STATE OF TENNESSEE
DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT
BOARD OF BOILER RULES

QUARTERLY MEETING OF THE
STATE OF TENNESSEE
BOARD OF BOILER RULES

August 8, 2018

CASSANDRA M. BEILING, LCR# 371
STONE & GEORGE COURT REPORTING
2020 Fieldstone Parkway
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APPEARANCES:

1. David W. Baughman, Acting Chairman
   Owner/User Representative
2. Allied Boiler & Supply, Inc.
   4006 River Lane
   Milton, Tennessee 37118
3. Harold P. Bowers
   Insurance Representative
   Centerville, Tennessee
4. Jeffrey Henry
   Boiler Manufacturer Representative
   Chattanooga, Tennessee
5. S. Keith Hargrove
   Mechanical Engineer Representative
   Goodlettsville, Tennessee
6. Sam Chapman, Chief Boiler Inspector
7. Chris O'Guin, Deputy Boiler Inspector
   Assistant Commissioner, State of Tennessee
   Legal Counsel, State of Tennessee
10. Lynn Kirby
    Board Secretary, State of Tennessee

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AGENDA

I. Call Meeting to Order
II. Introductions and Announcements
III. Adoption of the Agenda
IV. Approval of the March 21, 2018 Meeting Minutes
V. Chief Boiler Inspector’s Report
VI. Variance Report
VII. Old Business – None
VIII. New Business
   18-05 Cargill, Inc.
   18-06 Sofix
   18-07 Occidental Chemical Corporation (OxyChem)
IX. Open Discussion Items
   Status of the 2018 Tennessee Boiler Safety Conference
X. Rule Cases & Interpretations – None
XI. The next Board of Boiler Rules Meeting is scheduled for 9:00 a.m. (CT), Wednesday, September 19, 2018, at the Department of Labor & Workforce Development office building located at 220 French Landing Drive, Nashville, Tennessee.
XII. Adjournment.

** Reporter’s Note: All names are spelled phonetically unless otherwise provided to the Reporter by the parties.

ACTING CHAIRMAN BAUGHMAN: I've got right at 9:00, so we'll call the board of boiler rules meeting to be open.

I would like to welcome all of you. We're very thankful that each and every one of you is here, that you made it safely here today. Driving through Nashville traffic can always be an interesting proposition. But we're thankful that each one of you is here this morning.

Just as a matter of announcements, that should there be an event of an emergency or a disaster, that security personnel will take attendees to a safe place in the building or direct them to exit the building on the Rosa Parks side. So we're not anticipating anything, but just as a matter of protocol, to address that.

So as a matter of introduction, we have a new member sitting on our board of boiler rules board. And so, Mr. Henry, will you introduce yourself, please.

MR. HENRY: My name is Jeff Henry. I'm with a company called ATC-CES in Chattanooga, Tennessee. It's a pleasure to be here. Thank you.

ACTING CHAIRMAN BAUGHMAN: Well, we're glad to have Mr. Henry on the board. We're glad for your service you bring to the state. It's one of the most important boards, I feel like, in the state of Tennessee, from a safety standpoint that the public will never know about. And that's a good thing. So safety is the number one concern of what it is that we work with, and we're thankful that you're serving in that capacity, Mr. Henry.

MR. HENRY: Thank you very much.

ACTING CHAIRMAN BAUGHMAN: And so as a matter of introductions, then, we'll start going around the table here, and then continue on through with those in attendance. So we'll start here with yourself.

THE REPORTER: Cassandra Beiling, Stone & George Court Reporting.

MS. KIRBY: Lynn Kirby, board secretary.

MR. O'GUIN: Chris O'Guin, deputy boiler inspector.

MR. CHAPMAN: Sam Chapman, chief inspector.

MR. HARGROVE: Keith Hargrove, board member.
ACTING CHAIRMAN BAUGHMAN: Dave Baughman, board member.

MR. BOWERS: Harold Bowers, board member.

MR. HENRY: Jeff Henry, board member.

MS. JEFFERSON: Kim Jefferson, assistant commissioner.

MR. BAILEY: Dan Bailey, legal counsel.

MR. WILSDORF: I'm Don Wilsdorf, operations manager for Occidental Chemical in New Johnsonville, Tennessee.

MR. NEVILLE: James Neville, Neville Engineering.

MR. WHITLEY: Bruce Whitley, Occidental Chemical. I'm the subject matter coordinator.

MR. TOTH: Marty Toth, ECS Consulting and the Boisco Training Group.

MR. SCHONFELDER: Jameson Schonfelder with Cargill Memphis, utility supervisor.

MR. ANDERSON: Cody Anderson, engineer with Cargill Memphis.

MR. RYANTON: Mike Ryanton, state boiler inspector.

MR. PARHAM: Dave Parham, senior risk control consultant, Travelers.

MR. PETERS: Danny Peters, Tennessee state boiler inspector, Knoxville office.

MR. SHREINER: Justin Shreiner, Intellihot.

MR. HIGGINS: Kelly Higgins, Ferguson Enterprises.

MR. O'CONNOR: Michael O'Connor, qualifying agent for Mo's Mechanical.

MS. RHONE: Deborah Rhone, boiler office supervisor.

MS. PAIGE: Ebony Paige, ASA3, WRC.

MR. RAWLS: Bruce Rawls, Industrial Boiler out of Chattanooga.

MR. REYNOLDS: Sean Reynolds, Sofix, LLC, EHS manager.

MR. FRADY: Anthony Frady, technical service manager with Sofix, LLC out of Chattanooga, Tennessee.

MR. CAHILL: Paul Cahill, president, Sofix.

MR. PAULUCCE: Anthony Paulucce, plant manager, Sofix.

MS. XIXIS: Stamatia Xixis, department liaison.

ACTING CHAIRMAN BAUGHMAN: Well, thank you for the introductions. It's a pretty diverse group of people that we've got here this morning, so there will be some good discussions, I'm sure.

So the first thing that we move to is the adoption of the agenda. So you have the agenda and there are extra agendas in the back, if you don't have one. But we need an adoption of the agenda, so is there a motion to adopt the agenda?

MR. BOWERS: Motion to adopt.

MR. HARGROVE: Second.

ACTING CHAIRMAN BAUGHMAN: All in favor?

(Affirmative response.)

ACTING CHAIRMAN BAUGHMAN: Any opposed?

(No verbal response.)

ACTING CHAIRMAN BAUGHMAN: All right.

We have an approval of the March 21st, 2018 minutes. Next on the agenda is the chief boiler inspector's report. Chief Chapman?

MR. CHAPMAN: Yes, thank you. The number of inspections from the state inspector is 3,402 inspections; the number of inspections from the insurance company is 6,110, giving us a total of 9,512 inspections. The total number of delinquent inspections is -- state inspectors -- is 1,191; for the insurance company, it's 335, giving us a total of 1,526 delinquent inspections. Number of code violations found was 15. We have six that's uncorrected.

The variance report will be given by Mr. Toth.
ACTING CHAIRMAN BAUGHMAN: Thank you for the report, Chief Chapman, and thank you so much for the work that you do.

The variance report, Assistant Chief O'Guin?

MR. O'GUIN: Deputy boiler inspector.

ACTING CHAIRMAN BAUGHMAN: Deputy Boiler Inspector, your report, please.

MR. O'GUIN: As of to date, we've got 10 variances that require a follow-up inspection, 54 that have been verified and approved, 8 that require an audit, and 44 that no longer require a variance.

This quarter we completed five variance audits with five approved; that being BASF had two, and Vi-Jon had a follow-up visit and was approved, and Jack Daniel's was approved with two variances.

ACTING CHAIRMAN BAUGHMAN: Any questions on those reports?

MR. BOWERS: I have a question.

ACTING CHAIRMAN BAUGHMAN: Yes, Mr. Bowers?

MR. BOWERS: The 54, is that -- you said 54 variances approved. Is that physical year 2018?

MR. O'GUIN: That's 54 active as of June.

ACTING CHAIRMAN BAUGHMAN: Active variances. Okay. And how many have been approved this year? How many variances have been approved?

MR. CHAPMAN: We'll have to get back to you with that total number.

ACTING CHAIRMAN BAUGHMAN: Okay. But we have ten variances that --

MR. CHAPMAN: Needs follow-up.


MR. O'GUIN: And that was as of June meeting.

ACTING CHAIRMAN BAUGHMAN: Thank you.

There being none, we'll move on to the next on the agenda, being new business.

ACTING CHAIRMAN BAUGHMAN: So I would ask that there be a motion to discuss this line item.

MR. HENRY: So moved.

MR. BOWERS: Second.

ACTING CHAIRMAN BAUGHMAN: So all in favor?

(Affirmative response.)

ACTING CHAIRMAN BAUGHMAN: Opposed?

(No verbal response.)

ACTING CHAIRMAN BAUGHMAN: So we'll discuss the request.

MR. SCHOENFELDER: So just, I guess, high-level overview? Is that what you would like right now?

ACTING CHAIRMAN BAUGHMAN: Yes.

MR. SCHOENFELDER: So we have two high-pressure boilers that we are operating that we are requesting a variance for. One would be kind of your standard package water-tube boiler with a general operating pressure of 200 psig. A second one is kind of a specialty boiler. It is a package water-tube boiler as well, but it does not have a water system associated with it because it is a closed-loop system. We commonly refer to it as a high-pressure steam generator, and it actually just supplies steam to one piece of
MR. BOWERS: I had a question before you go too far.

MR. SCHOENFELDER: Yep.

MR. BOWERS: Your data sheet that you submitted, the first boiler you talked about, is that the Nebraska boiler?

MR. SCHOENFELDER: Nebraska boiler, uh-huh.

