Board of Boiler Rules

DEPOSITION OF QUARTERLY MEETING HEARING

Taken June 12, 2019
STATE OF TENNESSEE
DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT
BOARD OF BOILER RULES

QUARTERLY MEETING OF THE
STATE OF TENNESSEE
BOARD OF BOILER RULES

June 12, 2019

JANIE W. GARLAND
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Nashville, TN 37201
(615)714-5350
APPEARANCES

Brian Morelock, Chairman  
Tom Herrod, Commissioner  
Dan Bailey, Legal Counsel  
Terry Fox, Board Member  
David Baughman, Board Member  
Harold Bowers, Board Member  
Jeffrey Henry, Board Member  
Harold Bowers, Board Member  
Sam Chapman, Chief Inspector  
Chris O’Guin, Assistant Chief Inspector  
Lynn Kirby, Secretary

AGENDA

I. Call Meeting to Order  
II. Introductions and Announcements  
III. Adoption of the Agenda  
IV. Approval of the March 13, 2018 Meeting Minutes  
V. Chief Boiler Inspector’s Report  
VI. Variance Report  
VII. Old Business  
- None  
VIII. New Business  
- 19-8 BASF Chattanooga Polymer located at 2120 Polymer Drive, Chattanooga, Tennessee is requesting a new variance for two high pressure boilers to operate under the requirements of Chapter 0800-03.03.08(11).  
- 19-9 TriStar StoneCrest Medical Center located at 200 StoneCrest Boulevard, Smyrna, Tennessee is requesting a new variance for two high pressure boilers to operate under the requirements of Chapter 0800-03.03.08(11).  
- 19-10 Evonik Corporation located at 131 County Road 875, Etowah, Tennessee is requesting a new variance for one high pressure boiler to operate under the requirements of Chapter 0800-03.03.08(11).  
- 19-11 American Snuff Company located at 4583 Guthrie Highway, Clarksville, Tennessee is requesting a new variance for five high pressure boilers to operate under the requirements of Chapter 0800-03.03.08(11).  
IX. Open Discussion Items  
- Doris Barnett will provide a quarterly update on the Boiler Computer System and Jurisdiction Online (JO).  
- General discussion on the frequency of internal inspections on low-pressure boilers.  
- Update on the 2019 Tennessee Boiler Safety Conference.  
X. Announcement of Next Meeting - The next regularly scheduled meeting of the Board of Boiler Rules will be held at 9 a.m. (CST) on Wednesday, September 18, 2019 at the State of Tennessee, Department of Labor and Workforce Development building, located at 220 French Landing Drive, Nashville, Tennessee.  
XI. Adjournment  

CHAIRMAN MORELOCK: Good morning, everybody. I am going to call to order our June 12th Tennessee Board of Boiler Rules meeting this morning. I want to welcome everyone. And before we even go to introductions and announcements, I would like to introduce a couple of people to you. First off, I would like to introduce our new commissioner, Jeff McCord, and, Jeff, if you would like to say a few words.

MR. MCCORD: Absolutely. There’s a couple of new faces in the room, and I’m one of them. I just want to say I appreciate what you do. They invited me to the last board meeting, but I was unable to attend. Again, thank you, and I may preempt you a little bit and introduce you to another new face, Tom Herrod. He is now the assistant commissioner with responsibility for boilers. Tom comes with years and years, like a hundred years, based on the industry experience, he’s the chemical engineer from Vandy, so don’t hold that against him.

But also, for the last little while, he’s been running the TOSHA public sector for the State of Tennessee, and TOSHA is recognized as the best of the best in OSHA organizations for the country, so
he comes with some great credentials. I'm super happy that he's here to do this and really have a lot of confidence in Tom, as well. But, mostly, just want to say thank you for your guidance and for keeping Sam and Chris in line. That's always a good thing to do. Thank you. Thank you for the time.

CHAIRMAN MORELOCK: Thank you. Well, Mr. Herrod, based on your introduction, you look excellent for your age.

COMMISSIONER HERROD: Thank you.

CHAIRMAN MORELOCK: All right. Moving right along, as far as introduction and announcements go, I do have a safety item that I always like to go over. In the event of an emergency or natural disaster, security personnel will take attendees to a safe place in the building or direct them to exit the building on the Rosa Parks side, and so just -- we do have a lot of visitors, and I know some are regulars, but we have new faces here and hope we don't have to utilize that today, but you've been forewarned, so anyway, I wanted to pass that along.

I also have a courtesy item to share this morning. As we go through our meeting, those who make presentations will come to the table there and make their presentations, and so in courtesy of the conversation and presentations, please silence your cell phones or put them on vibrate. I know if you need to take a call, you can step out, but, please, as a courtesy to the presenters and to the discussion, please do that.

So are there any other announcements that need to be made?

MR. BAILEY: Mr. Chairman, I would like to remind everybody, also, that this is being transcribed by a court reporter, so try not to talk over each other. Let the person say what they are going to say or going to ask, even if you know what you're going to say back, let them finish, and then you can say what you have to say so we have a clean record.

CHAIRMAN MORELOCK: Thank you. We do have agendas on the back table. There's a sign-in sheet there, as well, and we'll be passing the sign-in sheet around, as well, to record everyone's attendance.

So moving on to Item III, Adoption of the Agenda, I do have some changes that I would like to note. When you look under Item VIII, New Business, the first item is BASF Polymers, the Chattanooga Polymer facility, that item number should be 19-9, because item 198 was handled in March for Parkwest Medical Center Covenant Health.

So moving on down then, 19-9 for TriStar, will become 19-10. And then Evonik Corporation will become 19-11. Mr. Toth sent us an e-mail concerning American Snuff, and they have requested to move their item from the June to the September meeting, so we will remove that from the agenda, which will allow Wonton Food to stay 19-12.

And as I earlier noted, Parkwest Medical Center Covenant Health, 19-13, was actually passed at the March Tennessee Board Meeting, under item number 19-8.

Are there any other corrections or additions or changes to the minutes -- or the agenda?

Okay. Hearing that, do I have a motion to accept our agenda as modified?

(WHEREUPON the members of the Board responded affirmatively.)

CHAIRMAN MORELOCK: Motion and a second from Mr. Henry. Any other discussion? All in favor, say aye.

(WHEREUPON the members of the Board responded affirmatively.)

CHAIRMAN MORELOCK: Opposed? Abstentions? Not voting?

(WHEREUPON the members of the Board responded negatively.)

CHAIRMAN MORELOCK: We have an approved agenda.

So moving along to go back and complete introductions and announcements, yeah, I want to start with our court reporter, Janie, and we'll go around and let everybody introduce themselves.

THE COURT REPORTER: I'm Janie Garland.

I'm a court reporter and glad to be here.

MS. KIRBY: I'm Lynn Kirby. I'm the board secretary.

MR. O’GUIN: Chris O'Guin, assistant chief inspector.

MR. CHAPMAN: Sam Chapman, chief inspector.

MR. HENRY: Jeff Henry with ATC in Chattanooga.

MR. BOWERS: Harold Bowers, board member.

CHAIRMAN MORELOCK: Brian Morelock, board member.
March 13, 2018 meeting minutes, I hope everyone has had a chance to review those. They are public records online, so you can go access those.

Do I have a motion to accept the March minutes?

MR. FOX: I'll make a motion to accept.

MR. BAUGHMAN: Second.

CHAIRMAN MORELOCK: Are there any questions, changes, provisions to the minutes?

Hearing that, I will call the question, all in favor say aye.

WHEREUPON the members of the Board responded affirmatively.

CHAIRMAN MORELOCK: Opposed? Abstentions? Not voting?

WHEREUPON the members of the Board responded negatively.

CHAIRMAN MORELOCK: The minutes have been approved. That will take us on to our next item, item V, Chief Boiler Inspector's Report, and I will turn that over to our chief inspector, Mr. Chapman.

CHAIRMAN MORELOCK: Any question or comments about the chief's report?

MR. BAUGHMAN: Those two inspectors that are going to be opened up, for what area are those going to be for?

MR. CHAPMAN: One is going to be in the Nashville area, and one is going to be in the Memphis area.

MR. BAUGHMAN: Thank you, chief.

MR. CHAPMAN: One is going to be in the Nashville area, and one is going to be in the Memphis area.

MR. BAUGHMAN: Thank you, chief.

MR. BOWERS: And the violations, what was the majority of the violations?

MR. CHAPMAN: On the CO2, because they are missing the monitoring on it, the audio alarm.

CHAIRMAN MORELOCK: Any other questions?

