

STATE OF TN BOARD OF BOILER RULES

TRANSCRIPT OF PROCEEDINGS

June 15, 2022



April Howard, LCR

Chattanooga (423)266-2332 Jackson (731)425-1222
Knoxville (865)329-9919 Nashville (615)595-0073 Memphis (901)522-4477
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STATE OF TENNESSEE
BOARD OF Boiler Rules
June 15, 2022
220 French Landing Drive,
Nashville TN 37228 - Pearl Room
9:00 a.m.

TRANSCRIPT OF PROCEEDINGS

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(615)595-0073

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A P P E A R A N C E S

Board

Chairman: Brian Morelick

Jeffrey Henry

Dave Baughman

Also Present:

Chris O'Guin

Mike Ryan

Tom Herrod

Dewayne Scott

Michele Irion

Dan Bailey

Marty Toth

AUDIENCE

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P R O C E E D I N G S

(WHEREUPON, with a quorum of the Board of Boiler Rules, the following proceedings were had:)

THE CHAIRMAN: Good morning everybody. I want to welcome you to the June 15, 2022 Tennessee Board of Boilers Rules. I hope you picked up an agenda at the back table. And so this is what we will work off today.

Just a note, we have a very full agenda today as you can evidence by the number of participants that we have to present items, and we are going to be very efficient with your time. So bear with us as we get through this, and make sure that we hear what we need to hear and say what we need to say, and thank you for coming and presenting today.

So with that, I'm calling the meeting to order. Again, we are going to look at the adoption of the agenda that you have before you. I do have one addition to this agenda, and that is to add under approval of the March 16, 2022, meeting minutes. We are going to add a chief update after that item before we get into old business. Are

1 there any other corrections or additions to the
2 agenda? All right. Hearing none, do I have a
3 motion to be able to adopt this agenda.

4 MR. HENRY: So moved.

5 THE CHAIRMAN: Thank you. I've got a
6 motion. Is there a --

7 MR. BAUGHMAN: Second.

8 THE CHAIRMAN: Second. Any other
9 discussions? All in favor say, Aye.

10 THE BOARD: Aye.

11 THE CHAIRMAN: Opposed? So we now have
12 an agenda. So what I want to do before I get into
13 approval is I want to take a minute to let everybody
14 introduce themselves, and we will start that with
15 our court reporter.

16 THE COURT REPORTER: I am April Howard,
17 the court reporter.

18 MR. HENRY: Jeff Henry, board member.

19 MR. MORELOCK: Brian Morelock, board
20 chair.

21 MR. BAUGHMAN: Dave Baughman, board
22 member.

23 MR. NORTON: Lindsey Norton, facilities
24 and project manager, Cleveland, Tennessee.

25 JAMES NEVILLE: James Neville, president

1 of Neville Engineering.

2 MARTY TOTH: ESC Consulting and the
3 Boisco Training Group.

4 DWAYNE SCOTT: Dwayne Scott, Deputy
5 commissioner.

6 DAN BAILEY: Dan Bailey, legal counsel.

7 TOM HERROD: Tom Herrod, assistant
8 commissioner.

9 CHRIS O'GUIN: Chris O'Guin, chief
10 inspector.

11 MICHAEL RYAN: Mike Ryan, assistant
12 chief.

13 MICHELE IRION: Michele Irion, board
14 secretary.

15 PHILIP HICKERSON: State of Tennessee,
16 Boiler inspector.

17 ROBERT SHELTON: Robert Shelton, Plant
18 superintendent for Stratas Foods.

19 JOSH KIRTS: Plant engineer, Stratas
20 Food.

21 TEDDY KOWALSKI: Teddy Kowalski, Pepsi
22 maintenance supervisor.

23 HUGH GARRISON: Hugh Garrison, Pepsi HS
24 manager.

25 JOHANA (phonetic) JONES: Johana Jones.

1 CALLON SCHMID: Callon Schmid, Butler
2 Snow.

3 DARREN ISBELL: Darren Isbell,
4 facilities maintenance manager, Hankook.

5 ERIC LONJAK: Erick Lonjak maintenance
6 engineer, Hankook.

7 CRAIG DAVENPORT: Craig Davenport,
8 director of quality for Intertek Testing services.

9 BRANDEN MATUB: Branden Matub,
10 inspector.

11 KELLY WISDOM: Kelly Wisdom, Babynov,
12 utility fulfiller.

13 ROBYN VERNER: Robyn Verner, Babynov,
14 technical engineering manager.

15 TIA XIXIS: Tia Xixis, Tennessee
16 Department of Labor and Workforce Development.

17 THE CHAIRMAN: Thank you for those
18 introductions. Quick safety item is if due to
19 weather or anything would come up that we would need
20 to exit the building, we will have security to come
21 to take us either to a safe place in the building or
22 take us out on the Rosa Parks side of the building.
23 And so with today's weather, I hope we don't have to
24 exercise any of that, but just to let you know if
25 there was an emergency that we would need to do

1 that. So that's my safety moment.

2 Okay. Moving on, the next item we have
3 on our agenda is approval of the March 16, 2022,
4 meeting minutes. Do I have a motion to approve
5 these?

6 MR. HENRY: So moved.

7 THE CHAIRMAN: Got a motion.

8 MR. BAUGHMAN: Yes, we'll second. But I
9 do have two items to address on it.

10 THE CHAIRMAN: Okay.

11 MR. BAUGHMAN: Just very small technical
12 changes. On page 32, line 7 in that line it says,
13 for E-stops, and it was spelled out as F-O-U-R and
14 it just should be F-O-R, for E-stops.

15 And on page 50 line 15, it's talking
16 about some vertical boilers and the word variable
17 was used instead of vertical. So variable should be
18 change to vertical, and that's all.

19 THE CHAIRMAN: Any other comments,
20 corrections?

21 Hearing none. Do I have a motion to
22 approve these amended March 16, 2022, minutes?

23 MR. HENRY: So moved.

24 THE CHAIRMAN: Okay. I got a motion.

25 MR. BAUGHMAN: Second.

1 THE CHAIRMAN: Second. Any other
2 comments or question. All in favor say, aye.

3 THE BOARD: Aye.

4 THE CHAIRMAN: Opposed; abstentions not
5 voting. The March 16th minutes are approved.

6 MR. BAILEY: Mr. Chairman, we've had a
7 new person come into the room.

8 THE CHAIRMAN: Have them introduce
9 themselves?

10 MR. BAILEY: Yes. Matthew?

11 MATTHEW GROVE: Yeah.

12 MR. BAILEY: Introduce yourself.

13 MATTHEW GROVE: Matthew with the
14 Department of Labor, legislative liaison.

15 THE CHAIRMAN: Thank you. That takes us
16 to the item that we just added to the agenda for the
17 chief's update. So Chief O'Guin, I will turn it
18 over to you.

19 MR. O'GUIN: Thank you Chairmen. We
20 have two new commission inspector. One of those is
21 Mark Reynolds in the Knoxville area. The other is
22 Mark Westerhill (phonetic). He will be covering
23 east of Nashville. They just passed through town
24 week before last. So that's wonderful news. We
25 got -- one of our Shelby County inspector,

1 Michael McGee, he decided to retire. Yesterday was
2 his last official day on the job, and Michael Ryan
3 has took a position with another company.
4 Congratulate him and thank him for the work he's
5 done for the Department. That's all I have for
6 today.

7 THE CHAIRMAN: Thank you for that
8 report. That will take us on to old business. We
9 do not have any old business. So let's go down to
10 the new business and our first item is item 22-02
11 Babynov USA requesting consideration for approval of
12 a variance to boiler attendant requirement. So if
13 you will come forward to the podium and you can
14 present your item. And while you are getting set up
15 to do that, are there any conflicts from the board
16 members on this particular items?

17 MR. HENRY: No.

18 THE CHAIRMAN: Okay, no conflicts.

19 MR. TOTH: Good morning, Mr. Chairman
20 and members of the board and Mr. Chief Inspector.
21 It's great to see you all again. I was unable to
22 attend the last board meeting. My name is
23 Marty Toth with ECS Consulting and Boisco Training
24 Group. And with me today I have Ms. Robyn Verner.
25 She is the technical engineering manager at Babynov

1 in Red Boiling Springs. Also I'm honored to have
2 Mr. Kelly Wisdom with us. He is the utilities
3 technician and one of their soon-to-be certified
4 boiler attendants. So I thought it would be wise to
5 bring Kelly with us.

6 Before we get started, I would like to
7 highlight a couple of revision within your manuals
8 that you will receive that we found during the last
9 review. If you would turn to page 12 in your
10 manual. You will see there's an error that would be
11 appendix A, page 12. You'll see an error under
12 boiler number one. The safety relief valve reads
13 125 pounds. Is there something missing --

14 MR. BAUGHMAN: Mr. Toth, you mentioned
15 page 12.

16 MR. TOTH: I'm sorry page 14. My
17 mistake. At the bottom you will see under boiler
18 number one, there it reads 125 PSIG, however that is
19 a typo and should be 150 PSIG. I imagine that would
20 have caught Mr. Baughman's attention during review,
21 so. And if we back up one page to page 13, which is
22 your site plan. I inadvertently omitted the
23 distances on that site plan. I will be happy to
24 provide all of those distances in a revision to you.
25 Just for a note, the furthest distance is just under

1 1,050 feet which is, as you can tell from the actual
2 site plan itself, is located in the break room.
3 Everything else is closer, too. As you can see this
4 is very in depth. I don't believe the board has saw
5 a variance of this magnitude with the number of
6 station. That just really goes towards the effort
7 that Babynov has made to ensure the safe operations
8 of the boilers and I applaud them for that.

9 The last revision was on page 39, under the
10 glossary of terms. You'll see under the shift again
11 to ensure safety and communication between the
12 shifts, Babynov has chosen to add an additional 15
13 minute overlap between the two shifts, so they will
14 go to 6:30 versus 6:15. Thank you. And that's all
15 the editorials that we have for that.

16 So if I may introduce the boilers that we
17 have at Babynov. We have two Flextube Watertube
18 boilers, manufactured by Bryan Steam LLC. They are
19 high pressure boilers with an operating set pressure
20 of 72 PSIG.

21 They also operate a Bryan Steam LLC tray type
22 DR that supplied all feed water to those boilers.
23 All three of these vessels are registered and
24 inspected through the rules and regulations of the
25 State of Tennessee.

1 Babynov will have remote attendants at
2 various locations throughout the plant. As you can
3 see, we have those locations located on your site
4 plan, and I will briefly go through those for you.
5 Again, that site plan is on page 13 of the manual.
6 You will notice that the remote panel are indicated
7 by the red icon. You will see a remote panel in the
8 maintenance shop, one located in the filling room,
9 in the center of the plant; one located in the cook
10 room adjacent to the filler room; and one also
11 located in the break room near the plant offices.

12 Something unique to Babynov is their need to
13 have additional E-stop stations. Those E-stop
14 stations are in addition to the local E-stops that
15 we have at the boiler room. These are -- will be
16 referred to as remote E-stop stations.

17 As you can see the packaging room is quite a
18 large space with individual packing equipment in
19 them. So upon discussion with Babynov, the decision
20 has been made to place E-stop stations in between
21 all of the packing equipment for additional safety.
22 The idea is Babynov will be operating 24/7 based
23 upon production needs. They will have both remote
24 attendants -- certified remote attendants and also
25 certified boiler attendants on site 24/7 while

1 boilers are in operation as well as the variances in
2 effect. That is my opening remarks. We are here to
3 answer questions that you may have.

4 THE CHAIRMAN: Do you have a motion to
5 discuss?

6 MR. HENRY: So moved.

7 THE CHAIRMAN: We've got a motion.

8 MR. BAUGHMAN: Second.

9 THE CHAIRMAN: What comments does the
10 board have in regards to this variance, please?

11 I just have a question, this is a brand
12 new facility.

13 MR. TOTH: No, it is not. It was
14 previously operated as a bottling factory.

15 THE CHAIRMAN: Okay. All right. So the
16 boiler were built in 2003. So was that part of the
17 previous manufacturing?

18 MR. TOTH: Yes, it was. I actually was
19 part of the department during that time, and chief
20 inspector, and was fortunate to be invited up there
21 when they were building that facility, and actually
22 saw those boilers ahead of time. So it was
23 interesting going back all these years later to see
24 how the plant has changed and the structure of the
25 plant. So it's quite interesting. It reminded me

1 of how time flies by so fast.

2 THE CHAIRMAN: Thank you, Mr. Toth.

3 What other questions does the board
4 have?

5 MR. HENRY: Mr. Toth, thank you for your
6 description, first of all. And just a question with
7 regards to the remote E-stop buttons. There will be
8 attendants remote -- at the remote facilities
9 constantly; is that correct?

10 MR. TOTH: That's correct. At least one
11 of the station -- that's why they have so many of
12 them. At least one of the stations will have a
13 certified remote attendant within that location
14 while the variance is in effect. If for some reason
15 it is not, then we go back to the 20-minute rule and
16 monitor the boiler in such fashion.

17 MR. HENRY: That being the case, it
18 certainly makes sense.

19 MR. TOTH: If we are in a position where
20 we maintain a boiler operation, but production may
21 not be packaging per se. We maybe utilizing
22 maintenance personnel to perform maintenance on the
23 packaging equipment. If we are not producing in
24 other areas, we at least have the ability to
25 activate the E-stop in those particular areas.

1 MR. HENRY: Okay, thank you.

2 THE CHAIRMAN: Other questions from the
3 board?

4 MR. BAUGHMAN: Dave Baughman, board
5 members. At those E-stop stations, do they shut
6 both boilers off?

7 MR. TOTH: No, they will not,
8 Mr. Baughman. At those station unlike the E-stop at
9 the boiler, those stations will have individual
10 E-stops for each boiler and marked accordingly.

11 MR. BAUGHMAN: And how will we know
12 which boiler is in -- since these are remote E-stop
13 buttons, how do we know which boiler is in alarm --

14 MR. TOTH: That's a great question. We
15 will have indicating lights showing as you can see
16 in the -- the strobing light at the E-stop itself
17 would indicate which boiler is in alarm.

18 MR. BAUGHMAN: So on this E-stop, you've
19 got a light that's tied into the alarm of the boiler
20 that is going off in the alarm status --

21 MR. TOTH: Right. No difference than
22 the situation that we have with our alarm panels.
23 As you can see under section 2 of the illustration
24 of the alarm panels, there is a light that will show
25 which E-stop or which boiler is in alarm. We will

1 have a light indicating which boiler is in alarm --

2 MR. BAUGHMAN: So instead of a remote
3 E-stop button, it's more like an individual remote
4 panel in each one since it's enunciating (phonetic)
5 just like the remote panel; is that correct?

6 MR. TOTH: It is. It's just an ability
7 to save on cost of building out a box itself, but it
8 still serves the same purpose. So don't be alarm by
9 saying that we are cutting down on cost. We are not
10 limiting any safety in that. All we are doing in
11 that case there is indicating that we do have a
12 boiler in alarm, which boiler is in alarm, and we
13 are going to activate that E-stop. The panels go
14 above and beyond in that we indicate which boiler is
15 on and which boiler is off. We also give an
16 opportunity for silencing of that alarm for
17 communication purposes. We don't do that in the
18 production area. We are providing the E-stop
19 itself. We're providing an audible alarm and
20 providing an indicating light that will strobe if
21 and when there's an alarm on a specific boiler.

22 MR. BAUGHMAN: With no silencing switch?

23 MR. TOTH: With no silencing switch.

24 MR. BAUGHMAN: Very good.

25 On the boilers themselves, boiler number

1 one and two, what burners are on those boilers?

2 MR. TOTH: You know that -- those
3 particular boilers -- Kelly, what is the boiler
4 manufacturer if you can remind me?

5 KELLY WISDOM: Well, it's a German -- I
6 don't know if I can pronounce it right. Vice- --
7 it's a weird name. Vice- -- I don't know if I can
8 pronounce the name of it.

9 MR. BAUGHMAN: It's okay.

10 KELLY WISDOM: But it's German, and they
11 run pretty good.

12 MR. BAUGHMAN: So Weiss Hop (phonetic)
13 is a German burner, and so you've got two different
14 size boilers. And you indicate that this boiler has
15 both burners -- excuse me, have Honeywell RM7800; is
16 that correct?