MR. BOWERS: And the second boiler, is that the Performance heating boiler?

MR. SCHOENFELDER: Correct, it is.

MR. BOWERS: Yes, they have.

MR. BOWERS: Do you need that right now?

MR. SCHOENFELDER: Well, we'll get to that. Okay.

MR. BOWERS: Okay. You can go ahead,

MR. BOWERS: In the proposal, it talked about some coal boilers. Have they all been taken out now?

MR. SCHOENFELDER: They're idle.

MR. BOWERS: Okay. They're not being renewed in our environmental permits. They will be demoed at some period of time. I don't know what the timeframe is.

MR. SCHOENFELDER: "Idled" as disconnected?

MR. SCHOENFELDER: Correct.

MR. BOWERS: Okay. They no longer have power to any of their control systems. We have not burned coal since 2015. But they were being burned with natural gas up until June here. I think it referenced that June was the expected timeline to start these two new boilers that we've referenced. They had been started, so the other boilers are no longer in service, with no plans from our environmental monitoring; so if, like, they have environmental permits, they are being removed from that.

MR. BOWERS: Okay. Thank you.

MR. HARGROVE: Keith Hargrove. Can you describe the security access protocol for the BMS system and, also, what is the means of communication between the personnel at the site.

MR. SCHOENFELDER: So our BMS system, as far as making changes to the BMS system? Or are you saying just as far as accessing a shut-down or a start-up sequence —

MR. HARGROVE: Yes. Yes.

MR. SCHOENFELDER: Okay. So our BMS system, as predominantly, that can only be done from DeltaV. And, you know, we have DeltaV consoles throughout our entire facility in several different departments, but only certain log-in rights have
got access to various areas. So, for example, with the boiler equipment, only the boiler operator and the boiler supervisor log-ins can actually log in to any of those consoles to actually access and initiate any kind of start, stop, silence an alarm, something like that, from the DeltaV system.

MR. HARGROVE: Are those the same access codes that both individuals have, or are they separate?

MR. SCHOENFELDER: They're separate.

MR. HARGROVE: Okay.

MR. SCHOENFELDER: So then you could identify -- you know, the supervisor may have slightly different rights, as far as changing some parameters, versus our standard operator log-in. And that allows our control system to keep, you know, a log at -- every command gets logged in the control system so that we can see the boiler supervisor log-in made the change or the boiler operator log-in made the change.

MR. HARGROVE: Okay. And communication between the personnel operators?

MR. SCHOENFELDER: Yes. So with our standard operating, we run three eight-hour shifts, so we're staffed around the clock 24/7, 365. And then during shift exchanges, which standardly happen at 7:00 a.m., 3:00 p.m., and 11:00 p.m., the shift leaving and the shift oncoming, the two operators that have the shift exchange discuss any items, any potential issues they are having, whether it might be, you know, say, a water quality-type issue that they're working on or any kind of issue from that perspective.

And then with the DeltaV system, as far as with the boiler log-in versus the operator log-in, versus the supervisor log-in, it's got access rights, and certain things would be locked down. Like, you may not be able to change certain set points like the desired water level for running the boiler at. The operator may not be able to change that. The supervisor might be.

MR. HARGROVE: And to the installation engineer, what current role do you provide now to the system?

MR. ANDERSON: Currently, I'm just supporting Jameson and the operators in day-to-day questions on the install as they're learning their way through the system, getting more familiar with it. I do not work on the boiler anymore, as I've moved on to other projects since start-up.

MR. HARGROVE: Have you been engaged in any of the training and education of the operators?

MR. ANDERSON: I have not, personally, been a part of that.

MR. HARGROVE: I'm done, Mr. Chairman.

ACTING CHAIRMAN BAUGHMAN: It's usually a colored sheet or a tab.

MR. BOWERS: Yes. You're supposed to have an emergency procedure sheet in the proposal that's a different color, or a tab, so it's easy to get to in case of emergency.

MR. SCHOENFELDER: Okay. So I think we referenced the emergency procedure, so you're saying we just need to update the document and make it a different color?

ACTING CHAIRMAN BAUGHMAN: I'll clarify that just a little bit. Under your boiler variance checklist, Item Number 40, it says, "Is the emergency procedure remote monitoring station a highlighted section that can be quickly turned to at the onset of an alarm condition?" Well -- and it references pages 6 and 7. And if you go and just take a look at page 6 and 7, there's not a highlighted section that is able to be quickly referenced. And that needs to be at the remote station. That's typically a placard that is highlighted, color-oriented, maybe, yellow or red placard that's easily
MR. SCHOENFELDER: Okay.

MR. BOWERS: In the City of Memphis, you stated that the operators have to have an operator license, correct?

MR. SCHOENFELDER: That's Shelby County.

MR. BOWERS: Okay. Is there any restrictions -- you know, you're going for a variance with the State of Tennessee. Is there any restrictions as far as Shelby County on the operator --

MR. SCHOENFELDER: Yes. So the restriction with that license is that the boiler operator has to have the ability to look at the boiler on a frequency. They don't have to put physical eyes on the device, but from the control system, they can look at it at that frequency. And they just have to have -- they have to be on site. So they could be on the site doing another activity, say, unloading a rail car. They don't actually physically have to be watching the control system 100 percent of the time.

MR. BOWERS: And you will have one of those operators 24/7.

MR. SCHOENFELDER: Correct. A licensed boiler operator is required 24/7, if the boiler is running.

MR. BOWERS: Okay. Thank you.

ACTING CHAIRMAN BAUGHMAN: Other questions?

ACTING CHAIRMAN BAUGHMAN: I have one. And that's just asking, there's no cross-connection between the steam generator and the other boiler steam header system.

MR. SCHOENFELDER: Right.

ACTING CHAIRMAN BAUGHMAN: There's no tie-ins whatsoever. They're totally separate.

MR. SCHOENFELDER: They are.

ACTING CHAIRMAN BAUGHMAN: Is there any monitoring that's done of the DA?

MR. SCHOENFELDER: As far as, say, pressure or water quality or...

ACTING CHAIRMAN BAUGHMAN: No. Just tied in with this DCS system.

MR. SCHOENFELDER: Yep. We have -- the DA only feeds, obviously, the Nebraska boiler, because the other boiler doesn't have a continuously running feed water system. But with that, the DeltaV DCS system does extensive monitoring, so that obviously feeds their feed water pumps, high pressure, multi-stage pumps, which are on BFD. So if that level were to run low, the pumps would shut down. And we actually have B -- not BMS trips, but BPCS trips, associated with the boiler with the feed water shutting off. That way we don't put extra wear and tear on our, say, low-water cutoffs, right? We don't want to force a low-water cutoff. We'll shut it down for loss of feed flow before that.

ACTING CHAIRMAN BAUGHMAN: Excellent.

Was the DA itemized under our equipment list, by chance? I didn't notice it offhand.

MR. SCHOENFELDER: As far as any detailed specifications in this document, no, I don't believe so.

ACTING CHAIRMAN BAUGHMAN: Okay. It doesn't fall under the variance. I just sense it's an integral part of the system itself. I always like to take a look at it just to kind of look at the parameters on it.

Has there been any issues at all on the Nebraska boiler?

MR. SCHOENFELDER: No. I mean, so we started it up in June, late June, the 20th or so of June.

ACTING CHAIRMAN BAUGHMAN: Of this year?

MR. SCHOENFELDER: Correct. And since then, it has run really, really well.

ACTING CHAIRMAN BAUGHMAN: Where did the boiler come from, previously?

MR. SCHOENFELDER: It was previously in a rental service. I don't know who was the --

MR. ANDERSON: With Nationwide Boiler out of Freemont, California.

ACTING CHAIRMAN BAUGHMAN: Okay. So this was a used boiler purchased from Nationwide Boiler.

MR. ANDERSON: That's correct.

ACTING CHAIRMAN BAUGHMAN: I take it all the proper second-hand boiler information has been presented and approved and so forth.

MR. SCHOENFELDER: Yes.

ACTING CHAIRMAN BAUGHMAN: Very good.

All right. Any other questions?

MR. HENRY: (Indicating.)

MR. HENRY: Mr. Chairman, I want to, first of all, apologize to the other members. I
haven't had an opportunity to review all the
information. Could you briefly explain to me what
the nature of the variance is that's being
requested?

ACTING CHAIRMAN BAUGHMAN: Yes. So
under the operations, instead of the boiler being
operated under the 20-minute rule, they're asking
for a variance to that. So within that, then the
variance would have them to where they are looking
at the boiler, making physical checks no longer
than once every four hours, logging those checks
and so forth.

MR. HENRY: Okay. Thank you very much.

ACTING CHAIRMAN BAUGHMAN: You're
welcome.

MR. TOTH: Does this steam generator
that they refer to not fall under bc9206, which is
a board case for boilers of that nature not to be
required to fall under the 20-minute rule?

ACTING CHAIRMAN BAUGHMAN: Being a steam
generator like a Clayton or --

MR. TOTH: Like a Clayton.

ACTING CHAIRMAN BAUGHMAN: I would have
to defer that question, Mr. Toth.

have a fixed water level.

ACTING CHAIRMAN BAUGHMAN: I know that
some of the units, the design actually goes from
the coils up to a separate steam section, and then
from there, it goes on out, just so the quality of
steam is better and so forth on it. So every
design is different. I'm not familiar with the
performance heating design, so, henceforth, the
questions. But we will defer that particular
question back to further review through
Mr. Chapman.

Any other questions?

(No verbal response.)

ACTING CHAIRMAN BAUGHMAN: All right.

Being that there are none, is there a motion to
accept the request for a variance for these two
boilers?

MR. BOWERS: A motion to accept.

ACTING CHAIRMAN BAUGHMAN: Is there a
second?

