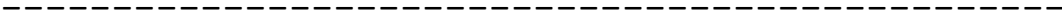


1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

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

QUARTERLY MEETING OF THE  
STATE OF TENNESSEE  
BOARD OF BOILER RULES  
ZOOM VIDEOCONFERENCE  
SEPTEMBER 16, 2020 - VOLUME 1



Jennifer G. Haynie, LCR, 403  
Stone & George Court Reporting  
2020 Fieldstone Parkway  
Suite 900 - PMB 234  
Franklin, Tennessee 37069  
615.221.1089

1 APPEARANCES: (VIA ZOOM VIDEOCONFERENCE)

2 Brian R. Morelock, Board Member  
Owner-User Representative

3 David W. Baughman, Board Member  
4 Owner/User Representative  
Allied Boiler & Supply, Inc.  
5 4006 River Lane  
Milton, Tennessee 37118

6 Dr. S. Keith Hargrove, Board Member  
7 Mechanical Engineer Representative  
Goodlettsville, Tennessee

8 Harold Bowers, Board Member  
9 Insurance Representative  
Centerville, Tennessee

10 Jeffery Henry, Board Member

11 Terry Fox, Board Member  
12 Boilermaker Representative  
Chattanooga, Tennessee

13 Sam Chapman, Chief Boiler Inspector

14 Christopher OGuin, Assistant Chief Boiler  
15 Inspector

16 Thomas Herrod, Assistant Commissioner, WRC  
State of Tennessee

17 Deborah Rhone, Boiler Office Supervisor  
18 State of Tennessee

19 Jamie Presson, Executive Admin. Asst.  
State of Tennessee

20 Daniel A. Bailey, Legal Counsel  
21 State of Tennessee

22 Tiffany Baker, Boiler Office Staff  
State of Tennessee

23 Deonne Bell, Boiler Office Staff  
24 State of Tennessee

25 APPEARANCES CONTINUED

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Carlene T. Bennett, Board Secretary  
State of Tennessee Workplace Regulations &  
Compliance Division

GUEST APPEARANCES:

Ivan Clipse with Crown Laboratories  
Johnson City, Tennessee

Josh Beatty, Crown Laboratories  
Jason Woodby, Crown Laboratories  
Jeff Dan Makey, Crown Laboratories

Marty Toth with ECS Consulting and Boisco  
Training Group

COURT REPORTING SERVICES AND ZOOM  
VIDEOCONFERENCING:

Jennifer Haynie, LCR, Stone & George Court  
Reporting

Nan George, Stone & George Court Reporting

1 MS. GEORGE: Good morning, everyone.  
2 I'm Nan George with Stone & George Court  
3 Reporting, and I am the Zoom host today. Our  
4 Court Reporter is Jennifer Haynie, who is also  
5 with Stone & George, and our job is to ensure  
6 that a verbatim transcript of the proceedings is  
7 produced.

8 So because of the number of  
9 attendees today, we will mute everyone until  
10 you're called on to speak. If you have  
11 something to say before you're called on, just  
12 please use the raise-hand function that's  
13 located in the participant screen down at the  
14 bottom of the screen.

15 We want to make sure that everyone  
16 that's on the Zoom is set up properly prior to  
17 this meeting starting so that we don't have any  
18 issues with audio or video once the meetings  
19 begin.

20 So if you haven't done so, we'll ask  
21 you now to, please, go and click on the chat box  
22 and enter your name and the company that you  
23 represent, and when you're called on, please  
24 unmute yourself and verbally state your name and  
25 your company.

1           Thanks, everyone and, Chairman  
2 Morelock, I'll turn it over to you.

3           CHAIRMAN MORELOCK: Thank you very  
4 much. As Nan said, if -- when we go through  
5 these items, if you want to participate in a  
6 conversation, just click the raised hand, which  
7 is at the bottom. And Deborah will help me make  
8 sure I don't overlook someone, so I'll be  
9 looking and Deborah will be looking to make sure  
10 we give you an opportunity to have the floor to  
11 speak, and that's pretty much it.

12           So I have 10:17 a.m. Eastern  
13 Standard Time, 9:17 a.m. in Nashville. So I'm  
14 going to call the meeting to order. This is the  
15 September 16, 2020, meeting of Boiler Board  
16 Rules.

17           We had really hoped that we would be  
18 in Nashville today meeting face-to-face, but due  
19 to COVID-19 and wanting to keep people safe and  
20 healthy, we're having an electronic meeting  
21 today.

22           So as far as announcements go, in  
23 the form of safety item, we would typically talk  
24 about how, if you had an emergency, to go to a  
25 safe place in the building or go outside the

1 building. But in this time of the year, with  
2 the storms and stuff, just be mindful of the  
3 weather. I don't know about you-all, but we get  
4 weather alerts, and those have been very  
5 beneficial. So that's my safety item for this  
6 meeting is make sure you make yourself available  
7 to -- even your smart phone, you can get weather  
8 alerts local and -- please, please use those.  
9 It could be a life-saver if it's severe weather.  
10 So that's my safety topic for today.

11 As far as -- we'll go around and do  
12 introductions here in a minute, but as far as  
13 announcements, I did want to congratulate Dr.  
14 Hargrove and Mr. Jeff Henry. They have been  
15 reappointed to the board for another term, as I  
16 have too, and so I wanted to congratulate them  
17 for their service and continued service on the  
18 board. So we appreciate your willingness to  
19 serve. We really value your expertise and  
20 input, and it just makes our board that much  
21 stronger. So thank you.

22 Does anybody have an announcement  
23 that they would like to share before I move on  
24 to introductions? Okay. Hearing none, what I'm  
25 going to do is let everyone introduce

1 themselves.