17 KELLY WISDOM: Yes.

18 MR. BAUGHMAN: Because what I see on one
19 burner is the free drive that Weiss Hop uses for the
20 variable speed fans. Weiss Hops typically does not
21 use the Honeywell control --

22 MR. TOTH: They do on this one. And if
23 you could like -- Mr. Baughman, I will be more than
24 happy to have my computer with all the photographs
25 and I'll be more than happy to show you that.

1 MR. BAUGHMAN: If you say it's got it,
2 it's got it, but being familiar with Weiss Hop and
3 what they use, the other problem that I have got in
4 utilizing the RM7800 comes with your distance of
5 just over 1,000 foot to the break room. And looking
6 at the technical data for the communications on the
7 MOD bus (phonetic), which you are using -- so what
8 are you using?

9 MR. TOTH: It's just our hardwired
10 connection that goes directly from -- and we use
11 local power on the actual -- the panel itself. So
12 we are sending that signal through to the panel that
13 has electric. So we're not using low V, if that's
14 your question.

15 MR. BAUGHMAN: So from the burner itself
16 with the RM7800, how are you conducting the alarm
17 circuit off of the 7800 control to the farthest
18 point of the remote panel?

19 MR. TOTH: It uses the power off the
20 actual boiler controller, the boiler panel itself,
21 sends that through to the actual panel in the remote
22 station utilizing the relays in the remote panel to
23 indicate that signal.

24 MR. BAUGHMAN: I'm still confused on how
25 it's picking up the alarm out of a display module.

1 MR. TOTH: Easy. We send it through a
2 relay. The relay then picks up the power and sends
3 it to the panel and then illustrates on the panel.
4 I see where you're getting at because usually in the
5 situation that you are going to run into is because
6 the voltage being so low, the concern is you are
7 going to have voltage drop over distance. That's
8 why we utilize local power to not only -- for
9 sending the signal from the actual burner itself and
10 the controller, but we also use local power at the
11 panel itself to pull those relays in.

12 MR. BAUGHMAN: Interesting. Thank you
13 for that description. So in going forth also on
14 the -- the E-stops are going through the checks of
15 the unit itself -- I didn't see anywhere where there
16 were checks of the E-stops in the procedures. In
17 other words the E-stop at the remote panel, I didn't
18 see a description of that in the manual. And you
19 might verse me as far as where to locate that.

20 MR. TOTH: So are you referring to the
21 communication checks at the time of shift change?

22 MR. BAUGHMAN: Actually, any checks,
23 just looking at -- and the reason I bring that up is
24 that we found some failures within the E-stops. And
25 so I'm wanting to know what that procedure is for

1 checking the E-stops themselves.

2 MR. TOTH: None of my clients, correct?

3 MR. BAUGHMAN: All of them were --

4 MR. TOTH: Let's make sure the record
5 indicates that he was joking. So just to let you
6 know, if you look at section 3 and 4 of the manual
7 under normal duties, you will see the proper
8 procedure for checking -- performing communications
9 checks at least at the beginning of every shift of a
10 boiler attendant.

11 As the board is very aware, the
12 communication checks are to help ease the mind of
13 the boiler attendant, that the boiler will actually
14 alarm when they are out and about doing other
15 duties. That will be done once a shift, at the
16 beginning of each shift. There will also be at a
17 minimum once a day will be a test of the low R
18 (phonetic) cost on the boilers that are in
19 operations. That may be utilized as one of the
20 communication checks. It does not have to be.

21 As for tripping the boilers per se, that
22 is not something that is a requirement. I do advise
23 all my clients to perform that on a regular basis to
24 ensure that those E-stops are actually performing as
25 necessary. But it is not something that we require

1 at this time for them to show that they actually
2 trip the boilers. And in some cases, it might be
3 something that the manufacturer would not want to do
4 on a regular basis during the day.

5 MR. BAUGHMAN: Fair enough answer. So
6 on page 115A, it says, a nonclassified {sic} boiler
7 attendant. Can you describe to me what a
8 nonclassified boiler attendant is.

9 MR. TOTH: Obviously, that should have
10 been certified and noncertified. If that's where --
11 I'm trying to read that. You said that was under
12 5A.

13 MR. BAUGHMAN: Yes, sir 5A, noncertified
14 boiler attendant shall not attempt to restart a
15 boiler in an alarm.

16 MR. TOTH: You said classified, but it
17 reads certified.

18 MR. BAUGHMAN: Yes, I'm sorry, you're
19 correct, instead of what I put down at
20 nonclassified, it should have been noncertified.
21 And I was interested to know what noncertified
22 boiler attendant meant.

23 MR. TOTH: That's a great question
24 because the interpretation of that would -- could be
25 that we have noncertified boiler attendants on site.

1 That is not the case. It should read somewhere
2 along the lines that individuals that are not
3 certified as a boiler attendant -- there are going
4 to be employees at Babynov that will not be
5 certified as a boiler attendant. We just wanted to
6 indicate in here that you have to be a Babynov
7 certified boiler attendant to restart the boiler. I
8 will be happy to clarify that, if you feel that it
9 needs to be.

10 MR. BAUGHMAN: I will leave that up for
11 others to discuss. It was just a question in my own
12 mind that I highlighted that I wasn't quite clear
13 on.

14 MR. TOTH: Okay.

15 THE CHAIRMAN: Is that it? Any other
16 comments? Question? Concerns? Hearing none. Do I
17 have a motion for contingent approval of this
18 variance based upon the revisions of the manual
19 based upon the comments from this Tennessee board
20 meeting today as well as a successful site visit
21 from the boiler unit when they come and do a site
22 visit of your boilers?

23 MR. BAUGHMAN: So move, motion to
24 accept.

25 THE CHAIRMAN: We've got a motion for

1 that.

2 MR. HENRY: Second.

3 THE CHAIRMAN: Any other comments?
4 Concerns? Question? Hearing none. All in favor
5 say, aye.

6 THE BOARD: Aye.

7 THE CHAIRMAN: Opposed; abstentions not
8 voting. You have a contingently approved variance,
9 thank you.

10 So that will take us to item 22-03,
11 Hankook and Company. Request consideration for
12 approval of a variance to boiler attendant
13 requirements. So if you will come forward and
14 introduce yourselves and present your -- while
15 that's going on. Does the board members have a
16 conflict on this item? No conflict on this item.

17 MR. TOTH: Mr. Chairman, if you'll give
18 me just a moment to get myself together, thank you.

19 THE CHAIRMAN: Sure.

20 MR. TOTH: Mr. Chairman and members of
21 the board, again my name is Marty Toth. I'm with
22 ECS Consulting and the Boisco Training Group. It is
23 my honor to present the actual service operations
24 manual for the variance for remote attendants for
25 Hankook and Company out of Clarksville, Tennessee.

1 It's my pleasure to introduce to you Mr. Eric Lonjak
2 and Mr. Darren Isbell. Mr. Lonjak is the
3 maintenance engineer as you will notice in the
4 manual. And Mr. Isbell is the maintenance manager
5 for Hankook.

6 This variance is probably -- at the last
7 variance request was very intense with a lot of
8 bells and whistles if you will, no pun intended.
9 This is about as vanilla as you can get. We have
10 two high pressure boiler Cleaver-Brooks, flextube,
11 watertube boilers with an operating pressure between
12 110 and 120 PSIG located very close to the guard
13 station where we will have a remote attendant
14 located.

15 Again, I failed to indicate the distance
16 between the guard shack and the boiler room.
17 Eric can help with that.

18 MR. LONJAK: It's much less than
19 1,000 --

20 MR. TOTH: As Eric indicated it much
21 less than 1,000. It's probably around 300 feet.
22 It's definitely within visual distance if you were
23 to step out of the guard shack and just take a look.
24 It's fairly close. I will make sure and have that
25 revised -- Mr. O'Guin, for your copy of the manual

1 so you will have that indicated.

2 Again, as I eluded to, we have one
3 remote station. That remote station is located in
4 the guard shack at the main entrance. It is manned
5 24/7, and we will have boiler attendants --
6 certified boiler attendants and remote attendants on
7 site while the boilers are in operation. I will
8 definitely have boiler attendants on site while the
9 variance is in effect. We will have a remote
10 attendant on site. As you see in section 3 of the
11 manual, we have that listed as the security guard
12 with the caveat that if for some reason we feel the
13 need to certify other individuals, they will go
14 through that training. That training is in contract
15 with BTG to develop the training modules for these
16 individuals. And if that were to happen, we would
17 list those individuals within the manual itself.

18 When we look at the boiler attendants,
19 boiler attendants are going to be under the
20 responsibility of these two individuals, where it
21 would be the electrical maintenance technicians,
22 multi-craft technicians, and then also another
23 individual, the wastewater operators. All of those
24 individuals will go through the extensive boiler
25 attendant i.e. boiler operator training program that

1 is offered through boiler training group.

2 With that said, we are open to any
3 questions that the board may have.

4 THE CHAIRMAN: Do I have a motion to
5 discuss?

6 MR. HENRY: So moved.

7 THE CHAIRMAN: Thank you, second?

8 MR. BAUGHMAN: Second.

9 THE CHAIRMAN: What questions or
10 comments does the board members have?

11 MR. BAUGHMAN: I guess this whole
12 distance thing is a real issue. I'll get out there
13 with a little roller and roll it off for you. So my
14 question being that the distance is 2 to 300-foot,
15 is the communication different in this particular
16 system than what you presented in your previous
17 system?

18 MR. TOTH: In the electrical -- no, it's
19 exactly the same. It's the same design panel.

20 MR. BAUGHMAN: So we are using a relay,
21 correct?

22 MR. TOTH: Yes, sir.

23 MR. BAUGHMAN: Have we had any failure
24 mechanism within that relay?

25 MR. TOTH: We have not. I have not

1 experienced any in my time. And that goes back to
2 encouraging continual testing of a system. As a
3 client of ECS Consulting, part of that is -- when
4 I'm in that particular area, I do a stop by. That's
5 just something that we provide as a courtesy, and we
6 will call up the individuals and say, Hey, let's go
7 down and test it out. And so not only are the
8 employees there at Hankook trained to perform those,
9 we at ECS, we have a partnership here and we are
10 going to make sure that they are running and
11 continually operating. If they are not, then we put
12 them in motion.

13 MR. BAUGHMAN: I understand. I'm still
14 as a boiler man have issues with checks every four
15 hours, and relays that can fail right after they are
16 checked and so for. And we have relays that fail on
17 our boilers all the time.

18 On the cover letter, Mr. Parks is listed
19 as the one that is responsible for implementation of
20 the variance criteria with authority to delegate
21 individual tasks. Is Mr. Parks still in that
22 position?

23 MR. TOTH: Yes, he is. As we say in
24 this -- the statement of authority letter, if you
25 look over into section 1 and beyond, you will see

1 that Eric here is the maintenance engineer, and it's
2 his responsibility to then implement and caretake
3 the manual. He does have opportunities to designate
4 those authorities, but he does not designate the
5 responsibility. And so he is going to -- or
6 responsibility he just does not give way the
7 authority in that. And so such as the training that
8 will be done through Boisco Training Group it does
9 list the maintenance engineer as responsible for
10 that or their designee that training will be
11 designated over to Boisco Training Group to perform.

12 MR. BAUGHMAN: I understand. I was just
13 getting a clarification on where Mr. Parks actually
14 was in this hierarchy equation since it lists him as
15 being the person ultimately responsible.

16 THE CHAIRMAN: Any other question or
17 comments from the board? All right. Hearing none
18 do I have a motion for contingent approval of this
19 variance based upon revisions to the manual and
20 based upon comments from the Tennessee board meeting
21 today as well as a successful site visit from the
22 boiler unit?

23 MR. HENRY: I make that motion.

24 THE CHAIRMAN: I have a motion. Do I
25 have a second?

1 MR. BAUGHMAN: Second.

2 THE CHAIRMAN: All right. I've got a
3 second. Anymore questions or concern? Hearing
4 none. All in favor say, aye.

5 THE BOARD: Aye.

6 THE CHAIRMAN: Opposed? Abstention not
7 voting.

8 Gentleman, you have a contingently
9 approved variance. Thank you.

10 That will take us to item 22-04, Stratas
11 Foods, requesting consideration for approval of
12 variance to boiler attendant requirements. While
13 they are coming forward to get ready, is there any
14 conflicts from the board? No conflicts from the
15 board. You may proceed with your presentation.

16 MR. TOTH: Mr. Chairman, if you can give
17 me just a moment.

18 THE CHAIRMAN: Sure.

19 MR. TOTH: Thank you.

20 Mr. Chairman and members of the board
21 again Marty Toth with ECS Consulting and Boisco
22 Training Group. It is my honor to represent Stratas
23 Foods from Nashville, Tennessee, and the request for
24 a variance to boiler attendants.

25 Before we go forward with the

1 introduction of the equipment, I would like to
2 indicate a couple of revisions that were found
3 during the prep meeting with Mr. Josh. And even
4 before that, I would like to introduce the gentlemen
5 that are with me. Well, I'll tell you what I'll let
6 you introduce yourselves. I do all the talking --
7 go ahead, Josh.

8 JOSH KIRTS: Josh Kirts, Plant engineer.

9 ROBERT SHELTON: Robert Shelton, plant
10 superintendent.

11 MR. TOTH: Thank you. And so Josh and
12 Robert have indicated to me that under page 13 of
13 the manual, the site plans, upon discussion, it's
14 been decided that the actual remote panel located in
15 the maintenance shop, as you can see towards near
16 the boiler -- gentleman, is going to be changed from
17 that location to a location in between cooler number
18 two and three. And if I may, I will come up and
19 actually point that out to you gentleman. It was
20 just thought that that was the best location for
21 that third panel to be located.

22 Again, just as with the first item that
23 we had, this is just a great example of the effort
24 that Stratas Foods is trying to operate above and
25 beyond what it is called for. As you can see, we

1 have a 24 hour, seven-day-a-week manned guard shack.
2 Then we also have one located in the lab as well
3 that is manned, and then also where there will be
4 production held, so that we will have personnel
5 available. So we are increasing that safety factor.

6 Also if we can turn to page 12 of the manual.
7 You will see the emergency procedures under section
8 5. There is a indication here that goes through
9 both your -- during the day shift and the evening
10 shift. Because we are operating or having an
11 ability to operate those boilers during any down
12 time. Even though the plan is to run 24/7,
13 production is going to also carry that. If
14 production is down, there will be the individuals
15 there. We are going to ensure that we do have
16 certified boiler attendants as with other locations
17 those would be individuals that serve the role as a
18 boiler guard, and those individual will be stationed
19 in the guard shack. They would be required to leave
20 that guard shack, go back to the boiler room, take
21 the readings, come back to the guard shack, and be
22 able to do that within the 20 minutes or less. And
23 so just to kind of walk that through, they leave the
24 guard shack. They have to be in boiler room within
25 20 minutes, which obviously from the site plan you

1 see it's not that far, and then once they take their
2 readings they will return to the guard shack.

3 Okay. On this particular section, there was
4 a typo that -- where it reads under three -- under
5 for day shift under three and four, it says that
6 they will move to step five. That should read step
7 six, okay.

8 THE CHAIRMAN: Okay. And so just a
9 general comment to that is so you'll correct it on
10 page 12, right?

11 MR. TOTH: And then also under section
12 2.

13 THE CHAIRMAN: And so all of your
14 emergency procedures that you show on page 5, 7, and
15 12 it needs to be the same. This is just a general
16 comment. Because you have emergency procedure on
17 those three pages.

18 MR. TOTH: Correct.

19 THE CHAIRMAN: Make sure they all match.

20 MR. TOTH: Yes, Mr. Chairman, they will.
21 The only location that will be affected is when we
22 show the actual example of what the placard looks
23 like, and so of course those will be redundant, and
24 hung with the panels so. So under section 3 when we
25 talk about the placard, it just points to section 5

1 or points to the placard that does not specifically
2 state the steps if that makes sense.

3 So if we could go to the actual
4 boiler -- the actual boiler we have -- we only have
5 one high pressure boiler at the location. It's a
6 Cleaver-Brooks Firetube boiler that operates between
7 100 and 110 PSI. It's a natural gas unit. It is
8 supplied by a Cleaver-Brooks spray type. Both of
9 these units are registered and inspected through the
10 Tennessee boiler unit and are up to date.