MR. HARGROVE: Keith Hargrove. Second.

ACTING CHAIRMAN BAUGHMAN: Okay. We
have a second.

MR. BAILEY: Mr. Chairman, is that a
motion to accept, pending they correct the placard
and -- I think that was the only thing.

ACTING CHAIRMAN BAUGHMAN: Yes. Yes,
sir, Mr. Bailey. Thank you very much.

So it's contingent upon those changes
being made and upon an inspection from the State
to get the final approval. So being that, being
the corrected motion and we accept that corrected
motion, I'll call for a vote. All in favor?

(Affirmative response.)

ACTING CHAIRMAN BAUGHMAN: Those
opposed?

(No verbal response.)

ACTING CHAIRMAN BAUGHMAN: Very good.

You have a variance.

MR. SCHOFIELDER: Great. Thank you.

ACTING CHAIRMAN BAUGHMAN: Thank you for
your presentation.

Thank you all very much, too, for your
input and questions. Marty, thank you.

All right. Moving on to Item
Number 18-06. Sofix, located in Chattanooga, is
requesting a variance to requirements for one
vessel to operate under the requirements of the
20-minute rule.

I'll call first for any conflicts
before we carry forth.

(No verbal response.)

ACTING CHAIRMAN BAUGHMAN: Being that
there's no conflicts, can you come up and
introduce yourselves, please.

MR. PAULUCCE: Good morning.

ACTING CHAIRMAN BAUGHMAN: Good morning.

MR. PAULUCCE: I'm Anthony Paulucce.

ACTING CHAIRMAN BAUGHMAN: I'm sean Reynolds. I'm a
PHS manager.

ACTING CHAIRMAN BAUGHMAN: Very good,
Anthony and sean. So if you will, I would like to
introduce the motion to discuss the request for
the variance for this one vessel located at Sofix.

Is there a motion to discuss?

MR. BOWERS: Motion to discuss.

MR. HARGROVE: Second.

ACTING CHAIRMAN BAUGHMAN: Okay. All in
favor say "aye."

(Affirmative response.)

ACTING CHAIRMAN BAUGHMAN: Opposed?

(No verbal response.)

ACTING CHAIRMAN BAUGHMAN: All right.

So we have a motion to discuss.

If you will, please, both Anthony and
Sean, if you'll make your presentation.

MR. PAULUCCE: Okay. Yeah. We would
like to submit our variance on a single
high-pressure boiler. It's a Cleaver-Brooks. We
operate at a nominal 100 psi. It's controlled by
a Nexus Fireye controller, integrated controller.
And within our variance, we define two
roles. We've got a boiler/operator, who is our
maintenance technician. He's responsible for the
maintenance of the boiler and, also, the alarm
verification. And then we also define the remote
system personnel, which is our security guards.
And that station is monitored 24/7. The boiler
runs on demand seven days a week.

ACTING CHAIRMAN BAUGHMAN: Thank you.

Questions for discussion?

MR. HARGROVE: Mr. Chairman, just for
clarity, this is a revised submittal. Could you,
if you don't mind, explain that just for
documentation of record?

MR. PAULUCCE: Sure. Yeah. We did have
a variance. And I don't remember the exact year
that it went out of compliance, but we had -- we
made some changes to the controller, and we didn't
submit that for approval. And we -- at the time
we did it, we talked with the inspector, the
boiler inspector who came out that year, and we
were under the assumption that he was a state
inspector. And he said everything was okay, so we
were under the assumption that we did not have to
resubmit. So in that case, we did not resubmit.
When they came back to ask about the variance, it
had been longer than three years, so you asked for
a resubmittal.

MR. HARGROVE: So my understanding, it's
been three years since the original submission?

MR. PAULUCCE: No. The original
submission was at the time the plan was built,
back in '92. So we had --

MR. HARGROVE: I'm sorry. I didn't hear
that. When was that?

MR. PAULUCCE: The original was 1992.
And we had a variance for -- up until 2012, I
believe.

MR. HARGROVE: Mr. Chairman, pardon my
ignorance, but why wasn't a complete document
versus a revised document submitted based on the
timeline for --
ACTING CHAIRMAN BAUGHMAN: We need to have a new variance submitted. So being that said and done, what we've got in our hands here, as a revision, then, cannot be considered for vote at this time; is that correct.

MS. JEFFERSON: That's correct.

MR. PAULUCCI: This is our variance.

MS. JEFFERSON: So, Chairman, are you saying that the information is not complete? Is that what you're saying?

MR. PAULUCCI: This is a brand-new variance for us.

MR. HARGROVE: As a board member, my interpretation is that this submittal is incomplete.

ACTING CHAIRMAN BAUGHMAN: Well, on the front page, it says "Revised."

MR. REYNOLDS: Oh, this is our internal document control.

MR. PAULUCCI: That's our revision date.

MR. REYNOLDS: Yeah. This is the date that is officially in our record system.

ACTING CHAIRMAN BAUGHMAN: Okay.

MR. REYNOLDS: Any document that Sofix prints, we have Sofix up at the top, a revision date, and then down below, we have our printed date. That's all hard-coded into any of our templates. For any document that we produce, you're going to see Sofix on top with the date of the actual revision. It's in our system under a QA system, and then down below, we have a printed date. This is the day we actually printed this and put the package together. So this is not --

MR. PAULUCCI: That's just part of our header and footer system.

ACTING CHAIRMAN BAUGHMAN: In our package, do we have the boiler variance checklist?

MR. PAULUCCI: I don't know if we included the checklist or not. I know --

MR. HARGROVE: We do not.

MR. PAULUCCI: Okay. We do not have the checklist.

ACTING CHAIRMAN BAUGHMAN: And that is a requirement for us to consider. So the checklist is not available to go through at this time, for us to identify and question and so forth. So the document, at this point, from my consensus and -- I don't know of the consensus of others, but Mr. Hargrove -- this is an incomplete document at this particular point in time. And so because of that, I would refer back to counsel to know how to proceed further.

MR. BAILEY: Well, if it's the board's consensus that this is an incomplete document, then I think the board needs to point out what's incomplete about it and then -- and give them instructions as to what they need to submit for the next time they appear before the board.

ACTING CHAIRMAN BAUGHMAN: Very good.

First of all, is it a consensus of the board that it is an incomplete document?

Mr. Henry?

MR. HENRY: Yes.

ACTING CHAIRMAN BAUGHMAN: Mr. Bowers?

MR. BOWERS: Yes.

ACTING CHAIRMAN BAUGHMAN: Mr. Hargrove?

MR. HARGROVE: Yes.

ACTING CHAIRMAN BAUGHMAN: So within that, then, we need to identify what you need to bring back to have this consideration. First of all, the boiler variance checklist.

MR. BAILEY: Mr. Chairman, does the checklist not cover everything that they need to submit in submitting a new proposal?

MR. BAILEY: Okay. So basically, that's -- you need to get that checklist, and you need to follow that checklist.

MR. REYNOLDS: We followed the checklist when we put this together. And it might have been my bad on my part. I did not see where the checklist had to be included in the document. That might have been missed by me. But we followed that checklist as we prepared this document to make sure that we had the tabs and the colored pages and everything that was required to be submitted for it.

ACTING CHAIRMAN BAUGHMAN: Okay. Is the proposal letter to the state of Tennessee included in this also?

MR. REYNOLDS: (Indicating.)

I'm sorry. I just don't have it on --

MR. REYNOLDS: It may have been a cover letter to -- on the back, which it's probably a cover letter that was attached to the top of it.

But I'd be happy to give you this one.

ACTING CHAIRMAN BAUGHMAN: Do you, by chance, have a copy of the checklist with you?
MR. REYNOLDS: Not with me, no, sir.

ACTING CHAIRMAN BAUGHMAN: Well, without that, we're not able to go through and review and pull back to your references, and so forth. So at this point in time, we don't have all the information that's available to be able to analyze to be able to vote on giving you a new variance.

So I would ask that you resubmit and bring back for --

MS. JEFFERSON: September 19th's meeting. We could possibly place that on the agenda.

MR. PAULUCI: So is that the only thing that is missing, is the checklist?

ACTING CHAIRMAN BAUGHMAN: Well, and so for you to go back through the checklist and to double check -- because the questions are going to be -- there's a training log that's in here. There is no -- even though it's an open log, we're going to be asking about training of the personnel, what types of training do they have; the Nexus controller, is it tied in through any communication systems; is that communication systems via -- whatever via mechanism it is, being web-based, hard-wired, so forth; we'll be looking at the maintenance tech and the security personnel and the protocols and their availability to respond; if a safety security personnel is called to come into the boiler room, who takes his place, what type of training had the security personnel had; is there more than one maintenance tech available --

MR. PAULUCI: All that's in here.

We're ready to answer all those questions.

And if there's something different than that to be discussed, to bring up, I'm open to hearing about that.

MR. BOWERS: I think our chief is a good resource, if you have any questions. But I think, exactly what we're saying. The checklist is not here. We can't really talk about the request without having the complete package.

ACTING CHAIRMAN BAUGHMAN: So with that, we'll ask you to resubmit, ask for approval to come to the September meeting, which is past the typical 45 days, but I think that there's --

MS. JEFFERSON: Under the circumstances, I think that we could work with them.

ACTING CHAIRMAN BAUGHMAN: Yes.

MR. REYNOLDS: Now, do you want the whole package with the checklist, or submit the checklist and the ten copies again, the whole thing?

ACTING CHAIRMAN BAUGHMAN: The complete package, please.

MR. REYNOLDS: Thank you, sir.

ACTING CHAIRMAN BAUGHMAN: All right.

Any other questions? Any other comments?

(No verbal response.)