Okay. Thank you, chief.
Drive facility that have already been approved by mirror the BCS and BMS systems at our Lost Mount systems. The new systems will be installed to first week of July to replace the original control will be completed in 2019 and scheduled for the management systems are obsolete, and the project So many parts of the original control system, burner They're part of a chemical manufacturing process. Boilers locked at 2120 Polymer Drive in Chattanooga. modification, a variance modification for two boilers locked at 2120 Polymer Drive in Chattanooga. They're part of a chemical manufacturing process. So many parts of the original control system, burner management systems are obsolete, and the project will be completed in 2019 and scheduled for the first week of July to replace the original control systems. The new systems will be installed to mirror the BCS and BMS systems at our Lost Mount Drive facility that have already been approved by
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<th>Page 18</th>
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<td>MR. HAYS: I did not include one. I did not include it.</td>
<td>MR. HAYS: The project is coming together at the same time as the manual is coming together, so we're gathering up final items really to the last minute.</td>
<td>with a large project, we have all the relief valves validated study signed off on.</td>
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<td>MS. DAVIS: It was drafted -- what's the manual due, 45 days before the meeting, so roughly 45 days before now.</td>
<td>Mr. BAUGHMAN: Super. Because I just noticed all the relief-valve information that was submitted is dated 2013.</td>
<td>Mr. BAUGHMAN: Very good. Thank you, Chris and Brittany.</td>
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<td>MR. BAUGHMAN: Fair enough answer.</td>
<td>MR. BAUGHMAN: Did you start utilizing it as a --</td>
<td>CHAIRMAN MORELOCK: Any other questions or comments? Hearing that, I will call the question --</td>
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<td>MR. HAYS: The project is coming together at the same time as the manual is coming together, so we're gathering up final items really to the last minute.</td>
<td>MR. BAUGHMAN: Of course, they weren't relief-valve inspections, those were just the studies that documented what size and capacity everything was. That was just the information we had from the original study from Hargrove Engineering.</td>
<td>well, I can't call the question without a motion. Sorry. I did have a motion for discussion. Do I have a motion for approval of this variance for BASF of Chattanooga Polymers contingent upon any revisions to the manual based on comments from the board meeting and a successful site visit by the boiler unit?</td>
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<td>MR. BAUGHMAN: I'm showing on Page 9 and also on the cover letter that this variance was effective 12/13 of '17. Is that when you put it into place when you started --</td>
<td>MR. BAUGHMAN: That's fair enough. So it was a study and not so much the valve inspection. I knew that in the study, there were recommendations on repairs, so forth, that were in that study, so I was just kind of interested to know if all those had been attended to, just from the curiosity standpoint.</td>
<td>MR. BAUGHMAN: Motion to accept.</td>
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<td>MR. HAYS: That was when our first variance was approved.</td>
<td>MR. HAYS: We didn't start operating under the variance until after our official inspection and we got the letter from the chief.</td>
<td>CHAIRMAN MORELOCK: Second?</td>
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<td>MR. BAUGHMAN: Did you start utilizing it as a --</td>
<td>MR. BAUGHMAN: Super. Because I just noticed the effective date of 12/13, but the inspection date was May 14.</td>
<td>MR. FOX: Second.</td>
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<td>MS. DAVIS: We didn't start operating under the variance until after our official inspection and we got the letter from the chief.</td>
<td>MS. DAVIS: Yes. We didn't start operating until after our inspection and we got the letter in the mail. We just, for documentation purposes, we just put the meeting date.</td>
<td>CHAIRMAN MORELOCK: Are there any questions or comments? Hearing that, I will call the question, all in favor say aye.</td>
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<td>(WHEREUPON the members of the Board responded affirmatively.)</td>
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<td>CHAIRMAN MORELOCK: Opposed? Abstentions? Not voting?</td>
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<td>(WHEREUPON the members of the Board responded negatively.)</td>
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<td>You have a contingently approved variance manual.</td>
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<td>MR. HAYS: Thank you all.</td>
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<td>CHAIRMAN MORELOCK: Thank you. Okay. That takes us to item 19-10, TriStar StoneCrest Medical Center. While they're coming up, are there any conflicts of interest for this item?</td>
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<td>MR. BAUGHMAN: There are, Mr. Bailey, I've got a conflict of interest. TriStar has been to our boiler training school, so in that regard, we -- but that's it.</td>
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<td>MR. BAILEY: Okay.</td>
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<td>CHAIRMAN MORELOCK: Okay. If you will introduce yourselves and present your manual.</td>
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<td>MR. NEVILLE: James Neville with Neville Engineering.</td>
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<td>MR. DELANEY: Brent Delaney with StoneCrest Medical Center, director of facilities.</td>
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<td>MR. GOLDEN: James Golden, manager of facilities, StoneCrest Medical Center.</td>
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<td>MR. NEVILLE: We are here to present a new request for boiler variance. If I could reference Page 2 of our manual, it shows the site plan, shows the location of the remote station at the PBX office and the location of the boiler room, approximately</td>
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1 106 feet distance there. The individuals that will
2 be monitoring at the remote station are classified
3 as a PBX operator, a secure officer or a plant
4 operations tech. The individuals that are trained
5 and qualified to be a boiler attendant are listed as
6 a plant operations tech or a security officer, which
7 will be a monitoring position only.
8 If I can have a brief discussion on how
9 they're qualified to be a boiler attendant, do you
10 want to fill the board in?
11 MR. DELANEY: So about two years ago, we
12 had all of our techs go through boiler training, and
13 this year we have new staff, so we'll have
14 additional -- we'll have boiler supplies who
15 provided the previous training, so we'll have them
16 come through and provide another training this year.
17 In addition to that, we do annual competencies for
18 all of our staff on the boilers that's internal to
19 StoneCrest. Also, Jimmy attends these boiler
20 meetings quarterly, so he stays up to date on any
21 changes that could come about.
22 MR. GOLDEN: Also if I can interject here,
23 also as a result of that, we also added emergency
24 stop boiler at the locations best for emergency
25 situations if we have to turn off boilers.

1 Emergency stops have been installed for our boilers.
2 It kills both boilers, one stop stops them.
3 MR. NEVILLE: At the remote station,
4 that's a hard-wired shutoff for each of the boilers.
5 If there are any other questions regarding
6 our request?
7 CHAIRMAN MORELOCK: Do we have a motion to
8 discuss?
9 MR. BOWERS: Motion.
10 CHAIRMAN MORELOCK: So moved. Second?
11 MR. FOX: Second.
12 CHAIRMAN MORELOCK: All right. Floor is
13 open. What are your questions or comments.
14 MR. BOWERS: I have a question. Are all
15 your -- anybody who attends to the boiler, looks at
16 the boiler, are you saying they've been through
17 boiler training?
18 MR. DELANEY: They go through an annual --
19 everyone goes through an annual competency at the
20 facility level. Only the boiler attendants from the
21 plant operation side attend the boiler supply
22 training.
23 MR. BOWERS: Are they the only ones that
24 look at the boiler?
25 MR. DELANEY: They would be the only ones

1 to service the boilers.
2 MR. BOWERS: On the rounds?
3 MR. DELANEY: Yes, on the rounds?
4 MR. NEVILLE: Now, that is training
5 regarding the boiler operations. They will also be
6 required to be trained to this manual, as well, so
7 there's two trainings that are involved.
8 MR. DELANEY: Once this is adopted, we'll
9 have everyone go through a training for this
10 variance, including PBX, security and plant
11 operations, as well.
12 MR. BOWERS: So security could check the
13 boiler, correct?
14 MR. DELANEY: They check the boiler, yes,
15 for pressures and everything.
16 MR. BOWERS: But they will be trained?
17 MR. DELANEY: Yes. They do that
18 currently and they're trained. That's part of their
19 annual competency that we do, but security wouldn't
20 do any of the service to the boiler.
21 MR. BOWERS: So they can shut down the
22 boiler? Are they authorized to shut it down?
23 MR. DELANEY: Yes.
24 MR. BOWERS: Are they authorized to start
25 the boiler?

