



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 NORTH HILTON • BOISE, IDAHO 83706 • (208) 373-0502

JAMES E. RISCH, GOVERNOR  
TONI HARDESTY, DIRECTOR

July 28, 2006

**Certified Mail No. 7005 1160 0000 1550 0870**

LeRoy B. Pope  
President  
Idaho Energy Limited Partnership - Energy Products of Idaho  
4006 Industrial Avenue  
Coeur d'Alene, ID 83815-8928

RE: Facility ID No. 055-00043, Energy Products of Idaho, Coeur d'Alene  
Final Permit Letter

Dear Mr. Pope:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-050112 to Energy Products of Idaho, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received May 3, 2005. This permit is effective immediately and replaces PTC No. 055-00043, issued November 9, 1994, the terms and conditions of which shall no longer apply. This permit does not release Energy Products of Idaho from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Coeur d'Alene Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator  
Air Quality Division

MB/SYC/bf

Permit No. P-050112

Enclosures

- c: **Dan Redline, Coeur d'Alene Regional Office**
- Bill Rogers, Permit Coordinator**
- Shawnee Chen, P.E., Permit Writer**
- Marilyn Seymore/ Pat Rayne, Air Quality Division**
- Laurie Kral, US EPA Region 10**
- Permit Binder**
- Source File**
- Phyllis Heitman (Ltr Only)**
- Reading File (Ltr Only)**



**Air Quality  
PERMIT TO CONSTRUCT**  
**State of Idaho  
Department of Environmental Quality**

**PERMIT No.:** P-050112  
**FACILITY ID No.:** 055-00043  
**AQCR:** 62                      **CLASS:** SM  
**SIC:** 3443                      **ZONE:** 11  
**UTM COORDINATE (km):** 512.5, 5285.4

**1. PERMITTEE**  
Idaho Energy Limited Partnership – Energy Products of Idaho

**2. PROJECT**  
Permit to Construct Modification

<b>3. MAILING ADDRESS</b> 4006 Industrial Avenue	<b>CITY</b> Coeur d'Alene	<b>STATE ID</b>	<b>ZIP</b> 83814
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<b>4. FACILITY CONTACT</b> LeRoy B. Pope	<b>TITLE</b> President	<b>TELEPHONE</b> (208) 765-1611
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<b>5. RESPONSIBLE OFFICIAL</b> LeRoy B. Pope	<b>TITLE</b> President	<b>TELEPHONE</b> (208) 765-1611
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<b>6. EXACT PLANT LOCATION</b> Approximately 0.4 miles west of the Atlas Road and Industrial Avenue	<b>COUNTY</b> Kootenai
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**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**  
Pilot combustor facility

**8. GENERAL CONDITIONS**

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.

  
TONI HARDESTY, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY

**DATE ISSUED:** July 28, 2006

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## **Acronyms, Units, and Chemical Nomenclature**

<b>acfm</b>	<b>actual cubic feet per minute</b>
<b>AQCR</b>	<b>Air Quality Control Region</b>
<b>CFR</b>	<b>Code of Federal Regulations</b>
<b>CO</b>	<b>carbon monoxide</b>
<b>CEMS</b>	<b>continuous emissions monitoring system</b>
<b>DEQ</b>	<b>Department of Environmental Quality</b>
<b>EPA</b>	<b>U.S. Environmental Protection Agency</b>
<b>EPI</b>	<b>Idaho Energy Limited Partnership, Energy Product of Idaho</b>
<b>gal/hr</b>	<b>gallons per hour</b>
<b>IDAPA</b>	<b>a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act</b>
<b>km</b>	<b>kilometer</b>
<b>lb/hr</b>	<b>pound per hour</b>
<b>MMBtu</b>	<b>million British thermal units</b>
<b>NO<sub>x</sub></b>	<b>nitrogen oxides</b>
<b>O&amp;M</b>	<b>Operations and Maintenance</b>
<b>PM<sub>10</sub></b>	<b>particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers</b>
<b>PTC</b>	<b>permit to construct</b>
<b>RDF</b>	<b>refuse derived fuel</b>
<b>SIC</b>	<b>Standard Industrial Classification</b>
<b>SM</b>	<b>synthetic minor</b>
<b>SO<sub>2</sub></b>	<b>sulfur dioxide</b>
<b>TDF</b>	<b>tire derived fuel</b>
<b>T/yr</b>	<b>tons per year</b>
<b>UTM</b>	<b>Universal Transverse Mercator</b>