ACTING CHAIRMAN BAUGHMAN: All right.

Well, thank you. I appreciate it very much, and we look forward to seeing you again.

Thank you for everyone's input and...

For the record, make sure that you have the availability of resubmitting so that we can bring this into the September 19th agenda.

Do we need to have a motion to take what we had off the table, or just clear it?

MR. BAILEY: No. The only motion you had was to discuss.

Very good. All right. Thanks again, guys, both of you. I'm apologetic, but that helps us identify and go through the procedures that need to be done. So thank you.

On to the next item on the agenda, 18-07, Occidental Chemical Corp, OxyChem, in New Johnsonville, Tennessee, is requesting a variance for one vessel to operate under the requirements of the 20-minute rule. I'll ask if there's any conflicts of interest before we have a motion to discuss. (No verbal response.)

ACTING CHAIRMAN BAUGHMAN: To discuss.

Very good. All right. Thanks again, guys, both of you. I'm apologetic, but that helps us identify and go through the procedures that need to be done. So thank you.

On to the next item on the agenda, 18-07, Occidental Chemical Corp, OxyChem, in New Johnsonville, Tennessee, is requesting a variance for one vessel to operate under the requirements of the 20-minute rule. I'll ask if there's any conflicts of interest before we have a motion to discuss.

(No verbal response.)

ACTING CHAIRMAN BAUGHMAN: No conflicts identified.

I'll have just a quick motion to discuss the proposal.

MR. BOWERS: Motion to discuss.

MR. HENRY: Second.

ACTING CHAIRMAN BAUGHMAN: Motion made by Harold Bowers, seconded by Mr. Henry.

In favor?

(Affirmative response.)

ACTING CHAIRMAN BAUGHMAN: Opposed?

(No verbal response.)
ACTING CHAIRMAN BAUGHMAN: All right. If you will please introduce yourselves.

MR. NEVILLE: James Neville with Neville Engineering.

MR. WILSDORF: Don Wilsdorf, the operations manager at Occidental Chemical.

MR. WHITLEY: And Bruce Whitley, the subject matter coordinator.

ACTING CHAIRMAN BAUGHMAN: Bruce, Don, thank you. All right. Present.

MR. NEVILLE: We're here today to request a variance to the 20-minute rule for one power boiler. This boiler is fired off of a chemical process that I'll have Mr. Wilsdorf explain to you. That chemical process produces hydrogen, and that's the fuel for this boiler. So if you would like to introduce that process.

MR. WILSDORF: Sure. I'll tell you a little bit about our plant and what we do. Of course, we started this plant in 2014. We supply chlorine and caustic soda to Chemours, formerly DuPont, locally there.

In a chloralkali manufacturer, you basically take salt and, through an electrochemical reaction, you make chlorine, caustic soda, and a byproduct of hydrogen gas. As most plants, what we do with the fuel is we'll make steam or use it in a cogeneration facility to make electricity and steam.

When we built this plant, Chemours was going to utilize the hydrogenous fuel, and they've chosen not to do that. So we have a lot of extra fuel that we want to use that will make steam at our facility. So we're installing this boiler to allow us to make our own steam for our needs.

Currently, we get steam from TVA through a contract with Chemours, which we will keep as a back-up to our plant needs. But that's what we'll be doing with the fuel, to make steam.

MR. NEVILLE: Now, as far as the remote station and the location of this boiler, we've identified that on Figure 1 of our site plan. The remote station will be at the DCS control room.

And that's approximately 600 feet from where the boiler is located. That boiler is not in a boiler room. That is in an open space.

The individuals at the remote station are the DCS/relief technicians. We've identified their job descriptions in Appendix G. And as far as who the qualified individual is for the boiler attendant, that's the chlorine and evap operating technician. And we've also identified their job description in Appendix G.

Now, I would like Bruce to go over their training, as far as how they qualify those individuals. That's important and it's quite a detailed process.

MR. WHITLEY: Okay. So I provide all the training. Now, personally, I have been with Occidental Chemical for 28 years. I've got quite a bit of experience under my belt.

So basically, we have a training program that we have several levels. We have an overview. We have a basic fundamental course. We have a process-specific training. We also have a job-specific training.

Primarily, I work with the overview, the basic fundamentals, and the process-specific personally, myself, on a one-on-one basis, with each and every person. Once they provide to me that they have demonstrated, by a written essay, a flow diagram -- which I do have an example with me, if needed to show -- that provide this information to me, and then they're given a written exam. If they can pass my test, we're in great shape, and they can go outside and they can be trained by -- outside as a job-specific training, which is going to entail training on operating the equipment. That's starting, stopping, pumps, performing emergency operations, things of such, particularly identifying what each and every equipment does and what it's designed to do, and what the overall -- maybe some of the hazards that may be associated with it.

The initial training is provided by myself. There is a checklist that I have designed for each training level. We go through the checklist, and once that training item has been completed and they demonstrate it proficiently, then I'll mark it off and then we'll go to the next until that checklist is complete.

Once that's done, then we have another level. And it's not just me that's going to do all this qualifying. We also have an area process supervisor who's got some predesigned questions that he feels is going to be important and critical to operate this one particular unit. He will ask these questions and expect some desired results of these answers.
If they're answered successfully, the process supervisor will qualify, or send out a qualification, that's going to be sent out to me, and then I'll draft up a qualification letter qualifying them.

So it's basically several different layers and other people besides myself qualifying this individual, or each employee that we have.

MR. BOWERS: So looking at this piece of equipment, how do you set the training up? What guidelines do you go by to set the right training up for this specific piece of equipment? What data do you go by?

MR. WHITLEY: Well, Occidental Chemical provides guidance, as far as what a training program is. So they have their corporate guidelines that we follow. And they have the structured levels --

MR. WILSDORF: I think he's talking about the manufacturers. The manufacturer is our starting point for their equipment.

MR. BOWERS: Exactly. That's where I was going. You go by what the manufacturer recommends on how to operate this piece of equipment?

MR. WHITLEY: Yes.

MR. WILSDORF: Correct. For the boiler specific. The main controls for controlling the safety of the units, the burn management system, which is -- that's all integral to the manufacturer anyway. And so we follow, then, the control system -- this is kind of a -- it's similar to the one you heard about earlier.

Emerson DeltaV controls our whole process, so we have -- there's two stages to the controlling of this boiler, which is -- one is the DCS will control a portion, and the BMS is a separate piece. It also manages the operation.

All the control points that we have are -- of course, our corporate engineering group and process engineers of the facility, along with the manufacturer, came up with the overall operation strategy that he, then, puts into his training program.

MR. BOWERS: Yeah. Training is only good if it's the correct training.

MR. WILSDORF: That is correct. That's right.

MR. BOWERS: Going to this boiler, this is an S-stamped ASME boiler?

MR. WILSDORF: Uh-huh.

MR. NEVILLE: That is correct.

MR. BOWERS: I notice it doesn't have a national board number listed.

MR. NEVILLE: Right. We will update that, and we have been given the Tennessee number for those boilers, as well.

MR. BOWERS: That's what I was fixing to ask next.

MR. NEVILLE: And the DA is -- also has --

MR. BOWERS: So it has been inspected by the State of Tennessee, and approved, then.

MR. NEVILLE: It has.

MR. WILSDORF: Correct.

MR. HARGROVE: What's the timeline on the training that you were describing, the period that it takes place?

MR. WHITLEY: Well, basically, it started since the day that we started doing some groundbreaking, so --

MR. WILSDORF: Well, he's talking about for this.

So I think the key for the boiler -- you started, what, a month ago?

MR. WHITLEY: It was over a month ago.

MR. WILSDORF: Over a month ago. We've already taken through an initial phase of where he's putting through the initial training where they have books and whatnot. But they're following through with his program. Then that'll lead to -- we're in the process of the commissioning the boiler. It'll probably be another week or so before we get to that phase.

But they'll -- and then Indeck, the manufacturer, also will come on site, and we'll work with them, along with, then, some field training. We've also had Nalco and Emerson, also, came in and did some training, as well. So that's been happening for about a month.

ACTING CHAIRMAN BAUGHMAN: So this is a Coen burner that's on this unit?

MR. WHITLEY: Yes.

MR. WILSDORF: I believe that is correct, yes.

ACTING CHAIRMAN BAUGHMAN: You made mention, Bruce, that during the training, that part of the training would maybe identify hazards. I would love for you to change that wording to "shall" --
MR. WHITLEY: Okay.
ACTING CHAIRMAN BAUGHMAN: -- "identify the hazards."
MR. WHITLEY: Yeah, sure.
ACTING CHAIRMAN BAUGHMAN: And that was just verbiage. That wasn't wrote down anywhere. But it's just a matter of thought process. Within this particular system, it is NFPA85; but in here, I see no nomenclature regarding any UL approvals. Being that this is a special control system that Indeck has put together in conjunction with mounting the Coen burner --

MR. NEVILLE: In Appendix B, we do list that it is -- that system is UL-listed.
ACTING CHAIRMAN BAUGHMAN: Very good.

And what page is that on?

MR. NEVILLE: That is on B-1.
ACTING CHAIRMAN BAUGHMAN: B-1?

MR. NEVILLE: Yes.
ACTING CHAIRMAN BAUGHMAN: Very good.

That is the burner controller itself.

MR. NEVILLE: That's correct.
ACTING CHAIRMAN BAUGHMAN: But there's other items besides the controller, and that's

MR. NEVILLE: Yes, uh-huh.
ACTING CHAIRMAN BAUGHMAN: Very good.

And then on the DA itself, the DA does not have a Tennessee number identified on it either.

MR. NEVILLE: We have that now.

MR. WILSDORF: Here's the number, 980.
MR. NEVILLE: 980 is the national board number. But on the DA, that's Tennessee Number T118123.