2                   We'll start with the board members,  
3 and so I'm Brian Morelock. I work for Chemical  
4 Company. I serve as Chair on the Tennessee  
5 Board. And, Nan, you've introduced yourself  
6 already, but you can go ahead and do that again,  
7 if you'd like.

8                   MS. GEORGE: I'm Nan George with  
9 Stone & George Court Reporting.

10                  CHAIRMAN MORELOCK: Okay. Carlene,  
11 you're muted.

12                  MS. BENNETT: Carlene Bennett, Board  
13 Secretary.

14                  CHAIRMAN MORELOCK: Okay. Sam?

15                  MR. CHAPMAN: I'm Sam Chapman,  
16 Tennessee Chief Boiler Room Inspector.

17                  CHAIRMAN MORELOCK: Okay. Chris  
18 OGuin?

19                  MR. OGUIN: Chris OGuin, Assistant  
20 Chief Boiler Room Inspector.

21                  CHAIRMAN MORELOCK: Mr. Bailey?

22                  MR. BAILEY: Dan Bailey, Legal  
23 Counsel.

24                  CHAIRMAN MORELOCK: Thank you, sir.  
25 Mr. Baughman?

1 MR. BAUGHMAN: Dave Baughman, Allied  
2 Boiler and Supply, Board Member.

3 CHAIRMAN MORELOCK: Okay. Deborah?

4 MS. JONES: Deborah Jones, Boiler  
5 Office Supervisor.

6 CHAIRMAN MORELOCK: Thank you,  
7 Mr. Bowers?

8 MR. BOWERS: Yes, Harold Bowers,  
9 Board Member, FM Global Insurance Company.

10 CHAIRMAN MORELOCK: Thank you.  
11 Jamie?

12 MS. PRESSON: Jamie Presson,  
13 Executive Admin Assistant, WRC.

14 CHAIRMAN MORELOCK: Okay.  
15 Mr. Henry?

16 MR. HENRY: Jeff Henry, ATC, Board  
17 Member.

18 CHAIRMAN MORELOCK: Okay. Jennifer?

19 MS. HAYNIE: Jennifer Haynie, Court  
20 Reporter for today with Stone & George.

21 CHAIRMAN MORELOCK: Okay. Mr. Fox?

22 MR. FOX: Terry Fox, FM Civil  
23 Mechanical, Board Member.

24 CHAIRMAN MORELOCK: Mr. Clipse?  
25 You're muted, Ivan. I still can't hear you.



1 There we go. I heard something.

2 MR. CLIPSE: Ivan Clipse with Crown  
3 Laboratories in Johnson City, Tennessee.

4 CHAIRMAN MORELOCK: Thank you, sir.  
5 And who's in the room with you?

6 MR. BEATTY: I've got Josh Beatty,  
7 Crown Laboratories.

8 CHAIRMAN MORELOCK: Thank you.

9 MR. WOODBY: Jason Woodby, Crown  
10 Laboratories.

11 CHAIRMAN MORELOCK: Jason.

12 MR. MAKEY: Jeff Dan Makey, Crown  
13 Laboratories.

14 CHAIRMAN MORELOCK: Okay, thank you  
15 for introducing yourself. Mr. Toth?

16 MR Toth: Yes, Marty Toth with ECS  
17 Consulting and Boisco Training Group.

18 CHAIRMAN MORELOCK: Thank you. Have  
19 I left anybody out?

20 MR. HERROD: Mr. Chairman?

21 CHAIRMAN MORELOCK: Yes?

22 MR. HERROD: Tom Herrod, Assistant  
23 Commissioner for Workplace Regulations and  
24 Compliance.

25 I spoke to you earlier this morning;

1 do you remember?

2 CHAIRMAN MORELOCK: I'm having  
3 short-term memory problems.

4 MR. HERROD: That's all right.  
5 Sometimes I have trouble recalling, but I don't  
6 have same-day service all the time.

7 CHAIRMAN MORELOCK: Well, I get to  
8 watching in this participant list, and then it  
9 slips, and then inevitably I leave somebody out.  
10 But it wasn't intentional.

11 MR. HERROD: I understand.

12 CHAIRMAN MORELOCK: Well, thank you  
13 for your patience with me on that. Okay. So  
14 that's all the introductions.

15 As far as the agenda, I hope  
16 everyone has a copy of the agenda. And as far  
17 as adoption of the agenda, there is a couple of  
18 corrections under Section 8 for old business.  
19 Item 20-01 AO Smith Corporation, that item has  
20 been moved to the December 9th agenda, and also  
21 old business Item 20-02 Stairs Corporation, that  
22 item has been moved to the December 9th  
23 Tennessee Board agenda.

24 Are there any other questions or  
25 comments about the proposed agenda? Okay.

1 Hearing none.

2 Do I have a motion to the -- to  
3 adopt the agenda?

4 UNIDENTIFIED SPEAKER: So motion.

5 CHAIRMAN MORELOCK: Okay. I've got  
6 a motion.

7 Do I have a second?

8 MR. BOWERS: Second.

9 CHAIRMAN MORELOCK: Thank you,  
10 Mr. Bowers. Just as a point of order, when we  
11 do vote items, it will be by roll call. And so  
12 we'll do that here in just a minute.

13 Are there any other comments or  
14 additions or deletions to the agenda.

15 Okay. I'm going to call the  
16 question, then. So the way we'll do this is  
17 it'll be yeah/nay, extension, or not voting.

