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

March 20, 2020

PERMIT TO INSTALL
128-16B

ISSUED TO
Prefix Corporation

LOCATED AT
3500 Joslyn Road
Auburn Hills, Michigan 48326

IN THE COUNTY OF
Oakland

STATE REGISTRATION NUMBER
P0328

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: **December 13, 2019**	
DATE PERMIT TO INSTALL APPROVED: **March 20, 2020**	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_2e	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_2S	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
EU-DYNO1	Engine development and durability testing is performed in the test cell equipped with a dynamometer. The maximum gasoline (unleaded and leaded) or diesel usage per engine is 92 gallons/hour at full open throttle. The maximum output of an engine that can be tested while burning gasoline or diesel is 1,300 HP. The maximum natural gas usage per engine is 42 Gasoline Gallon Equivalents (GGE)/hour at full open throttle. The maximum output of an engine that can be tested while burning natural gas is 600 HP.	1/19/2017	FG-DYNOS
EU-DYNO2	Engine development and durability testing is performed in the test cell equipped with a dynamometer. The maximum gasoline (unleaded and leaded) or diesel usage per engine is 92 gallons/hour at full open throttle. The maximum output of an engine that can be tested while burning gasoline or diesel is 1,300 HP. The maximum natural gas usage per engine is 42 GGE/hour at full open throttle. The maximum output of an engine that can be tested while burning natural gas is 600 HP.	2/13/2017	FG-DYNOS
EU-DYNO3	Engine development and durability testing is performed in the test cell equipped with a dynamometer. The maximum gasoline (unleaded and leaded) or diesel usage per engine is 92 gallons/hour at full open throttle. The maximum output of an engine that can be tested while burning gasoline or diesel is 1,300 HP. The maximum natural gas usage per engine is 42 GGE/hour at full open throttle. The maximum output of an engine that can be tested while burning natural gas is 600 HP.	1/26/2018	FG-DYNOS

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
FG-DYNOS	Three individual engine test cells equipped with dynamometers.	EU-DYNO1, EU-DYNO2, EU-DYNO3

FG-DYNOS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Three individual engine test cells equipped with dynamometers.

Emission Unit: EU-DYNO1, EU-DYNO2, EU-DYNO3

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. CO	49.0 tpy	12-month rolling time period as determined at the end of each calendar month.	FG-DYNOS	SC VI.3	R 336.1205(1)(a) & (3), 40 CFR 52.21(d)
2. Lead	88.6 lb/3-month	3-month rolling time period as determined at the end of each calendar month.	FG-DYNOS	SC VI.3	R 336.1205(1)(a) & (3), 40 CFR 52.21(d)

Emission Factors for CO (rounded):

Gasoline (unleaded or leaded): 3.94 lb/gallon
Gasoline (unleaded or leaded) (WOT*): 6.49 lb/gallon
Natural Gas: 2.1 lb/GGE**
Natural Gas (WOT*): 3.5 lb/GGE**
Diesel: 0.13 lb/gallon
Diesel (WOT*): 0.2 lb/gallon

Emission Factors for Lead (rounded):

Unleaded Fuel: 0.00011 lb/gallon
Leaded Gasoline: 0.0115 lb/gallon or as determined based upon fuel receipts and approved by the AQD District Supervisor

*WOT = Wide Open Throttle
**GGE – Gasoline Gallon Equivalent
Where the conversion is 123.57 ft^3/GGE for natural gas

II. MATERIAL LIMIT(S)

1. The permittee shall only burn unleaded gasoline, leaded gasoline, diesel, and natural gas in FG-DYNOS. **(R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))**

2. The total gasoline (unleaded and leaded combined) usage for FG-DYNOS shall not exceed 500 gallons per calendar day. Of the 500 gallons, total gasoline usage shall not exceed 9.2 gallons per day while in operation under WOT. **(R 336.1205(1)(a) & (3), R 336.1225, 40 CFR 52.21(c) & (d))**

3. The natural gas usage for FG-DYNOS shall not exceed 500 GGE per calendar day. Of the 500 GGE, natural gas usage shall not exceed 378 GGE per day while in operation under WOT. **(R 336.1205(1)(a) & (3), R 336.1225, 40 CFR 52.21(c) & (d))**

4. The diesel usage for FG-DYNOS shall not exceed 500 gallons per calendar day. Of the 500 gallons, diesel usage shall not exceed 9.2 gallons per day while in operation under WOT. **(R 336.1205(1)(a) & (3), R 336.1225, 40 CFR 52.21(c) & (d))**

5. The leaded gasoline usage for FG-DYNOS shall not exceed 7,604 gallons per 3-months on a 3-month rolling time period as determined at the end of each calendar month. **(R 336.1205(1)(a) & (3), 40 CFR 52.21(d))**

6. The total gasoline (unleaded and leaded combined) usage for FG-DYNOS shall not exceed 15,000 gallons per year on a 12-month rolling time period as determined at the end of each calendar month. Of the 15,000 gallons, total gasoline (unleaded and leaded combined) usage shall not exceed 714 gallons per year on a 12-month rolling time period as determined at the end of each calendar month while in operation under WOT. **(R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))**

7. The natural gas usage for FG-DYNOS shall not exceed 10,000 GGE per year on a 12-month rolling time period as determined at the end of each calendar month. **(R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))**