1 MR. DELANEY: No.
2 CHAIRMAN MORELOCK: Other questions or
3 comments?
4 MR. BAUGHMAN: I have a question. On the
5 deserator, Appendix A, Page A1, this is a pressure
6 vessel, but it shows no national board number and it
7 shows no Tennessee number.
8 MR. DELANEY: It's atmospheric. It is not
9 a pressure vessel.
10 MR. BAUGHMAN: Very good. Being a spray
11 flow and industrial steam and I saw the 4SP511, it's
12 got a pounds per hour rating on it, so that's why I
13 kind of wanted to make sure we addressed it, that it
14 was atmospheric and not actually a pressure. The
15 drawing shows it as a DA and shows it with a steam
16 regulator, so I had a little bit of a conflict in
17 what the drawing showed as a pressurized DA versus
18 what's listed as a atmospheric DA.
19 MR. NEVILLE: We can make a note. I mean
20 we have --
21 MR. DELANEY: I see the vent. It is not
22 pressured. I know that, but I don't see --
23 MR. BAUGHMAN: It's showing steam in your
24 steam drawing, steam coming up into the vessel
25 itself.
CHAIRMAN MORELOCK: So does the deaerator have a name plate on it with a pressure rating?
MR. DELANEY: It does not.
CHAIRMAN MORELOCK: It does not? No nameplate? Is there a manufacturer's nameplate on it?
MR. DELANEY: It has a nameplate but no --
MR. BAUGHMAN: No pressure rating on it whatsoever?
CHAIRMAN MORELOCK: So if you had a failure and you pressurized it with steam, is your vent sized where it would not see any pressure?
MR. DELANEY: We can verify that. I wonder if that's supposed to be condensate instead of steam.
CHAIRMAN MORELOCK: I mean, it's okay, but Mr. Baughman's point is well taken in the fact that in the state of Tennessee, 68-122-105 exemptions will tell you if that vessel is operated, relieved or rated at 15 pounds or less, it does not have to be registered with the State of Tennessee. So this DA could see up to 15PSI and it wouldn't have to have a State registration, but we just need to make sure that you have a process control for a pressure situation.

MR. DELANEY: Okay. We can verify that.
CHAIRMAN MORELOCK: Yeah.
MR. BAUGHMAN: It shows steam and condensation both coming in.
Just make sure you document it well. Mr. Toth?
MR. TOTH: Just for clarification, are you saying that any vessel that operates or any vessel that's rated 15PSI or below, because you could have a deaerator that operates at 5PSI, however, it's relief valve and its MAWP is over 15PSI; therefore, it is required to be registered with the State.
MR. BOWERS: The code strictly says MAWP.
MR. TOTH: Absolutely. So I just wanted to clarify that.
CHAIRMAN MORELOCK: Well, but if the vessel is relieved at 15 PSI or less --
MR. TOTH: Absolutely, and that's where I wanted to make clarification that --
CHAIRMAN MORELOCK: Even if it's being rated higher than 15, it's being operated at 15 or below, it doesn't have to have State --
MR. TOTH: Right. Operating. But I just wanted to make sure of that clarification, because most deaerators that you're going to see are going to have a safety valve set at probably 50PSI, not 15.
CHAIRMAN MORELOCK: Okay. Then that would be a regulated vessel.
MR. TOTH: I just wanted to clarify that.
CHAIRMAN MORELOCK: Thank you for that information.
MR. BAUGHMAN: So to further that, who is the inspector, your boiler inspector?
MR. DELANEY: So we had a new one last year. Do you remember his name?
MR. GOLDEN: The one that replaced Micah.
MR. BAUGHMAN: So we just want the boiler inspector to go back over it and take a look at it and verify.
MR. DELANEY: Okay. Our annual is due in July, so he should be able to do that quickly.
CHAIRMAN MORELOCK: Thank you. What other questions or comments do you have?
In Appendix G, so if you look on Page G5, I think it's just a printing format error, but on G4, you have the job title, position title for PBS operator, but there's nothing under that. Then on G5, you have all the information for the PBX operator with no title at the top, so it's just an editorial thing. Okay?
MR. DELANEY: Okay.
CHAIRMAN MORELOCK: And also in Appendix G, what are the training experience required for the plant ops tech to be a boiler attendant? I don't see that in Appendix G.
MR. NEVILLE: On G8, last line, is that what you're referring to?
MR. NEVILLE: That is correct.
CHAIRMAN MORELOCK: But it doesn't mention any training requirements in that job description, whereas the other ones do, if I'm remembering right. Most of the other job descriptions under education and development have annual training.
MR. NEVILLE: We will definitely add that.
CHAIRMAN MORELOCK: That would be great.
On Page 9, under Restart Procedures, you do say that if the boiler is restarted before the cause of the alarm is diagnosed or corrected, then you have to basically go to the 20-minute rule, which you referenced. In some of your manuals, you actually put that paragraph in there, so for consistency sake --
MR. NEVILLE: We can add that.

CHAIRMAN MORELOCK: One way or the other, you may want to do that. That's all the comments I have. Any other questions or comments?

All right. Hearing that, do I have a motion to contingently approve this variance based upon revisions to the manual based upon comments from the Tennessee Board of Boiler Rules meeting today and the successful site visit for the boiler unit?

MR. FOX: I'll make that motion.

CHAIRMAN MORELOCK: Do I have a second?

MR. HENRY: Second.

CHAIRMAN MORELOCK: Any other comments or questions? Hearing that, I'll call the question, all in favor say aye?

(WHEREUPON the members of the Board responded affirmatively.)

CHAIRMAN MORELOCK: Opposed? Abstentions?

One abstention from Mr. Baughman.

Not voting?

(WHEREUPON the members of the Board responded negatively.)

CHAIRMAN MORELOCK: Gentlemen, you have a contingently approved variance.

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MR. NEVILLE: Thank you.

CHAIRMAN MORELOCK: Okay. That will take us to our next item, 19-11 with Evonik Corporation for a new variance for one high-pressure boiler, so if you will come forward, introduce yourself. While you're coming forward, are there any conflicts of interest for this item? Okay.

MR. NEVILLE: James Neville with Neville Engineering.

MR. FREEMAN: Mike Freeman with Evonik Corporation.

MS. ADERHOLD: Laura Aderhold with Evonik Corporation.

MR. NEVILLE: We are here to present a new variance; however, this was previously J.M. Huber, so the company name change. It was bought out by Evonik, so they had a previous variance. April of 2017 was the previous variance. But we are presenting this as a new variance due to that company buying J.M. Huber.

In our location of the remote station is in the QC laboratory. The distance there is approximately 305 feet, the travel distance between the boiler and that remote station.

The individuals that will be monitoring at the remote station are laboratory technicians, and we define their job descriptions in Appendix G. And the individuals that will be boiler attendants, there are five different job titles. That's the maintenance -- or the mechanical maintenance lead, mechanical maintenance six, seven, eight and nine, job titles that would be boiler attendants. We can talk about the training of those to be boiler attendants.

MR. FREEMAN: The training is all hands-on. The new hires will be trained by the lead maintenance guys or the boiler tech. Every one of them will be before they even come over to operate and take control of that boiler. They also got a SOP they have to go by, the chemicals and all that, but it's all hands-on before they ever come over. It's pretty extensive. It lasts three to six months.

MR. NEVILLE: And that's the training to be a boiler attendant. As far as training for this manual, each will be required to be trained to this manual, as well, and documented. Is there any questions?

CHAIRMAN MORELOCK: Do I have a motion to discuss?

MR. BOWERS: Motion.

MR. BAUGHMAN: Second.

CHAIRMAN MORELOCK: Okay. What are your questions and comments?

MR. BOWERS: How long, under your old variance, your old company, how long had you had a variance?

MR. NEVILLE: The first variance was in 2013. It was renewed in 2017, and then the company was purchased and that's why we're presenting.

MR. BOWERS: So four or five years under a variance, correct?

MR. NEVILLE: That is correct.

CHAIRMAN MORELOCK: So did this manual require any technical changes from the 2017 renewal?

MR. NEVILLE: It did not. As far as the controls, everything was the same. Job descriptions did change, work chart changed, but that was the extent of it.

CHAIRMAN MORELOCK: The changes are pretty much editorial due to the name change of the company; is that correct.

MR. NEVILLE: That is correct, yes.

MR. BOWERS: Personnel is pretty well the same personnel?
MR. FREEMAN: It's listed maintenance six, seven, that's just the pay grade. We bring them in, we start them, train them and work them up so...

CHAIRMAN MORELOCK: Okay. Any other questions or comments?

MR. BOWERS: Who did the training for your personnel?

MR. FREEMAN: Our lead boiler attendants have been there 20, 25 years. They're the ones that train them. We have one on every shift. We have four shifts and there's one of them on every shift. Our new hires will be with, not the same guy every day, he might be with a different -- oh, and maintenance supervisor, yes, which will be us.

MS. ADERHOLD: As far as the variance to train them to this manual, we do that yearly, and I handle that, and I go to each individual and walk them through the manual. I've got a sign-off sheet and we do that yearly.

MR. BOWERS: Typically, how many hours of training for a new hire?

MR. FREEMAN: I've got one guy switching over now. They had him over there two days a week, 12-hour shift. He'd been doing it for about two months right now. He won't be going over for a while. I mean, he's learning, but he's going to be ready before he goes over.

MR. BOWERS: On-the-job training basically.

MR. FREEMAN: Yeah, he gets hands-on up close and personal with everything.

CHAIRMAN MORELOCK: Yes, sir?