18 So, Mr. Baughman?

19 MR. BAUGHMAN: Aye.

20 MR. MORELOCK: Okay. Mr. Bowers?

21 MR. BOWERS: Aye.

22 CHAIRMAN MORELOCK: Mr. Fox?

23 MR. FOX: Aye.

24 CHAIRMAN MORELOCK: Mr. Henry?

25 MR. HENRY: Aye.

1           CHAIRMAN MORELOCK: Thank you. So  
2 we do have an agenda.

3           Okay. Moving on to Item 4, we are  
4 going to have a rule-making hearing this morning  
5 and this will be to hear changes to Rule  
6 0800-03-03.14, Fees, and I am going to have  
7 Mr. Tom Herrod to present this item.

8           MR. HERROD: Thank you,  
9 Mr. Commissioner. This morning as part of our  
10 meeting we will be presenting the proposed rule  
11 changes for fees structure increases to our  
12 board inspections and certifications fees. It's  
13 been approximately ten years plus since we've  
14 had any fees increases, and these fees are  
15 modest in nature, but are necessary to continue  
16 funding -- providing sufficient revenue for the  
17 boiler unit.

18           Just recently we have been given by  
19 the legislature approval for four additional  
20 positions for boiler inspectors with the  
21 understanding that our fees would be increased  
22 sufficiently to cover those costs.

23           So what we're presenting today are  
24 fee increases of about 20 percent for  
25 certification fee and all the different

1 inspection fees associated with the vessels that  
2 we inspect. None of these fees exceed the  
3 statutory limits that are in place at this time.  
4 So we have some modest increases but necessary,  
5 as I say, which will raise about \$450,000 in  
6 additional revenue annually.

7 So with that we want to present this  
8 as an opportunity for those that want to make  
9 comments or have questions to what we propose,  
10 and at this time I'll turn it over to Mr. Dan  
11 Bailey, who will discuss the process for the  
12 completion of the rule-making hearing.

13 MR. BAILEY: First of all, is there  
14 anybody who is in attendance at this meeting  
15 here to comment on the rules?

16 MR. BOWERS: Could you say that  
17 again, Mr. Bailey?

18 MR. BAILEY: I said is there anybody  
19 who is in attendance at this meeting wish to  
20 comment on the rules?

21 MR. BOWERS: Is this in regard to a  
22 question on the process or any discussion on the  
23 rules, Mr. Bailey?

24 MR. BAILEY: I'm sorry. I didn't  
25 hear you.

1           MR. BOWERS: Is this to open  
2 discussion on the rule change? Or just, let's  
3 say we have questions about the process, I guess  
4 you're going to talk about the process, correct?

5           MR. BAILEY: Well, this is the point  
6 in time where if there's anyone who wishes to  
7 comment on the proposed rule changes, it's open  
8 for public comment. This is that time. If  
9 anybody wishes to make a comment about the  
10 proposed fee increases. If nobody is here to  
11 make a comment on it, then we can move on.

12           However, prior to this meeting  
13 adjourning, I do need the board to vote whether  
14 to approve or disapprove the fee increases, so  
15 we can leave it open, and that way, if somebody  
16 joins the meeting at a later time and wishes to  
17 comment, then we can still take the comment.  
18 But before we adjourn this meeting, I've got to  
19 have a board vote on whether you-all approve or  
20 disapprove of the proposed fee increases.

21           MR. TOTH: Mr. Chairman and  
22 Mr. Bailey, just as a citizen in the industry  
23 and the public, I'll be honest, I think this is  
24 a great move by the department. Something that  
25 probably needed to be done.

1 I know that I was a part of the some  
2 of the last increases, and everybody that's on  
3 the call knows how long it's been since I've  
4 been away from the department. So this is  
5 something that I think is going to be great for  
6 the department to move forward and get the  
7 inspectors in that the department needs. So  
8 thank you.

9 CHAIRMAN MORELOCK: Thank you, Mr.  
10 Toth. Mr. Bailey, I would add to Mr. Toth's  
11 comment on the fact that when we reorganized  
12 0800-03-03 in 2015 and got it approved in 2016,  
13 those fee increases were included in that  
14 action, and it was removed from that action, so  
15 it's -- it is overdue. And so I think this is a  
16 proper time for this to be presented. And it's  
17 been a while. It's been more than a while, so  
18 thank you for presenting this item.

19 MR. BAILEY: Okay. Thank you.  
20 Mr. Toth, if you would -- for the record, would  
21 you state who you represent.

22 MR. TOTH: I represent ECS  
23 Consulting and Boisco Training Group.

24 MR. BAILEY: Okay. Thank you. Is  
25 there anyone else at this time that wishes to

1 comment on the proposed fee increases?

2 MR. BOWERS: The only question --  
3 this is Harold Bowers, Board Member.

4 The only question I have, if the  
5 board approves this, what is the next process  
6 after the board approves this?

7 MR. BAILEY: I have to submit it to  
8 the Attorney General's office along with a  
9 red-line version. They will review it, and if  
10 they approve it, they'll send it back to me,  
11 and then at that time I can file it with the  
12 Secretary of State's office. And once it's  
13 filed with the Secretary of State's office, it  
14 typically would go -- normal rules would go into  
15 effect 90 days after you file it with the  
16 Secretary of the State's office, but with any  
17 kind of a fee increase, it would not go into  
18 effect until July 1 of 2021, which would be more  
19 than 90 days. But by statute it cannot go into  
20 effect until July 1, the new state fiscal year  
21 basically. So that would be the earliest that  
22 it would take effect.

23 MR. BOWERS: The way I understand  
24 the process, even if we approve it, it's still  
25 going to be six months to a year before it would



1 actually come into play, correct?

2 MR. BAILEY: Yeah, the earliest it  
3 could come into effectiveness would be July 1 of  
4 2021. And that's -- also I did leave out one  
5 step of the process. After I file it with the  
6 Secretary of State's office, Tom and I will have  
7 to appear before the Government Operations  
8 Committee who will, you know, usually have  
9 questions about it. Now, they can -- they can  
10 disapprove it. So they can veto it basically.  
11 So assuming it gets through all that, July 1 of  
12 2021, would be when they would be effective. If  
13 you-all approve first of all.