11 The controller again, as with the others
12 that we've discussed today, are the RM7800 a series
13 that we provide all of the needed information along
14 with a photo of where that is located on the front
15 of the boiler itself.

16 Training for the individuals for the
17 remote attendants and the boiler attendants will be
18 contracted through Boisco Training Group. We are in
19 the process of putting that together for them, and
20 hope to have that done pretty quickly. So if we are
21 so honored with approval, we will be moving forward
22 with that. And with that we are open to any
23 questions you may have.

24 THE CHAIRMAN: Motion to discuss?

25 MR. HENRY: So moved.

1 THE CHAIRMAN: Thank you.

2 MR. BAUGHMAN: Second.

3 THE CHAIRMAN: All right. What
4 questions or comments do the board members have?

5 MR. BAUGHMAN: Gentlemen, I will ask
6 about the position of the guard in particular and
7 his other duties. In other words, we're talking
8 about he's in the guard shack. We take it that he's
9 leaving the guard shack to make these checks on the
10 boiler, but what other checks does he make?

11 ROBERT SHELTON: Personnel checks as
12 they come in, you know, checking their background
13 before they come in, because it is a food plant, so
14 everybody has to come in and be certified as they
15 come in. You know, they're preapproved before they
16 come into the gate.

17 MR. BAUGHMAN: Does he have any other
18 checks within the plant that he has to go around
19 and -- check doors, security, or anything else
20 within the plant?

21 ROBERT SHELTON: Not within the plant,
22 sir.

23 MR. BAUGHMAN: Well, then outside of the
24 plant.

25 ROBERT SHELTON: Making sure that the

1 gates and all that is secured in that surrounding
2 area.

3 MR. BAUGHMAN: So how long would you say
4 that would take?

5 ROBERT SHELTON: Just a couple minutes,
6 because it's all right there at the front of the
7 plant. It's pretty isolated at the front entrance.

8 MR. BAUGHMAN: Very good. If that's an
9 emergency, and he's called out to do anything what
10 would the procedure be?

11 ROBERT SHELTON: If he's called out,
12 he's got to close all the gates right there at the
13 entrance of the plant before he can go -- or allow
14 anybody in or out.

15 MR. BAUGHMAN: Okay.

16 ROBERT SHELTON: Everything has to be
17 shut down there.

18 MR. BAUGHMAN: And then as far as
19 operations of the boiler, what would the procedure
20 be?

21 JOSH KIRTS: It automatically should
22 shut off, correct, I mean, as far as safety. But
23 then they'd hit E-stop and then it would communicate
24 to the boiler attendant, and he would do his checks
25 also.

1 MR. TOTH: If you are referring to I
2 think -- Josh, is eluding to what happens during an
3 emergency. And I think you're referring to
4 something outside of the boiler happening. So the
5 procedure -- if that guard is the only individual on
6 the premises and serving as boiler attendant or
7 boiler guard, as well as remote attendant, their
8 responsibility is that anything that draws them away
9 from either the boiler or the remote station for
10 longer than 20 minutes, we have to revert back to
11 the current 20-minute rule.

12 With that said, if there's a situation
13 that causes for an emergency, they are going to be
14 trained to hit the E-stop at the remote station
15 prior to leaving to address that situation. That
16 will be in their training process, as it is with
17 other locations that have the same type of set up.

18 MR. BAUGHMAN: Is that identified in
19 your manual?

20 MR. TOTH: It is not identified in the
21 manual. We will be happy to put that in the manual.
22 And in that case there, the communication is still
23 there within -- treated as an emergency, no
24 different than the boiler actually -- tripping the
25 boiler. They will be the one that trips that boiler

1 and then communicates to authority.

2 MR. BAUGHMAN: I guess, my issue is,
3 when there is something that calls the security
4 guard away, he does not necessarily look at his
5 watch to know if it's falling within this 20 minute
6 rule or he's sets an alarm or what have you. So but
7 you get the gist, and we've discussed this on other
8 occasions.

9 How far away -- since he might be on his
10 own, how far away is the on call technician seeing
11 he's not on site during this particular point in
12 operation? How far away does that person live.

13 ROBERT SHELTON: Our maintenance man is
14 about 25 minutes away.

15 MR. BAUGHMAN: Okay.

16 ROBERT SHELTON: I'm literally another
17 20 minutes away as a backup.

18 MR. BAUGHMAN: So that's what I was
19 looking at was just the timeframe from where there's
20 an emergency versus him going through the procedure
21 and calling what that response is to come back and
22 look at. So on page 11, 5-I, it states, boiler
23 guards and non-certified boiler attendants shall not
24 attempt to restart a boiler in alarm/fault. Only
25 SFL boiler attendants are authorized to

1 start/restart the boiler.

2 Now, turn to page 28, under boiler
3 guard, and going down near the bottom, there's a
4 statement, is not responsible for restoring boiler
5 operation unless authorized by SFL management. To
6 me that's in direct conflict with what you have on
7 page 11.

8 MR. TOTH: Okay. I think -- I don't
9 want to speak for these gentleman. They can correct
10 me, but we have spoken about this, that boiler
11 guards will not restart the boiler. So my
12 recommendation -- we will strike that from their job
13 description. It's not that they are not trained to
14 do that. It's just not necessary for them to do
15 that. And so the belief of management is that we
16 will bring in additional technicians to perform
17 those duties.

18 MR. BAUGHMAN: And I would disagree with
19 you in that statement of, that -- they are not
20 competent to restore it, because part of restoring
21 the boiler operations is identifying what caused the
22 boiler to go into alarm before you restart the
23 boiler. And I doubt a security guard honestly has
24 that capability and competency of determining what
25 caused the boiler to shut off. So I just want to

1 make that statement that I don't feel he's actually
2 got the training or competency to restart the
3 boiler. He can restart it. He can't identify what
4 the cause was which is also part of your manual.
5 You have to identify the cause before you restart
6 the boiler.

7 MR. TOTH: Absolutely. And I definitely
8 understand your beliefs. I believe that is on an
9 individual basis as to what individuals are
10 competent or not. I do know that the individuals
11 that go through the specific boiler attendant
12 training, it's pretty extensive, and they do have to
13 pass an exam. That's something that you and I could
14 chew on for a long period of time, absolutely. So I
15 agree with what you say there partially.

16 MR. BAUGHMAN: Thank you.

17 THE CHAIRMAN: Any other questions,
18 comments? Hearing none, do I have a motion?

19 MR. HENRY: I have just a quick
20 question. On the cover letter, it says, I will
21 ultimately be responsible for continued
22 implementations and there's two names given there.
23 Do the two people share responsibility or is there
24 one individual that ultimately has that
25 responsibility, and if so which one?

1 MR. TOTH: I will let these two
2 gentlemen discuss that since these are the two
3 gentlemen that signed the letter.

4 JOSH KIRTS: We just wanted to make sure
5 two people were involved, so there was full
6 accountability across the board. But I will be the
7 administrator of this variance process.

8 MR. HENRY: Thank you.

9 THE CHAIRMAN: Any other questions? The
10 only thing I will add to this is Dr. Cananaco
11 (phonetic) famous conundrum concerning those
12 responsibilities given to security guard. They have
13 a weighty job to begin with. And so it's always
14 good to readdress it. I think you have a plan that
15 will be operable. And so you all are not the only
16 ones struggling with how to do that so, thanks for
17 your development of this.

18 I need a motion for contingent approval
19 of this variance based upon manual revisions and
20 based on the comments from the Tennessee board here
21 today as well as a successful site visit from the
22 boiler unit.

23 MR. BAUGHMAN: So moved.

24 MR. HENRY: Second.

25 THE CHAIRMAN: All right. Last call for

1 questions? Comments? Okay. None. All in favor
2 say, aye.

3 THE BOARD: Aye.

4 THE CHAIRMAN: Opposed? Abstentions not
5 voting. Gentleman you have a contingently approved
6 variance.

7 So that will take us to 22-05 request,
8 Comotech, requests, consideration for approval of a
9 variance to boiler attendant requirement.

10 While they are coming forward, is there
11 any conflict of interest from the board? No
12 conflicts. Introduce yourselves to the board.

13 JAMES NEVILLE: Good morning. I'm
14 James Neville with Neville Engineering.

15 LINSDEY NORTON: I'm Lindsey Norton.
16 I'm a facilities project manager for Cormotech.

17 JAMES NEVILLE: Today we would like to
18 request a variance for two boilers -- two Miura
19 boilers. And the remote stations our plan is to
20 have six remote stations in the production area.
21 The boiler attendants will be the maintenance
22 associates and the remote station attendants will be
23 the production associates. So as far as the
24 production associates, Mr. Norton can give us a
25 little background as far as what they're producing

1 at the facility, and then the need for these remote
2 stations that make up the variance; that make a
3 selective catalytic reduction modules that reduce
4 the NO output of fuel plants for coal -- gas plants.
5 So ceramics is our main product in our catalyst. So
6 we do everything from the mixing to the forming and
7 the assembly of the modules. We even do some on
8 site repairs.

9 Currently, we are staffed 24/7. Working
10 around the clock right now, is our current workload.
11 We have continuance maintenance coverage and
12 continuance of operation associates at the plant, in
13 most of the areas throughout the plant 24/7. So
14 it's an around-the-clock operation currently.

15 LINDSEY NORTON: So the site plan it is
16 kind of small on page 2. I have a larger copy of
17 that. The numbering of those as far as the remote
18 stations, there's one directly outside of the boiler
19 room, and going counterclockwise is how the stations
20 are numbered. So on -- and as far as the distance
21 on those remote stations, they go from, you know,
22 15 feet to 290 feet is the longest run on that
23 borderline stations.

24 Regarding the boilers in appendix A we
25 list the boiler. These are two Miura boilers LX-150

1 and both are using the Honeywell RM7800L series
2 controller, and the expended enunciator (phonetic)
3 used to each of these remote stations.

4 Now, as far as the training of the
5 maintenance associate to operate these boilers, they
6 are currently giving on site training to operate
7 these. And Mr. Norton can tell us any other details
8 about the training.

9 LINDSEY NORTON: With this variance we
10 do plan on hiring or outsourcing of an outside
11 contractor to help us with a more professional means
12 of training since we are moving forward to getting
13 this variance. We'll do that annually as well.

14 Now, for our operation associates, we
15 are going to add this process to our monthly
16 training that we do for ROA, so once a year all
17 employees will go through their remote attendant
18 training on how to respond to an alarm if it goes
19 off and what steps are needed to be taken after they
20 have manually stopped the boiler or enunciation
21 (phonetic).

22 JAMES NEVILLE: Are there any questions?

23 THE CHAIRMAN: Do I have a motion to
24 discuss?

25 MR. HENRY: So moved.

1 MR. BAUGHMAN: Second.

2 THE CHAIRMAN: What questions or
3 comments do the board members have?

4 MR. BAUGHMAN: Thank you for the
5 expanded drawing, Mr. Neville, not that I need
6 stronger glasses, but this works well. So at each
7 one of these remote station locations, one of them
8 is 15 feet right outside of the boiler room.

9 JAMES NEVILLE: That is correct. And
10 the reason for that is so that production associate
11 will be within, you know, a very short distance in
12 line of sight for every remote stations so they can
13 hear and see the alarm and respond.

14 MR. BAUGHMAN: Do we have a picture or
15 drawing of the remote station?

16 JAMES NEVILLE: We do not. Those have
17 not been installed yet so. We can add that to the
18 variance.

19 MR. BAUGHMAN: So this is a future
20 installation of the remote stations?

21 JAMES NEVILLE: Right.

22 MR. BAUGHMAN: So as a question was
23 delivered earlier, regarding the remote stations,
24 will the E-stop shut off both boilers?

25 JAMES NEVILLE: There will be an E-stop

1 for each boiler, so boiler one and two will have a
2 light enunciator, you know, at each of those six
3 stations.

4 MR. BAUGHMAN: Okay, very good. And
5 looking at the drawing of the boiler room -- and I'm
6 going to keep this drawing or if you have your
7 reference. How many exits are there from that
8 boiler room?

9 LINDSEY NORTON: There are two.

10 MR. BAUGHMAN: I see the one door in
11 what I would indicate is the front where the remote
12 panel is located. Where is the second?

13 LINDSEY NORTON: Directly behind on the
14 exterior of the building.

15 MR. BAUGHMAN: Okay. And is that a
16 roll-up door?

17 LINDSEY NORTON: There is a roll-up door
18 and a manual door.

19 MR. BAUGHMAN: Very good. Are either of
20 those locked or have any kind of a mechanism to lock
21 them?

22 LINDSEY NORTON: Yes.

23 MR. BAUGHMAN: And how would they be
24 unlocked?

25 LINDSEY NORTON: A maintenance associate

1 or any associate with a building key but typically a
2 maintenance associates can unlock the door. There's
3 not a badge access on that exterior door. There is
4 a door maybe 40 feet down the wall that does have
5 badge access that any associate can come through.
6 We do currently have an E-stop located on each exit,
7 just a standard E-stop that does disable the boilers
8 if there were an event. That was suggested by the
9 inspection that we had three inspections ago, I
10 believe.

11 MR. BAUGHMAN: Okay. And would each one
12 of those E-stop at the point of pedestrian egress
13 shut off both boilers?

14 LINDSEY NORTON: Those in that case,
15 they do.

16 MR. BAUGHMAN: Very good. So I'm
17 familiar with the representative -- the Miura rep
18 down out of Chattanooga, and -- in servicing those
19 units. So these boilers you cannot actually check
20 the water level by looking at the boiler, correct?

21 LINDSEY NORTON: I believe that's
22 correct.

23 MR. BAUGHMAN: Okay. Although, they are
24 section -- one high pressure steam boiler. These
25 have a pump that puts water in one end and you get

1 steam out the other which is more like a steam
2 generator than it is a fixed water line or an actual
3 watertube or firetube boiler. So at some point, we
4 cannot go up to that boiler and physically check the
5 water level. We're using a set of probes that are
6 inside the boiler and checking the conductivity and
7 so forth. So I have issues somewhat with this
8 design boiler in being able to know what our water
9 levels are, being able to check the water levels and
10 so forth, not that that pertains a whole heck of a
11 lot to the variance, but it's still under
12 construction of the boiler. It's kind of out of the
13 bounds of what a typical boiler is. Do you have
14 economizers (phonetic) on these boilers?

15 LINDSEY NORTON: I don't believe so.

16 MR. BAUGHMAN: Okay. They typically
17 come with it.

18 JAMES NEVILLE: We can verify that.

19 LINDSEY NORTON: I believe they do,
20 actually.

21 MR. BAUGHMAN: Okay, thank you. That's
22 really it as far as getting down to the checks of
23 the boiler, and when we get to looking at our logs
24 and developing those sample logs, and as we're
25 making sure that we don't, you know, cut and paste

1 that.

2 In your Appendix F boiler monitor log
3 F1, on your log it shows water level. And being
4 that we have no means of checking the water level,
5 I'm somewhat in a conflict on how to apply that, how
6 to check it, whether or not this actually even falls
7 within the criteria of a boiler versus a steam
8 generator and so forth. But all that said and done
9 and getting back to the boiler monitor log, I don't
10 see how we can monitor or log what the water level
11 is.

12 JAMES NEVILLE: It's more water status,
13 I guess, on this boiler.

14 MR. BAUGHMAN: Possibly. In your or
15 under the description, Miura actually provides on
16 Appendix B 1, this is directly out of Miura, it
17 states on there that a water column, an external
18 water column, can be added, but it is not a fair
19 representation of what's in the boiler, because it's
20 more of a generator and the high level of steaming
21 and water bounds and so forth. So at any rate, I
22 will not beat that anymore, but thank you.

23 THE CHAIRMAN: So for clarity sake as
24 far as remote monitoring, what's in place now and
25 what's going to be put in, in the future?

1 JAMES NEVILLE: As the expanded
2 enunciator will be added to these boilers for the
3 remote stations. So that's the component that we
4 added to these with all remote stations.

5 MR. BAUGHMAN: So you are adding the
6 Honeywell expanded enunciator?

7 JAMES NEVILLE: That's correct.

8 MR. BAUGHMAN: The problem that I have
9 with that is it's being obsoleted and that expanded
10 enunciator is not available anymore. It's no longer
11 produced. So and we know this, because we are in
12 the industry. So moving forward my next question
13 would be knowing that information, what direction
14 are you going to go?

15 JAMES NEVILLE: If that is not available
16 to purchase, then they would upgrade those controls
17 to what is available.

