

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

August 2, 2019

PERMIT TO INSTALL
84-19

ISSUED TO
Comfort Research, Inc.

LOCATED AT
1719 Elizabeth Avenue, NW
Grand Rapids, Michigan

IN THE COUNTY OF
Kent

STATE REGISTRATION NUMBER
N1916

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: July 26, 2019	
DATE PERMIT TO INSTALL APPROVED: August 2, 2019	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUHIRSCH	One Hirsch EPS bead expander with a capacity of approximately 1,500 pounds of beads per hour. The Hirsch expander will be used for the first, second, and third stage expansion.	4-1-2013 / 2-1-2016	FGEXPANDONLY, FGFUSION
EUCURING	29 curing nets used to hold the beads after expansion to allow them to stabilize before their intended use or further expansion.	9-1-2011 / 2-1-2016	FGEXPANDONLY, FGFUSION
EUCBBOILER1	6.275 MMBtu/hour natural gas fired boiler which would be exempt from Rule 201 permitting except it is part of a project that exceeded the PSD significant emission rate of 40 tpy for VOCs. Therefore, Rule 278 applies. However, no special permit conditions are required for this emission unit.	3-16-2012	NA
EUCBBOILER2	6.275 MMBtu/hour natural gas fired boiler which would be exempt from Rule 201 permitting except it is part of a project that exceeded the PSD significant emission rate of 40 tpy for VOCs. Therefore, Rule 278 applies. However, no special permit conditions are required for this emission unit.	3-16-2012	NA
EUSUPBOILER1	2 MMBtu/hour natural gas fired boiler which would be exempt from Rule 201 permitting except it is part of a project that exceeded the PSD significant emission rate of 40 tpy for VOCs. Therefore, Rule 278 applies. However, no special permit conditions are required for this emission unit.	9-1-2011	NA
EUFOAMSHRED	Foam shredder, exhausted inside the building which would be exempt from Rule 201 permitting except it is part of a project that exceeded the PSD significant emission rate of 40 tpy for VOCs. Therefore, Rule 278 applies. However, no special permit conditions are required for this emission unit.	9-1-2011	NA
EUMOLD	Molding machine for expanded EPS beads that the applicant believes qualifies for the Permit to Install exemption in Rule 290.	2-1-2016	FGFUSION

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGEXPANDONLY	EPS raw bead expansion process consisting of a Hirsch expander and 29 curing nets. When operating as part of FGEXPANDONLY, the Hirsch expander is used for the first, second, and third stage expansion. The 29 curing nets are used to hold the beads for curing after each stage of expansion.	EUHIRSCH, EUCURING
FGFUSION	EPS raw bead expansion process consisting of a Hirsch expander, 29 curing nets, and a molding machine. When operating as part of FGFUSION, the Hirsch expander is used for a single expansion stage. The curing nets are used to hold the expanded beads for curing between expansion and molding. This flexible group also includes a molding machine emission unit that the applicant believes qualifies for the Permit to Install exemption in Rule 290.	EUHIRSCH, EUCURING, EUMOLD

**FGEXPANDONLY
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

EPS raw bead expansion process consisting of a Hirsch expander and 29 curing nets. The Hirsch expander is used for the first, second, and third stage expansion. The 29 curing nets are used to hold the beads for curing after each stage of expansion.

Emission Unit: EUHIRSCH, EUCURING

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	89.55 tpy	12-month rolling time period as determined at the end of each calendar month	FGEXPANDONLY	SC VI.5	R 336.1702(a)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. EPS beads	VOC content 6.5 pounds per 100 pounds of EPS beads processed	Each shipment of EPS beads received	FGEXPANDONLY	SC VI.4	R 336.1225(1), R 336.1702(a)
2. EPS beads	30,800 pounds of beads per day ¹	Calendar day	FGEXPANDONLY First stage bead expander	SC VI.2	R 336.1225(1)
3. EPS beads	2,755,385 pounds of beads per year	12-month rolling time period as determined at the end of each calendar month	FGEXPANDONLY First stage bead expander	SC VI.3	R 336.1225(2), R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702(a))**
2. The permittee shall monitor and record, in a satisfactory manner, the throughput of EPS beads through the FGEXPANDONLY first stage expansion, in pounds, on a calendar day basis.¹ **(R 336.1225)**
3. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the throughput of EPS beads through the FGEXPANDONLY first stage expansion. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**
4. The permittee shall keep, in a satisfactory manner, a separate record of the pounds of VOC per 100 pounds of EPS beads for each shipment of EPS beads received. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**
5. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the VOC emission rate from FGEXPANDONLY, using a method acceptable to the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1702(a))**

VII. REPORTING

1. The following records, for each calendar month in which the data was collected and recorded, continuing for a period of one year after approval of Permit to Install No. 159-15, or longer upon the request of the AQD District Supervisor, shall be submitted to the AQD District Supervisor in an approved format within 30 days following the end of the calendar month:
 - a) EPS beads throughput for the first stage expansion per calendar day.
 - b) EPS beads throughput in pounds and tons for the first stage expansion per 12-month rolling time period as determined at the end of each calendar month.
 - c) Pounds of VOC per 100 pounds of EPS beads for each shipment of EPS beads received at the permittee's location.
 - d) Monthly records of VOC emissions using a method acceptable to the AQD District Supervisor.
 - e) The 12-month rolling time period records of VOC emissions, using a method acceptable to the AQD District Supervisor.