14 MR. BOWERS: Thank you for your  
15 information. Thank you.

16 CHAIRMAN MORELOCK: So just another  
17 piece of information for everyone who's  
18 attending today virtually, on August 12, 2020, a  
19 public notice was sent out to the people in  
20 Tennessee that this was going to happen today.

21 So certificate holders and people  
22 who would be affected by this have received a  
23 public notice. So they've had the opportunity  
24 to either attend through this Zoom meeting or  
25 contact the Department of Labor, so it's not

1 like this is being done without the public being  
2 aware of it. So that I wanted to make that  
3 point as well.

4 So, Mr. Bailey, if you think it  
5 would be prudent, we could hold this item until  
6 the end of the agenda if you want to see if  
7 other people show up that would want to make a  
8 comment. I don't think any of the board members  
9 would be opposed to that. Is that your  
10 preference?

11 MR. BAILEY: That would be what I  
12 recommend. Yes, sir.

13 CHAIRMAN MORELOCK: Okay. All  
14 right. All right. So what we will do is, we  
15 will hold voting on Item 4 until we get to the  
16 end of the agenda, and that way it will give  
17 people an opportunity to logon to this meeting  
18 if they do have a public comment.

19 So any concerns or opposition to  
20 that? Okay. Then we're going to hold Item 4  
21 and move on to Item 5.

22 Item 5 is approval of the June 24,  
23 2020, Meeting Minutes. I do have one spelling  
24 correction that needs to be made in reading  
25 through the notes. Mr. Ivan Clipse is here

1 today. And we need to put "E" at the end of his  
2 name in the June 24th meeting minutes because  
3 it's spelled in the minutes as C-L-I-P-S and it  
4 needs to be C-L-I-P-S-E, so add an E to that.

5 Are there any questions, comments,  
6 additions, deletions to the June 24, 2020,  
7 minutes?

8 MR. FOX: Brian, Terry Fox, Board  
9 Member.

10 They had -- in the meeting minutes,  
11 they had my address listed as Chattanooga,  
12 Tennessee.

13 CHAIRMAN MORELOCK: Okay.

14 MR. FOX: Which is incorrect.

15 CHAIRMAN MORELOCK: Okay.

16 MR. FOX: That needs to be  
17 corrected.

18 CHAIRMAN MORELOCK: So what should  
19 it be?

20 MR. FOX: Kingston Springs,  
21 Tennessee.

22 CHAIRMAN MORELOCK: Okay. So we'll  
23 capture that in these minutes.

24 MR. FOX: There you go.

25 CHAIRMAN MORELOCK: Any other

1 questions or comments about the June 24th  
2 minutes? All right. Hearing none.

3 Do I have a motion to accept the  
4 June 24th meeting minutes as commented and  
5 amended?

6 MR. FOX: I make a motion to accept.

7 CHAIRMAN MORELOCK: Do I have a  
8 second?

9 MR. BAUGHMAN: Second.

10 CHAIRMAN MORELOCK: Mr. Baughman  
11 seconds that. Any questions or comments? I'm  
12 going to call the question. Mr. Baughman?

13 MR. BAUGHMAN: Aye.

14 CHAIRMAN MORELOCK: Mr. Bowers.

15 MR. BOWERS: Aye.

16 CHAIRMAN MORELOCK: Mr. Fox?

17 MR. FOX: Aye.

18 CHAIRMAN MORELOCK: Mr. Henry?

19 MR. HENRY: Aye.

20 CHAIRMAN MORELOCK: All right. So  
21 the June 24th minutes have been approved as  
22 amended. That will take us to Item 5, which is  
23 the Chief Boiler Inspectors Report. I'll hand  
24 that over to Chief Sam Chapman.

25 MR. CHAPMAN: Thank you, Chairman.

1 Member of inspection performed was -- gosh,  
2 that's hard to read -- September 1st through the  
3 14th. There was 323 performed. State performed  
4 154 -- 51. I'm sorry. Insurance inspector  
5 performed 172. As of the June -- September  
6 the 14th, we have 72,770 active vessels. Total  
7 delinquents: September the 14, 2020, State  
8 inspector, 1,212; insurance agents, 1,828 -- 24;  
9 giving us a total delinquents, 3,036, which give  
10 us 4.1 percent -- 1.7 percent delinquent.  
11 There's 226 delinquent high-pressure inspections  
12 that's due.

13 Members of coal violation found  
14 between September 1st through September 11th was  
15 eight.

16 Tom mentioned that we have in the  
17 process of hiring two inspectors, one for east  
18 Tennessee and one for middle Tennessee. Chris  
19 OGuin will give the variance report, and that  
20 the Chief's report.

21 CHAIRMAN MORELOCK: Thank you, Chief  
22 Chapman. Assistant Chief OGuin, do you have  
23 your variance report?

24 MR. OGUIN: Yes, sir. As of today  
25 we've got 134 known variances. Eight of those

1 requiring a follow-up inspection. Seventy-seven  
2 are active. Nineteen require reinspection, and  
3 37 of those are dormant. This quarter we  
4 completed two variance audits and two approved  
5 at St. Thomas West and US Nitrogen. That's all  
6 the variance report.

7 CHAIRMAN MORELOCK: Thank you,  
8 Mr. OGuin. I do have a comment, and it's just a  
9 reminder in the vein of the variances, the  
10 attendant variances have a renewal frequency of  
11 every three years. And the boiler unit -- we  
12 just want to encourage those variance holders to  
13 make sure that they follow up with the boiler  
14 unit when they are coming due for renewal, and  
15 that they also make sure that they've updated  
16 their manual and make sure that they've also met  
17 the requirements to schedule their review before  
18 the Tennessee board 45 days in advance.