MR. ROBINSON: Who sets the standards for the SOPs?

MR. FREEMAN: Them was put in line with Huber, so I don't know whereabouts them come from. I don't really know.

MS. ADERHOLD: The SOPs were developed based on how the boiler operates, and so how you start it up, how you shut it down, and then we review those every so often. Right now, we're getting ready to review them again, because they're actually switching once again in our transition from Huber to Evonik, we're reviewing them one more time. Usually, every two years, probably the senior boiler operator we feel has been there the longest, so Steve Coleman is the one that reviewed them last, so the senior boiler operator is going to go through those and make sure that they -- you know, we sit down with the maintenance supervisor to make sure that those are the way we operate that boiler.

MR. BAILEY: For the record, that question was asked by Eugene Robinson.

MR. FREEMAN: And he set them up, as far as -- I've been there 25 years, and that's the same SOP we run, you know, when we got the same boiler and everything.

MR. ROBINSON: Very well. Thank you.

CHAIRMAN MORELOCK: With that said, as controls and stuff have been changed, the SOP had been updated to reflect that; is that correct?

MR. FREEMAN: Everything has been upgraded and modified.

CHAIRMAN MORELOCK: Any other questions or comments?

MR. HENRY: In regard to the training and the change in the company ownership, have there been any fundamental changes in the way in which the training is conducted in the new company?

MR. FREEMAN: No.

MR. HENRY: Identical to before?

MR. FREEMAN: Nothing has really changed, just basically the name of the company.

MR. HENRY: Thank you.

CHAIRMAN MORELOCK: So -- go ahead.

MR. BAUGHMAN: Remote station is continually staffed by a laboratory technician?

MS. ADERHOLD: Yes.

MR. BAUGHMAN: Single technician, multiples?

MR. FREEMAN: Multiple. During the day, single, on shift, nights and weekends.

MR. BAUGHMAN: Boiler operates 24/7?

MR. FREEMAN: Yes.

MR. BAUGHMAN: Remote station lab tech has to take a break, will take a break, what's the SOP?

MR. FREEMAN: They break right there where they're at. It's in the same --

MR. BAUGHMAN: So the restroom is in the same --

MS. ADERHOLD: Yeah.

MR. BAUGHMAN: So if he's in the restroom, got it locked --

MR. FREEMAN: I hope he hears it.

MS. ADERHOLD: He's close enough to be able to hear the alarm. It's an enunciated alarm.

MR. FREEMAN: He's also got a radio.

They're supposed to carry a two-way radio and a cell phone, too.
MS. ADERHOLD: If they're going to be on an extended break, or let's say they're sick and they go home, they're trained, and it's in the training that I do that says if you're going to be out of the lab for an extended period of time, if you go home sick, you need to absolutely let the boiler tech know, and they go back on 20-minute checks. So they know that that's their responsibility and if they step away from it for any extended period of time, then they let the boiler tech know so we go back on 20-minute checks.

MR. BAUGHMAN: Okay. And that's in our manual here?

MS. ADERHOLD: Yeah, it says if they leave for any time, they need to let the boiler tech know that they will be gone so that we can go back in 20-minute checks.

MR. BAUGHMAN: Okay. One other question I had was on Page 4. We talk about the remote shutdown switch and a hard-wired emergency shutoff switch, but it mentions that there is an on-screen switch that must be enabled to allow the start up of the boiler; although, it cannot be started from the remote computer, there is an on-screen switch.

MS. ADERHOLD: Yeah. The remote monitoring station, which is the lab, they have to give it permissive, so it's a two-way -- the lab gives it the permission, okay, you're ready to start. If they don't have that permission, the guy at the boiler, the boiler operator cannot start that boiler. He just sits there and waits for that permission.

So it's basically -- it's a permissive that says, you're okay here, the lab knows all the alarms here are cleared, so now you can start it. But they have to have that permissive before the guy at the boiler can start it.

MR. BAUGHMAN: But there is an on-screen --

MS. ADERHOLD: It's just an on-screen button that say, boiler permissive.

MR. BAUGHMAN: On the computer?

MS. ADERHOLD: Yeah.

MR. NEVILLE: But there is a hard-wire shutoff.

MS. ADERHOLD: There's a hardware estop, yeah. To shut it down, it's not on the computer, it's just a hard-wire mushroom estop, but to give it the permissive is a computer switch, yes.

MR. BAUGHMAN: I bring that up just because we've had discussions previously about on-screen switches, so forth, so that's something I'll defer back over to the chief and the assistant for when they take a look at the system.

CHAIRMAN MORELOCK: The way I understand what you're explaining to me, and correct me if I'm wrong, this is no different than the remote station radioing to the boiler attendant saying, okay, I've cleared, you're ready to restart the boiler. You're just doing it through a computer screen instead of a two-way radio.

MS. ADERHOLD: Correct.

MR. BOWERS: And there's a lot of systems out there like that. You push in the remote estop -- basically, you undo it, it does not unlock the system, you have to go somewhere else to unlock the system. I see a lot of locations that have that. Just because you pull the estop back out, you cannot start the boiler.

MS. ADERHOLD: Right. You want to make sure there's a --

MR. BOWERS: The system is locked out until you check with somebody else.

MR. BAUGHMAN: Is this on-screen switch actually tied in to the circuitry to where the boiler will not physically start up until that on-screen switch is enabled?

MS. ADERHOLD: That's correct. It will not start up. It's in the commuter system.

MR. BAUGHMAN: Is there a backup to that in case the computer, not that we ever had computer issues?

MS. ADERHOLD: Yes. I mean, we can -- there is a back door to it. You can get into the logic if you had to, the computer logic, if there was a terrible -- you know, if that screen went down for any reason, but we've not had any problems with it.

MR. BAUGHMAN: I understand.

CHAIRMAN MORELOCK: Since you opened that door, I'm assuming the back door is password protected?

MS. ADERHOLD: Oh, yes. This is absolutely password protected, as well. This remote monitoring station is password protected, yes.

CHAIRMAN MORELOCK: Thank you.

MR. BAUGHMAN: Thank you.

CHAIRMAN MORELOCK: Any other questions?

All right. Do I have a motion for contingent approval of this variance based upon the comments made?
and recommendation from the Tennessee Board and
contingent upon a site visit from the boiler unit?

MR. BOWERS: Motion.

CHAIRMAN MORELOCK: Have a second?

MR. BAUGHMAN: Second.

CHAIRMAN MORELOCK: Any other questions or
comments? I'll call the question, all in favor say
aye.

WHEREUPON the members of the Board
responded affirmatively.

CHAIRMAN MORELOCK: Opposed? Abstentions?

WHEREUPON the members of the Board
responded negatively.

CHAIRMAN MORELOCK: You have a
contingently approved variance.

MR. NEVILLE: Thank you.

CHAIRMAN MORELOCK: And just note, moving
forward, now that you've got the name change and you
submitted it as a new variance, in the future when
it comes up for renewal, if there's no technical
changes, the boiler unit can handle that for you.
The only reason it would come back to us is if
there's a technical change to the manual or
equipment change, software.

MR. NEVILLE: Thank you.

MS. ADERHOLD: Thank you.

CHAIRMAN MORELOCK: Okay. That takes us
to item 19-12, Wonton Food, Incorporated. While
they're getting settled, is there a conflict in this
particular item?

Okay. There is not.

So, gentlemen, I'll let you present your
manual.

MR. TOTH: Good morning, Mr. Chairman and
members of the board. My name is Marty Toth. I'm
with ECS Consulting, Boisco Training Group. I'm
representing Wonton Food. To my right is Mr. Wei
Lik Chan. He is representing Wonton Food here,
also. Mr. Chan will appear in your manual initially
as human resource manager. I'm proud to announce
that he has been extended his responsibilities with
Wonton to project manager, so you will see, when the
revisions are given to the chief inspector, this has
happened recently. The chief inspector will see the
change of title from human resource manager to
project manager within the board chart. Other than
that, the responsibilities are still his for this
manual system. Mr. Chan serves as a -- in the
responsibility of quality assurance for this system,
and has sole responsibility for its implementation
and update. Wonton Foods is located on Firestone
Parkway in LaVergne, and they operate, or will be
operating two high-pressure boilers, 150-horsepower
Fulton, tubeless vertical boilers for their
operation in their steam noodle line. That is a new
line that is being put into production right now.
Actually, they're not in production. They are
actually being installed as we speak.

These boilers have been in place since
2018, have not been operated at that point. As you
will see in the appendix for the equipment, you will
see information on the deaerator. The deaerator has
not been registered with the State of Tennessee. It
operates below 15 PSI and has a safety relief valve
of 15 PSI.

