



Florida Department of Environmental Protection

Northeast District
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Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

PERMITTEE:

The Feldspar Corporation
Post Office Box 8
Edgar, Florida 32149

I.D. Number: 1070001
Permit/Cert Number: 1070001-013-AC
Date of Issue: March 25, 2008
Expiration Date: March 25, 2009
County: Putnam
Latitude/Longitude: 29°35'41"N; 81°57'13"W
UTM: E- (17) 407.7; N-3274.1
Project: Air Construction Permit

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62-212, 62-272, 62-296, 62-297 and 62-4. 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 department and made a part hereof and specifically described as follows:

PROJECT

The purposes of this project are for the:

- Installation of two dust collectors (Manufacturer: Flex-Kleen, Model: 120 WSW-225) to control Particulate Matter (PM) emissions from the Raymond Mill and No. 1 Sand Plant.
- Removal of No. 2 fuel oil and propane as permitted fuels for the Clay Dryer (EU 003) and No.1 Sand Dryer (EU 004).
- Development of an operation and maintenance (O&M) plan to reduce PM emissions.

One of the baghouse is to control PM emissions from No. 1 Sand Plant including bucket elevators, screens, conveyor belt transfer, bagging, and railcar/truck loading. The second baghouse is to control PM emissions from the clay plant including lump clay bucket elevator, lump clay and EPK product storage bins, railcar/truck loading, and bagging.

The baghouse is a pulse-jet dust collector that has 225 bags and a cloth area of 3,433 ft². Estimated airflow to the new baghouse is approximately 10,000 actual cubic feet per minute (acfm) resulting in an air-to-cloth ratio (filtering velocity) of 2.9 feet per minute.

FACILITY DESCRIPTION

On September 5, 2007, The Feldspar Corporation was acquired by IMERYS North America Ceramics. The Edgar facility mines and processes ore reserves comprised of silica sand and kaolin clay. The facility is a non-title V source.

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The permitted emissions units are as defined below

<u>E.U. ID No.</u>	<u>Brief Description</u>
001	No. 2 Sand Dryer with dry cyclone
002	Raymond Mill
003	Clay Dryer
004	No.1 Rotary Sand Dryer with wet cyclone

No.2 Sand Dryer (EU001). The moist sand feedstock is fed to the No.2 sand dryer feed hopper by a front end loader. The moist sand feedstock is transferred from the feed hopper to the dryer by a conveyor belt where the raw material moisture content is reduced from approximately 5.0 to 0.5 percent. The dried sand product is then transfer by a bucket elevator to two vibrating screens for sizing. From the storage bin, the sand product is loaded directly into railcars/trucks or transferred to the bagging area.

Raymond Mill (EU 002). The dried clay is conveyed by a screw conveyor from the lump clay storage bin to Raymond Mill. The Raymond Mill consists of a Flash Dryer for further moisture reduction prior to the grinding of dried clay. A baghouse (DCE Inc. Dalamatia Baghouse, series DLM 15, Model 2/6/15) is used to control particulate matter emissions from the mill and the fugitive PM source listed below.

- Bucket elevators
- Railcar loading
- Storage bins
- Small bagger
- Truck loading
- Large bagger

Clay Dryer (EU003). The moist clay feedstock is transferred by front-end loader to the Clay dryer feed hopper. The moist clay is then transferred from the feed hopper to the Clay Dryer by a conveyor belt where the raw material moisture content is reduced from approximately 42 to 8 percent. The dried clay from the Clay dryer is transferred and stockpiled in an enclosed storage building. Within the enclosed building, the dried clay is transferred by front-end loader to the lump clay storage bin bucket elevator and then transferred to the lump clay storage bin.

No.1 Rotary Sand Dryer (EU004). The moist sand feedstock is fed to the No.1 sand dryer feed hopper by a front end loader. The moist sand feedstock is transferred from the feed hopper to the dryer by a conveyor belt where the raw material moisture content is reduced from approximately 5.0 to 0.5 percent. The dried sand product is then transfer by a bucket elevator to two vibrating screens for sizing. The screened product next flows to the primary storage bin. From the primary storage bin, the product is either loaded directly into railcars/trucks or transferred to secondary screening.

OPERATING LOCATION

Located at 651 Keuka Road (County Road C-20A), Edgar, Putnam County, Florida.

RULE APPLICABILITY

The unit is subject to the following regulations:

- Rule 62-296.320, F.A.C. – General Pollutant Emissions Emitting Standards

ATTACHED APPENDICES ARE MADE A PART OF THIS PERMIT

Appendix GC General Conditions

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RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

Application for Air Permit - Non-Title V Source received December 31, 2007.