19 And so I just wanted to provide that  
20 as just some information. And also with the  
21 internal boiler inspection variance, we have the  
22 same comments as well for that. So we just want  
23 to make sure that our variance holders are being  
24 aware of their renewal dates, and that they're  
25 following up with the boiler unit to get that

1 work done in a timely manner.

2 So that's only comment I have for  
3 that, Mr. OGuin.

4 MR. BOWERS: I have a question on  
5 the -- not a question, more of a statement.  
6 This is Harold Bowers.

7 I wish there was place that we had  
8 that we could access the list of the variances  
9 outlines, where we could look at who has a  
10 variance and the expiration dates of the  
11 variances, you know.

12 I'm hitting a lot of sites and some  
13 of them, I'm not always aware they have  
14 variances or where the expiration dates that us  
15 inspectors could -- especially the insurance  
16 inspectors, could follow up on some of these  
17 that are starting to become delinquent and push  
18 to get these people to follow through with that  
19 before they become delinquent.

20 MR. CHAPMAN: Chairman, may I speak  
21 to something on that.

22 CHAIRMAN MORELOCK: Yes, sir.

23 MR. CHAPMAN: Mr. Bowers, this is  
24 Chief.

25 We do now send a letter out to them.

1 They should have that letter in their boiler  
2 room, and it states when it expires and  
3 everything on that. So, you know, because if  
4 you ask them do they have a variance, they  
5 should be able to show you that letter. Also  
6 with the manual.

7 MR. BOWERS: Yeah, they're supposed  
8 to. It's a good process. I think y'all are  
9 doing an excellent job.

10 Sometimes at the locations, it's not  
11 always -- sometimes getting them to comply is  
12 not always as easy as finding the manual or  
13 finding when the expiration date is. And I know  
14 it's their responsibility. It's their variance;  
15 they're the owners, they're responsible. But,  
16 you know, we like to push them to make sure  
17 they're compliant to the state law.

18 MR. TOTH: Mr. Chairman, this is  
19 Marty Toth, ECS Consulting.

20 One of the things, Mr. Bowers, I  
21 know if you requested that from the State, they  
22 will provide that list to you. I would assume,  
23 and I don't want to speak for the department,  
24 but I would assume that any inspector that's  
25 commissioned in the state, they could get that



1 report if they requested.

2 I do agree with you. It would be  
3 nice if there was a clean list, such as we have  
4 with the board interpretations and board cases,  
5 but I believe that all the inspector would have  
6 to do is call in to the State and be able to get  
7 that list.

8 On another subject, Mr. Chairman,  
9 you mentioned that time for notification -- just  
10 for the record, I want to make sure we're clear,  
11 that time for notification for a new variance to  
12 appear on the agenda and notification for  
13 reinspection of a variance is two different  
14 times. And I want to make sure for the record  
15 that we have clarity that states when somebody  
16 is requesting a reinspection, what timeframe  
17 they have to have their manual in. And from my  
18 understanding, it's pretty extensive. I believe  
19 it's six months. So I just want to make sure  
20 we're clear on that. Thank you, sir.

21 CHAIRMAN MORELOCK: Thank you.

22 MR. HERROD: Mr. Chairman?

23 CHAIRMAN MORELOCK: Yes?

24 MR. HERROD: This is Tom Herrod,  
25 Assistant Commissioner.

1 I think that's a great suggestion is  
2 to have that available. We can do that on our  
3 website. And I'm going to volunteer a few folks  
4 to do that. I won't name them, but their  
5 initials are Carlene Bennett, Jamie Presson,  
6 Deborah Rhone, Sam Chapman, and Chris OGuin.  
7 And I think by the next meeting, we can have  
8 that -- at least by the next meeting, we can  
9 have that available on the website for anybody  
10 to view and keep that current. That's a great  
11 suggestion. Thank you.

12 CHAIRMAN MORELOCK: All right.

13 MR. TOTH: And then, Mr. Chairman,  
14 if I could add to that? I want to make sure for  
15 the record that it's stated that Mr. Harold  
16 Bowers requested that, not Mr. Marty Toth.

17 MR. BOWERS: I do want to make one  
18 point, kind of, now. Mr. OGuin and Mr. Chapman  
19 has always bent over backward to give you  
20 information. If you ever have a question about  
21 variance, Mr. OGuin is very good about getting  
22 the information, follow up.

23 It's kind of amazing because, you  
24 know, we're -- as insurance inspectors, we're  
25 responsible for the whole southeast. And it's

1     amazing, I tell people how -- in Tennessee how  
2     easy and smooth it is compared to other states,  
3     getting the information. You know, I've just  
4     got to call Mr. OGuin or Mr. Chapman, and  
5     they're like, "Oh, yeah, okay. This is the  
6     information," you know. I said, "We got one  
7     that's going to expire like next week," and they  
8     said, "Well, they'll have to get on the agenda."  
9     And then they explain how to do it, you know.

10                     But, yeah, they're all very -- and  
11     Deborah is always very cooperative to get things  
12     done here. Never have a problem getting things  
13     done. So as an insurance representative, I  
14     really always appreciate the effort the staff  
15     makes to help us.

16                     CHAIRMAN MORELOCK: Okay. Carlene,  
17     you had a comment?

18                     MS. BENNETT: Yes. I know with some  
19     of the other units of WRC, we post monthly  
20     updates, if there are any. So do we want to  
21     make this list updated monthly, Chris or Sam?  
22     Or just as it comes -- you know, once it's been  
23     changed? How would you like to do that?

24                     MR. CHAPMAN: I think -- this is Sam  
25     Chapman, Chief.

1 I think it would be once something  
2 is changed on it. Because if not, you know what  
3 I'm saying? It would be the same list if  
4 nothing hadn't changed.