The boilers, during the process of putting
this program together, we came across the need for
inspections to be performed on this boiler. I
communicated with the state office, boiler office,
and they informed me of that information, so we are
in the process and having an inspector that will do
the required reinspections of these boilers prior to
they are put into operation.

We have -- the remote station will be at
the production lines, which is only a couple hundred
feet away from the boiler room. The boiler room has
two accesses on each side for accessing at each
boiler room. There is boiler room -- excuse me,
there is an estop there. There will also be an
emergency estop panel that you see in the manual
itself that will be posted -- positioned in between
both production lines. These production lines will
be manned while the boilers are in operation. The
boiler will only be operated as-needed per
production. Production at this time is scheduled
for 7:00 a.m. to 11:30 p.m. If it's needed for
increased production, which we are all hoping
happens, it will be manned as-needed with qualified
individuals. The individuals, the boiler attendants
and remote attendant will be trained as outlined in
the manual.

Also, the burner management system we have
is a very good system. It's a Siemens LMV3, more
specifically 37, and a very nice system. And we are
more than welcome to take any questions you may
have.

CHAIRMAN MORELOCK: Motion to discuss?

MR. BOWERS: Motion.

CHAIRMAN MORELOCK: Second?
MR. HENRY: Second.

CHAIRMAN MORELOCK: Questions?

MR. BOWERS: Now, these boilers aren't even registered with the State yet.

MR. TOTH: No, they actually are. You'll see they were registered in February of 2018; however, they were not put into operation at that time. Going through the process, the plant has been operating on a production line that does not require the steam boilers at this time. It was just preparation for the upcoming production lines.

MR. BOWERS: So they have or have not been registered with the State of Tennessee?

MR. TOTH: They have been registered with the State of Tennessee, as I alluded to, they were registered in February of 2018. Their certificates of operation came due in February of 2019, which we found that are in a delinquent status; so, therefore, we have made contact with the inspector with the insurance company. The inspector is scheduled to come in and perform those inspections internally. These will not be put into operation until such time that we have the required variance equipment put into place, such as remote panels, such as the passing by this board, and the subsequent inspection by the chief inspector.

MR. BOWERS: And really, you can't do another internal unless Sam -- because actually it needs an operational inspection, which hasn't been done because they're not in operation, unless the chief decides to override not having an operation inspection.

MR. TOTH: I respectfully disagree with that, because they have not been put in operation at all, they have not been operated, other than testing the system. They have been dormant, not being operated. An operational inspection or external inspection would only be required if the boilers were being operated, so what we would do is go through the process of doing a reinspection internally, then the external inspection thereafter. I can assure you that there will be a full external inspection prior to the required one by the state inspector.

MR. BOWERS: I just wonder if you're jumping the gun of going after a variance when not having even operated the boilers at the plant yet.

MR. TOTH: By saying that, that really has no relevance in the discussion, because the boilers in operation, it could be something that's done simultaneously. There is no requirement that states that you have to be in operation to get a variance.

MR. BOWERS: He doesn't have any experience with these boilers.

MR. TOTH: Experience with the boilers, that will come through the training, the rigorous training that they will go through, and I promise you, it will be pretty rigorous.

MR. BAUGHMAN: The boilers are shown as 2018s, so they sat until they were registered in 2018, you said?

MR. TOTH: Yes. They were, I would assume, a stock item, if you would, that were not put into operation prior to being -- they are brand new. As you can see from the photographs, in appendixes, this a pretty sharp looking operation.

CHAIRMAN MORELOCK: In the play off of, that date was when it was put under order to build, so it could have set on the shelf a while before it was sold.

MR. TOTH: Absolutely. That's the year of manufacture. That's going to appear on the manufacturer's data plate. That is not necessarily when it was put into operation.

MR. FOX: Out of curiosity, have these boilers been stored wet or dry?

MR. TOTH: These boilers have been stored wet, fully filled with water with no air pockets within the water line. There's no water line of these boilers at all.

MR. BAUGHMAN: Just as a matter of clarification, Mr. Toth, we've got these listed as tubeless boilers, and these are VMPS, so actually -- VM just stands for vertical multi-pipe, which is a fancy name for vertical tubeless, or vertical fire tube, I should say. So we would change that type from tubeless to vertical fire tube.

MR. TOTH: That's an oversight on my part.

MR. BAUGHMAN: Yes. So you do have a very good control system. The Siemens LMV3, particularly the 37, it's a very good control, but it's also specific to how it's wired. How does this control enunciate the water?

MR. CHAN: The enunciation will -- we do have a remote control system that is in the vicinity of the remote control attendants, remote attendants, that will hear sound and there will be -- they will hear the sound from the remote station.
MR. TOOTH: I'll cover that. I'll cover the technical part of that because this is something that will be covered in their extensive training that I referred to. Their enunciator comes through from the panel that's located on the front of the control panel. If you're referring to enunciation that is going to be carried over to the remote panel, that will be done hardwired.

And if I may add, that information that you're looking for, you can find on Page 16.

MR. BAUGHMAN: Which, actually, I'm looking for, on Page 17, Page 16 doesn't identify the low water so much, but the fault codes on Page 17 is what I was looking at because in the manual, it talks about a list of faults that are enunciated, and as I was going through the code, I didn't see anything, and I was curious as to how the low water was enunciated on this particular control.

MR. TOOTH: Well, as you very well know, with your experience with boilers, they have two low water cutoffs; one is -- they're both probe, one is internal, one is external. They are tied into the limit circuits that will cause an open circuit if those probes are exposed. So, as you know, that's exactly how this boiler is.

MR. BAUGHMAN: I guess my question goes back a little bit deeper because it doesn't identify it. Your training is going to take care of it well, I'm sure, but being that we know this control, how it gets wired up, the alarm circuit on those, even though they're on the control circuit, the control circuit doesn't give enunciation, it just turns the boiler on and off, so we've got an alarm circuit on the low water that ties back into this Siemens, and I'm curious where it's tied in at to enunciate on this fault code list.

MR. TOOTH: And I appreciate that. I just think that's above and beyond what we're looking for in this board. If you're wanting to look at a wiring diagram, I'd be more than happy to send you a wiring diagram. I do believe that goes above and beyond what you're looking for at this meeting.

MR. BAUGHMAN: And so that will get taken care of at the time of inspection, actually, when they'll go through and check the controls, see how it enunciates and so forth. I appreciate that.

MR. TOOTH: Absolutely. And we do have those wiring diagrams. I do not put those in manuals, nor does anybody else who does these manuals put wiring diagrams in, but I'd be more than happy to present that to the inspector, and I will be in attendance and I can help him maneuver through that wiring diagram, if need to.

MR. BAUGHMAN: And you know why I brought it up, just because it didn't specifically show an enunciation for low water, and that's why I was bringing it up.

MR. TOOTH: And when we talk about the fault codes, for one, as we all know, fault codes are not a requirement of -- with the checklist of our manuals. It's something that's added in as an information sake. It's covered during training. Most manuals, when we start looking at fault codes, we're not going to find very many that are going to highlight low water conditions when we're talking about the burner management system, i.e. the flame safeguard. But it is covered during the training that BTG has contracted with Wonton Foods, and it will be tested appropriately.

MR. BAUGHMAN: Perfect. Thank you, Mr. Toth.

MR. TOOTH: No problem, Mr. Baughman.

MR. FOX: You stated just a moment ago that the primary and secondary are both probe control.

MR. ROBINSON: That's it?

MR. TOOTH: I'll cover that. I'll cover the technical part of that because this is something that will be covered in their extensive training that I referred to. Their enunciator comes through from the panel that's located on the front of the control panel. If you're referring to enunciation that is going to be carried over to the remote panel, that will be done hardwired.

MR. ROBINSON: Into manual reset low water cutoff, what happens?

MR. TOOTH: Say that one more time.

MR. ROBINSON: So when the boiler goes into manual reset low water cutoff, what happens?

MR. TOOTH: The boiler goes off.
MR. TOTH: Oh, it's going to alarm. Is that what you're asking? Yes, it will alarm. Thank you, sir.

CHAIRMAN MORELOCK: Any other questions?
I've got some editorials, so these -- on Page 4 and also on Page 12, for your emergency procedures.

MR. TOTH: Is this going to embarrass me?
CHAIRMAN MORELOCK: No. It's just -- it says, if the boiler attendant responds move to step six, it should be, if the boiler attendant responds. You want to do that in three and four, on Page 4 and 12. It's just grammar. Then on Page 32 where you list the operating shifts, the second shift should be 3:00 p.m. to 11:30 p.m., not 11:30 a.m.

MR. TOTH: Thank you. During the review of this on Monday, Mr. Chan and I both saw that. It has been -- if you were to look in our books, it has been revised in our books.