This reporting requirement may be discontinued, or reduced in frequency, with approval from the AQD District Supervisor upon submittal of a written request from the permittee. **(R 336.1225, R 336.1702(a))**

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-HIRSCH1	24 ¹	27 ¹	R 336.1225
2. SV-HIRSCH2	24 ¹	27 ¹	R 336.1225
3. SV-HIRSCHSTEAM	6 ¹	27 ¹	R 336.1225

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

**FGFUSION
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

EPS raw bead expansion process consisting of a Hirsch expander, 29 curing nets, and a molding machine. When operating as part of FGFUSION, the Hirsch expander is used for a single expansion stage. The curing nets are used to hold the expanded beads for curing between expansion and molding. This flexible group also includes a molding machine emission unit that the source claims is covered under exemption in Rule 290.

Emission Unit: EUHIRSCH, EUCURING, EUMOLD

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	24.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFUSION	SC VI.5	R 336.1702(a)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. EPS beads	VOC content 6.5 pounds per 100 pounds of EPS beads processed	Each shipment of EPS beads received	FGFUSION	SC VI.4	R 336.1225(1), R 336.1702(a)
2. EPS beads	4,500 pounds of beads per day ¹	Calendar day	FGFUSION First stage bead expander	SC VI.2	R 336.1225(1)
3. EPS beads	738,462 pounds of beads per year	12-month rolling time period as determined at the end of each calendar month	FGFUSION First stage bead expander FGFUSION	SC VI.3	R 336.1225(2), R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702(a))**
2. The permittee shall monitor and record, in a satisfactory manner, the throughput of EPS beads through the FGFUSION first stage expansion, in pounds, on a calendar day basis.¹ **(R 336.1225)**
3. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the throughput of EPS beads through the FGFUSION first stage expansion. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**
4. The permittee shall keep, in a satisfactory manner, a separate record of the pounds of VOC per 100 pounds of EPS beads for each shipment of EPS beads received. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**
5. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the VOC emission rate from FGFUSION, using a method acceptable to the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1702(a))**

VII. REPORTING

1. The following records, for each calendar month in which the data was collected and recorded, continuing for a period of one year after approval of Permit to Install No. 159-15, or longer upon the request of the AQD District Supervisor, shall be submitted to the AQD District Supervisor in an approved format within 30 days following the end of the calendar month:
 - a) EPS beads throughput for the first stage expansion per calendar day.
 - b) EPS beads throughput in pounds and tons for the first stage expansion per 12-month rolling time period as determined at the end of each calendar month.
 - c) Pounds of VOC per 100 pounds of EPS beads for each shipment of EPS beads received at the permittee's location.
 - d) Monthly records of VOC emissions using a method acceptable to the AQD District Supervisor.
 - e) The 12-month rolling time period records of VOC emissions, using a method acceptable to the AQD District Supervisor.

This reporting requirement may be discontinued, or reduced in frequency, with approval from the AQD District Supervisor upon submittal of a written request from the permittee. **(R 336.1225, R 336.1702(a))**

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-HIRSCH1	24 ¹	27 ¹	R 336.1225, 40 CFR 52.21(c)&(d)
2. SV-HIRSCH2	24 ¹	27 ¹	R 336.1225, 40 CFR 52.21(c)&(d)
3. SV-HIRSCHSTEAM	6 ¹	27 ¹	R 336.1225, 40 CFR 52.21(c)&(d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

FGFACILITY CONDITIONS

DESCRIPTION: The following conditions apply source-wide to all process equipment including equipment covered by other permits, grand-fathered equipment and exempt equipment.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	Less than 89.9 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)

II. MATERIAL LIMIT(S)

Material	Maximum VOC Content in pounds per 100 lbs of EPS Beads Processed	Annual Usage Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. EPS Beads	6.5	2,755,385 pounds per year	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(1)(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205)
2. The permittee shall keep the following information for FGFACILITY:

- a) Pounds of EPS beads processed per month and per 12-month rolling time period as determined at the end of each calendar month.
- b) VOC content, in pounds per 100 pounds of EPS beads processed, for each lot of beads.
- c) VOC emission calculations determining the monthly emission rate in tons per calendar month.
- d) VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **((R 336.1205))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).