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050112**

<b>Permittee:</b>	Idaho Energy Limited Partnership – Energy Products of Idaho	<b>Facility ID No.</b> 055-00043	<b>Date Issued:</b>	July 28, 2006
<b>Location:</b>	Coeur d'Alene, Idaho			

**1. PERMIT TO CONSTRUCT SCOPE**

***Purpose***

- 1.1 This permit is a modification of the facility's existing PTC. The modified permit allows Energy Products of Idaho (EPI) to increase the operating hours of the fluidized bed waste incinerator, and to incinerate additional solid wastes such as biomass, waste coal, refuse derived fuel, tire derived fuel, sludge and other non-hazardous fuels in the fluidized bed waste incinerator.
- 1.2 This PTC replaces PTC No. 055-00043, issued November 9, 1994, the terms and conditions of which shall no longer apply.

***Regulated Sources***

- 1.3 Table 1.1 lists all sources of regulated emissions in this PTC.

**Table 1.1 SUMMARY OF REGULATED SOURCES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
2	The fluidized bed waste incinerator can be used to burn various solid waste fuels including biomass (plant materials and animal waste materials), coal, refuse derived fuel (RDF), tire derived fuel (TDF), sludge, and other to be determined non-hazardous fuel.	Emissions from the incinerator stack are controlled by a cyclone and a pulse-jet baghouse connected in series.

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**2. PILOT FLUIDIZED BED INCINERATOR**

**2.1 Process Description**

The fluidized bed waste incinerator is used for research and development to study various fuel characteristics in EPI's combustion process. The information is necessary for the development of full-scale combustion systems in determining pollution control, combustion, and material handling requirements. The fuels typically combusted in the incinerator include industrial byproducts of non-toxic and non-hazardous types (wood waste, biomass, paper sludge, agricultural waste, etc). Additional solid wastes such as biomass, waste coal, refuse derived fuel, tire derived fuel, sludge and other non-hazardous fuels are allowed to be combusted in the incinerator by this permit.

**2.2 Emissions Control Description**

Emissions from the incinerator stack shall be controlled by a cyclone and a pulse-jet baghouse connected in series.

**Table 2.1 INCINERATOR DESCRIPTION**

<b>Emissions Unit(s) / Process(es)</b>	<b>Emissions Control Device</b>	<b>Emissions Point</b>
The fluidized bed waste incinerator	A cyclone and a pulse-jet baghouse connected in series.	Incinerator stack

***Emissions Limits***

**2.3 Emissions Limit for Incinerators**

Emissions of particulate matter shall not exceed 0.2 pounds per 100 pounds of refuse burned as required in IDAPA 16.01.01.786 (Rules for the Control of Air Pollution in Idaho).

**2.4 Emissions Limits**

The PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, and CO emissions from the incinerator stack shall not exceed any corresponding emissions rate limits listed in Table 2.2.