18 MR. BAUGHMAN: Which would be a hardware
19 change, which would then be a technical change to
20 the manual. It would have to be reproduced.

21 JAMES NEVILLE: That's correct.

22 MR. BAUGHMAN: Okay.

23 THE CHAIRMAN: So we have remote
24 stations to build in the future, correct?

25 JAMES NEVILLE: Yes.

1 THE CHAIRMAN: And right now you're
2 working off the 20-minute rule, correct?

3 JAMES NEVILLE: Yes.

4 THE CHAIRMAN: So what is the projected
5 date to have the remote station up and operable?

6 LINDSEY NORTON: Third quarter,
7 idealistically. We'd like to get this moving
8 forward as fast as possible.

9 THE CHAIRMAN: Okay. Okay. What I'm
10 struggling with -- I apologize, is you are putting
11 things in we have not seen in your manual, I guess,
12 as far as pictures, placards, you know, enunciators.
13 So, I mean, in order to have a successful site visit
14 obviously you don't want to do that until
15 construction is completed. And so the board can say
16 well, you need to have all of these components in
17 place prior to the site visit. So I guess my
18 question is does the board members fill like we have
19 detailed enough in our minutes of what needs to be
20 completed before this remote station is put into
21 operation? Because if you don't, then we table it
22 'till another day, and so -- another meeting. So I
23 really -- what is your pleasure?

24 JAMES NEVILLE: We can double check as
25 far as on the availability of that hardware with the

1 vendor. If it requires an upgrade to a currently
2 available thing, we will have to present that at the
3 next meeting.

4 MR. BAUGHMAN: And in particular, I
5 would be interested in looking at -- since we don't
6 have the hardware in here i.e., the enunciator in
7 particular, what we have is a big description on
8 what we are going to do in an alarm situation. We
9 don't necessarily have everything quite in place
10 yet, the panel built, enunciation, what have you.
11 And if you're looking at taking this to, what did we
12 say third quarter, it might be well served to put
13 all these things together and re-present rather than
14 for us to vote up or down presently.

15 JAMES NEVILLE: Okay.

16 THE CHAIRMAN: So I don't want to put
17 words in your mouth --

18 JAMES NEVILLE: If we could defer this
19 to the September meeting.

20 THE CHAIRMAN: So if we voted this in
21 September, would that meet your desired start date?

22 JAMES NEVILLE: I believe so.

23 THE CHAIRMAN: All right. So based on
24 that information, do I have a motion from the board?

25 MR. HENRY: Before we do that, can I

1 make a --

2 THE CHAIRMAN: Absolutely.

3 MR. HENRY: Mr. Neville, I have a couple
4 thing that you might want to address in the order
5 just simple editorial. On page 8 item 3, the boiler
6 attendant will perform a mobile phone system to
7 verify communications with the remote station.
8 Obviously, there's something missing there or
9 something has to be reworded. Do you see where I'm
10 eluding to? Page 8, item 3 at the top of the page.

11 JAMES NEVILLE: Okay.

12 MR. HENRY: I am not sure what you meant
13 to say there, but it's...

14 JAMES NEVILLE: It really should be a
15 test.

16 MR. HENRY: Then on page 10 I'm assuming
17 on this second sentence personnel I assume should be
18 in there.

19 JAMES NEVILLE: Yes.

20 MR. HENRY: And then back in the
21 checklist, one of the question is this a remote
22 monitoring system and it says, yes, it does, and it
23 eludes to some kind of a statement. I didn't find
24 anything made mentioned of that. I certainly could
25 have missed it.

1 JAMES NEVILLE: We will update this.

2 THE CHAIRMAN: Any other comments from
3 the board?

4 MR. HENRY: The only other thing I would
5 mention in the checklist, you could make clear who
6 is responsible for the training of the remote
7 personnel. That is not clear.

8 THE CHAIRMAN: I agree with that
9 comment. So you are planning on having training set
10 up and contracted, right?

11 LINDSEY NORTON: Yes, for our
12 maintenance personnel.

13 THE CHAIRMAN: All right.

14 JAMES NEVILLE: Our EHS management.

15 THE CHAIRMAN: So that may be more
16 update to your manual how you are doing your
17 training and how you are going to keep records. Is
18 it annual for new and annual for your experienced
19 and all that and you want to put all that in there.
20 What else?

21 MR. HENRY: That's it.

22 THE CHAIRMAN: So correct me if I am
23 wrong but what I'm hearing on this item is that you
24 wish to table this item until the September
25 Tennessee boiler meeting, correct.

1 JAMES NEVILLE: Yes.

2 THE CHAIRMAN: And will you provide the
3 board with an updated manual within a 45-day window
4 before the September meeting? Thank you.

5 JAMES NEVILLE: Thank you.

6 THE CHAIRMAN: Thank you gentlemen. All
7 right. I'm paying attention and it's time for a
8 break. So let's come back at 10:35. I'll give you
9 a 10-minute break. That way no one will want to
10 hurt me for working them to death.

11 (Short break.)

12 THE CHAIRMAN: Let's reconvene. We are
13 now on our new business item. We are now to item
14 22-06 Pepsi located at 715 Thompson Lane,
15 Nashville, Tennessee request that a vessel be
16 classified as a Tennessee special. So gentlemen, if
17 you'd come forward and introduce yourselves. And
18 while you are doing that, is there any conflict of
19 interest from the board members? Okay. No
20 conflicts.

21 TEDDY KOWALSKI: Teddy Kowalski. I'm
22 the maintenance supervisor there at Pepsi plant here
23 in Nashville.

24 HUGH GARRISON: Hugh Garrison health and
25 safety manager.

1 THE CHAIRMAN: Okay. So what do you
2 have to present concerning your vessel?

3 TEDDY KOWALSKI: Today, Mr. Chair, we
4 ask that this vessel that we have in conflict here
5 we just ask that it be reclassified, I guess, as
6 Tennessee special. It's a vessel that's been in
7 place since 2003.

8 Basically -- according to -- we had it
9 certified back in 2003. The national boiler stamp
10 number on it -- it's always been used as a serial
11 number. This tank was never -- basically had the
12 national boiler stamp number on it. And it's been
13 in place since then. We just ask that we can have
14 it, you know, a special.

15 THE CHAIRMAN: Okay.

16 TEDDY KOWALSKI: And we have provided
17 the information, and declaratorily (phonetic) of the
18 tank, you know, being safe.

19 THE CHAIRMAN: Very good. So just to
20 give a little bit of information, when an ASME code
21 vessel is built and stamped with ASME code, the
22 national boiler requires that that vessel to be
23 registered with the national boiler and a new one
24 sent to the national boiler within 30 to 60 days. I
25 can't remember the exact number, but it has to be

1 registered with the national boiler.

2 So the situation here is that we have a
3 perfectly good pressure vessel, but it just was not
4 registered with the national boiler, and so what we
5 are working from is simply this -- is that when you
6 look at Rule 0800-03-03-.3 construction standards
7 paragraph 1 of that rule says, that boilers and
8 vessels shall be designed, constructed, inspected,
9 stamped, and installed per ASME; and item 2, says
10 boilers and pressure vessels shall bear the national
11 boiler of stamping, and therein lies the concern.
12 And so you are requesting to make this vessel the
13 Tennessee special -- will alleviate that problem
14 by -- the vessel will be stamped as a Tennessee
15 special, and that will alleviate your issue right
16 here with this vessel, because you have had it
17 inspected, and the vessel is certainly ready to be
18 put into service as a pressure vessel. And so if
19 you are good with that, I'm good with that.

20 TEDDY KOWALSKI: Yes, we are.

21 THE CHAIRMAN: So I'll just open it up.
22 Do I have a motion to discuss?

23 MR. HENRY: So moved.

24 MR. BAUGHMAN: Second.

25 THE CHAIRMAN: Okay. What questions

1 does the board members have?

2 MR. BAILEY: Mr. Chairman, did you ask
3 about conflict?

4 MR. BAUGHMAN: Yes.

5 MR. BAILEY: Sorry, I missed it.

6 MR. BAUGHMAN: So the ASME (phonetic)
7 manufactures daily reports says that the location of
8 the installation was originally Texas, 2003, but you
9 have had it since 2003.

10 TEDDY KOWALSKI: We actually bought it
11 through a company Triple S out of Fort Worth, Texas.
12 And it was shipped to the Pepsi Cola plant in 2003
13 and placed into production at that time. That's
14 when we had it certified, state stamped, and
15 everything, you know, as far as you guys coming out.
16 And it's been going through all of these years
17 passing, and then the conflict comes up of why
18 wasn't it ever stamped and the seal number and all
19 that stuff.

20 MR. BAUGHMAN: And my question isn't so
21 much the integrity of the vessel as it is just all
22 of the paperworks that shows that the original
23 installation was Texas, but you bought it and
24 brought it here from Texas. It shows the location
25 being the Middle Point Landfill. It shows Middle

1 Point Landfill on Jefferson Pike from 2008 up until
2 2018. It still showed Middle Point Landfill as the
3 installation location. It shows year built 2004
4 instead of 2003. There was just discrepancies on
5 the paperwork that when you are looking at it from
6 the outside in, not being intimate with the piece of
7 equipment or knowing where it went, the paperwork
8 itself was not matching up. I know some of the
9 inspectors along the way, but, again, it's this
10 conflict on the installation location. So it sounds
11 like everything is status quo now. It is at the
12 Pepsi bottling plant on Thompson Lane.

13 TEDDY KOWALSKI: Yes, sir. I've been in
14 that plant since 1977 and was actually right there
15 when it was put there. So I don't know where all of
16 the landfill, you know, come in right there. It's
17 still in the same place.

18 MR. BAUGHMAN: I understand.

19 MR. O'GUIN: If you look back at the
20 first inspection that was performed, you can see the
21 owner is Pepsi, so more than likely when they put in
22 the user location they keyed it wrong. I don't know
23 how they entered their reports back in that
24 timeframe, but the owner has stayed Pepsi all the
25 way through, and also showed in the circuit

1 (phonetic) room, so we know that's not a landfill.
2 So why they didn't catch it up until 2018 I am not
3 sure.

4 MR. BAUGHMAN: Well, it at least it's on
5 the right track now, and it's not so much a design
6 operational issue as it was more along the lines of
7 looking at that paperwork and trying to find the
8 trail on this end of it, doing the due diligence, so
9 I think we are all in good shape. I love Pepsi.
10 That's not a conflict is it?

11 TEDDY KOWALSKI: You don't have any over
12 there.

13 THE CHAIRMAN: Mr. Toth.

14 MR. TOTH: Yes, Mr. Chairman,
15 Marty Toth, ECS Consulting. These vessels are
16 stamped section A, division 1. Just for the record,
17 recognizing that it came out of Texas. It probably
18 had a lot to do with Texas not enforcing the umpire
19 (phonetic) pressure vessel state law. And so the
20 need to have it registered with the national boiler
21 was probably omitted from the construction due to
22 the fact that it was in Texas.

23 THE CHAIRMAN: That's a good point. Any
24 other question or comments? Hearing none, do I have
25 a motion?

1 MR. BAUGHMAN: So moved.

2 MR. HENRY: Second.

3 THE CHAIRMAN: We have a motion and a
4 second for this vessel to be a Tennessee special,
5 yes. Last call for any questions or comments?
6 Hearing none, all in favor say, aye.

7 THE BOARD: Aye.

8 MR. BAUGHMAN: Opposed; abstentions not
9 voting. So you now have a Tennessee special vessel.
10 And just for the record when you look up in the
11 rules when you do have a Tennessee special, just be
12 mindful that any repair to that vessel will need to
13 go through the boiler unit for approval, and if you
14 were to alter the vessel, you would have to put a
15 package together of drawings and calculations of
16 what you would alter whether it be adding or
17 changing the vessel. That would have to come to the
18 Tennessee Boiler for the review of that alteration
19 and approval. Okay, thank you, gentleman.

20 THE CHAIRMAN: Okay. So that takes us
21 now to item 22-07, Covenant Health request
22 consideration for approval of a variance to boiler
23 attendant requirement. So if you will come forward
24 and introduce yourselves and present your item.

25 MR. TOTH: Thank you, Mr. Chairman and

1 members of the board. Again my name is Marty Toth.
2 I'm with ECS Consulting and the Boisco Training
3 Group.

4 THE CHAIRMAN: Let me interrupt you for
5 just a second. Are there any conflicts on this
6 item? Thank you. You may proceed.

7 MR. TOTH: As you can see the manual
8 that you're presented with, this particular manual
9 itself is a current variance at Morrisson-Hamblen
10 part of the Covenant Health Systems, which is one of
11 my clients. And I have worked with them for a
12 number of years. The situation that we had is very
13 similar to what happened with the previous location
14 with the expanded enunciator system. We have a
15 superior boiler that use the RM7800 series, with an
16 expanded enunciator. We had a malfunction of the
17 expanded enunciator. In the process for looking for
18 replacements it was found that they are being
19 discontinued. The chose of the client in a
20 situation of needing to get this boiler up. The
21 superior boiler is the main boiler that they use.
22 That do have a second boiler there that will serve
23 the purpose. It's a unit they try not to rely upon
24 for 24-hour service. So they had to act quickly to
25 get new controls in place. On their Cyclotherm unit

1 they also have a E111 burner management system in --
2 excuse me E110, burner management system in place.
3 So they choice to go with the Nexus NX6100 series
4 controller. As you can under Appendix B it goes
5 into great detail. It's a better system than what
6 they have. It does have a human machine interface,
7 an HMI screen, so it's better controlled, better
8 visualization, than just the standard RM7800.

9 With the fact that they changed out that
10 burner control system, they are required to appear
11 before the board to get approval. Immediately upon
12 the situation that we had there at the location, I
13 communicated with Chief O'Guin and expressed the
14 concerns that we had with it. Chief O'Guin was
15 gracious enough to say, well, let's get them up and
16 going. It's a hospital and we want to make sure
17 they don't have any other situations, and then let's
18 get on the agenda. And that's what we've done here.

19 As you can see, we have gone through on
20 the revision page III, you'll see in front of the
21 book, this is pretty much an ongoing process with
22 this client as well as all my other clients that we
23 continue monitor their system. We go by and test
24 their system on a regular basis, and then also go
25 through and do a revision meaning, if they have any

1 changes, as you can see from that change. We had
2 one session in November where we made some simple
3 editorial changes, that did not affect their system,
4 but then leading up to this meeting, you will see,
5 we put -- "we" being me, put tomorrow's date in
6 there. I do apologize. I will make sure that's
7 corrected. And I will take the blame for that one
8 of course. But we go through and see the different
9 information illustrated not only in Appendix A, B,
10 and then also the fall codes in Appendix C. So I
11 will open to any questions that you have about the
12 system.

13 THE CHAIRMAN: Do I have a motion to
14 discuss.

15 MR. HENRY: So moved.

16 MR. BAUGHMAN: Second.

17 THE CHAIRMAN: All right. What
18 questions, comments do the board members have?

19 MR. BAUGHMAN: So this being a
20 modification revision, when does their variance come
21 up for expiration.

22 MR. TOTH: They as a matter of fact that
23 was a discussion that Chief O'Guin and I had. There
24 was some confusion as to when the documentation has
25 been submitted for the last inspection, and I hate

1 to use the phrase, fell through the cracks, but I
2 think that's what happened when things were
3 submitted into the State. It kind of fell through
4 the cracks. We had the COVID situation occur. I am
5 not -- and maybe Chief O'Guin can say when their
6 actual certification has -- had expired. We have a
7 few and I have been working really closely with
8 Assistant Chief Ryan to make sure that any clients
9 of ECS Consulting, if we have anything that came up
10 during that period of 2019 through 2021, that are
11 due for reinspection, we are looking those up. So
12 it's around the time that they were due for an
13 inspection anyway.

14 MR. BAUGHMAN: So has their present
15 variance expired?

16 MR. TOTH: I believe it may have
17 presently expired due to the fact that of -- it
18 falling through the cracks in 2021; however, what we
19 have done is gone through the point of doing those
20 checks and making sure that they are -- everything
21 is working through the proper system. I believe
22 Assistant Chief Ryan is looking it up right now.
23 The plan is either they have expired from 2018.
24 They should not have. They should have been
25 reinspected to 2021 and then be reinspected after

1 the approval of the variance -- for the variance
2 itself.