CHAIRMAN MORELOCK: The guys on second shift have a long shift.

MR. TOTH: I looked at that and I said, I don't believe they're going to be working that long. I think I may have gotten that incorrect on that.

CHAIRMAN MORELOCK: Just a comment.
The -- thank you for sharing the story of Wonton and the introduction. It's a very neat story. So thank you.

MR. TOTH: Great. Thank you. I always find that's educational for me, too. All of my clients, I try to do some research and see what they actually do.

CHAIRMAN MORELOCK: Great story.

MR. BAUGHMAN: One other question I have, being that the remote panel was out in the work area, does the work area require hearing protection?

MR. TOTH: At this time, I will ask Mr. Chan to answer that, because the process is not up and running.

MR. CHAN: The process is not running and as far as we know right now, it doesn't require hearing protection. It doesn't go above 85 decibels.

MR. BAUGHMAN: Very good.

CHAIRMAN MORELOCK: Any other questions or comments?
MR. HENRY: One minor, following up on your editorial, if you look on Page 5, the last line, bottom of the page, location, placard (phonetic), I believe.

MR. TOTH: Thank you. I'm going to really have to have a talk with my administrative assistant.

CHAIRMAN MORELOCK: Any other questions or comments? All right. Do I have a motion for contingent approval for this variance based upon the comments made during the Tennessee Board meeting and a successful site visit by the boiler unit?

MR. BAUGHMAN: So moved.
MR. FOX: Second.

CHAIRMAN MORELOCK: Any other questions or comments? I'll call the question. All in favor say aye.

(WHEREUPON the members of the Board responded affirmatively.)

CHAIRMAN MORELOCK: Opposed? Abstentions? Not voting?

(WHEREUPON the members of the Board responded negatively.)

CHAIRMAN MORELOCK: Gentlemen, you have a contingently approved variance.

MR. TOTH: Thank you, gentlemen. I really appreciate it.

CHAIRMAN MORELOCK: That concludes our new business. Moving on to Item IX, Open Discussion Items. Our first item is, Doris Barnett will provide a quarterly update on the Boiler Computer System and Jurisdiction Online.

MS. BARNETT: Good morning. Doris Barnett. I work with the Workplace Regulations and Compliance. I have a couple of roles here. Right now, I'm speaking as the IT liaison for Jurisdiction Online.

As you're probably aware, JO manages the inspections, revenue, allow online payments, e-mailing of documents, including invoices, and also provide faster communication on inspections entered by the insurers.

I do want to say now that we have pushed the implementation date out. At last meeting, I mentioned that it would be July. It has been pushed out a little bit further. We're not sure of the actual date yet. We had a meeting yesterday and it's going to be a couple of months additional.

I won't touch on the accounts; although I will mention that Sam and Chris did a very good job giving the numbers, but I want to say, with the delinquents, the numbers might have sounded high, but it's less than 3 percent that we actually have that are delinquent. We have .02 percent active code violations, so less than .02 percent.
And I think that's excellent. That's something else that JO can allow us to track at a deeper level.

We have planned to have additional search processes for addressing and resolving our audit issues, including the questions of delinquents and followup inspections that we had before. It will give us the ability to e-mail invoices and other documents, and we're working on the process to get variances tracked through JO. We have -- our current system has a way to enter variances and to report on them, but we don't have a really good tracking mechanism, and we'll get that.

We're also working with STS and JO to get a process to allow us to bring in all the insurer files. Right now -- that's why we pushed it out, because right now, we don't have that set as part of our project, and cannot really go live without having the ability to include the insurance inspections. So right now, that's what we're seeing.

We had a couple of previous questions and I think I'd answered all those questions from previous meetings. I don't see one here that needs to be addressed. So that's my report.

MR. BOWERS: How are you doing, Doris, are you doing all right? Question I have, I use Jurisdiction Online, and I see where you added the variance part. I know after the variance part that has a variance comment, what would you expect for the inspectors to put in that variance comment? Maybe expiration date or something?

MR. CHAPMAN: The manual date.

MR. BOWERS: Okay. I have another suggestion. On JO safety valve type, it has a pull down, like pounds per hour, CFF. I would like to add gallons per minute on that because of the valves. The safety valves are rated in gallons per minute. And I'll give you this right here. This is a sample. And I don't know if that can be added, because it has, like you said, CFF, BTU and all that down here. If we could add gallons per minute on that safety valve setting.

MR. CHAPMAN: We're trying to get things added, because like if you have a ruptured (inaudible) there's nothing on it.

MR. BOWERS: Right. I know the safety valves are rated in gallons per minute, and I noticed also, too, looks like you've all added several good things on there, but up on top, it talks about MAWP, then we do the inspection, and it also MAWP, is that just a redundance of what's on top?

MR. CHAPMAN: I can't answer too much of that.

MR. BOWERS: That's something that might be discussed down the line? Okay.

CHAIRMAN MORELOCK: Should be MAEP for vacuum rating?

MR. CHAPMAN: We really don't know because they keep changing things on it, so that's the reason I really can't give you an answer.

MR. ROBINSON: What I've been doing, Eugene Robinson -- what I've been doing is, the MAWP is right adjacent to the capacitor, and what it is is that that's the singular capacity if you have one valve; meanwhile, below you'll note that it says, total capacity, so if you have two valves, now you're going to do that number and double it.

MR. BOWERS: Oh, okay. I see that on the top and the bottom. Okay.

MR. ROBINSON: Yes, sir. It's the total.

CHAIRMAN MORELOCK: Any questions? Any other questions? As far as people importing data, like for us, for instance, right now, we send data from Eastman to the boiler unit. What is this going to look like in JOL?

MS. BARNETT: We are not sure of that yet. We have been under discussion with the STS, which is our computer people, and with Jurisdiction Online to try to get that ironed out. Right now, it's -- we're kind of up in the air and it's pushed our implementation date out.

CHAIRMAN MORELOCK: Okay. Will that have a fee tied to it?

MS. BARNETT: Again, I don't know.

CHAIRMAN MORELOCK: Okay. Thank you for that.

MR. BOWERS: We're talking about 70,000 objects state-wide, I mean, between the insurance company and everything, right?

MR. CHAPMAN: Right.

MR. BOWERS: That's a lot of objects to get all put into one single data base.

MR. CHAPMAN: That's what we're trying to do. We don't want two systems.

MR. BOWERS: Right. And once we get it all in one data base -- and, you know, we're trying to do better ass insurance companies, at least our insurance company, put more data in there for the
and insurance, it was discussed on low-pressure boilers in particular, section four, both high-pressure and low-pressure steam hot water boilers, that it was at the discretion of the inspector on whether they looked at it internally. And if the boiler looked good, then it didn't necessarily get opened up, and as this kept being perpetuated and communication going, and we were encountering many boilers in the industry that were failing because they hadn't been looked at internally. Boilers that hadn't been looked at for 10, 15, sometimes 20 years, and our state code is very specific that these boilers have to be looked at internally. It spells it out in our annotated code. It spells it out very specifically, the frequency of inspections.

So I wanted to make sure that we discussed this so that there wasn't anymore lack of communication, that everybody was very clear that these boilers are mandated, construction permitting, to be internally inspected. I copied quite a few pictures of boilers recently that had failed and had to be replaced or totally re-tubed because they hadn't been looked at, and these problems could have been attended to through proper internal inspections. In other words, these instances didn't come up over a two-year period of time, they are instances that manifested themselves over a period of time, so that was why the open discussion, just to make sure that the state dictated from the state back down, what the actual protocol is so that we got everybody on the same plane.

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I appreciate putting this on the agenda items because we've bounced this around for a while in trying to get communication on an even plane between chief, the assistant, those in the boiler inspection community, the state inspectors, the insurance inspectors, us within the boiler service industry, and getting everybody together, and there's been a disconnect on communication, so this has been going on for a period of time, and this was a format that we wanted to be able to at least bring it up so that we could attend to it to get everybody on the same page, hopefully.

So what this came about was through conversations with various inspectors, both state and insurance, it was discussed on low-pressure boilers in particular, section four, both high-pressure and low-pressure steam hot water boilers, that it was at the discretion of the inspector on whether they looked at it internally. And if the boiler looked good, then it didn't necessarily get opened up, and as this kept being perpetuated and communication going, and we were encountering many boilers in the industry that were failing because they hadn't been looked at internally. Boilers that hadn't been looked at for 10, 15, sometimes 20 years, and our state code is very specific that these boilers have to be looked at internally. It spells it out in our annotated code. It spells it out very specifically, the frequency of inspections.