ACTING CHAIRMAN BAUGHMAN: Thank you, Mr. Neville.

MR. TOTH: Okay. Thank you.

MR. NEVILLE: Yes, uh-huh.
ACTING CHAIRMAN BAUGHMAN: Very good.

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MR. NEVILLE: We have that now.

MR. WILSDORF: Here's the number, 980.
MR. NEVILLE: 980 is the national board number. But on the DA, that's Tennessee Number T118123.

ACTING CHAIRMAN BAUGHMAN: Thank you, Mr. Neville.

MR. TOTH: Any other questions?

MR. WILSDORF: Would it help for me to describe the remote monitoring and the field monitoring a little bit better for you?

ACTING CHAIRMAN BAUGHMAN: Absolutely. Thank you, Don.

MR. WILSDORF: That's fine. We operate as a 24/7 operation. We work two 12-hour shifts with our personnel. We have one lead technician. We call him our shift supervisor, he might more commonly be referred to. But we have two ECS board operators. They are our remote station people, if you will. And they operate the plant from one location.
We have four field technicians, which as James described earlier, the chlorine and caustic utilities, that's the main purpose -- they kind of rotate their key responsibilities, depending on how they're divided in a plant. But all of these people are trained to operate this boiler, because they may rotate in. So you could pull somebody from other places. There will be technically four field people that could respond to the boiler in the field.

We also have a closed-circuit camera that monitors other processes, and we have one specifically located and mounted for the boiler that can see controls and operations around the boiler, as well as, you know, the DCS sees what it sees on the screen, so...

ACTING CHAIRMAN BAUGHMAN: So under this, we are making the checks no longer than every four hours. Somebody is going in --

MR. WILSDORF: That is correct.

ACTING CHAIRMAN BAUGHMAN: -- and making the checks and logging.

MR. WILSDORF: That is correct.

ACTING CHAIRMAN BAUGHMAN: You mentioned having the cameras looking at the boilers.

MR. TOTH: That's a great question. Honestly, the very first variance that was passed by the State of Tennessee, actually consisted of a camera that was mounted to where you could see the site glass and gauges and things like that. That has since, kind of, gone by the way of the -- the experience that that's not quite sufficient. So it's something that you don't do. It's good to have as a secondary, but you don't need to rely on it.

ACTING CHAIRMAN BAUGHMAN: Is that actually listed anywhere in our codes? Because --

MR. TOTH: Listed as what?

ACTING CHAIRMAN BAUGHMAN: As not acceptable. Because I know we've talked about line-of-sight checks, even to the extent of line of sight being the boiler being a hundred feet away, that if I can see the boiler, that constitutes a line of sight. The cameras being the same thing.

But I'm interested, since you just mentioned that you've got cameras looking at it, have we ever talked or addressed that?

MR. TOTH: Well, Mr. Chairman, that's a great question. Let me ask you a question. Are you looking for it to take the place of the boiler attendant or the remote attendant?

ACTING CHAIRMAN BAUGHMAN: Neither.

MR. TOTH: Neither.

ACTING CHAIRMAN BAUGHMAN: I'm looking at it for --

MR. TOTH: So when we talk about a camera being line of sight in the vicinity, you're really talking about the boiler attendant, the boiler operator itself. The operator, obviously, needs to be in the vicinity of the boiler to do their checks, once every four hours, in regards to a variance, if that's what you're referring to.

Obviously, it wouldn't be satisfactory to have a camera and nobody monitoring the camera. So I hope I answered that question. I don't think it really follows the intent of the rule.

ACTING CHAIRMAN BAUGHMAN: And I bring that up because I've been asked in the field before, because in this day and age of live streaming, cell phones, and so forth, is the constitution or the point of looking at the boiler -- no longer than once every 20 minutes, it says the boiler shall be checked -- but there's no specific checks wrote in, and line of sight constitutes a check. And so does this constitute a check (indicating)?

MR. TOTH: Uh-huh.

ACTING CHAIRMAN BAUGHMAN: Does this constitute a check (indicating)?

And so I bring that up, just food for thought, because there's going to be further discussion on it at some point in time, because the questions get asked to us in the field, and there's nothing specific that we have in our rules that address that.

MR. TOTH: So in other words, what you're referring to is the 20-minute rule,
1 specifically --
2 ACTING CHAIRMAN BAUGHMAN: Yes.
3 MR. TOTH: -- not necessarily a
4 variance.
5 ACTING CHAIRMAN BAUGHMAN: That's
correct.
6 MR. TOTH: Yeah. That's definitely --
7 there's room for discussion on that, especially
8 with the advent of the controls and safety devices
9 over the years. I don't know if right now is
10 necessarily the forum for that, but it would be
11 good to have that discussion sometime.
12 ACTING CHAIRMAN BAUGHMAN: Yeah. Well,
thanks for your input, Mr. Toth, very much.
13 Mr. Bowers, did you have something?
14 MR. BOWERS: No. On a variance, of
15 course, it would have to come before the board,
16 and we, of course, wouldn't approve it.
17 Now, you brought up the 20-minute
18 rule. That brings up a whole different
19 discussion. And maybe in our rules we need to be
20 specifically saying an actual person looking at
21 something, not a camera. I don't know if it --
22 we'd have to look at the rules and see how that
23 defines that. But I've had locations that had
24 cameras as a backup, but not -- never the primary.
25 MR. WILSDORF: Sure.
26 MR. NEVILLE: To clarify --
27 ACTING CHAIRMAN BAUGHMAN: And I didn't
28 mean to get off on a whole different discussion
29 within that. But I just wanted to bring it up
30 offhand because if I don't mention it or think
31 about it, I'll forget about it. Thank you very
32 much.
33 MR. NEVILLE: This is just an additional
34 safety feature for the remote station, to have a
35 physical eye on it.
36 ACTING CHAIRMAN BAUGHMAN: Yes. Thank
37 you, Don.
38 MR. WILSDORF: Correct.
39 ACTING CHAIRMAN BAUGHMAN: Other
40 questions?
41 MR. HARGROVE: Just a comment,
42 Mr. Chairman. You know, we have the opportunity
43 to look at a number of variance submittals, and
44 even though the boiler functional operations are
45 the same, the applications of the different type
46 of companies are different.
47 I'd like to, just as a comment, the
48 current system description, to help inform this
49 board, as well as to add value to the document, be
50 a little more descriptive. I know Neville has
done that in the past.
51 MR. NEVILLE: Yes.
52 MR. HARGROVE: So I would just like to
53 make a comment that in the current system
54 description, add content that's relevant and
55 provides clarity and understanding for the board
56 member, but also for yourselves.
57 MR. NEVILLE: Okay.
58 ACTING CHAIRMAN BAUGHMAN: Is this unit
59 presently in operation.
60 MR. WILSDORF: No. It is --
61 construction is completing this week, and we will
62 be starting the commissioning going forward over
63 the next few weeks.
64 ACTING CHAIRMAN BAUGHMAN: Fantastic.
65 Are there any other questions? Comments?
66 (No verbal response.)
67 ACTING CHAIRMAN BAUGHMAN: Well, hearing
68 none, then I will make the motion that we accept
69 the proposed request for variance, contingent upon
70 acceptance by the State of Tennessee inspection,
71 and that we have the proper nomenclature under the
72 boiler data sheet.
73 Anything else? Any other items to
74 address on that?
75 MR. BAILEY: Mr. Chairman, I think
76 someone -- one of the other board members needs to
77 make the motion. You said that you make the
78 motion.
79 ACTING CHAIRMAN BAUGHMAN: Oh.
80 MR. BAILEY: The Chairman shouldn't --
81 ACTING CHAIRMAN BAUGHMAN: Very good.
82 Thank you, Mr. Bailey.
83 I'll ask for a motion to accept the
84 request.
85 MR. BOWERS: Yeah. I make a motion that
86 we accept, contingent on proper inspection, that
87 it pass inspection, and updating your manual with
88 all the criteria, the Tennessee number and
89 national board number, and everything that has to
90 be updated, and nomenclature of the boiler.
91 ACTING CHAIRMAN BAUGHMAN: Do I have a
92 second?
93 MR. HARGROVE: I second.
94 ACTING CHAIRMAN BAUGHMAN: All right.
95 I'll call for a vote. All in favor?
96 (Affirmative response.)
ACTING CHAIRMAN BAUGHMAN: All those opposed?  

(No verbal response.)

ACTING CHAIRMAN BAUGHMAN: Brother Bruce, Brother Don, you have a variance.

MR. WILSDORF: Thank you sir.

MR. WHITLEY: Thank you.

ACTING CHAIRMAN BAUGHMAN: Mr. Neville, thank you, also, for your input and all those others in that discussion. Thank you very much.

Very good. So that brings us up to the next item, which is open discussion items. So I'll ask the representative from the Department, Deborah?

MS. RHONE: Yes. Deborah Rhone, boiler office supervisor.

I wanted to announce and present to others that we did receive the approval for our 2018 Tennessee Boiler Inspector Safety Conference, which we have sent out announcements.

The conference, Full Steam Ahead with Safety, is going to be held on September 17th through the 21st, here in Nashville at this location, the 220 French Landing Drive, with the special inspectors training beginning on Wednesday, September the 19th at 9:00, with the board of boiler rules meeting being held that day. And we'll also conclude on Thursday, September 20th, for the special deputy inspectors, with an awards banquet at 6:00 p.m. here at this location.

Our host hotel will be the Fairfield Inn at Metro Center. And the hotel is offering a conference rate for all attendees if you make the announcement that you're with the safety conference.

Our registration, we currently have approximately 20 additional slots. There's registration forms on the back of the table. So we only have 20 slots left. They're going fast. So we're real excited.