3 MR. BAUGHMAN: So that variance would be
4 for both boiler then, and it would be a renewal
5 instead of a modified.

6 MR. TOTH: Well, I'm sorry. It's not a
7 renewal per se. The renewal manual was submitted.
8 Does that make sense?

9 MR. BAUGHMAN: No.

10 THE CHAIRMAN: So it was submitted with
11 no change.

12 MR. TOTH: Right. It was submitted for
13 no change for reinspection. It fell through the
14 cracks. No one in this room right now allowed that
15 to fall through the cracks. Let me just say it that
16 way. And it fell through the cracks, then it came
17 about that we had to do the modification. So
18 there's a previous submittal of a manual, and then
19 there's this one which is a modification not just a
20 renewal. The previous one was indicated with
21 renewal in its checklist. This one is modification.

22 MR. BAUGHMAN: And did we ever receive
23 that renewal one that you said fell through the
24 cracks? The Board --

25 MR. TOTH: The board would not receive

1 that because it is renewal. The boiler unit
2 received that.

3 MR. BAUGHMAN: Very good. So my
4 question would be on here, are we attempting to
5 utilize this manual then as the renewal for both
6 boilers?

7 MR. TOTH: It can be if you chose to. I
8 believe some grace was given to Morristown-Hamblen
9 because there was no malicious intent. The intent
10 was to submit the documentation appropriately for
11 the renewal, and that's how we operated through
12 that. There was some communication that was made
13 the last time I visited Morristown-Hamblen. And,
14 again, as I mentioned earlier, doing those courtesy
15 visits while in that location, and the communication
16 that came back to me -- and I'm paraphrasing here,
17 yes, the inspector came out and ran us through a
18 test. Great. So me assuming the inspector was the
19 State of Tennessee came out and did that. After
20 communication with -- communicating with Assistant
21 Chief Ryan and -- it was not one of the state
22 inspectors. It was probably one of their insurance
23 inspectors.

24 As I mentioned numerous times in this
25 meeting when we speak about the variance I really

1 applaud the boiler unit for their efforts of getting
2 that communication out. We're seeing a lot more of
3 the insurance inspectors paying closer attention to
4 variance, and then also assisting by having those
5 individuals run test on their variance to ensure --
6 to satisfy themselves. And I think that that's kind
7 of what's happened here. And so when we had that
8 discussion with Assistant Chief Ryan and myself and
9 then Chief O'Guin was brought into the discussion I
10 believe, that -- okay, we're going to have -- they
11 are going to get some grace because it did fall
12 through the cracks in that sense. The intent was to
13 get it renewed. Now, we are going to move forward,
14 appear before the board. Nothing had changed in the
15 program itself. The only thing that's changed is
16 the actual controls, and those were done on
17 emergency basis because it was found that the
18 existing controls were discontinued and unable to be
19 swapped out. That's a lot of words. So hopefully I
20 answered your question.

21 MR. O'GUIN: Chris O'Guin, chief
22 inspector. Morristown-Hamblen expired in 2021, but
23 I did give the authority to keep operating until we
24 get this figured out. It was just an upgrade to the
25 controls since the controls are no longer available.

1 THE CHAIRMAN: So my question is this,
2 the upgraded controls was that the equivalent of the
3 outdated control? Because what I'm getting out is
4 this, when a variance is approved and the boiler
5 unit makes their site visit, and then it's put into
6 action, when it comes up for renewal -- three years
7 later, if there's no technical change, the boiler
8 unit they renew it and it goes on. So is this new
9 piece of equipment enough of a change to warrant the
10 board to approve a change in the manual or is this
11 controller the next generation of what is obsolete.
12 And in that case, in my opinion, that would be no
13 different than letting the boiler unit renew it,
14 because that's the only piece of equipment that you
15 can put in there without there being a change to the
16 system.

17 MR. TOTH: If I can address that just
18 from my experience with the variances over the
19 years, the simple answer would be, yes, it needs to
20 come back before the board. The reason is
21 microprocessor base controller itself was swapped
22 out. The board always had the position that the
23 equipment that affects the operation of the boiler
24 per se such as a burner, controller, such as
25 including something like an ICS, something of that

1 nature, or simply replacing the boiler itself comes
2 back or in addition to -- comes back to the board
3 for modification renewal, so like a swap out. In
4 the case -- if this particular boiler had that
5 enunciator go out and they contacted a service
6 supplier and they were able to get their hands on a
7 replacement, no. There is no need to contact the
8 board, or the state. It a like for like
9 replacement.

10 What this body is doing is not only
11 approving the boiler along with the system --
12 procedure, but also the safety controls. And that's
13 what the codes call the burner controller, a primary
14 safety control. So if we are switching out the
15 primary safety control to a different type or model,
16 then that does come back before the board.

17 THE CHAIRMAN: Thank you for that.

18 MR. BAUGHMAN: And the issue that I have
19 is in going through these renewals where we have a
20 hardware change or even the manual, and if we say
21 within the manual there's been technical revisions
22 and that's it, that's one thing. But where we've
23 got a hardware change, being that some of us keep
24 every manual from every variances that's been
25 produced, it allows us to go back and review the

1 previous manual, which in this case, would have been
2 2018.

3 MR. TOTH: 2018, and then another one
4 was submitted after that. I believe it was probably
5 the beginning of 2021 or the end of 2020.

6 MR. BAUGHMAN: So from my case, being a
7 board member, what I like to do is go back and look
8 at those manuals and make sure everything is the way
9 it is supposed to be. And not saying things get
10 changed, but things get changed. So I'm on board as
11 far as the hardware, but I would like to review the
12 previous manual instead of just saying here we go
13 we're going to approve this and moving on three
14 years, I still would like to look at the previous
15 manual for my own review, just to make sure that
16 everything is in order and that we have done our due
17 diligence.

18 MR. TOTH: So in this situation here,
19 you would have received a 2018 revision from
20 previous, because this variance has been in effect
21 for quite a while. So you would have received 2018
22 or maybe not, because it was just a renewal. But
23 let's say it was new in 2018 and then we received a
24 renewal in 2021, are you saying that that renewal
25 should be submitted to the board?

1 MR. BAUGHMAN: If that renewal had --
2 other than technical revisions and not hardware
3 revisions. So if one was just technical going
4 through, no, we wouldn't need a review. But if it
5 was a hardware, yes, we would.

6 MR. TOTH: And that is the case. So you
7 received or you received the hardware revisions to
8 this. Does that make sense. So 2021's copy you
9 would not have received it, because it was just a
10 renewal. This particular one that you have in front
11 of you now incorporates those hardware changes that
12 is required to appear before the board.

13 MR. BAUGHMAN: Very good. And that
14 makes sense. Okay.

15 MR. TOTH: And that's how the system is
16 run and should be run.

17 MR. HENRY: Clarification. The change
18 in the hardware was for one both boilers?

19 MR. TOTH: No, sir. It was just for the
20 superior boiler which is their main operating
21 boiler. The Cyclotherm is their backup boiler that
22 they have. The hospital size does not require for
23 both boilers to operate at one time, but of course,
24 they need to maintain multiple boilers.

25 MR. HENRY: Sure. So what we would be

1 acting on is just a modification to the boiler with
2 the change in the hardware?

3 MR. TOTH: Yes, sir.

4 MR. BAUGHMAN: But both boilers are
5 under the variance?

6 MR. TOTH: Yes.

7 MR. BAUGHMAN: So even though the
8 Cyclotherm is not on line, which means it can't be
9 checked -- so it would only be checked when it comes
10 from standby into operation and then it would go
11 through it's check and fall under that. So there's
12 no way for them to be checking the operation in
13 between all these times. So the boiler is just laid
14 up, in other words, until it's asked to be put on
15 line or checked. I mean it's a 1982 Cyclotherm.

16 MR. TOTH: Absolutely. If they have an
17 issue with boiler number 1, they would go flip the
18 boiler to boiler number 2 into operation. It not
19 automatically going to come up. It will take a
20 manual start on it. At that time, procedures are in
21 place that if they have to light off a standby
22 boiler such as the Cyclotherm, they are then at that
23 time -- "they" being the boiler attendant, is
24 required to go through the communication test with
25 the remote station.

1 MR. BAUGHMAN: How often are they
2 checking the boiler on fuel being that natural gas
3 is their primary, but I see this must be -- it's got
4 a number two fuel/oil as a standby, and I know how
5 difficult that can be on a Cyclotherm. I'm
6 interested to know how often they are doing the
7 check on number 2 fuel/oil?

8 MR. TOTH: That's a great question. And
9 I ask that of my clients quite often. Most are done
10 annually -- on an annual basis, because they are not
11 required -- being a hospital are not forced as you
12 would an industrial company to go on curtailment for
13 the natural gas. Most will do at the minimum once a
14 year. I try to encourage once a quarter, but,
15 again, that's just a recommendation, because you and
16 I both know and many others in this room, that it
17 can be difficult depending on the boiler. The
18 Cyclotherm can be switched over to fuel oil however
19 it is number 2, not number 6, which is nice. And so
20 it's not nearly as hard, but I would recommend that
21 as well, but they do it once a year.

22 MR. BAUGHMAN: And the reason I asked
23 too is just going back in the default code list to
24 see what faults for number 2 fuel/oil are tied into
25 particularly programmer since there's different

1 control mechanism for number 2 fuel. But all in all
2 they can do that through a site visit. And my
3 recommendation is that both fuel be check for their
4 alarm circuit. And we've not addressed that in the
5 past. There's something to discuss moving forward,
6 but that's from a technical standpoint just for the
7 record.

8 MR. TOTH: And I agree with you. It is
9 operational mostly a good business practice to do
10 that. I think it may go outside of the scope of
11 what you are trying to achieve here with attendance
12 variance only because we are wanting that
13 communication to remote station. But I digress. I
14 agree it's something that should be done and it is
15 recommended.

16 MR. BAUGHMAN: I tell you where the
17 concern comes from is when we're talking about
18 E-stops and the connection of the E-stops to disrupt
19 the fuel source and the fuel source being a
20 different fuel source than this medium, being number
21 2 fuel. And if, in fact, they are just tying an
22 E-stop into the main gas and not tying it into the
23 fuel oil also, then that's a concern. So that's
24 kind of where I was getting at with checking things
25 out on both fuels and making sure the E-stops has

1 been tied into the proper fuel source. Thank you.

2 THE CHAIRMAN: Any other questions or
3 comments. All right hearing none, do I have a
4 motion for a contingent variance approval.

5 MR. HENRY: I would approve -- I would
6 move to approve the motion for the modification as
7 presented.

8 MR. BAUGHMAN: Second.

9 THE CHAIRMAN: Okay. All right. So we
10 have a motion on the table for contingent approval
11 based upon the comments that's been made during the
12 Tennessee board meeting, and successful site visit
13 by the boiler unit.

14 MR. TOTH: Just to put everybody at
15 ease, the client has been put on notice that they
16 will be receiving a variance inspection promptly,
17 not that they are going to call and say we are
18 ready. It's that the boiler unit will show up.

19 THE CHAIRMAN: Any other comments?
20 Hearing none. I'm going to call the question. All
21 in favor say, aye.

22 THE BOARD: Aye.

23 THE CHAIRMAN: Opposed? Abstentions not
24 voting. You have a contingently approved variance.

25 That takes us item 22-08. This is house

1 bill 1904 Tennessee Code Annotated 68-122-05 to
2 discuss and take possible action regarding new
3 legislation on the exception of sterilizer unit --
4 slash, boiler from the clearance required stated in
5 the board of boiler rules.

6 So everybody has got a copy of this,
7 correct? Do I have a motion to discuss?

8 MR. HENRY: So moved.

9 MR. BAUGHMAN: Second.

10 THE CHAIRMAN: So what you have before
11 you is -- there is an approved revision or addition
12 not revision an addition to Title 68, Chapter 122,
13 and it's been enacted by the General Assembly of the
14 State of Tennessee. And so this act is going to
15 amend the Tennessee Code Annotated 68-122-105, which
16 is for exemptions, by the way, by adding the
17 following as a new subsection. Autoclave is exempt
18 from the clearance requirements of this part and the
19 rules promulgated pursuant to this part related to
20 clearance.

21 Item two says, this Subsection D does
22 not prohibit the enforcement of other requirements
23 of this part that are unrelated to clearance
24 requirements.

25 And item three, the board may at its

1 discretion weigh or exempt the requirement of
2 68122110 through 68122113 for an autoclave pursuant
3 to the exemption provided by subdivision D1.

4 So what we want to do here is express
5 the boards opinion of this change. So I will go on
6 record by stating that I do understand that this is
7 being made law, but I also know that ASME National
8 board inspection code require inspections of
9 pressure equipment. And so with that said, to
10 exempt certain items of pressure equipment to not be
11 inspected is a conflict. And in my opinion, we will
12 uphold the ASME Code as well as the national boiler
13 inspection code to perform inspections that will
14 satisfy those codes, because those codes are also
15 written into 68122 as well as -- as well as Rule
16 0800-03-03-.03. And that's my statement. What other
17 comments does the board members want to make?

18 MR. BAUGHMAN: Chairman, I totally agree
19 with that statement. I don't know any other way to
20 present it other than we're here strictly from the
21 standpoint of safety. That's the whole purpose of
22 what we do in this unit -- boiler rules board.
23 DASME construction codes, the national board,
24 inspections, are there for one purpose, and that's
25 safety. And that's what we are upholding within our

1 statements here and within our jurisdiction.

2 MR. TOTH: Marty Toth, DCS consulting.

3 I would just like to, as a citizen, I would like to
4 make a comment about this. It's very concerning the
5 road we're going down with this. It's when we start
6 exempting specific vessels for one reason or another
7 and then being so broad about it to call it an
8 autoclave. Without the understanding that
9 throughout this industry autoclaves are more than
10 just units for sterilization in a hospital
11 environment. You've got autoclaves used in food
12 industries that are used for retort. You have them
13 used in manufacturing industries for curing rubber.

14 So now what we have just done is we put
15 all of these into one basket and all you have to do
16 is see the damage that can be caused from the door
17 flying open on one of these autoclaves to know how
18 important it is to not only inspect these, all
19 right, but to have the ability for inspectors to be
20 able to inspect these.

21 I'm very concerned when we put money
22 over safety -- very concerned with it. I have been
23 involved with this department since 1993. This is
24 the worst thing I have seen come through in all of
25 those years, because it's a slippery slope we are

1 going down. And it needs to stop before somebody
2 does something that gets someone killed. Thank you
3 for your time.

4 THE CHAIRMAN: Thank you, Mr. Toth.

5 MR. BAILEY: Mr. Chairman.

6 THE CHAIRMAN: Yes, Mr. Bailey.

7 MR. BAILEY: Just for clarification
8 purposes, Paragraph D4 says, for the purposes of
9 this subsection D, quote, unquote, autoclaves
10 means that the device -- subpart A says, sterilizing
11 is a reusable medical or dental equipment used by
12 individuals or entity that is likely under this
13 title, Title 63.

14 So I think they tried to limit the
15 number of autoclaves that are affected by this bill.
16 So in my opinion, I don't think it would affect a
17 autoclave that's in a rubber manufacturing plant. I
18 just want to make that clarification.

19 THE CHAIRMAN: Thank you for that
20 comment, Mr. Bailey. You are correct.

21 MR. BAUGHMAN: And, Mr. Bailey, to
22 extend that further in B in accordance with
23 manufactures recommendation contains a boiler. So
24 in particular this is an autoclave for the medical
25 or dental equipment used but also contains a boiler.

1 And so most of what we were talking about within the
2 rubber and food industry is an autoclave retort
3 separately. But this is specific within this
4 particular wording.

5 MR. HENRY: Having said all that, I
6 think that's a very important clarification. I
7 think Mr. Toth statement is exactly on the money
8 that we are concerned for all of the board members
9 is that the financial consideration are being put
10 above safety consideration. So I appreciate your
11 comments Mr. Toth. In regards to what action the
12 board can take the comments that you made,
13 Mr. Chairman, do they become part of the public
14 record now?

15 THE CHAIRMAN: The letter that I
16 submitted to the boiler unit has been submitted,
17 correct, Mr. Bailey?

18 MR. BAILEY: Yes.

19 THE CHAIRMAN: That was before the
20 legislative actions. We sent a letter on behalf of
21 the Tennessee board.

22 MR. HENRY: You talking about new rules?

23 THE CHAIRMAN: Yes. Stating our
24 position.

25 MR. HENRY: Okay. And that was approved

1 by the board as a whole?