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EMISSIONS UNIT (S) SPECIFIC CONDITIONS:

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

1. Hours of Operation: The hours of operation for each emissions unit are as shown in the table below.

Emissions Unit	Hours of Operation
EU 001 – No.2 Sand Dryer	Shall not exceed 7000 hours per 12 consecutive months
EU 002 – Raymond Mill	No restriction
EU 003 – Clay Dryer	No restriction
EU 004 – No. 1 Rotary Sand Dryer	Shall not exceed 2000 hours per 12 consecutive months

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

2. Maximum Operating Rate: The maximum operating rates are listed below and shall not be exceeded without prior Department approval:

Emissions Unit	Process Description	Maximum Operation Rate
EU 001 – No.2 Sand Dryer	Sand Throughput Rate	30 tons/hour
	Maximum Heat Input Rate	4.3 MMBtu/hour
EU 002 – Raymond Mill	Clay Drying Rate	8 tons/hour
	Maximum Heat Input Rate	1.5 MMBtu/hour
EU 003 – Clay Dryer	Clay Drying Rate	7 tons/hour
	Maximum Heat Input Rate	19.0 MMBtu/hour
EU 004 – No. 1 Rotary Sand Dryer	Sand Throughput Rate	130 tons/hour
	Maximum Heat Input Rate	40 MMBtu/hour

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

3. Permitted Fuel: All the emissions units are natural gas fired only.

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

EMISSION LIMITATIONS AND STANDARDS

4. Particulate Matter (PM) Emission Limits: The maximum allowable PM emissions rates for each emissions unit are as follows:

Emissions Unit	Emissions Limit		Basis
	Lbs/hour	Tons/year	
EU 001	4.52	15.82	Ambient Air Quality Standards (AAQS) Analysis 1990, Rule 62-210.200(PTE), F.A.C.
EU 003	3.0	13.14	
EU 004	10.0	10.0	

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EMISSIONS UNIT (S) SPECIFIC CONDITIONS

5. No.1 Rotary Sand Dryer - Wet Cyclone Pressure Drop Monitoring Requirements: The pressure switch, located in the water supply line ahead of the water sprays in the spray section of the feed duct to the cyclone dust collector, shall be maintained such that the main stack exhaust fan, dryer, and dryer feed conveyor will immediately shutdown in the event the water pressure drop below 20 psi (the minimum operating level).
[Permit No. 1070001-005-AO]
6. General Visible Emissions Standard: Except for emissions unit 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 discharge 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 Ringelmann Chart (20% opacity). Compliance shall be determined by EPA Method 9 upon Department's request, incorporated and adopted by reference in Rule 62-297, F.A.C.
[Rule 62-296.320(4)(b) 1., F.A.C.]
7. Industrial, Commercial, and Municipal Open Burning Prohibited. Open burning in connection with industrial, commercial, or municipal operations is prohibited, except when:
 - (a) Open burning is determined by the Department to be the only feasible method of operation and is authorized by an air permit issued pursuant to Chapter 62-210 or 62-213, F.A.C.; or
 - (b) An emergency exists which requires immediate action to protect human health and safety.[Rule 62-296.320(3), F.A.C.]
8. Operation and Maintenance (O&M) Plan: The facility shall develop and implement an operation and maintenance (O&M) plan to minimize the PM emissions from the regulated emissions points and the facility wide fugitive PM emissions. These procedures shall include the followings:
 - a. Daily inspections of all process equipments and the emissions control system to identify any equipment leaks or malfunctions during the days when operating.
 - b. Conduct repair/corrective action as soon as possible once the leaks or malfunctions are identified.
 - c. Daily monitoring of the pressure drop for each control unit system during the days when operating. The control unit's pressure drop shall be operated in the range of manufacturer's recommendation. The pressure drop shall be recorded on a daily basis during the days when operating.
 - d. Daily inspection on the stack visible emissions from each dryers and baghouses during the day when operating. If an unusual high visible emission (compare to normal) is observed, the operator shall evaluate the process equipment and the control unit (if any) in order to conduct corrective action to bring the visible emissions back to normal.
 - e. Watering, or an equivalent method, shall be implemented, for facility unpaved roads, on an as needed basis, to reduce fugitive PM emissions due to truck traffic.