So I wanted to make sure that we discussed this so that there wasn't anymore lack of communication, that everybody was very clear that these boilers are mandated, construction permitting, to be internally inspected. I copied quite a few pictures of boilers recently that had failed and had to be replaced or totally re-tubed because they hadn't been looked at, and these problems could have been attended to through proper internal inspections. In other words, these instances didn't come up over a two-year period of time, they are instances that manifested themselves over a period of time, so that was why the open discussion, just to make sure that the state dictated from the state back down, what the actual protocol is so that we got everybody on the same plane.

62..65
inspection, which absolutely blows my mind on high-pressure boilers, let alone low-pressure boilers. So with that, you know, I think if you want to delve deeper into it and put more guidelines, do more interpretation, that's what we've done for a number of years here, that establishes that without regurgitating it into the code, that you can then publish out to the community. I think it would be very beneficial. CHAIRMAN MORELOCK: The board's interpretation would get you an enforceable answer faster than going through the legislative process. And with what you're saying is, the words in the Tennessee Code Annotated are not prescriptive, because it gives you the caveat, where construction permits, and it can be abused. I mean, obviously that's what you're saying. In the industry, it's just being abused, but, you know, if they'd not put that statement in there, it would be very prescriptive and you'd have to do it, but it gives you a caveat, and that's what's being utilized. Yes, Eugene? MR. ROBINSON: To further define the divisional rules, in 0800-03-03-.05, Paragraph C, it reads, As a result of an external inspection or determination by other objective means, it is the opinion of the inspector for continued operation of the boiler or pressure vessel, constitutes a danger to life or property, the inspector may order an internal inspection. It is Page 12 of 0800-03-03-.03, Paragraph C. So my point being, in short, is that that paragraph that you just read from the annotated code is further defined as the inspector's autonomy to perform. In other words, as a seasoned commissioned inspector, if you feel that an internal is due based on your external examination, then you order the internal inspection. As Mr. Toth stated, the problem that would occur is how to manage all of these various unique types of boilers, and keep in mind that boilers are evolving, technology is evolving. We have so many variations of how we're introducing fuel inside a cabinet to make hot water. Where would we draw the line? For me, if you were to say that all boilers ought to be inspected, that would include a water tube boiler that's mounted on the wall, instantaneous heaters. What would you see? Well, you would have the guy disconnect the pipes and you would look inside a heat exchanger that has curvatures. My point being is your return on investment is going to be zero, because you can't see it. MR. BAUGHMAN: And I agree, and that's where it gets into, the construction permitting, we in the boiler industry know that the boiler manufacturers that it's not conducive to looking into the boiler. You virtually can't, the way that the boiler is sealed up and the heat exchanger is manufactured. But there are boilers, the old Wrights and the Ajax, that have all these multiple bolts around the outside of it, that that can be disassembled. It's a job, but it can be disassembled. Case in point, we had a hot water boiler that we were doing a CSD 1 update on, the boiler was 20 years old, so we needed to look at it internally. It never -- MR. BAILEY: Excuse me, you just rattled off some letters. What does that mean? CHAIRMAN MORELOCK: Control safety devices 1. MR. BAUGHMAN: I'm sorry, Mr. Bailey. Good question. It's a code reference.
is specified, these boilers are mandated to be
looked at internally.

MR. BOWERS: I disagree. I'd say it's up
to the inspector. We've got a lot of good
inspectors in the state of Tennessee. I've got 40
years of experience, got guys out there, many years.
We've got a chief that's got many years of
experience. We've got thousands and thousands of
these hot-water boilers all over the state. We're
not having thousands and thousands of failures. I
mean, we have some, and, yeah, we're going to miss
some, we're going to miss some along the way, and
it's our job to try to get them, and we're going to
make mistakes, we're not going to get them all, and
the chief can say, well, y'all need to do a better
job, and some of you need to be opening up when you
can, but there's thousands of thousands of boilers,
and we're going to miss some. There's going to be
some failures. We've got a lot of closed-loop
systems that maybe leak in there, get some trash
there, and they are going to fall. But to say,
we're going to change the whole system and we're not
going to rely on the experience of our inspectors, I
don't think that's right. We can't say we're going
to do this from here on out.

And I remember we had a situation years
time, me and Martin, we had an unfired pressure
vessel, a vacuum tank exploded, and Martin thought
about it back then and he said -- we have a
fatality, maybe we need to register on fire-pressure
vessels, vacuum tanks. We talked it back and forth,
and he said, well, that would be thousands and
thousands of vessels just because this one that
wasn't operated properly, that would be knee-jerk
reaction to something that happened one time.

Yes, we are having failures on some of
these hot-water boilers, and maybe the inspectors
need to do a better job in certain situations, but
not to change the whole rules just because we're
having some failures.

MR. HOLT: Tim Holt. We have to look at
the future, too. These type of boilers that are
falling apart, they don't make them anymore. Okay.
The cast iron, the ones -- I've gone in, and two of
them, I've gone in and ordered an internal. They
couldn't get the bolts off, they had to cut them
off. The boiler went away and they got a nice new
one that you can inspect and did the same thing.
I'm just looking to the future. I wouldn't change
it right now because there's more and more of the
new ones that are smaller, compact, and you can't
inspect them anyway and they do the same thing, same
BTUs, same thing. So I'm for discretion of the
inspector, because -- except for low-pressure steam
boilers. That's different. That's a heating
boiler. That's a different thing. That needs, I
think, to be inspected.

MR. BAUGHMAN: Well, too, that point and
Mr. Bowers's point, we're not changing anything.
We've got what's already in place, so from the
legality standpoint, we've got a code that is very
specific that's already in place. What I'm hearing
is is that it's been taken upon others in the
industry to make that a part of their thinking of
discretionary inspection, but by the letter of the
code, we've got what's already in place.

MR. HOLT: What about glycol in the
system? You can't inspect that. I mean, you can,
but that boiler is going to be good.

MR. TOTH: Just to kind of cover, what the
code is -- the intent of the code is actually to
protect the enforcement of the code. So if we say
that inspected internally or externally and
internally where construction permits, that allows
for the state to do those inspections. The code
reference or the rule reference that Mr. Robinson
referred to is exactly what was put in there for
that very intent. It is to allow for the inspector,
upon their determination, because let's be honest,
some of the types of vessels that are being brought
up, be it cast iron, be it tankless water heaters,
they're different constructions, they're different
allowances. We understand that. What also needs to
be taken into consideration is that maintenance
that's been done, is that care that's been done.
Do we have -- I have clients that both work high --
pressure, high-temper glycol systems, okay.

Low-pressure closed-loop systems, low-pressure
steam, high-pressure steam. Specifically, I look at
those individuals on an individual basis when we go
through training or I'm doing consulting, and we
look at, what are we doing to make sure that we're
taking care of our system. That's the same thing,
during my tenure as chief, that gentleman right
there can tell you, he's sat through it, is my
education of those inspectors is to treat every
boiler system on its own merits. When it came to
low-pressure units that were steam units, okay, that
are required an inspection once every two years,
there would be a cycle of when we do an external
authority to determine if construction permits.
2 It's the national board commission inspector
3 empowered by the state law in the State of
4 Tennessee, so that's where that resides, and that's
5 why they're trained and all that to do that. Now --
6 MR. BOWERS: And we make mistakes.
7 CHAIRMAN MORELOCK: Well, nothing is
8 perfect. But my recommendation is -- I've got two
9 recommendations. One would be, you could pursue
10 development of a board case or a board
11 interpretation, but you've even got a better
12 opportunity coming up in September. Schedule a
13 workshop with the inspectors and get all their
14 input, because they're going to come together for
15 some training. It would be a perfect opportunity to
16 have a good sit down face-to-face conversation with
17 the folks that are crawling in and out of things
18 every week.
19 MR. TRIPP: Allen Tripp. If I could
20 comment just a little bit. Just listening to all,
21 you can see some merit and good information firing
22 from all sides here, but as a service company, we
23 kind of get put on the stop a lot of times. We
24 sell, we install, we service. It's almost --
25 whichever inspector he happened to get this year, as
26 compared to maybe a different inspector next year or
27 two years from now, and when we bring it to the --
28 we bring the topic up of when's the last time this
29 boiler has been inspected, it adds a lot of
30 confusion to the customer side who doesn't
31 understand what we all do or go through. We need to
32 establish some guidelines, to me. To me, a -- some
33 of the boilers Dave is talking about, we were
34 actually involved in one of them. And, I mean, when
35 you see a low-pressure steam boiler that you can
36 pull 12, 15, 55 gallon bags of scale out of, that's
37 pitiful to feel me. That is a ticking time bomb.
38 And whether it's 15 pounds steam, 150 pounds steam,
39 250 pounds steam, the workshop idea may be the best
40 place to get all the input from everybody, because a
41 lot of people have good, valid points here, but
42 there's something still missing. None of us want to
43 have a fatality because of something like this, so
44 it's best to me for everybody to get their heads
45 together.
46 CHAIRMAN MORELOCK: And I can give you a
47 quick example of that. Several years ago, we had a
48 heavy wall vessel at our company and needed a
49 repair. We had three different repair companies
50 come in and quote this, and the treatment
51 requirements ranged from 9 to 200 degree preheat to
52 a full blown PWHT. And these were all reputable
53 companies. So we went back to ASME, we processed an
54 interpretation and we got everybody on the same
55 page.
56 Same thing here, a board case can add
57 clarity to that, or a board interpretation, however
58 you want to process that. But I do, I think in
59 September, you're going to have this great
60 opportunity to get all the parties involved. You
61 could have owner user, you know, inspectors, you can
62 have all these people come together and share ideas
63 and come away with words that will work.
64 MR. BAUGHMAN: So thank you, Mr. Tripp,
65 for that.
66 MR. ROBINSON: I want to add, the one
67 thing I don't want to get confused is that the
68 boiler unit for the State of Tennessee represents
69 safety. They are not a maintenance program. If you
70 gentlemen sell a boiler on the service center, and
71 the fact of the matter is you don't inform your
72 client that he should be doing PMs, I don't know if
73 that's just -- forgive me, I'm direct, bad
74 representation or miscommunication. That's where
75 the missing link is. As the inspector, the
MR. BAUGHMAN: My input is, I agree with Mr. Toth. We've all made interpretations both from the service side and the inspector side, so not only did you hear me make an interpretation, but I did the same thing, as well as yourself, so I think that's the way to go.