2 THE CHAIRMAN: Yes.

3 MR. HENRY: Should we just reiterate
4 our.

5 THE CHAIRMAN: Yes.

6 MR. HENRY: As a board action?

7 THE CHAIRMAN: And that's basically what
8 I've paraphrased in my comments.

9 MR. HENRY: So should we vote on that.

10 THE CHAIRMAN: I'm going to seek
11 Mr. Bailey's wisdom here. Do we need to make this
12 the next item or just provide comments?

13 MR. HENRY: Well, I think both might be
14 appropriate. I mean, paragraph subparagraph D3 says
15 the board may in it's discretion weigh or exhume a
16 requirement of 68-122-110 through 113. And those
17 statutes that are referenced there all pertain to
18 68-122-110 is addressing inspection of boilers.
19 Section 111 talks about inspection certificates and
20 maximum certificate fees. 112 is talking about
21 operation without a certificate or excess pressure
22 and the penalty. And then 113 talks about
23 inspection fees. So the bill allows the board, if
24 it so choices, to weigh these autoclaves that are
25 defined in this statute from the requirements of

1 those statutes that I just talked about.

2 I think the board should make a
3 statement one way or the other whether or not they
4 intend to waive these devices from those statute or
5 not. It could be argued that you would only have to
6 take action if you chose to waive it and not have to
7 take any action if you chose not to waive it. But I
8 think it should be very clear either you are waiving
9 these devices from those statutes or you are not.

10 THE CHAIRMAN: Well, that's why I made
11 my initial statement is that the codes that we build
12 these pressure items from require inspection.

13 MR. BAILEY: Right.

14 THE CHAIRMAN: And those codes are
15 listed in 68-122 and the construction codes that we
16 we're going to use to build this pressure equipment.
17 So this action is just creating contradiction. It's
18 not helping anything. And so, like I said, on
19 behalf of the board, we've sent that response before
20 it was voted where we stood. I still stand on those
21 words that we sent forward, and so help us, you
22 know, is that sufficient or is there something else
23 that the board needs to do?

24 MR. HENRY: Well, is it the board's
25 intent or pleasure to waive these devices from being

1 inspected? And from what I'm hearing, that's a no.

2 MR. BAILEY: So then I think it would be
3 appropriate if the board would have a motion and
4 second it that these autoclave devices that are
5 defined in this new statute are not waived from the
6 inspection requirements and fee requirements of the
7 statute. And so that way these devices would still
8 be inspected and if the inspector is able to do a
9 complete inspection and pass it as being fit to run,
10 then they pay the fee and get an inspection
11 certificate.

12 THE CHAIRMAN: And you actually have
13 examples of that today?

14 MR. BAILEY: Yes.

15 THE CHAIRMAN: You do. Okay. So based
16 on your counsel, we need a motion from the board
17 stating that we are not going to waive the
18 inspection of pressure equipment even though this
19 change in legislature is -- and I will read it.
20 That it, you know, in D1 it says, an autoclave is
21 exempt from the clearance requirements that this
22 part and the rules promulgated pursuant to this part
23 related to clearance. If we have clearance per MBIC
24 and ASME, primarily MBIC, the inspection will
25 happen. But if it cannot be inspected, the boiler

1 unit and the Tennessee board is not going to support
2 passing it and giving it a certificate of
3 inspection, because it's not been properly
4 inspected. And that's -- so I guess my motion is --
5 my motion on behalf of the Tennessee board is that
6 we will not exempt these autoclaves from clearance
7 requirements and --

8 MR. BAILEY: If I may interject here, I
9 think the motion would have to be that the board
10 does not waive or exempt the autoclaves described in
11 this statute from the requirements of TCA 68-122-110
12 through 68-122-113.

13 THE CHAIRMAN: Okay. That's my motion.
14 So do I have a second?

15 MR. BAUGHMAN: Second.

16 THE CHAIRMAN: Anymore discussion?

17 MR. HENRY: I fully support the motion.
18 I'd just like to suggest that maybe we add an
19 introduction clause in consideration of our
20 commitment to uphold the public safety. Make it
21 clear that -- what the reason for our action is.

22 MS. XIXIS: And I want to add one
23 clarifying point -- Tia Xixis, Department of Labor.
24 This was not legislation from this department, and
25 it was not signed by the governor.

1 MR. BAILEY: If you can would you be
2 able to read back what the motion is. I know if was
3 kind of convoluted. And with his introduction.

4 (WHEREUPON, the court reporter reads
5 back the pending question.)

6 MR. HENRY: I think the motion would
7 read something like, in consideration of our
8 commitment to uphold the public safety, the board
9 will not waive inspection requirements for
10 autoclaves as described and then whatever is
11 required after that.

12 THE CHAIRMAN: That sounds fine.
13 Basically quoting the statute right, okay. Will
14 that suffice from a legal counsel's case?

15 MR. BAILEY: Yes.

16 THE CHAIRMAN: Any other comments?
17 Hearing none, I will call the question. All those
18 in favor say, aye.

19 THE BOARD: Aye.

20 THE CHAIRMAN: Opposed? Abstention not
21 noting.

22 MR. HENRY: Do we need to make sure the
23 legislature understand this was a unanimous vote
24 this time.

25 THE CHAIRMAN: Yes. Any other things

1 that we need to discuss on this item. All right.
2 Thank you for the input. So that completes our new
3 business. Let's go on to rule cases and
4 interpretations and the first one is BC 22-01, and
5 Intertek is requesting a ruling by the Tennessee
6 Board of boiler rules to revise Tennessee Boiler
7 Rule 0800-03.3.

8 So this item concerns Underwriting
9 laboratory label.

10 MR. BAILEY: Mr. Chairman, I think
11 there's somebody that might want to speak.

12 THE CHAIRMAN: Yes.

13 CRAIG DAVENPORT: I don't know if you
14 want me to say a short few words on this or --

15 THE CHAIRMAN: Please do.

16 CRAIG DAVENPORT: May I take a seat.

17 THE CHAIRMAN: Introduce yourself and
18 thank you very much.

19 CRAIG DAVENPORT: I'm Craig Davenport
20 director of quality for Intertek testing services.
21 Intertek, if you don't know, Intertek is a
22 nationally recognized testing laboratory in the US
23 We are also accredited by several agencies to do
24 testing and certification of electrical products and
25 construction materials energy efficiency

1 measurements on HVAC, boilers, and such. We have
2 been in business since 1896. We started out as part
3 of Eddison, and I guess, you know, our -- in looking
4 at the boiler regulation the construction
5 regulation, it specifically says underwriters
6 laboratory certification label. And we would
7 respectfully request the board to consider modifying
8 that code to allow for other qualified certification
9 agencies in addition to Underwriters Laboratory. To
10 us that seem a bit restrictive requiring the UL mark
11 on a boiler when there are other agencies like
12 Intertek, CSA, FM approvals and also NSF that can
13 do -- they're approved to do the same kind of work.
14 That really to us is an administrative change.

15 The national boiler inspection code as a
16 good general reference to those kind of
17 qualifications, we'd prefer that the Tennessee code
18 mirror the language of the financial -- or national
19 boiler inspection code, if possible.

20 THE CHAIRMAN: Okay. Do I have a motion
21 to discuss?

22 MR. HENRY: So move.

23 MR. BAUGHMAN: Second.

24 THE CHAIRMAN: What questions or
25 comments does the board member have?

1 MR. BAUGHMAN: Mr. Davenport, thank you
2 for being here and presenting this to us. So
3 Intertek previously ELT, being a NRTL facility, how
4 does your facility test unit and certify them as far
5 as manufactures go in particular related to electric
6 boilers.

7 MR. DAVENPORT: We have a number of
8 laboratories in the US and Canada. Those
9 laboratories are accredited by national
10 accreditation bodies for that type work for those
11 specific test standard. We have quite a few test
12 standards. We also participate on many of the
13 standard writing bodies. So we understand the codes
14 and we understand the products specifications.

15 Normally, are laboratories are
16 centralized around certain specialties, certain
17 discipline. So we have a laboratory in Plano, Texas
18 that does most of the work around these types of
19 products. I'm not a technical expert in the field
20 to be sure, but we have registered professional
21 engineers and our chief engineering structure that
22 handles the technical qualification of all of our
23 staff working on these types of products.

24 MR. BAUGHMAN: So we mentioned United
25 States and Canada. What about Mexico?

1 MR. DAVENPORT: We don't do work
2 specifically in Mexico, but we would evaluate that
3 might aminate from Mexico in our laboratories in the
4 US.

5 MR. BAUGHMAN: Do you know what
6 laboratory that would go to in particular?

7 MR. DAVENPORT: I think it would
8 probably either go to the Plano laboratory or the
9 laboratory we have in Kirkland, New York just south
10 of Syracuse.

11 MR. BAUGHMAN: Okay. If we were to have
12 an issue with Intertek labeling their equipment with
13 the -- do they put ETL label still on there.

14 MR. DAVENPORT: Yes.

15 MR. BAUGHMAN: So it's still got an ETL
16 label even though it's back to Intertek. What would
17 the procedure be if you found, because these labels
18 also says they conform to UL statute, what have you.
19 What would the process be if we found multiple units
20 coming out of a manufacture that had the labels on
21 it, but were not actually conforming. What would be
22 the process on addressing that back through ETL.

23 MR. DAVENPORT: Well, there's a couple
24 methods to do that. We do have a web presence where
25 an inspector can go to our website and issue a

1 complaint against a certain lines of products. But
2 we're also available on the call. Paul Maliski
3 (phonetic) our vice president of accreditations
4 completed the paperwork for this meeting. He would
5 be a prime contact. I would also be a contact. We
6 often talk to regulators and people in the field
7 relating to compliance of the products that we mark.
8 Once that report comes in, we have a pretty robust
9 process for investigation and determination if, you
10 know, if there was an excursion from compliance we
11 would have a full investigation team that would
12 address that directly with the manufacture. And at
13 the end of the day that may require recalls, retest,
14 whatever obviously public safety.

15 MR. BAUGHMAN: And that's good
16 information to know, because we are encountering
17 that. And so I bring that to the table from we're
18 UL listed shop personnel, and because of that if we
19 are in noncompliant we cannot put labels on. We go
20 through the variation, the associated fees and what
21 have you associated with being noncompliant. But in
22 particular with you bringing this to the table for
23 our discussion one of the issues that I have is that
24 we have multiple electric boilers that is produced
25 from a manufacture utilizing the ETA label with a UL

1 conformity, and the only reason that we knew that
2 this was a problem was that we -- because we only
3 accept UL certification, we got UL involved to do
4 field inspections, and these units are consistently
5 failing.

6 And so it was brought up that this needs
7 to be brought up and taken through ETL which being a
8 member of the board, I can do so much investigation
9 and so forth, but this is a good place to have this
10 discussion because as we stand today, the only
11 reason this noncompliance came up was because of
12 where we stand with UL and our codes. So we have
13 boilers that are noncompliant to ETL. We need to
14 move forward in communicating and addressing that,
15 but as it stands status quo today, we still have
16 boilers that are noncompliant from this entity of
17 electric boilers in our industry, and it makes it
18 difficult for us to carte blanche accept ETL at this
19 time, you know. So I just brought that up for your
20 own discussion, conversation to let you know what
21 issues we're are dealing with.

22 MR. DAVENPORT: I appreciate that. We
23 welcome that kind of feedback. If we can get more
24 detail on those products, we certainly can open up
25 an investigation on our side. We'd be happy to do

1 that absolutely.

2 MR. BAUGHMAN: And I believe that's the
3 directional process to go through being that ETL
4 Intertek is a competent testing laboratory in order
5 for them to be within our acceptability moving
6 forward that we need to address what we are dealing
7 with presently.

8 MR. DAVENPORT: That make perfect sense
9 to me.

10 MR. BAUGHMAN: That's my comments.

11 THE CHAIRMAN: So what's our path
12 forward?

13 MR. BAUGHMAN: Mr. Henry, do you have
14 input on that too.

15 MR. HENRY: You are experienced in this
16 so I am going to defer to you.

17 MR. BAUGHMAN: Some entity other than
18 myself needs to be communicating with Mr. Davenport
19 and I didn't write down the other --

20 MR. DAVENPORT: Paul Maliski but either
21 one of us is fine.

22 MR. BAUGHMAN: To get this process going
23 because as we stand today, we are going through
24 compliance issues and I don't think this will be
25 limited although information that we are dealing

1 with is Tennessee, but I think this will go across
2 the board to others that are utilizing this electric
3 boiler that is not being compliant. So the boiler
4 unit will need to start this process and
5 communication going and filing a complaint or
6 whatever the process is back through Intertek to
7 start seeing how to move forward.

8 MR. BAILEY: Mr. Chairman, you have a
9 question.

10 THE CHAIRMAN: I'm sorry. Mr. Toth.

11 MR. TOTH: So the main issue that we are
12 up against is obviously UL, CSA, ETL is aiming more
13 toward those refrigeration heating that are coming
14 from Asia, correct? That's where it's mostly coming
15 from, from china in essence?

16 CRAIG DAVENPORT: Well, due to
17 manufacture, yes. We do quite a bit in the US as
18 well.

19 MR. TOTH: Well, that would be not so
20 much the Mexico issue as the issue of the items
21 coming in from China. And I know the issues that I
22 have ran into in the industry in the boiler pressure
23 vessel industry, there are some concerns in that
24 case that really need to be looked at before we
25 check off that box. And that's all I have to say

1 about that. Thank you.

2 MR. BAUGHMAN: Chief O'Guin, I'm going
3 to ask for your input on how to proceed further with
4 going through -- first of all let me back up. When
5 we are doing -- when UL is doing their field
6 inspections, they are only looking at fire and shock
7 hazard. And we have issues with that in as much as
8 there's some other wiring that UL will or that
9 Intertek will look at the conformity to UL and
10 address even further at the manufacturer. And this
11 will be good for everybody. It will make for a
12 better product and so forth.

13 This particular boiler used to be UL and
14 a change made it to where they dropped UL and went
15 with ETL. But how to follow that back up and
16 utilize the resources of the boiling unit is what
17 I'm looking to bounce off of you.

18 MR. O'GUIN: I have Paul's contact so
19 I'll speak with Dan kind of shortly after the
20 meeting and get legal advise and then I'll followup
21 with Paul on how to move forward.

22 THE CHAIRMAN: So this is just a
23 progress report, right? I mean, we are not going to
24 vote or anything, are we?

25 MR. BAUGHMAN: No. Except that it's

1 requesting a ruling to revise the existing boiler
2 rule.

3 THE CHAIRMAN: But you have to do all
4 this leg room first.

5 MR. BAUGHMAN: So we are going to table
6 the ruling.

7 THE CHAIRMAN: Yes. I would table to
8 ruling until we get the homework done and come up
9 with a proposal that we can vote on would be my
10 recommendation. I mean, that's going to be the best
11 path forward for all parties involved. I think that
12 would be a good thing to do.

13 MR. BAUGHMAN: Do you agree?

14 CRAIG DAVENPORT: I agree. I think that
15 sounds reasonable given the information.

16 THE CHAIRMAN: So you can reach out to
17 chief O'Guin and he can reach out to the board as
18 needed. And we can all have input as we build this
19 and whether we get to the bottom and see what we
20 need to do with it whether we need to make changes
21 to it. All right. So we will leave that as a
22 progress report.

23 MR. DAVENPORT: Thank you very much we
24 appreciate the opportunity.

25 THE CHAIRMAN: Trying to keep my notes

1 caught up. I apologize. So next on our agenda is
2 BC22-02, Power boiler external inspection frequency
3 requirements.

4 So we having BC 22-02 the statement of
5 need is the staff of the Tennessee boiler unit is
6 requesting a ruling by the Tennessee Board of Boiler
7 Rules for frequency of the external inspection.

8 Background, The Tennessee code
9 68-122-110(a)(1) Power boilers shall be inspected
10 annually both internally and externally while not
11 under pressure and shall also if possible, be
12 inspected externally while under purchase
13 approximately six months following the date of each
14 internal inspection.

15 Inquiry, what is the external inspection
16 frequency requirements for power boilers?

17 Reply, it is in the opinion of the
18 Tennessee Board of Boiler Rules that power boilers
19 external inspection shall be performed six months
20 after the internal inspection has been performed.