Upon the Department's request, the facility shall revise the O&M plan to make necessary changes to reduce fugitive PM emissions. The revision of the O&M plan does not require permit revision. The plan (with the latest revision) shall be kept on site at all times.
[Applicant's proposal received December 31, 2007]

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9. Unconfined Emissions of Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.
[Rule 62-296.320 (4)(c), F.A.C.]
10. Circumvention: No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
[Rule 62-210.650, F.A.C.]
11. Excess Emissions: Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

COMPLIANCE DEMONSTRATION AND PERFORMANCE TESTING

12. Standard Testing Requirements: All required emissions test (s) shall be conducted in accordance with the procedures and requirements of Rule 62-297, F.A.C.
[Rule 62-297.100, F.A.C.]
13. Test Method (s): The owner or operator shall demonstrate compliance with the emissions limit with the test methods as described in the table below.

Compliance Demonstration For	Test Method	Description
PM Limit	EPA Method 1 through 4	Method for determining traverses points, velocity, flow rate, gas analysis, and moisture content. These methods shall be performed as necessary to support other methods.
	EPA Method 5	Method for determining the Particulate Matter Emissions.

The above EPA methods are specified in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C.
[Rule 62-297.401, F.A.C.]

14. PM Compliance Test Frequency: The owner or operator shall conduct a performance test, with the test method specified in Specific Condition No.13, to demonstrate compliance with the PM emissions limit (as specified in Specific Condition No.4) at least once every 5 years prior to permit renewal.
[Rule 62-297.310(7)(a), F.A.C.]
15. PM Compliance Test Requirements for EU 003: The owner or operator shall conduct a performance test, with the test method specified in Specific Condition No.13, to demonstrate compliance with the PM emissions limit for Clay Dryer (EU003) prior to obtaining the Air Operation Permit. The subsequent testing frequency for EU 003 shall be in accordance to the requirements of specific condition No. 14.
[Rule 62-4.030 and 62-297.310(7) (b), F.A.C.]

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EMISSIONS UNIT (S) SPECIFIC CONDITIONS

16. Operating Rate During Testing. Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operating at permitted capacity as defined below. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. [Rules 62-297.310(2), F.A.C.]
17. 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 shall 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) (b), F.A.C.]

NOTIFICATION, RECORDKEEPING AND REPORTING REQUIREMENTS

18. Compliance Test Notification. 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. [Rule 62-297.310(7) (a) 9, F.A.C.]
19. Malfunction Notification. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the NED Air Program immediately in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
20. Plant Operation – Problems: If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. [Rule 62-4.130, F.A.C.]
21. Recordkeeping: The owner or operator shall maintain the following records onsite for at least 3 years.
- Monthly hours of operation for EU 001 and EU 004. The latest monthly record shall be added to the hours of operation from previous 11 consecutive months to obtain hours of operation for 12-consecutive months.
 - All the test reports.
 - A copy of O & M plan.
 - Inspections (pressure drop, opacity reading, leaks, and etc.) and corrective actions records.
- [Rule 62-4.030 and 62-4.160 (14)(b), F.A.C.]

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EMISSIONS UNIT (S) SPECIFIC CONDITIONS

22. Test Reports. The owner and operator shall comply with the following reporting requirements.
- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
 - (b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
 - (c) The test report shall provide sufficient detail about the emissions unit tested and the test procedures used according to the requirements of F.A.C. Rule 62-297.310 (8)(c).
- [Rule 62-297.310(8), F.A.C.]

ADMINISTRATIVE

23. The I.D. No. and Project name for this source shall be used on all correspondence.
24. Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.
25. Modifications. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rule 62-210.300(1), F.A.C.]
26. New or Additional Conditions. For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080(1), F.A.C.]
27. General Conditions. The owner or operator is subject to and shall operate under the General Permit Conditions as described in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes.
[Rule 62-4.160, F.A.C.]
28. All reports, tests, notifications or other submittals required by this permit shall be submitted to the:

Department of Environmental Protection
Northeast District – Air Program
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256
Telephone: 904/807-3300
Fax: 904/448-4366

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29. A completed Application for Air Permit -Non-Title V Source (DEP Form No. 62-210.900(3), F.A.C.), shall be submitted to the Department at least 60 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, processing fee, and compliance test reports as required by this permit.
[Rules 62-4.055 and 62-4.220, F.A.C.]

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Christopher L. Kirts, P. E.
District Air Program Administrator

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APPENDIX GC - GENERAL CONDITIONS [RULE 62-4.160]

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 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. Neither 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 is not 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, as 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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor 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.

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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 non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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 prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the 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 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards (NSPS)

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14. 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 measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. 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 that 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.