We've got a few new and unique things that's going to be on the agenda. So it's going to be a very full, fun, exciting, knowledgeable training. And we hope to see you all there.

ACTING CHAIRMAN BAUGHMAN: Does anybody have any questions for Ms. Rhone?

(No verbal response.)

ACTING CHAIRMAN BAUGHMAN: No? Well, we're excited that it's back on the schedule for this year. It's such a great time, for one, of being able to expand upon experiences and knowledge within the industry. We're all in this together from the standpoint of safety. But what a great time of fellowship with those in our industry also.

And I just want to thank you for the efforts in getting this together. I'd like to give thanks, also, to the administration for the support and through the State in supporting this also.

But thank you very much, Ms. Rhone. We're very appreciative of you.

MS. RHONE: You're welcome. And, of course, it's always a team effort.

ACTING CHAIRMAN BAUGHMAN: Absolutely.

Are there any other items that are open for discussion?

Yes, sir, Mr. Toth?

MR. TOTH: Yes, Mr. Chairman. I would like to ask about a submittal of board cases and interpretations. What is the time frame that the chief inspector would like to have those in for submittal to the board?

MR. CHAPMAN: That's the same. It's 45 days.

MR. TOTH: You want 45 days on those?

MR. CHAPMAN: Yes.

MR. TOTH: Thank you.

Also, the database of keeping those, or the actual link of keeping those board cases and interpretations, appears like it has not been revised in some time. And I was wondering if there is a continuing running database of those interpretations and if those are published somewhere for general knowledge.

MS. RHONE: I believe the last update was placed on the website. Now, I know we've gone through some web design here at the State. So I wasn't aware that that link wasn't working, at the time. But we did post the latest and the greatest on the website, yes.

MR. TOTH: Great. If we could just kind of take a look at that and make sure, because that is pretty critical.

MS. JEFFERSON: And one thing I was going to suggest is that maybe talk with Sam after the meeting because we have updated our websites. You may be looking at an older link that's not working, but we recently updated that information.
MR. TOTH: Perfect. Great to hear.

ACTING CHAIRMAN BAUGHMAN: Excellent.

Thank you, Mr. Toth.

Any other items for --

MR. PETERS: Yes, sir. Glad to be here.

We've got Intellihot here today.

ACTING CHAIRMAN BAUGHMAN: I'm sorry.

Would you introduce yourself, Mr. Peters?

Danny Peters, state boiler inspector, the Knoxville area.

MR. SHREINER: Justin Shreiner with Intellihot.

ACTING CHAIRMAN BAUGHMAN: Thank you.

And your name again, please, sir. I'm sorry.

Justin Shreiner.

ACTING CHAIRMAN BAUGHMAN: Thank you, Justin.

MR. O'CONNOR: Michael J. O'Connor, Sr.

ACTING CHAIRMAN BAUGHMAN: Michael, thank you.

Mr. O'Connor: And I'm with Mo's Mechanical, not Intellihot.

ACTING CHAIRMAN BAUGHMAN: I'm sorry, what company?

MR. O'CONNOR: Mo's Mechanical.

ACTING CHAIRMAN BAUGHMAN: Mo's?

MR. O'CONNOR: M-O apostrophe S Mechanical, LLC.

ACTING CHAIRMAN BAUGHMAN: And where are you out of?

Knoxville, Tennessee.

ACTING CHAIRMAN BAUGHMAN: Very good.

Thank you.

MR. SHREINER: We, Intellihot, have sold this product in the state of Tennessee, and everywhere else in the country for about the last five years now. Specifically, regarding the floor model that has multiple ASME-stamped heat exchangers that are prepiped, plumbed, packaged inside a single cabinet. I don't know the total number in the state of Tennessee. I would guess well over a hundred.

MR. BOWERS: Excuse me.

MR. SHREINER: Yes, sir?

MR. BOWERS: I hate to interrupt. I want to back up a little bit. The intention was to get some clarification on how the inspections are being done, specifically regarding our piece of equipment with a modular design.

ACTING CHAIRMAN BAUGHMAN: And excuse me again, but the name of the company?

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Thank you.

MR. SHREINER: We, Intellihot, have sold this product in the state of Tennessee, and everywhere else in the country for about the last five years now. Specifically, regarding the floor model that has multiple ASME-stamped heat exchangers that are prepiped, plumbed, packaged inside a single cabinet. I don't know the total number in the state of Tennessee. I would guess well over a hundred.

MR. BOWERS: Excuse me.

MR. SHREINER: Yes, sir?

MR. BOWERS: I hate to interrupt. I want to back up a little bit. The intention was to get some clarification on how the inspections are being done, specifically regarding our piece of equipment with a modular design.

ACTING CHAIRMAN BAUGHMAN: And excuse me again, but the name of the company?

MR. SHREINER: Intellihot.

ACTING CHAIRMAN BAUGHMAN: Thank you.

MR. O'CONNOR: Mo's Mechanical.

ACTING CHAIRMAN BAUGHMAN: Mo's?

MR. O'CONNOR: M-O apostrophe S Mechanical, LLC.

ACTING CHAIRMAN BAUGHMAN: And where are you out of?

Knoxville, Tennessee.

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ACTING CHAIRMAN BAUGHMAN: Excuse me.

What is the issue? You say a variance to the issue. What's the issue?

MR. SHREINER: The variance is whether or not we're required to pull a single permit or multiple permits, is what it comes down to. So, you know, six permits for essentially the IQ1501, are we having to pull six permits for that one cabinet because of the six heat exchangers internally, or are we pulling one single permit, which, again, is how it's been addressed for the last almost-five years.

ACTING CHAIRMAN BAUGHMAN: Okay. Thank you. And a question in the back through Mr. Toth first.

MR. TOOTH: Mr. Chairman, I can probably help with a little bit of this.

ACTING CHAIRMAN BAUGHMAN: Thank you.

MR. TOOTH: First off, the vessels are all linked together. They're modular. There is no intervening valves in between, correct?

MR. SHREINER: That's correct.

MR. TOOTH: Okay. They are classified, then, as one unit. This would be no different than a low-pressure boiler made of cast iron.

MR. BOWERS: Just like you said, Martin; we've got plenty of boilers out there that are multiple units, you know, with different national -- the Parkers have some like that, multiple coils connected together. Each coil has an individual national board number, but it's still just one unit, and it's still protected under the same pressure relief valves.

ACTING CHAIRMAN BAUGHMAN: Right. Well, let me ask -- let me bring something up real quick, while I'm thinking of it.

MR. BAILEY: Mr. Chairman?

ACTING CHAIRMAN BAUGHMAN: Go ahead, Mr. Bailey.

MR. BAILEY: And it's okay. I don't think there's any problem, maybe, having this discussion, but ultimately, it's going to be the boiler unit's decision as to how they permit this, whether it's one or multiple. And whatever that decision is, if this company disagrees with it, they would have to come before this board to see if that decision could be reversed or overturned.

So I think the discussion should be pretty limited, because you could turn around and become the adjudicating body of your own discussion. Do you understand?

ACTING CHAIRMAN BAUGHMAN: Yes.

And from a technical standpoint, I'm interested in having the discussion on the equipment only, itself, to get a better idea of what it is we're working with.

So each one of these units can be tied together with no valving in between, and they have their own individual burner system controller.

MR. SHREINER: They're all able to run independently of one another via their own blower/gas valve burner control.

ACTING CHAIRMAN BAUGHMAN: So from that standpoint, each unit doesn't get rated separately. You've got to rate the unit, then, together as one whole; is that correct?

Each individual section of that boiler itself has its own individual markings as an H-stamp. Just to correct the gentleman, the HLW is an H stamp. It's just a subsection of Section 4 of the ASME code. I don't -- I'll be honest with you, this would be classified and should be classified as one unit. This is the first I've heard of this. But this should be one unit, just in my opinion.

MR. BOWERS: Just like you said, Martin; we've got plenty of boilers out there that are multiple units, you know, with different national -- the Parkers have some like that, multiple coils connected together. Each coil has an individual national board number, but it's still just one unit, and it's still protected under the same pressure relief valves.

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separate module. It would have to be applicable to the capacity of the whole unit combined.

MR. SHREINER: Correct.

ACTING CHAIRMAN BAUGHMAN: Okay.

MR. SHREINER: Yeah. I don't believe CSD-1 would apply to -- yeah. Okay.

ACTING CHAIRMAN BAUGHMAN: But anything that we've got from any code requirements, anything else that's a governing body, whether it's UL or any other code governing bodies, would relate to that, then, as a whole unit, since it's being looked at to be permitted as a whole unit.

MR. SHREINER: Correct.

ACTING CHAIRMAN BAUGHMAN: The relief valves would need to be looked at from a whole unit standpoint and not individually and so forth.

MR. SHREINER: That's exactly right. And national board is working on that definition and has already passed the verbiage for a modular water heater. And that has already been passed and approved. That will be in the 2019 next revision, or when that gets adopted.

ACTING CHAIRMAN BAUGHMAN: But what we're working with right now is presently 2018.

MR. SHREINER: Correct. And there is no -- for 2018, there is no definition for what we're doing, I guess. So the technology has outpaced the code verbiage.

ACTING CHAIRMAN BAUGHMAN: Interesting. Okay.

MR. SHREINER: Now, I will say there are precedents that have been set with Texas, Arizona, Missouri, and other states that have already done a variance on what we're discussing. And Mr. Rob Troutt, who just happens to be the chief boiler inspector of Texas, also sits on the national board for Section 4.

And in Texas -- again, I understand it's not Tennessee, but they have -- the verbiage says they are able to pull a single Texas boiler number. Owners of such modular units will be billed for only one boiler, not multiple boilers. And that is also what other states have done as well.