CHAIRMAN MORELOCK: And to take that to a broader audience, our boiler unit, our chief inspector can go out to the NBIC forum and post this out there to see what all the other jurisdictions are doing.

MR. TOTH: Sure. Absolutely.

CHAIRMAN MORELOCK: So we can seek consistency not only within Tennessee, but a broader scope.

MR. BOWERS: The other thing you brought up, too, is when the inspector submits an inspection, it does through the chief. There's a comment section. The chief, at any time and he's done it, is he rejected inspections because internal has not been done. I know that for a fact. So he has the discretion as the chief to look at those inspections, and every inspection goes through the chief. Now, he can't look at every single one of them, but he's got his people to review them, and he can determine, that inspector, no, you should have done an internal on that one, and he can reject that inspection, and he has.
MS. RHONE: Deborah Rhone. And not to mention, you're right, Harold, as far as the quality assurance of the inspection report, if it's definitely the type of vessel that requires an internal inspection, even though they do an external, they're still not going to get a certificate, so they're still going to be operating in violation if they don't have a certificate.

MR. BOWERS: That's right.

CHAIRMAN MORELOCK: Well, Deborah, it's going to be able to attend, but, I, as you all know, I serve on the NBIC committee. I will be out there. I will put that on my list of conversations with the other chief inspectors that are there to see what they get, and I will let you know, Chief Chapman, what they come up with. But by all means, adding that to the forum would be very helpful, as well.

CHAIRMAN MORELOCK: Well, also, you have the October chief forum, another great opportunity to --

MR. TOTH: That's a great area of discussion right there, absolutely.

CHAIRMAN MORELOCK: Excellent conversation. This is why we've added discussion items because we do want input, and we all see the elephant differently, right? So we're standing around looking at it, and we all have a different view, so we've got to come together on that.

MR. BAUGHMAN: I appreciate that very much, because I've had so much communication as to finally be able to bring it up. Really a breath of fresh air. And as you can see, by that discussion, there is a lot of things that needed to be talked about with it. So moving forward, do we need to put this on the agenda or propose it to go on the agenda for the next meeting, or how do we carry forward this conversation?

CHAIRMAN MORELOCK: Well, Deborah is getting ready to talk about the fall conference, and so let's see what venue is available for the fall conference and go from there.

MS. RHONE: Actually we were in discussion regarding the fall training. The actual -- we received approval, thank you, to conduct the fall training for the Tennessee Deputy Boiler Inspectors only. We've got a lot of things that we want to make sure that we get covered for when we have the next deputy and special inspectors, and we know it was discussed previously about different formats and things we wanted to make sure that we included. And for the sake of the time frame, we decided to just shoot for a fall of 2020 to conduct that training in lieu of the 2019 one.

And we did receive approval we have for our deputy inspectors to hold their training. That's going to be on September 23rd through the 27th. It's actually going to be held in Gatlinburg, and this is an opportunity for all of our inspectors to be together as well as we're working on the agenda, and the topics that we've discussed today, Sam and Chris, they've been in contact with several presenters so we're still working on that agenda, and, of course, it's going to be open to any of the board members if they choose to attend as well.

MR. BOWERS: It's too bad that the insurance inspectors, and we have a bunch of topics that -- like the hot-water boilers, too bad the insurance inspectors couldn't be involved in those.

MS. RHONE: Right. As you well know, it takes a lot to plan for everyone, and then as far as the different formats that we've had in the past with getting assistance from the insurance companies or different representatives, the time frame now, you know, with the transition and everything, we just felt that for us to have a viable training that it would be better for us to go for the 2020 training, and then that way everything wouldn't be as forced in the time frame.

MR. BOWERS: Yeah, September is just around the corner.

MS. RHONE: Yes. But we're definitely open for suggestions regarding that. And we also had suggestions from the past training of presenters, because we did get companies that expressed us coming to their locations and them providing different services and presenters, so, you know, we'll discuss that and see about the approval and everything.

CHAIRMAN MORELOCK: So with all that said, that week between the 23rd and the 27th, we'll have a board meeting on Wednesday; is that correct?

MS. RHONE: It will be the normal board meeting that's already scheduled.

CHAIRMAN MORELOCK: It's on the 18th.

MS. RHONE: Yes. The regular board meeting. That will be here. And then the following week, we'll have our training. Like I said, of course, the board members will be welcome to attend.

CHAIRMAN MORELOCK: Okay. So to answer...
your question, we may have to wait and make it a December discussion item if you wanted to discuss it just amongst the state inspectors during their training. Because we will meet before they have their training.

MR. TOTH: Can I make a suggestion? As we have done in the past, when we did the permitting system, and as we do in the NBIC, ASME, I would suggest that you put together a forum of individuals such as a task group, individuals that work in the industry that can put together any ideas for this board case, and then put that up for discussion, because I tend to see that through these meetings, that we have every intent, or you, as the board, does have every intent, and then it keeps getting pushed and gets getting pushed, and you never see anything happen. That's just my suggestion.

CHAIRMAN MORELOCK: So based on that suggestion, Mr. Baughman, since you're passionate about it, are you going to lead this task group, assemble it?

MR. BAUGHMAN: Let me think about it. Yes.

MR. ROBINSON: Mr. Chairman, to further expand on what Mr. Toth said, also put together that code case in addition to the expected outcome.

CHAIRMAN MORELOCK: Right. To assemble a board case.

MR. ROBINSON: Right. There is a web site that has a format for you to follow. It's either in ASME, I think it's also in the Tennessee State Provision of Rules.

CHAIRMAN MORELOCK: Thank you.

MR. BAUGHMAN: Good discussion.

CHAIRMAN MORELOCK: So Mr. Baughman is going to head up a task group to get development of a board case. Mr. Toth has offered to talk to our colleagues in July at the NBIC to gain information. Our chief has resources available to also gather information, as well as during your training, you could have some information gathering there that could be brought back to Mr. Baughman's task group.

MR. BOWERS: I think Mr. Robinson needs to be in that task group.

MR. ROBINSON: I'll volunteer, sir.

MR. BAUGHMAN: Thank you, Eugene. CHAIRMAN MORELOCK: Anything else on that?

All right. That takes us to item X, Announcement of the Next Meeting, which will be at 9:00 a.m. on Wednesday, September 18 right here in Nashville.

And future dates will be December 11th for our last quarterly meeting in 2019.

If there is not anything else, I'll adjourn this meeting. Thank you all.

WHEREUPON THE PROCEEDINGS WERE ADJOURNED.

REPORTER’S CERTIFICATION

STATE OF TENNESSEE  
COUNTY OF DAVIDSON  
I, Janie W. Garland, LCR#111, licensed court reporter, in and for the State of Tennessee do hereby certify that the above Boiler Rules meeting was reported by me and that the foregoing pages of the transcript is a true and accurate record to the best of my knowledge, skills, and ability.

I further certify that I am not related to nor an employee of counsel or any of the parties to the action, nor am I in any way financially interested in the outcome of this case.

I further certify that I am duly licensed by the Tennessee Board of Court Reporting as a Licensed Court Reporter as evidenced by the LCR number following my name below.

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