**Table 2.2 THE INCINERATOR EMISSIONS LIMITS**

<b>Source Description</b>	<b>PM<sub>10</sub></b>		<b>SO<sub>2</sub></b>		<b>NO<sub>x</sub></b>		<b>CO</b>	
	<b>lb/hr</b>	<b>T/yr</b>	<b>lb/hr</b>	<b>T/yr</b>	<b>lb/hr</b>	<b>T/yr</b>	<b>lb/hr</b>	<b>T/yr</b>
The incinerator	2.4	0.72	41	7.45	---	12.43	---	2.12

**2.5 Toxic Air Pollutants**

For each fuel, except for tobacco sludge, coal, refuse derived fuel (RDF), and tire derived fuel (TDF) that their respective testing data in the application have demonstrated compliance with IDAPA 58.01.01.161 and 203.03, and wood waste, paper sludge, and agricultural waste that were originally permitted in the former November 9, 1994 permit, the permittee shall comply with preconstruction requirement for toxic air pollutants in accordance with IDAPA 58.01.01.161 and 203.03. Compliance with all applicable toxic

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air pollutant carcinogenic increments and toxic air pollutant non-carcinogenic increments, pursuant to IDAPA 58.01.01.585 and 586, shall demonstrate preconstruction compliance with Section 161.

**2.6 Opacity Limit**

Emissions from the incinerator stack, or any other stack, vent, or functionally equivalent opening associated with the incinerator stack, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

**Operating Requirements**

**2.7 Operations and Maintenance (O&M)**

Within 60 days of the permit issuance, the permittee shall have developed an O&M manual for the operation and maintenance of the incinerator and air pollution control equipment. The O&M manual shall describe the procedures that will be followed to comply with General Provision 2. The O&M manual shall contain at a minimum, the following information: a general description of the incinerator and air pollution equipment; a general discussion of the operation of the incinerator and air pollution control equipment; normal operating procedures; normal operating ranges; corrective action procedures when the incinerator and/or air pollution control equipment operates outside normal operating range(s); and maintenance procedures and maintenance frequency. The O&M manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

**2.8 Air Pollution Control Equipment Pressure Drop Monitoring Device**

The permittee shall install, calibrate, maintain and operate a pressure drop monitoring device to measure the pressure drop across the air pollution control equipment.

**2.9 Incinerator Afterburner Combustion Zone Temperature Monitoring Device**

The permittee shall install, calibrate, maintain and operate a temperature monitoring device to continuously measure the temperature in the afterburner combustion zone.

**2.10 Operation of Air Pollution Control Equipment**

At all times, the permittee shall operate the air pollution control equipment as follows:

- The permittee shall operate the air pollution control equipment in accordance with Permit Condition 2.7.
- Emissions from the incinerator stack shall be controlled by a cyclone and a pulse-jet baghouse (air pollution control equipment) connected in series.

**2.11 Incinerator Operation**

At all times, the permittee shall operate the incinerator as follows:

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<b>Location:</b>	Coeur d'Alene, Idaho			

- The permittee shall operate the incinerator in accordance with Permit Condition 2.7.
- Whenever the incinerator is combusting waste, the fluidized bed chamber afterburner combustion zone shall operate at a temperature no lower than 1,400°F.
- The incinerator shall combust wastes containing no more than 10% sewage sludge (dry basis) produced by municipal sewage treatment plants.
- The incinerator shall combust no more than 1,200 pounds of sewage sludge (dry basis) each day.
- The incinerator shall operate no more than 600 hours per any consecutive 12-month period as requested by the permittee.
- Ash shall be disposed in a manner which minimizes fugitive emissions and which meets all applicable federal, state, and local requirements.
- No hazardous waste, as defined in IDAPA 58.01.01.006.49, 40 CFR 261.3, or manifested waste, as defined at Idaho Code Section 39-4403(12), shall be incinerated in this unit without obtaining the applicable licenses and/or permits.
- The fluidized bed waste incinerator is allowed to burn various solid waste fuels including biomass (plant materials and animal waste materials), coal, refuse derived fuel (RDF), tire derived fuel (TDF), sludge, and other to be determined non-hazardous fuel when the permittee is in compliance with this permit.