ACTING CHAIRMAN BAUGHMAN: It will be interesting to get further discussion on that, Mr. Bowers.

MR. BOWERS: The only question I have is, without making any -- what I want to know is why you are asking for a variance -- from what are you asking a variance from? Where in the State of Tennessee code says you can't register it?

MR. SHREINER: I don't know the answer to that. Mike may be able to help out.

MR. O'CONNOR: May I elaborate? Mike O'Connor. Basically, I am an installing contractor of this product and every other brand. In doing this, they utilize me as a service provider and, also, a start-up agent.

So I had went to a job that another mechanical contractor installed two of the IQ751 units. When the boiler inspector came and did his inspection, he stated to the maintenance man at this facility, the Comfort Inn, that if one of the heat exchangers fails, you've got to tear the whole system out and replace the whole box. These systems start around 30,000 and up.

So this guy calls me, wanting to know if I'd ever heard of anything like that, so I took a minute and I called Mr. Danny Peter, deputy inspector for our area, which is who I've dealt with on four of the installs, I believe, I've done with my company. And he's inspected them and he's permitted it one tag for the unit.

The deputy inspector had stated to the maintenance man, basically, you know, we would have to replace it if one of them fails. So my question to Danny was is that true. So Danny, I guess, talked to Chief Chapman, back and forth. A couple days went buy. I'm trying to get the man, who called me, an answer.

I called Chief Chapman and spoke to him and I gave him my thoughts of being a start-up agent and a service provider for this product. I don't think the question is the payment of each engine; it's the purpose of having to replace the whole system if one heat exchanger fails, instead of carrying up -- one guy could carry this box up and take four or five bolts out of this thing and replace it very simple.

My thoughts on that is that it would be crazy for somebody to spend 30– to $50,000 for a unit and one part of the unit fail and have to replace the whole box. That's why I'm sitting here.

MR. BOWERS: Well, I don't quite understand the variance. I guess we would have to talk about it and maybe get a better idea of what you're asking, because -- or make sure that the three units -- the question is are these three
separate units, or are these one unit. That's the question. And that's --

MR. SHREINER: And we're getting mixed messages, depending on what part of the state we sell and install this equipment.

MR. BOWERS: Well, Sam is the man there, so he can probably give you the definition of what -- I mean, he can show you the code and define it. If you have a question of insurance inspector or state inspector, Sam can probably idle it down to what, actually, the code is.

ACTING CHAIRMAN BAUGHMAN: Thank you, Mr. Bowers.

Yes, sir, back in the back?

MR. HIGGINS: I think there's been some --

ACTING CHAIRMAN BAUGHMAN: Would you identify yourself, please? I'm sorry.

MR. HIGGINS: Kelly Higgins with Ferguson Enterprises.

There's several manufacturers out there now that are selling what they call a rack system with individual wall tankless units. And they're putting them on a rack. The State is doing it, the Navy and everybody and their brother

as this moves forward and you have anything in particular, definitively, that you want to bring to the board for a vote, then I would ask you to identify that, submit it in, in the proper format, and then we can bring it up for discussion and vote at that particular time. And it will be good once it's in the NBIC. So gray areas are tough. When things are black and white, it's a lot easier for us to be able to identify and have discussion on it.

MR. SHREINER: Okay.

ACTING CHAIRMAN BAUGHMAN: Mr. Peters?

MR. PETERS: Yeah, Danny Peters, boiler inspector in Knoxville. I do inspect these vessels, of course. And they're a new item that is on the market, technology high-condensate-type boilers. And when they first started out selling these about five years ago, I seen the first one that rolled off the truck. It was a big thing to me.

So I looked at it and I seen that the heat exchangers on the inside of the cabinet had no stop valves in between. It had one safety valve that was on the outside, through the outlet. It had one inlet, and it was controlled through one master control that controlled all of them. If there is a safety valve -- no, I'm sorry -- a stop valve that's placed in between them -- which we have had happen with Texas. Mr. Troutt, in trying to regulate his state -- and I've read his letters pertaining to that vessel.

I do know that they will overheat because of the controls. If you shut one of them off in between those heat exchangers, it's a safety issue. It will burn it up. It will burn it up. The other issue is they allowed them to put safety valves on each one of those heat exchangers, making it a vessel, independent, to where that they were going to inspect each one of them with a state certificate.

So this has all materialized in and up to the present day. In the meantime, ASME has had their committee, which was in 2017, of Mr. Troutt going to the ASME committee, presenting this, and letting the ASME decide through interpretation and definition of a modular boiler. The definition of
A modular boiler is now going to be published in Article 9, Section 4, Number 716. It will read -- it will be inserted -- water heater, modular, a water heater assembly consisting of a group of individual heaters called modulars intended to be installed and operated as a unit with no intervening stop valves between the modulars, with a single inlet and a single outlet. Modulars may be under one jacket or may be individually jacketed.

So we've got a skin casing over heat exchangers, a number -- it may be three or it may be four -- with no intervening stop valves. So the chief inspector in 2015 decided he wanted to put stop valves in between and make it an individual unit to where he can inspect and register for the State each one. So as time went on, he realized there was a problem. A safety issue. They even had to go back and put a key on to lock the skin casing so you can't get in this boiler. You have to have a key. And the reason why for the key is they don't want anybody to go in there and shut the stop valve. So it's a safety issue.

ACTING CHAIRMAN BAUGHMAN: Until it's actually in 2019, things can be changed, and all we can do is go by present -- I'll defer back to Mr. Toth.

MR. TOOTH: Mr. Chairman, thank you. These units and units very similar to this have been addressed in the code for years. NBIC -- first off, the ASME handles construction. Okay? Once it's constructed, they lose any jurisdiction over it. Post-construction goes to the NBIC.

NBIC has addressed modular units. It doesn't necessarily, specifically, talk about boilers, per se. It talks about units that are connected with no intervening valves can be categorized as a single unit. Okay?

This case here, if you would let me kind of go out here a little bit, if I have a boiler, and that boiler has a ten-to-one turn-down -- okay? For us technical guys, we know what that is. That means that at high fire, it's ten, and at the lowest fire, it's one. It's no different than what we have here with this. You have multiple units inside. It has a control.

ACTING CHAIRMAN BAUGHMAN: What does our present code say? Since this is -- this is -- what you're saying is this will be included in 2019.

MR. PETERS: Yes.

MR. BOWERS: Well, that's the only question I have on this is, you know, like, we have a variance with a 20-minute rule. We've got a rule that says in 20 minutes you'll do this. We've got a variance of that. So for you to even ask for a variance, you've got to have something that's not in compliance. And to say it's not in compliance, you have to have a rule saying this is not in compliance from the NBIC or the state rules or something like that.

So if you were to even ask for a
variance, you have to find out what you're not in
compliance of. I don't think you even know what
you're not in compliance of.

Mr. Shreiner: Is it more an injunction
on stopping the enforcement of having to pull
multiple permits for a single cabinet versus one
permit?

Mr. Bowers: But where does it say you
have to pull multiple permits?

Mr. Shreiner: That's what I'm -- that's
what we're --

Mr. Bowers: No. I want to see the code
that says you've got to pull multiple permits.

Mr. O'Connor: Right. I understand.
The only reason I drove to Nashville to sit here
is because I was told this was a public meeting
that I could voice my opinion, so I was doing
that. I've already spoken to Chief Chapman.

Mr. Bowers: That's good.

Mr. O'Connor: I've talked to Danny.
The new inspector, I've not met, Mark Newman, I
believe, was his name. I haven't met him. He's
the gentleman who explained this to the
maintenance guy I was talking to. So that's the
only reason why I'm sitting here. I don't know
exactly what order things have to happen to make
it legal. I'm here so you can teach me, I guess.

Mr. Bowers: That's right. And you've
got a good question. I think you've got a good
question. But you've just got to say -- that's
what I'm saying. You have to go by the rules that
we are set up to go by, and that what we go by.

We go by our state laws and we go by our NBIC and
ASME. So if someone asks to go beyond that,
that's when you have to ask for a variance from
these rules that are set up for us to go by.

Acting Chairman Baughman: Mr. Peters?

Mr. Peters: I understand from Mr. Toth
saying that this is an open discussion. Yes, we
were told to come here by Mr. Chapman and get this
out in the public. He wanted it as a public
record. Okay?

We have, in the meantime, tried to get
on the agenda for September to present everybody
with documents and the codes and the Tennessee
code that I more address to you, Harold.

Mr. Bowers: Okay.

Mr. Peters: And it's in 800-3-3-.06(f).

And this is pertaining to hot water heating
boilers. And there again, it's safety when
operating conditions are changed or added boiler
heat surface is installed. And we've got that
with a valve capacity that shall be increased, if
necessary, to meet the new conditions and comply
with the paragraph.

When adding valves are required, they
may be installed on outlet pipes, provided there
is no intervening valves.

So we have intervening S-valves, not
between the safety valve and the boiler, but we've
got intervening valves on a heat exchanger that's
created, against this code, that -- where we don't
need any intervening valves in between these
units.

Acting Chairman Baughman: So let me ask
you, real quick. So what you're saying is we have
existing installations in the state of Tennessee
that have these valves installed?

Mr. Peters: No valves were installed in
the beginning.

Acting Chairman Baughman: Okay.

Mr. Peters: They had decided according
to our code.

Acting Chairman Baughman: Okay.

Mr. Peters: And when they come out, I
ACTING CHAIRMAN BAUGHMAN: But they've got valves, which makes them individual.

MR. PETERS: Yes.

ACTING CHAIRMAN BAUGHMAN: Okay. And each one has its own individual stamp on it --

MR. PETERS: Yes.