5 MS. BENNETT: Right. Right. Okay.  
6 Thank you.

7 Great comment, Sam. Yes.

8 CHAIRMAN MORELOCK: Excellent.  
9 Excellent conversation. There's some very good  
10 items come from that.

11 Okay. So this will take us to Item  
12 8, which is old business, and as I said, Items  
13 20-01 and 20-02 have been moved to the  
14 December 9th agenda, so that takes Item 20-06,  
15 which is Crown Laboratories located in Johnson  
16 City, Tennessee requesting a new variance for  
17 one high-pressure boiler to operate under the  
18 requirements of Chapter 0800-03-03.811.

19 So Mr. Clipse, if you-all want to  
20 introduce everybody that's going to participate  
21 in this presentation.

22 And before you do that, I need to  
23 ask the board members, is there anyone that has  
24 a conflict of interest on this item? Okay.  
25 Hearing none or seeing no hand waving, I'm going

1 to say there are no conflicts.

2 So, Mr. Clipse, you present your  
3 item, please.

4 MR. CLIPSE: I'm Ivan Clipse with  
5 Crown Laboratories in Johnson City, Tennessee.

6 As I stated in the June 24th  
7 meeting, Crown is one of the leaders in skin  
8 care products -- one of the fastest growing  
9 companies in northeast Tennessee. Matter of  
10 fact, since the last board meeting, we probably  
11 added 50 new employees or more.

12 We have a high-pressure boiler that  
13 we have requested a variance for, and which  
14 heats our solutions so they gel together to make  
15 our products.

16 And the last board meeting, you had  
17 certain questions and comments. And on the new  
18 variance that I sent to you-guys, I did a  
19 revision of the operation manual.

20 In Table of Contents, I added a  
21 partial floor plan. Last time it was hard to  
22 read, so I said I would enlarge it and put some  
23 dimensions on there, so I added that to the  
24 table of contents, removed the statement on  
25 page 1 that said the boiler would be on standby,

1 which was confusion -- which created confusion  
2 to people. They thought the boiler was off, but  
3 it's really on even when it's in standby. And  
4 it -- let's see -- revised the microprocessor  
5 location and approximate dimensions to have a  
6 larger print.

7 I revised the Figure 2 to be a  
8 partial floor plan to give the location and  
9 approximate dimensions to each remote station.  
10 I added training to the implementation on the  
11 page 1. And added hard wire on page 2 to the  
12 remote locations. I added training, again, on  
13 page 2. Page 4, I added training again.

14 And in the Appendix 8, I added the  
15 information on the relief valves -- both relief  
16 valves, what their capacities are and when we  
17 checked them. We check them once a year. We  
18 lift them before we shutdown for our annual  
19 cleaning and inspection, and we log it and we  
20 also -- I also have a verification signature in  
21 there with me to show that I'm not the only one  
22 that saw them being lifted.

23 Also added -- in Appendix J, added  
24 training remote station personnel, and I added  
25 "Attendance Branch Request Checklist" with our

1 responses. And that was -- according to my  
2 notes, that was what all the questions or  
3 comments that was brought up last board meeting.

4 And I guess I'll turn it over to  
5 you-all to see if you have any questions for me,  
6 and then I can answer it. And once this is over  
7 with, I have one question for you-guys.

8 CHAIRMAN MORELOCK: Okay. So.  
9 Thank you, Mr. Clipse. That's a very good  
10 explanation. I did go through the manual and  
11 also the minutes, and your revision sheet is  
12 very helpful to show all the changes that you've  
13 made into this next revision.

14 And what questions or comments do  
15 the board members have?

16 MR. BOWERS: We have to open the  
17 discussion on this.

18 CHAIRMAN MORELOCK: Yes, so do I  
19 have a motion to discuss?

20 MR. BOWERS: I motion to discuss.

21 CHAIRMAN MORELOCK: Okay.

22 MR. BOWERS: Harold Bowers.

23 CHAIRMAN MORELOCK: Do I have a  
24 second?

25 MR. HENRY: Second.

1                   CHAIRMAN MORELOCK: I've got a  
2 second from Mr. Henry. Okay. So what are your  
3 comments?

4                   MR. BAILEY: Did we ask for a  
5 conflict of interest on this item?

6                   CHAIRMAN MORELOCK: I did. Believe  
7 it or not, I remembered that.

8                   MR. BAILEY: You need to vote on the  
9 motion, though, first.

10                  CHAIRMAN MORELOCK: Okay. All  
11 right. So roll call for the board discussion.  
12 Mr. Baughman?

13                  MR. BAUGHMAN: I vote aye. We're  
14 out keep you straight.

15                  CHAIRMAN MORELOCK: That's good.  
16 Mr. Bowers?

17                  MR. BOWERS: I vote aye.

18                  CHAIRMAN MORELOCK: Mr. Fox?

19                  MR. FOX: Aye.

20                  CHAIRMAN MORELOCK: Mr. Henry?

21                  MR. HENRY: Aye.

22                  CHAIRMAN MORELOCK: All right.  
23 Thank you very much. So now, what questions or  
24 comments do you have? Mr. Clipse, the only  
25 comment that I would add is, in your



1 organizational chart -- it would be nice to  
2 denote on your organizational chart who was  
3 serving as a remote monitor and who was serving  
4 as boiler attendants.

5 MR. CLIPSE: Okay.

6 CHAIRMAN MORELOCK: What comments do  
7 the board members have?

8 MR. BAUGHMAN: This is Dave  
9 Baughman, Board Member.

10 I just noted in the manual checklist  
11 itself that there's no references listed for any  
12 of the items. In other words, as you go  
13 through, it says it's got the applicant  
14 response, but next to it we don't have the  
15 manual reference for that response.