21 The second inquiry is, are miniature
22 power boilers required to have an external
23 inspection? And the reply is, it is in the opinion
24 of the Tennessee Board of Boilers Rules that
25 miniature power boilers are required to have an

1 external inspection that shall be due six months
2 after the internal has been completed.

3 The final inquiry, are electric power
4 boilers required to have an external inspection?
5 And the reply, it is in the opinion of the Tennessee
6 Board of Boilers Rules that an electric power boiler
7 is required to have an external inspection that
8 shall be due six months after the internal has been
9 completed. So...

10 MR. O'GUIN: Chairman, the reason that
11 we are requesting this, the statute -- it's saying
12 approximately -- I can't hold anybody accountable as
13 far asking making sure these vessels are looked at
14 twice annually. What's happening is they will come
15 and do the internal and three days later do the
16 external. Will since it don't say shall, it says
17 approximate, there's really nothing I can do. So we
18 wanted to present the board case and kind of get
19 that more tied down so it's not 12 months in between
20 inspections.

21 THE CHAIRMAN: Well, what's interesting
22 is that you have leverage on that already with the
23 variance for internal inspection of power boilers to
24 extend that from annual to either 18 months or 24
25 months. And it clearly states in that variance that

1 you must do an external every six months. So you
2 already have part of that built in to the boards
3 internal inspection variance. So I think that's
4 reasonable, don't you?

5 MR. BAUGHMAN: I agree.

6 THE CHAIRMAN: So motion to discuss.
7 What comments do you have? Do I have a motion to do
8 that?

9 MR. BAUGHMAN: So moved.

10 MR. HENRY: Second.

11 THE CHAIRMAN: What other questions and
12 comments.

13 MR. BRANDEN MATUB: Branden Matub, is
14 this still going to be a two month variance on that,
15 two day grace period --

16 THE CHAIRMAN: Yes. Mr. Toth.

17 MR. TOTH: I think that one month
18 Chief O'Guin has is something that's being on going
19 to a long time. I think support from the board in
20 this interpretation to give it to the discretion of
21 the chief inspector or his designees in regard to
22 that will allow for them to give them some tea, so
23 if they say they want it every six months, that's
24 when you're going to have it. If you feel it's --
25 you're unable to actually put it in, that it will be

1 six months. Again it's misinterpretations
2 throughout the years and there are even some
3 jurisdictions that misinterpret that. It's all
4 about safety. It's not about convenience for the
5 inspector. It's not about money. It's about
6 safety. And in regards to the other boiler that are
7 listed such as the electric miniature boiler, they
8 have safety features in place that need to be
9 checked while the boiler is in operation. Not to
10 have that, is asking for trouble. Thank you.

11 THE CHAIRMAN: Thank you, Mr. Toth.
12 Other comments? All right. Hearing none, do I have
13 a motion?

14 MR. BAUGHMAN: Motion to accept boiler
15 case 22-02.

16 THE CHAIRMAN: Second.

17 MR. HENRY: Second.

18 THE CHAIRMAN: Comment? Question?
19 Hearing none, I'm going to call the question. All
20 in favor say, aye.

21 THE BOARD: Aye.

22 THE CHAIRMAN: Opposed? Abstention not
23 voting; it's approved.

24 So that takes us to BC 22-03, and the
25 statement of need for 22-03, is the staff of the

1 Tennessee Boiler unit is requesting a ruling by the
2 Tennessee Board of Boiler Rules to allow boiler
3 attendants to perform checks pursuant to National
4 Boiler recommendations every one hour instead of 20
5 minutes.

6 The background for this is that the
7 20-minute rule was put into place in 1949, and with
8 advances in technology in today's boilers, these
9 checks can be made once every hour.

10 The next inquiry is it required for a
11 power boiler 5 horsepower or 50 square feet of
12 heat-absorbing surface or greater be checked once an
13 hour?

14 The reply is, it is the opinion of the
15 Tennessee Board of Boiler Rules that the power
16 boilers can be checked once an hour pursuant to
17 National Boiler's recommendations.

18 The final inquiry is, is it required for
19 an attendant to maintain the boiler logs of the
20 checks?

21 The reply is, it is the opinion of the
22 Tennessee Board of Boiler Rules that the attendant
23 shall maintain boiler logs of all hourly checks.

24 So with that, do I have a motion to
25 discuss?

1 MR. HENRY: So moved.

2 MR. BAUGHMAN: Second.

3 THE CHAIRMAN: What question, comments
4 do you have for 22-03?

5 MR. BAUGHMAN: My comments are, yay.
6 This has been a long time coming. The boiler logs
7 make sense. We require them for the four-hour
8 checks. It gives some amount of accountability.
9 Logs can be fudged, but when it comes down to rubber
10 hitting the road, you've got to have accountability.
11 And so the logs bring somewhat of that aspect to the
12 table. So mandating those in there advocate for the
13 one hour -- so, yes, thank you.

14 THE CHAIRMAN: Other comments.
15 Mr. Toth.

16 MR. TOTH: As for the logs, logs have
17 always been spelled out in NFP85CSD1. I think this
18 is great that you are putting something in place. I
19 think we can go a little bit further with that as to
20 what is going to be indicated on such logs, but for
21 right now actually having a log that indicates that
22 somebody has been there is good. I'm on the fence
23 when it comes to a 20 minutes or an hour.
24 Obviously, I have individuals that I work with in
25 the service industry that do have concerns with

1 lifting the 20-minute requirement due to deaerators
2 being sized to hold X amount of gallons of water,
3 how quickly they can be drained and things of that
4 nature. But I think one hour is sufficient. In the
5 Navy we did reading once an hour. If the Navy can
6 do it, I think we can do that in the industry. The
7 concern that I have -- this goes back to Mr. Brown
8 as to having a board case because when we created
9 board cases interpretation the board case was
10 something that was going to go in addition to the
11 written rules. So the written rule right now is
12 once every 20 minutes. Do we feel this would be
13 sufficient to extend this board case to an hour or
14 is it something that you plan on removing or
15 changing in the current rules and regulations and
16 sending that up through the process?

17 THE CHAIRMAN: What's your opinion?

18 MR. O'GUIN: My opinion is changing the
19 rules -- more interpretation of the rule change.

20 MR. TOTH: And let me ask a question.
21 Chief O'Guin, you and I have discussed this. Have
22 you heard any opposition to this whatsoever on the
23 service side?

24 MR. O'GUIN: I have not.

25 THE CHAIRMAN: Well, and correct me if I

1 am wrong, but if you set it at an hour if an
2 owner/user wants to check it more frequently, you
3 are not violating anything, correct?

4 MR. TOTH: That's right. If I may, the
5 feedback that came to me came from people in the
6 service industry that had concerns of it. I have
7 been of the opinion that one hour can be sufficient.
8 It used to be there was a couple of rules of thumb
9 of why it was 20 minutes. There was funny stuff
10 that we will not mention here, but some of the
11 reason was that fact that that would be the time it
12 would take a certain size boiler to actually get
13 into a dry fire condition. And so with the advent
14 of the automatic controls not having a boiler
15 operator on site, those were in essence antiquated
16 time. Now, this is going to affect all variances
17 henceforth that are put before the board, but I
18 guess we would change those as times permits.

19 THE CHAIRMAN: All right. Any other
20 comments? All right. Hearing none, do I have a
21 motion?

22 MR. BAUGHMAN: I'll make the motion to
23 accept and pass board case 22-03.

24 MR. HENRY: Second.

25 THE CHAIRMAN: All in favor say aye.

1 THE BOARD: Aye.

2 THE CHAIRMAN: Opposed. Abstention not
3 voting. All right, it's passed. All right. I have
4 12:05, and I think we will take a break for lunch
5 unless you tell me different. No objection to that.
6 All right. So 30 minutes. Will that work? So
7 we'll reconvene roughly at 12:30, 12:35.

8 (Short break.)

9 THE CHAIRMAN: So we are now on item
10 BC22-04 and clearance requirements for wall mounted
11 tankless boilers. All right. The statement of need
12 for this item is, the staff of the Tennessee Boiler
13 unit is requesting a ruling by the Tennessee Board
14 of Boiler Rules to allow tankless hot water supply
15 boilers of wall mounted, stacked, and modular design
16 to be exempt from the installation clearance
17 requirements or Rule 0800-3-3-08(4)(a).

18 Background is with the advances in
19 technology and design, the boiler industry has seen
20 hot water supply boilers coming into the market that
21 are mounted on walls. These low pressure boilers
22 have either been labeled and/or listed by a
23 nationally registered testing agency. In the case
24 of those boilers 200,000 BTU per hour and greater
25 or those boilers with combined 200,000 BTU per hour

1 and greater. The boiler is required to be stamped
2 ASME and registered with the national board.

3 Inquiry, is it required is it required
4 for a low pressure hot water supply boilers be
5 designed and installed as a wall mounted unit to
6 adhere to the minimum clearance of at least
7 one-and-a-half feet clearance requirements set forth
8 in rule 0800-3-3-08(4)(a) of the Tennessee Boiler
9 Rules and regulation, except for the wall mounted
10 side -- set forth in Rule 0800-3-3-.08 (BC06-23).

11 Reply: it is in the opinion of the
12 Tennessee Board of boiler rules that the tankless
13 wall or rack mounted low pressure hot water supply
14 boilers that are designed accordingly may be exempt
15 from the clearance requirements of Rule
16 0800-3-3-.08(4)(a).

17 Wall and rack mounted tankless boilers.
18 This installation will include the phrase per
19 manufacture recommendation for clearance.

20 Two, the boiler nameplate and where
21 applicable, code stamping is in view or as stated in
22 Rule 0800-3-3-03-(23). The following shall be
23 legible to the unaided eye: Manufacture name or
24 certifying agency input rating BTU/HR, maximum
25 allowable working pressure, manufacture, serial

1 number or NBIC code number and year of manufacture.

2 Three, the boiler safety relief device
3 shall be accessible by the inspector. The operation
4 and testing lever shall not be obstructed by the
5 installation or another unit or mounting surfaces or
6 piping. The relief device shall be visible to the
7 unaided eye and have the following information
8 available: Size, set pressure, manufacturer, and
9 code stamping and BTU/HR.

10 Four, the installer should indicate if
11 the boiler is wall mounted on the permit application
12 submitted for permission to install to ensure
13 manufacturer recommendations have been utilized at
14 minimum.

15 Five, Boilers that exceed 400,000 BTU/HR
16 are required 36 inches clearance as per
17 0800-03-03-.08 (4)(1).

18 And six, the chief inspector or his
19 designee has the discretion to require more
20 clearance if needed for inspection purposes.

21 So do I have a motion to discuss.

22 MR. HENRY: So moved.

23 MR. BAUGHMAN: Second.

24 THE CHAIRMAN: What questions or
25 comments do you have on this item?

1 MR. HENRY: Just ask a clarification if
2 I may. I'm not sure I understand what number 1 is
3 trying to say. If anyone can help with that, I
4 would appreciate it. It say, accordingly maybe
5 exempt from require clearance requirements as
6 follows and maybe I'm reading it wrong. What is the
7 intent of subparagraph 1?

8 THE CHAIRMAN: Well, you can have these
9 individually or you can have them in a module or you
10 can have -- it's almost like a stacked on. You can
11 add more BTU by putting more of them together as one
12 unit. That's the way I'm reading it.

13 MR. HENRY: Chef O'Guin, what do you
14 think about that.

15 MR. O'GUIN: I thought we had added
16 about the communication tables in our reply. Do any
17 of you-all recall that?

18 MR. BAUGHMAN: I do not see it in mine.
19 I remember discussing it, but it's not in this board
20 case. One of the things that it doesn't -- while
21 you are looking that up, I'll bring it up, because
22 it does not relate to clearance. But it's the
23 relief filed installations on these units themselves
24 that's a concern in particular the safe point of
25 discharge. So it gets into some of the same issues

1 that we deal with on other pieces of equipment
2 whether it be boilers or sterilizers or whatever.
3 It's that safe point of discharge. And so many of
4 these just have a relief valve either open or -- so
5 I know we are looking at being able to have them
6 accessible by the inspector, but also having those
7 installed properly is something that I see out in
8 the field that's is fairly inconsistent.

9 MR. O'GUIN: I cannot find it for the
10 communication. We can add it or table it to another
11 if you think there's going to be a lot of
12 discussion, so we can get through some of these
13 items. So it's not a big deal to table it. I know
14 Mr. Henry needs to leave at 1:30 and I don't want to
15 hold up a lot of time.

16 THE CHAIRMAN: Is that your preference
17 is to table it?

18 MR. O'GUIN: Let's table it and we'll
19 look at it more and get a couple more plumbers
20 involved with it.

21 THE CHAIRMAN: BC 22-04 will be tabled
22 to the September 2022 Tennessee board meeting. So
23 that will takes us to -- that will take care of rule
24 cases. So lets look at board interpretations. And
25 the first one is BI 22-01 walkways, runways, and

1 platforms. And let me get to that. Marty, do you
2 want me to present this.

3 MR. TOTH: I can Mr. Chairman, or if you
4 would like to go the way you've been doing it that
5 will be fine. Whichever way you want to do it. I'm
6 here to answer any questions that you may have.

7 THE CHAIRMAN: I'll read it and we'll
8 discuss it. So the background -- the statement of
9 need for this is, is ESC Consulting, LLC requests
10 the Board of Boiler Rules provide an interpretation
11 on the requirements for walkways, runways, and
12 platforms above boilers installed in the State of
13 Tennessee.

14 The background, though there are very
15 specific installation requirements within Part 1
16 installation of the National Board Inspection Code
17 regarding walkways, runways, and platform, provided
18 between or over the top of boilers, heaters or
19 vessels that are more than 8 feet above the
20 operating floor, the enforcement of these
21 requirements if often not enforced uniformly
22 throughout the state or between inspectors.

23 So Inquiry one is, In the state of
24 Tennessee is it required for all boilers, heaters or
25 vessels where the top of the unit is more than 8

1 feet above the operating floor required to be
2 provided with walkway, runways, and, slash, or
3 platform.

4 The reply is, yes. Per the requirements
5 in NBIC part 1 section 1.6.4, Ladders and runways.

6 Then inquiry two, if inquiry one is yes,
7 are provided walkways, runways, or platforms
8 required to have two means of exit? Reply 2, only
9 those runways and platform that exceed 6 feet in
10 length are required to have at least two permanently
11 installed means of exit.

12 Do I have a motion to discuss?

13 MR. HENRY: So moved.

14 MR. BAUGHMAN: Second.

15 THE CHAIRMAN: What questions or
16 comments do you have?

17 MR. BAUGHMAN: So this is a requirement
18 laid out by MBIC. Are there variables to that to
19 where we'd have a vessel that would not have the
20 need -- in other words it exceeds the height
21 requirement, but would not have the need to be on
22 top of the vessel whether that be a storage tank and
23 air tank, so forth. So what I'm looking at is this
24 interpretation does not give any leeway to have any
25 variables to it, whether that be through the chief

1 or come back to the board or what have you. I just
2 notice as we look at these installation, there
3 may -- and I cannot think of anything offhand
4 specifically. But there maybe a time that it's not
5 applicable even though the letter of the code state
6 we have to have this ladder and platform because of
7 the height requirement. So I don't know how to add
8 that possibly in there.

9 MR. TOTH: Mr. Chairman, DCS consulting,
10 I failed to put into the interpretation request. I
11 mentioned MBIC. There's actually something in the
12 rules and regulations pertaining to this under .04
13 that speaks pretty much verbatim to those
14 requirements for boilers and pressure vessels. So
15 if we do go that route and if it's something that
16 you feel strongly about, I think this would be the
17 appropriate place to add another inquiry or a
18 statement, an answer, that does allow for the chief,
19 at the point of installation permit, you know, to
20 where you could revise the permit application
21 requesting such a waiver. Because again it spells
22 out specifically in the rules and regulations that
23 you will have runways and platforms. So that's
24 under installation which is .04. And so anything
25 that deviates from that, would be by control of this

1 body. Does that make since? You are putting the
2 chief in a bad position where now he's not only the
3 enforcer of the rules but he's making the rules.
4 And he doesn't want that. He doesn't want to be put
5 in that position.