ACTING CHAIRMAN BAUGHMAN: -- as it is.

MR. PETERS: Yes.

ACTING CHAIRMAN BAUGHMAN: So each one has its own individual data report?

MR. PETERS: Yes. And they had to --

ACTING CHAIRMAN BAUGHMAN: Okay. Where are these heat exchangers manufactured?

MR. SHREINER: Assembled in Galesburg, Illinois.

ACTING CHAIRMAN BAUGHMAN: But where are they manufactured?

MR. SHREINER: The coil itself, the water tube coil, comes from Germany.

ACTING CHAIRMAN BAUGHMAN: Okay. So we've got a German-manufactured unit that's already stamped. It's got its --

MR. TOTH: ASME stamp.

ACTING CHAIRMAN BAUGHMAN: -- ASME stamp and so forth. It's coded. One of the things I've encountered in the past because these things are typically made in France or Europe, and they're made in high quantities, the data reports aren't supplied individually with each unit that's going out. And that's what I've encountered in the past and that I've had to go back and ask for those to actually be supplied, which is what's supposed to be done by our requirements anyway.

Yes, Mr. Peters?

MR. PETERS: They do have a data report, and on that data report, as you know, in an HLW shop, they are making them in bunches. They make them by 50 because they want to save paper. They don't make 50 sheets of paper, so they put a serial number with 50. If you subtract that number right there, there's 50 in that note.

ACTING CHAIRMAN BAUGHMAN: I see that.

MR. PETERS: So in that unit, it's going to be in that number. In that unit, right here, is going to be the national board number. It's in that -- it's corresponding with the serial number and the national board number in their logbook in the shop.

ACTING CHAIRMAN BAUGHMAN: Yes. What I'm --

MR. PETERS: So there is traceability on each one of them.

ACTING CHAIRMAN BAUGHMAN: Sure. And I'm familiar with that. The thing with it is, it's not always supplied at the time of sale. Out in the field, when you're installing it, you're supposed to actually have that there, and that's not happening in the field. So being that, that's just a point of view from what I see in this service area on it.

But, where do we go from here? This is a great discussion, but in the context of time and wanting to get down to a concise area for furthering, what is it that you would like to see move forward?

MR. SHREINER: I think you were right. We need to get on the docket for the September meeting and introduce -- let some people from our factory come in and speak.

ACTING CHAIRMAN BAUGHMAN: Okay.

MR. SHREINER: I think that would probably be the right thing to do.

ACTING CHAIRMAN BAUGHMAN: Ms. Jefferson?

MS. JEFFERSON: Now, the other situation was a little different, because they were already -- they had already submitted paperwork to meet the 45-day requirement. And since they had to prepare something different, we will allow them to be on the September's agenda with you-all's approval.

But for this, to my knowledge, no paperwork has been submitted within the 45-day requirement. So for that reason, we would need to place them on the proper agenda. It probably won't be the September agenda, because we already have other items on that agenda.

So if you could just work with Sam's area so that we can try to determine whether or not there's something that's noncompliant, what the issue is. If you can work with Sam's area, and then Sam can provide you more information, let you know what's needed in order for you-all to be placed on the agenda, paperwork you have to submit within 45 days, and then we can place them on the proper agenda.

ACTING CHAIRMAN BAUGHMAN: Very good.

MR. O'CONNOR: Can I say one more thing?

ACTING CHAIRMAN BAUGHMAN: Yes, sir, Mr. O'Connor.
MR. O'CONNOR: Basically, what Mr. Peters is talking about, when they first came out without the stop valves and the safety valves and the drain on each heat exchanger, he was coming out and doing our inspection and you’ll have one tag. $75, $35 -- it was $110 bucks for a $30,000; it's a very minimal cost. Not a big deal. Where the problem is now, the factory decided to do everything it could to be in compliance with the State of Texas, and added all these trinkets onto each one of these heat exchangers. Which, in turn, now, you have multiple inspectors coming in, and they're reading it and interpreting how they see that cabinet at that point in time. So that being the case, they have had to back up and, I guess, not putting the stop valves in anymore because Texas is not making them. They decided to make it the same for the whole country and shipping them out without -- you know, with the stop valves. So now they're going back to no stop valves, no safety valve, no drain on each heat exchanger, back to the way it originally was.

Chief Chapman said, "No. If we're going to pull a permit per heat exchanger, they can pull a permit if the heat exchanger were to fail and replace that with a boiler permit."

Is that not what we --

MR. CHAPMAN: That is what we said.

MR. O'CONNOR: Do you have anything else you would elaborate on, on this discussion, so I would know how to pull boiler permits in the state of Tennessee and explain to people who are in my shoes of what they need to do.

MR. CHAPMAN: Just like you said, if it has valves in it, that makes it individual units.

MR. O'CONNOR: I understand that.

MR. CHAPMAN: And as long as there's no valves, it's one unit.

MR. O'CONNOR: That helps me with the discussion that I don't have to come back unless you need me to come back.

ACTING CHAIRMAN BAUGHMAN: Yes, sir.

Mr. Toth?

MR. TOTH: Yes. Just a suggestion, in talking about this. Board cases and board interpretations, when I was chief inspector, was put into place to answer questions like this.
and burning these units up. And now we've got interpretations of where if you take the whole unit out, we've got new inspectors out there that's hanging tags on everything, and it's to the point to where it's almost ridiculous. And it's getting to the point to where the industry is looking at it as ridiculous, and the owner/user is looking at us like it's ridiculous, and we're trying to determine what to do.

I would like to recommend today, if we could, in this 45-day timeframe, if we could have some sort of a revision -- not a revision, but a variance to that rule to where we could be -- they could be on the September board meeting and they can present their case as a board case, or they can present their case as a clarification of an interpretation. We need to do this as soon as possible. Thank you.

ACTING CHAIRMAN BAUGHMAN: Thank you, Mr. Peters. And I'll direct that back to Ms. Jefferson and Mr. Bailey for what's the protocol. And I know the agenda is pretty full as it is, and I understand the want and the desire to discuss this in a timely manner. And we need to be able to have the availability of looking at the information ourselves, as board members, to be able to identify questions ahead of time and so forth, and do our due diligence on the homework. So I'll refer over as far as to your thoughts on the agenda.

MR. SHREINER: If the paperwork was submitted today, would we be within the 45-day window, or is that already past?

MS. JEFFERSON: The meeting is scheduled for September the 19th, so that's not going to be within the 45 days.

As the chairman mentioned, it's not just for us, but it's for the board members. They have to have time to analyze all that information. And the unit has to prepare for each one of these cases. So I would suggest that we place that on the December meeting agenda. That way it will provide you--all time, sufficient time, to submit all that information to the office. And then we can just go from there.

MR. O'CONNOR: With that being that way, if we're going to wait until 45 days, we're getting into the next one where he can come speak.

MR. CHAPMAN: If they're an individual Tennessee member, with that you can pull that unit out and pull another permit for the new unit they're going to watch. I think y'all call them engine, the new engine.

MR. O'CONNOR: If it's -- say Ferguson sends out one of the units that doesn't have the stops, and one tag has been hung on it, then how do we treat that heat exchanger?

MR. CHAPMAN: As one unit.

MR. O'CONNOR: So we would be able to replace the heat exchanger or we would have to replace the whole 30-40-, $50,000 unit? That's my question.

MR. SHREINER: Everything is replaceable in the cabinet. They're all held together by screws.

ACTING CHAIRMAN BAUGHMAN: I'm going to ask Mr. Toth. He's got some input again, on it.

MR. TOTH: It's a part. It would be treated like a part. Yeah. Each individual section is -- it's just a part. ASME allows that as a part.

ACTING CHAIRMAN BAUGHMAN: Here's the way -- I'm sorry. I don't mean to interrupt.

MR. TOTH: It just needs to be replaced by a code-built section. And as long as the section that's brought in was built to ASME codes and stamped accordingly. It's a part.

ACTING CHAIRMAN BAUGHMAN: Well, and so I'll make the reference back to cast-iron sectional boilers. We've got individual boiler sections that are put together to make a whole. When we've got a section that goes bad, we replace the section, and not the whole.

And with these being in modules with no valves in between, I understand that they're each their own stamped individual unit, and they're permitted as one unit as a whole, as a cast-iron boiler would be. But as long as you've got the availability of replacing a module or a section, it seems pertinent that that would be able to be replaced. And I don't think that there's any reference anywhere that says that that is not acceptable within the NBIC.

MR. CHAPMAN: No, there's not.
MR. O'CONNOR: I understand.

ACTING CHAIRMAN BAUGHMAN: So is there anything else you want to bring to any of the other meetings, I look forward to seeing these units up and running out in the field and giving us hot water. And if they don't work, we know who to call.

And we appreciate you guys bringing this in for discussion very much. Appreciate the input from everybody, for counsel, you as the inspectors, and from those in the audience, and here on the board. Thank you very much.

Anything else?

(No verbal response.)

ACTING CHAIRMAN BAUGHMAN: Are there any other items that would like to be discussed?

(No verbal response.)

ACTING CHAIRMAN BAUGHMAN: Good. So being as such, we'll go to the next item, which is identifying the next board of boiler rules board meeting that's scheduled for 9:00, Wednesday September 19th, here at this building. The meeting will actually be held in the Pearl Room.

MS. JEFFERSON: Actually --

ACTING CHAIRMAN BAUGHMAN: Do we know?

MS. JEFFERSON: It will be in the Pearl room.

ACTING CHAIRMAN BAUGHMAN: Very good discussion. It was great to have the input. I'm very thankful. Thank you for working with me, as the first time sitting here with this. I tried to channel Mr. Morelock as best I could. But being that all the items on the agenda have been attended to in the discussion, I call for an adjournment.

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