8. The total diesel usage for FG-DYNOS shall not exceed 15,000 gallons per year on a 12-month rolling time period as determined at the end of each calendar month. Of the 15,000 gallons, total diesel usage shall not exceed 767 gallons per year on a 12-month rolling time period as determined at the end of each calendar month while in operation under WOT. **(R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, one or more devices to monitor the usage rates of unleaded gasoline, leaded gasoline, and diesel for FG-DYNOS on a continuous basis. **(R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 52.21(c) & (d))**

2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor the natural gas usage rate for FG-DYNOS on a continuous basis. **(R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 52.21(c) & (d))**

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 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))**

2. The permittee shall keep the following information on a daily basis for FG-DYNOS:
   a) Gallons of unleaded gasoline used per calendar day for both WOT and non-WOT operation separately.
   b) Gallons of leaded gasoline used per calendar day for both WOT and non-WOT operation separately.
   c) Total gasoline use calculations determining the daily usage rate in gallons per calendar day while in operation under WOT.
   d) Total gasoline use calculations determining the daily usage rate in gallons per calendar day for all operations combined (WOT and non-WOT).

e) GGE of natural gas used per calendar day while in operation under WOT.
f) GGE of natural gas used per calendar day for all operations combined.
g) Gallons of diesel used per calendar day while in operation under WOT.
h) Gallons of diesel used per calendar day for all operations combined.

The permittee shall keep the records in a 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 336.1225)**

3. The permittee shall keep the following information on a monthly basis for FG-DYNOS:
   a) Leaded gasoline use calculations determining the monthly usage rate in gallons per calendar month for both WOT and non-WOT operation separately.
   b) Unleaded gasoline use calculations determining the monthly usage rate in gallons per calendar month for both WOT and non-WOT operation separately.
   c) Leaded gasoline use calculations determining the 3-month usage rate in gallons per 3-month rolling time period as determined at the end of each calendar month.
   d) Total gasoline (unleaded and leaded combined) use calculations determining the annual usage rate in gallons per 12-month rolling time period as determined at the end of each calendar month for all operations combined.
   e) Total gasoline (unleaded and leaded combined) use calculations determining the annual usage rate in gallons per 12-month rolling time period as determined at the end of each calendar month while in operation under WOT.
   f) Natural gas use calculations determining the monthly usage rate in GGE per calendar month for both WOT and non-WOT operation separately.
   g) Natural gas use calculations determining the annual usage rate in GGE per 12-month rolling time period as determined at the end of each calendar month for all operations combined.
   h) Natural gas use calculations determining the annual usage in GGE per 12-month rolling time period as determined at the end of each calendar month while in operation under WOT.
   i) Diesel use calculations determining the monthly usage rate in gallons per calendar month for both WOT and non-WOT operation separately.
   j) Diesel use calculations determining the annual usage rate in gallons per 12-month rolling time period as determined at the end of each calendar month for all operations combined.
   k) Diesel use calculations determining the annual usage rate in gallons per 12-month rolling time period as determined at the end of each calendar month while in operation under WOT.
   l) CO emission calculations determining the monthly emission rate in tons per calendar month.
   m) CO emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
   n) Lead emission calculations determining the monthly emission rate in pounds per calendar month.
   o) Lead emission calculations determining the emission rate in pounds per 3-month rolling time period as determined at the end of each calendar month.

   The permittee shall keep the records in a 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(1)(a) & (3), R 336.1225, R 336.1702(a), CFR 52.21(c) & (d))**

4. The permittee shall keep, in a satisfactory manner, a daily record indicating if any dynamometers in FG-DYNOS were operated in WOT or otherwise. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(1)(a)(3), R 336.1225, 40 CFR 52.21 (c) & (d))**

5. The permittee shall keep, in a satisfactory manner, records of the maximum lead content in the leaded gasoline for each delivery. The permittee shall keep all records on file and make them available to the Department upon request. For reference: the review for this permit was based upon a maximum weight percent of 0.3 percent of tetraethyl lead in the fuel, yielding a lead emission factor of 0.0115 lb/gallon. **(R 336.1205(1)(a) & (3), 40 CFR 52.21(d))**

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify

the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of FG-DYNOS. **(R 336.1201(7)(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-1	24	30	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV-2	24	30	R 336.1225, 40 CFR 52.21(c) & (d)
3. SV-3	24	30	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. Each Individual HAP	Less than 8.9 tpy*	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	SC VI.2	R 336.1205(3)
2. Aggregate HAPs	Less than 22.4 tpy*	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	SC VI.2	R 336.1205(3)

* To establish the source-wide potential to emit for FGFACILITY, emissions from all existing equipment in FGFACILITY were included in the calculations. The potential emissions from FG-DYNOS were calculated using the fuel restrictions in FG-DYNOS. For all exempt equipment, the potential emissions of CO were calculated based on each piece of equipment operating at its maximum capacity for all hours of the year.

II. MATERIAL LIMIT(S)

NA

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))**

1. The permittee shall determine the HAP content of any material (coating, reducer, clean-up solvent, etc.) as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. **(R 336.1205(3))**

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 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(3))**

2. The permittee shall keep the following information on a monthly basis for FGFACILITY:
   a) Gallons or pounds of each HAP containing material (coating, reducer, clean-up solvent, etc.) used.
   b) Where applicable, gallons or pounds of each HAP containing material (coating, reducer, clean-up solvent, etc.) reclaimed.
   c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material (coating, reducer, clean-up solvent, etc.) used.
   d) Fuel usage for all fuels used in combustion sources and HAP emission factors for each fuel.
   e) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
   f) Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

   The permittee shall keep the records in a 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(3))**

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).