. These boilers were initially permitted with operating permit AO17-26576 issued February 1, 1980 and evidently constructed in 1975. This precedes the applicability date of 40 CFR 60 Subpart Dc and the applicability date of July 15, 1989 for Rule 62-296.406 F.A.C. applicable to fossil fuel steam generators less than 250 MMBtu/hr heat input. The VE limits of 20% opacity while operating using natural gas, and a tiered VE limit while using fuel oil is for consistency with other NAS emission points.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Capacity. The maximum allowable operating rate is 20.9 MMBtu/hr heat input for each boiler.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; renewal permit application 0330086-002-AO received August 4, 1999]

B.2. Methods of Operation - (i.e., fuel). These boilers shall be primarily operated using natural gas. During natural gas curtailments, these boilers operate using fuel oil with a maximum sulfur content of 0.5%S by weight. The permittee shall maintain records available for Department inspection of fuel oil purchases and sulfur content, and usage.

[Rules 62-4.160(2) and 62-213.440(1), F.A.C.; Permit AC17-159628]

B.3. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

B.4. Visible emissions shall not exceed 20% under normal operation. When operating using no. 2 fuel oil, visible emissions shall not exceed 20% opacity except for one six-minute period per hour during which opacity shall not exceed 27% opacity.

[Permit AC17-159628, Rule 62-296.406, F.A.C.]

Test Requirements, Methods, and Procedures

B.5.a. Visible Emissions tests are required for each boiler to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. The visible emissions tests shall be conducted in accordance with EPA Method 9 for one hour. Such tests shall be scheduled between February 1st and March 31st, 2004. In addition tests for visible emissions are required while operating using fuel oil between February 1st and March 31st following each year in which any boiler burns fuel oil for more than 400 hours. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.

[Rules 62-4.070, 62-297.310(7), and 62-297.401(9), F.A.C.]

B.5.b. The test reports shall comply with applicable portions of F.A.C. Rule 62-297.310, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.310(7). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.

[Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

B.5.c. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.

[Rules 62-297.310(2) and 62-4.070, F.A.C.]

Recordkeeping and Reporting Requirements

B.6. The permittee shall maintain continuous records of fuel consumption or approximate fuel consumption based on hours of operation, and each analysis that provides the heating value and fuel sulfur content.

[Rule 62-4.070(3), F.A.C.]

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GENERAL CONDITIONS:

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1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of this permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and,
 - c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of noncompliance; and

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Appendix G-1

GENERAL CONDITIONS:

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- b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages, which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
 - c. and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages, which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.
12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.
13. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurement;
 - the person responsible for performing the sampling or measurement;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.
14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.