### ***Monitoring and Recordkeeping Requirements***

#### **2.12 Compliance Tests**

- Compliance test in this permit means stack testing, continuous emissions monitoring (CEM), emissions calculations, and/or other method(s) approved by DEQ in the compliance test protocol.
- The permittee shall use CEMS, or DEQ-approved compliance method(s) to demonstrate compliance with the emissions limits for SO<sub>2</sub>, NO<sub>x</sub>, and CO as listed in Permit Condition 2.4. The permittee shall comply with CEMS performance requirements in Permit Condition 2.15 when CEMS are used to demonstrate compliance with the emissions limits for SO<sub>2</sub>, NO<sub>x</sub>, and CO.
- Within 30 days of incinerating a fuel type allowed by this permit; except for tobacco sludge, coal, refuse derived fuel (RDF), and tire derived fuel (TDF) that their respective testing data in the application have demonstrated compliance with IDAPA 58.01.01.161 and 210, and wood waste, paper sludge, and agricultural waste that were originally permitted on November 9, 1994; the permittee shall conduct compliance test using DEQ-approved compliance test protocol to demonstrate compliance with all applicable toxic air pollutants emissions limits pursuant to Permit Condition 2.5.
- For each compliance test, the permittee shall submit a compliance test protocol to DEQ for approval at least 30 days prior to each test date.
- For each compliance test, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present for any compliance test required by this permit. DEQ requests such testing not be performed on weekends or state holidays.

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- For each compliance test, the permittee shall submit a compliance test report to DEQ within 30 days following the date in which a compliance test required by this permit is concluded. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.
- For each compliance test, the proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following address:

Air Quality Permit Compliance  
Department of Environmental Quality  
Coeur d'Alene Regional Office  
2110 Ironwood Parkway  
Coeur d'Alene, ID 83814  
Phone: (208) 769-1422 Fax: (208) 769-1404

**2.13 Visible Emissions**

- For each fuel type and when the fuel type changes, the permittee shall conduct a visible emissions test on the incinerator stack during normal operation to demonstrate compliance with Permit Condition 2.6.
- During each visible emissions test, the permittee shall record the information listed in Permit Condition 2.14 as applicable.
- In accordance with IDAPA 58.01.01.625.04, the test method to conduct visible emissions estimation shall be EPA Method 9 (contained in 40 CFR 60) with the method of calculating opacity exceedances altered as follows:
  - Opacity evaluations shall be conducted using forms available from DEQ or similar forms approved by DEQ.
  - Opacity shall be determined by counting the number of readings in excess of the percent opacity limitation, dividing this number by four (each reading is deemed to represent 15 seconds) to find the number of minutes in excess of the percent opacity limitation. A minimum of 30 observations shall be recorded.
- The permittee shall submit a written report of the visual emission tests required in this permit condition to DEQ within 30 days of the test.

**2.14 Parametric Monitoring and Recordkeeping Requirements**

The permittee shall monitor and record the following information as directed. Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

- The type of fuel combusted in the incinerator, daily or more frequently when applicable.
- A quantitative and qualitative analysis of the compounds in the fuel type, for each fuel type.
- The sewage sludge content in the fuel type, for each fuel type.

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- The sewage sludge (dry basis) charging rate, whenever sewage sludge is combusted.
- Afterburner combustion zone temperature, continuously.
- Hours of operation, daily, monthly and annually.
- Pressure drop across the air pollution control equipment, weekly when operating.

**2.15 CEMS Operating Requirement**

The permittee shall properly calibrate, maintain, and operate the CEMS for SO<sub>2</sub>, NO<sub>x</sub>, and CO according to manufacturer's specifications and recommendations.

- The manufacturer's specifications and recommendation shall be kept on site at all times.
- The CEMS' calibration, maintenance, and operating records shall remain on site for the most recent two-year period.
- These records shall be made available to DEQ representatives upon request

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<b>Location:</b>	<b>Coeur d'Alene, Idaho</b>			

**3. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
  - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
  - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211.01 and 211.03:
  - A notification of the date of initiation of construction, within five working days after occurrence;
  - A notification of the date of completion/cessation of construction, within five working days after occurrence;
  - A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
  - A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
  - A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

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<b>Location:</b>	Coeur d'Alene, Idaho			

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.