6 MR. BAUGHMAN: So being that it's
7 already in our rules and regulations, which means
8 it's enforceable --

9 MR. TOTH: Why are we doing the
10 interpretation?

11 MR. BAUGHMAN: Partly. And then what do
12 we do retroactively too since it's already in our
13 rules and regulation and if it hasn't been enforced
14 are we going to go back, because nothing is
15 technically grandfathered in.

16 MR. TOTH: It doesn't give that
17 opportunity. And I can give you a small background
18 about this. Is my company we work with installers
19 and in some cases service companies, and they are
20 putting forth bids for job. And they put in the bid
21 for the job that goes by the letter of the code,
22 however, somebody else puts it in and doesn't do it,
23 and next thing you know it flies by it and everybody
24 inspects it and they are good to go, and company A
25 is wondering well, I'm trying to follow the code and

1 it's just getting past. And I think it's something
2 that sat at the end of .04, nobody paid a lot of
3 attention to it. And it's kind of slipped through
4 the cracks. Whereas, if we have an interpretation
5 out there, yes, we are enforcing this and it needs
6 to be put out there.

7 MR. O'GUIN: And one thing, the Board of
8 Boiler Rules does state runways are necessary for
9 safety. There shall be a steel runway or platform
10 of standard construction installed across the tops
11 of boilers or pressure vessel --

12 MR. TOTH: Thank you. And that's a
13 great point of why we went through the next level of
14 this is that it helps define it further than the
15 rules. Let's go back to what the MBIC states and
16 then the intent is next time we open up the rules
17 and regulation we can take these interpretation and
18 board cases incorporate them into your rules and
19 regulation and archive those essentially if you
20 don't need them anymore since it's in the rules.

21 THE CHAIRMAN: Well, are there OSHA
22 rules too? If somebody is going to climb something
23 that's eight feet high that you have to have a
24 harness, ladder, and cage and all that stuff on.

25 MR. TOTH: You're opening up a can of

1 worms. Let's stick with this.

2 THE CHAIRMAN: I'm fine with the regs
3 and installation. I don't have a problem with that.
4 Any comments or questions?

5 MR. HENRY: Couple minor things, the
6 inquiry two, I would suggest to say, if the response
7 to inquiry one is yes -- I think that's the standard
8 formula or that.

9 The second on, on the six feet in length
10 is there any concern that should you say length or
11 width since I think...

12 MR. TOTH: You definitely could add that
13 into this.

14 MR. HENRY: Just so nobody would
15 circumvent the rules.

16 MR. TOTH: It could be that or any
17 dimension.

18 MR. HENRY: So six feet in any dimension
19 right.

20 MR. BAUGHMAN: That would be good. So
21 my issue with this getting back into the background
22 the enforcement of these requirement is often not
23 enforced uniformly throughout the state or between
24 inspectors, is how are we going to enforce this
25 moving forward? And so you are talking about new

1 installation, but again it's a rule or regulation
2 that do we go back retroactively and if we don't
3 then we are not enforcing it again as we're
4 intending to do. So I've got -- and it's a question
5 in my mind of how I've advising customers on how we
6 address this particular issues, because they're
7 going to have push back to it.

8 So I'm for putting this forward. I just
9 don't know how to address it to make it uniformly
10 enforced entity, because we cannot segregate the
11 enforcement of our rule.

12 MR. TOTH: If I can reply to that.
13 That's a great point. In that if you take the same
14 approach this body took with other interpretation in
15 other cases in regards to locale E-stops and things
16 of that nature and how the boiler unit is able to
17 enforce that for those locations, you can probably
18 put that within as a inquiry three or add it to
19 inquiry two and establish that all location even if
20 they have been registered. You do have the power to
21 do that, because this is not something that was just
22 added. This is something that has been there. They
23 have their annual meeting. That would be part of
24 the trainings, identification of those things and
25 then just enforce it the way that it is.

1 MR. BAUGHMAN: And I still would like to
2 have the ability to have a variance to it should
3 that be identified in the field and be valid.

4 MR. TOTH: And it would have to be at
5 the point of installation or you're saying be
6 retroactive -- can I ask not to take up too much
7 time on it. Can you give me an example of where
8 you'd feel something would be 8 feet above the floor
9 where they would not need something like that.

10 MR. BAUGHMAN: Not offhand. I can just
11 foresee it -- again, we are taking a broad brush
12 stroke, and that does not always apply. So I'm
13 thinking of that. No, is the short answer to the
14 question.

15 MR. TOTH: The things that Chief O'Guin
16 and his staff have by way of the permit allow for
17 certain individual waivers. We don't call them
18 variance. We want the variance to stay at this
19 body, and a waiver to stay at the chief's
20 discretion. I think that that would be -- if he
21 wants that responsibility I think that would be an
22 appropriate situation. The concern that I have,
23 just as a former inspector myself is that we look at
24 things like a large storage tank that can be 10 feet
25 off the ground and now we are going to ask an

1 inspector to climb up a ladder to get to it while
2 somebody is trying to hold it so he can verify
3 safety valves. This gets away from that, and that's
4 the whole purpose of this. So we have to have a way
5 for the inspectors to get up there safely without
6 the fear of whatever they are standing on slips out
7 from under them.

8 MR. BAUGHMAN: There's no question about
9 why. Getting back to my original whether it's a
10 waiver or what have you, because somewhere along the
11 line, there maybe a waiver on the front end and
12 another inspector comes in down the road and goes,
13 well, we don't have this ladder or walkway in place.
14 And so that was the only reason of adding anything
15 to that.

16 THE CHAIRMAN: Okay. Any other
17 comments? Do I have a motion?

18 MR. HENRY: I move we accept these
19 inquires and replies with the recommended
20 corrections indicated and move to accept those.

21 THE CHAIRMAN: Second?

22 MR. BAUGHMAN: Second.

23 THE CHAIRMAN: All in favor say aye.

24 THE BOARD: Aye.

25 THE CHAIRMAN: Opposed? Abstention.

1 Passed. Okay. That takes us to board
2 interpretation 22-02, automatic bottom blowoff. So
3 the statement of need is ECS Consulting, LLC,
4 request the Board of Boilers Rules provide an
5 interpretation on the installation and utilization
6 of automatic bottom blowoff valves on boilers
7 installed in Tennessee.

8 Background, Although, it is common
9 practice in the industry for surface blowdown of
10 impurities to be drained from the boiler employing
11 continuous blowdown or automatic means, the same
12 cannot be said for bottom blowoff. There are
13 boilers manufacturers that provide the option of
14 automatic bottom blowoff equipment with their boiler
15 installation. There is a need for a clear
16 understanding of the Board of Boiler Rules and the
17 Tennessee Boiler unit's position on their use within
18 the state.

19 Inquiry one, are automatic bottom
20 blowoff valves allowed to be installed and utilized
21 in Tennessee. And the reply is, no.

22 Inquiry two, is a qualified owner,
23 slash, user attendant operator required to be
24 present at the boiler while a manual bottom blowoff
25 is being performed, and the reply is, yes.

1 And so with that, do I have a motion to
2 discuss?

3 MR. HENRY: So moved.

4 MR. BAUGHMAN: Second.

5 THE CHAIRMAN: Okay. What comments do
6 you have?

7 MR. BAUGHMAN: I'm in total agreement of
8 this. We addressed this firsthand safety wise.
9 We've encountered the safety issues, have discussed
10 it with other companies that are selling boilers
11 that they sold the automatic blowdown with the
12 boilers, and as this discussion has moved forward,
13 there was nothing to address it in our codes. So
14 I'm glad this is up here and thank you for getting
15 wrote up and presented. We're addressing totally
16 the bottom blowdown aspect of this equation and the
17 operation of the boiler.

18 THE CHAIRMAN: Very good. Any other
19 comments?

20 MR. HENRY: (Shook head negatively.)

21 THE CHAIRMAN: Hearing none. Those in
22 favor say, Aye.

23 THE BOARD: Aye.

24 THE CHAIRMAN: Opposed? Abstention not
25 voting. That passes. That the takes us to item

1 22-03, internal inspection for low pressure heating
2 boilers. The statement of need: The staff of the
3 Tennessee boiler Unit is requesting a ruling by the
4 Tennessee Board of Boilers Rules for low pressure
5 inspection requirements.

6 Background, in the past, the low
7 pressure heating boiler internals were only
8 performed at the discretion of the inspector.
9 Tennessee law 68-122-110(a)(2) states low pressure
10 heating boilers shall have an internal and external
11 biennially where construction permits.

12 Inquiry one, what is the frequency for
13 the required inspection on low-pressure heating
14 boilers?

15 Reply, it is the opinion of the
16 Tennessee Board of Boiler Rules that low-pressure
17 heating boilers be internally and externally
18 inspected biennially. The external inspection shall
19 be the certificate inspection with the internal
20 following 12 months after the external. The
21 internal shall be at least 60 days after the
22 external.

23 So do I have a motion to discuss?

24 MR. HENRY: So moved.

25 MR. BAUGHMAN: Second.

1 THE CHAIRMAN: What question or comments
2 do you have?

3 MR. TOTH: Do you mind reading the
4 response?

5 THE CHAIRMAN: The reply.

6 MR. TOTH: Yes.

7 THE CHAIRMAN: It is in the opinion of
8 the Tennessee board of Boiler rules that low
9 pressure heating boilers be internally and
10 externally inspected biennially. The external
11 inspections shall be the certificate inspection with
12 the internal following 12 months after the external.
13 The internal shall be at least 60 days after the
14 external.

15 MR. TOTH: So I love the idea of
16 internal on heating boilers. The concern that I
17 have is what burden is that going to put on your
18 staff, Chief O'Guin. And the reason is, is not only
19 labor wise but also physically, because if you are
20 only charging -- your charging a certificate fee
21 once every two years and you're charging an
22 inspection fee based on that certificate inspection,
23 are you now going to require an inspection on
24 that -- in between year. And what authority is set
25 in place right now for that. Again, I think it's

1 great that you are doing it. I just think it's more
2 than just we are going to do internal inspections,
3 because you are going to run into a lot of physical
4 and labor intensity. Personally, I think that doing
5 it every two years within the timeframe, because we
6 know it's just heating boiler and not hot water
7 supply boilers, that those heating boilers are going
8 to be down in the summer and up in the winter. And
9 so that timeframe -- and I tell all my clients and
10 students about these low pressure boiler. And I
11 demonstrate how important it is to do these
12 inspection. I think if you maneuver it where it's
13 not labor intensive on your staff, I think you are
14 going to get a lot more out of it.

15 MR. O'GUIN: The purpose behind the --
16 well, we are finding a lot now -- we're at the point
17 where schools they have never been opened in 20
18 years and they are completely blocked. So then it's
19 heating season and they don't have any heat. And
20 we're having to go in and try to fix this stuff.
21 But my thought process and some more of -- do this
22 once a year, you know, the external is your
23 certificate. So if you put the internal due within
24 a 60 day to 12-month window, then they can go in and
25 do this in the summertime when they're down. And

1 yes, they will still be charged an inspection fee
2 but not the certificate fee.

3 MR. TOTH: And Mr. Chairman.

4 THE CHAIRMAN: Yes.

5 MR. TOTH: And, again, it's -- you want
6 to have that backing and Dan can definitely help you
7 with that. Understanding that you have the
8 authority to do that whenever you want. Are you
9 also putting hot water heating boilers and steam
10 heating boilers in the same basket? And where I'm
11 going with that is hot water heating boilers you
12 should find less of scaling materials in them. Not
13 to get too technical -- and, again, I said, you
14 should. Steam hitting completely different animal,
15 because you have makeup water being put into it.
16 Are you putting -- or wanting them all to be this or
17 are they both hot water and steam?

18 MR. BAUGHMAN: I will address that
19 somewhat in that this does not differentiate steam
20 in this inquiry. And I disagree totally on the hot
21 water side being that we have boilers again totally
22 plugged up through hot water systems, hot water
23 pipes go through the ball field through the system.
24 The system has leaks in it. The boilers aren't
25 looked at. So we're not differentiating between

1 steam boiler and hot water boilers nor are we in the
2 same inquiry. And to move forward on it, the
3 inspection frequency can change somewhat because
4 we've got low pressure boiler from museum,
5 libraries, that are doing reheat that run year
6 around. So again it's not a one-size-fits-all
7 proposition. But we're going to be able to at least
8 address it to where now we are mandating that these
9 inspection be dons. Will there be flexibility, I
10 believe so.

11 MR. O'GUIN: In the interpretation we
12 are looking at the heating boiler definition which
13 states means a steam or vapor boiler operating at
14 pressure not exceeding 15 PSIG or a hot water boiler
15 operating at pressure not 160 PSIG or temperature
16 not exceeding 250 Fahrenheit. That was the
17 definition out of 0800.

18 MR. TOTH: And I'm not disputing that at
19 all. I just wanted to make sure we are clear on
20 that. Is the intent to get this interpretation in
21 and then go back and advise the rules to allow for
22 annual inspections and then identify certificates
23 and non certificate inspections?

24 MR. O'GUIN: The intent was to try to
25 get more -- follow the law and try to get the rules

1 to match the law, is our intent. With so many of
2 those issues being found and without writing some
3 kind of board determination -- the inspector just
4 keep doing -- it's very stressful. TCA trumps board
5 of boiler rules. Board of boiler rules can write
6 anything they want, but TCA trumps it.

7 MR. TOTH: The which code?

8 MR. O'GUIN: TCA trumps the board boiler
9 Rule. The TCA code is what you shall follow.

10 MR. TOTH: No I agree with that. Again,
11 it goes back to what Mr. Baughman said. It's hard
12 to write those rules because it comes from National
13 board, and that's how all those laws were written.
14 I agree 100 percent with it. I just want to make
15 sure that when you go down that road, you are going
16 to be protecting yourself. And it would be a good
17 idea to take this interpretation and eventually
18 incorporate it into your Rule and regulations so it
19 spells it out exactly how to run it.

20 THE CHAIRMAN: Any other comments.

21 MR. HENRY: If I may, I would suggest
22 just a slight rewording of the reply, the last part
23 I think. It's a little confusing as it's worded.
24 So we would say the external inspection shall be the
25 certificate inspection with the internal following

1 not less than 60 days or more than 12 months after
2 the internal inspection.

3 MR. BAILEY: I agree with that. I
4 thought the way it was worded was a little
5 confusing.

6 MR. BAUGHMAN: And that last statement
7 can be deleted all together.

8 MR. O'GUIN: Got it.

9 THE CHAIRMAN: Hearing no more
10 discussion, do I have a motion?

11 MR. HENRY: I move we accept the
12 interpretation of BI22-03 with the suggested
13 modification.

14 MR. BAUGHMAN: Second.

15 THE CHAIRMAN: All in favor say, Aye.

16 THE BOARD: Aye.

17 THE CHAIRMAN: Opposed? Abstentions.
18 It is passed. That takes us to the next item which
19 is open discussion item, which is none. And our
20 last item is announcement of the next meeting.

21 Unless the board decides otherwise, the
22 next regularly scheduled meeting of the Board of
23 Boiler Rules will be held at 9:00 a.m. on
24 September 14th, 2022, at the State of Tennessee
25 Department of Labor and Workforce Development

1 building located at 220 French Landing Drive,
2 Nashville, Tennessee.

3 And with that, do I have a motion to
4 adjourn?

5 MR. HENRY: So moved.

6 MR. BAUGHMAN: Second.

7 THE CHAIRMAN: Thank you all for being
8 very concise in getting all these items through the
9 agenda and so we are adjourned.

10 (Proceedings concluded at 1:23 p.m.)

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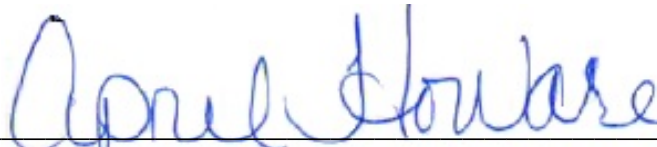
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REPORTER'S CERTIFICATE

STATE OF TENNESSEE
COUNTY OF RUTHERFORD

I, April C. Howard, Licensed Court Reporter, with offices in Smyrna, Tennessee, hereby certify that I reported the foregoing hearing of Board of Boiler Rules by machine shorthand to the best of my skills and abilities, and thereafter the same was reduced to typewritten form by me. I am not related to any of the parties named herein, nor their counsel, and have no interest, financial or otherwise, in the outcome of the proceedings.

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