16 And so it makes it a little bit  
17 difficult to go back in -- as a checklist -- see  
18 whether responses are listed. Is that something  
19 that we want to address or talk about?

20 CHAIRMAN MORELOCK: If you look on  
21 page 3 of 4, you do have some responses from  
22 Crown on the checklist.

23 MR. BAUGHMAN: Oh, I see that,  
24 Brian. It's under the applicant response, but  
25 not the manual -- it doesn't show the manual

1 reference -- under the manual reference, but it  
2 does show it under the applicant response.

3 CHAIRMAN MORELOCK: Yes.

4 MR. BAUGHMAN: For some of the  
5 items, not all the items.

6 CHAIRMAN MORELOCK: Some of the  
7 items, yes.

8 MR. BAUGHMAN: Is that mandatory?

9 CHAIRMAN MORELOCK: Well, I mean,  
10 that's a question for Crown to answer. Did the  
11 checklist -- did they respond to all the  
12 checklist items?

13 MR. CLIPSE: I thought I responded  
14 to the all the checklist items. Yes, I did.

15 CHAIRMAN MORELOCK: As far as your  
16 yes/no answers, all the boxes are checked, and  
17 there are some references on page 3 of 4 that  
18 would provide some additional information.

19 MR. CLIPSE: Correct.

20 MR. BAUGHMAN: I'm sorry. I didn't  
21 mean to step on you. So on page 1 and page 2,  
22 there's no manual references listed. On page 3,  
23 there is some, and page 4, there is not. So for  
24 the majority, I'm just wanting to know, for our  
25 own end of it, as far as moving forward and

1 setting the precedent, is it required to have  
2 the manual references identified for each one  
3 these questions? So I'll leave that up to those  
4 in power to be.

5 MR. TOTH: Mr. Chairman, can  
6 Mr. Baughman repeat his question? I missed that  
7 one.

8 CHAIRMAN MORELOCK: Mr. Baughman's  
9 question is since the checklist does not have  
10 manual references, do we require those as part  
11 of the completion of the checklist. And the  
12 only statement I have is there is no "Thou  
13 shall" verbiage in the guidance to fill out the  
14 checklist. It's just -- you use the checklist  
15 as a guide to complete the manual. So.

16 MR. MR. BAUGHMAN: And that's  
17 sufficient for me, CHAIRMAN MORELOCK. I just  
18 wanted to address it. It makes it easier for us  
19 as board members, instead having to go back  
20 through the manual to find where that reference  
21 is at, to have it already listed. If it's not a  
22 "Shall item" in our requirements, then, yeah, so  
23 be it. So that kind of answers that for me, I  
24 think.

25 Next question, Mr. Clipse, is, is

1 this monitoring already in place?

2 MR. CLIPSE: Not yet. We are  
3 getting quotes on it as we speak. Don't really  
4 know at this time what the deadline is going to  
5 be on it. I do know that all the remote  
6 station's wiring has -- is in the panel itself,  
7 but has not been hooked up at this time because  
8 we're waiting on the remote -- waiting on the  
9 microprocessor.

10 MR. BAUGHMAN: Very good. Next  
11 question I have relates to the emergency  
12 procedure on page 6. And it not so much a  
13 question, I guess, as just trying to understand.  
14 The last number, which is Number 4, states: "If  
15 the boiler attendant is unable to restart the  
16 boiler, he or she will call cell phones from the  
17 boiler emergency call list." And I don't quite  
18 understand that inasmuch as why the boiler  
19 attendant is calling cell phones to the boiler  
20 emergency call list. So could you clarify that  
21 for me a little bit?

22 MR. CLIPSE: If the boiler attendant  
23 is unable to take care of the problem when was  
24 the boiler goes into alarm, if they're unable to  
25 take care of the alarm, then they can get on

1 the -- they go to the emergency call list, and  
2 they call the people that are qualified to make  
3 decisions on what to do with that emergency.

4 MR. BAUGHMAN: To try to  
5 troubleshoot the problem or get the boiler back  
6 online. Okay.

7 MR. CLIPSE: Yes. Yes. All the way  
8 to calling the independent contractor in.

9 MR. BAUGHMAN: Which is not on the  
10 emergency call list, so that's what I --

11 MR. CLIPSE: No, but we should -- so  
12 far we've been able to correct anything that has  
13 been -- that's gone up with the boiler, with the  
14 new controls, with this list that we have here.

15 MR. BAUGHMAN: Very good.

16 MR. CLIPSE: And it's actually  
17 management's decision to call a contractor.

18 MR. BAUGHMAN: Very good,  
19 Mr. Clipse. On Appendix F-1, the manufacturing  
20 associate -- I was looking for where he's listed  
21 in the manual.

22 MR. CLIPSE: Manufacturer's  
23 associate, that's the remote station -- that is  
24 the ones at the remote stations. That's the  
25 people who make the product. They're in there,

1 when they're making the product, if that  
2 alarm -- the manufacturer's associate is the one  
3 that will shut down the boiler. I mean, the  
4 boiler will be shut down, but he or she will  
5 push the stop -- remote stop and page the boiler  
6 attendant. If the boiler attendant does not  
7 respond to them within a minute to tell them  
8 that they are on their way to take care of the  
9 problem, then they start paging the boiler  
10 attendant.

11 MR. BAUGHMAN: Very good. He's not  
12 listed as a remote attendant under Appendix F  
13 for his accountabilities, job duties, so forth.  
14 He's just listed, but it doesn't have anything  
15 associated with remote attendants or boiler  
16 attendants or anything on that. At least not --  
17 unless I'm missing it.

18 MR. CLIPSE: No, it's not listed  
19 there. It's going to be added -- it will be  
20 added to his duties as we go.

21 MR. BAUGHMAN: Okay. The same would  
22 apply to G-1, Appendix H-1, and Appendix I-1?

23 MR. CLIPSE: Correct.

24 MR. BAUGHMAN: Okay. That I would  
25 suggest and, again, input from others needs to

1 be added into the descriptions.

2 CHAIRMAN MORELOCK: Yes,  
3 Mr. Baughman, that's a question -- a comment  
4 that I also had. You know, on page 4 for remote  
5 monitoring system, the first sentence describes  
6 the fact that the remote monitor is the  
7 manufacturing associate, but it'd also be good  
8 to have linkage in Appendix G, so that it cross  
9 references each other, the text as well as the  
10 job requirements, and to also show it on the  
11 Appendix D organizational chart as well.

12 MR. CLIPSE: We can do it.

13 MR. BAUGHMAN: And I know under  
14 Appendix G it lists boiler attendant/maintenance  
15 personnel duties, but it doesn't specifically  
16 list the duties of boiler attendant. It's under  
17 the description up at the top, but it doesn't  
18 actually list that under "scope of position"  
19 on -- so forth anywhere. So I would ask for  
20 that addition also.

21 CHAIRMAN MORELOCK: Yeah, and, Mr.  
22 Clipse, I mean, if you would just tie in the  
23 verbiage in the front of the your manual for the  
24 responsibility for remote monitoring station,  
25 the boiler attendant, tie that into your

1 Appendix G "scope of position," as well as the  
2 training requirements that you've added on pages  
3 4 and 5. I think that would just make your  
4 manual more cohesive.

5           You've got the statements in there;  
6 you just link them all together. I think it'll  
7 make your manual read better because you know  
8 what your folks are doing, but when we read the  
9 manual as an outsider, we don't necessarily have  
10 the knowledge you have. So that's why you're  
11 seeing these little disconnects when we're  
12 reading the manual. Does that make sense?

13           MR. CLIPSE: It does.

14           MR. BAUGHMAN: Thank you,  
15 Mr. Clipse. That's all I've got.

16           MR. CLIPSE: I really thought about  
17 that before the meeting --

18           CHAIRMAN MORELOCK: What other  
19 comments --

20           MR. CLIPSE: -- when I was going  
21 through it again, you know.

22           CHAIRMAN MORELOCK: Any complaints  
23 from the board members?

24           MR. TOTH: Mr. Chairman, this is  
25 Marty Toth.



1           I have a question, if you don't  
2 mind. I think I heard the gentleman speak of  
3 have not received or not been sold or purchased  
4 the microprocessor yet, and I was a little  
5 curious what he meant by that? Just for my  
6 future reference.

7           (Indiscernible.)

8           MR. CLIPSE: We have filler -- we  
9 have people quoting on the microprocessor. We  
10 have an IT department here, but they're so busy  
11 with our growth that's taking place, and now  
12 they don't really have time, so we were going  
13 outside to try to get someone else to supply us  
14 with a microprocessor and printer that will  
15 monitor what goes on and due to alarms and print  
16 them out for us.

17           MR. TOTH: If I could add to that,  
18 just in general knowledge. That is inside your  
19 boiler operation right now. That's your burner  
20 management control system. Just want to make  
21 sure that the understanding there is hardwire  
22 connection to the remote station. That's  
23 just -- I know that's a consulting side, the  
24 board, you know, wouldn't tell you that, but I  
25 just overheard that, and it brought some concern

1 in making sure you're going down the right road.  
2 That's all I have.

3 MR. CLIPSE: I do state that there  
4 is the hardwired. Our control system does have  
5 all the stuff on it. All we're going to be  
6 doing with microprocessor is monitor what goes  
7 on with the controls.

8 CHAIRMAN MORELOCK: Yeah, on the  
9 page 2 of the manual, under Item 3 in the first  
10 paragraph, it states that the remote station  
11 would be hardwired.

12 MR. CLIPSE: Is there anything else?

13 CHAIRMAN MORELOCK: Let's see.  
14 Mr. Baughman, as we've been going through this  
15 conversation, I did want to share something with  
16 you too. When you look at the first page of the  
17 checklist in this manual, it says: "This  
18 checklist has been developed to assure the  
19 basics of the guidelines for the computerized  
20 monitoring. Boiler system is included in the  
21 system operating manual."

22 So it's a guideline, so it's not a  
23 "Thou shall"; it's a guideline. I just want to  
24 make sure we all understand that.

25 MR. BAUGHMAN: Thank you for that.

1                   CHAIRMAN MORELOCK:  You're welcome.  
2  Any other questions, comments?  Hearing none, do  
3  I have a motion from the board members?

4                   MR. BOWERS:  Yeah, I motion that we  
5  approve on the conditions of -- of course  
6  getting all the equipment in before the  
7  inspection and any updates that they need to  
8  make on this manual that's per this discussion.

9                   CHAIRMAN MORELOCK:  Thank you,  
10 Mr. Bowers.

11                   Do I have a second to Mr. Bowers'  
12 motion?

13                   MR. BAUGHMAN:  I'll second the  
14 motion.

15                   CHAIRMAN MORELOCK:  Thank you,  
16 Mr. Baughman.  I do have a second.  Any last  
17 comments or questions?

18                   MR. CLIPSE:  I will have a question  
19 at the end.

20                   CHAIRMAN MORELOCK:  Okay.  So do we  
21 need to hear the question before we vote or  
22 after?

23                   MR. CLIPSE:  I don't want to make  
24 you change your mind.  But we -- as I told you  
25 before, we are growing fast.  So, you know,

1 there will be revisions to this that have to  
2 take place. Especially the remote stations as  
3 we grow, and I'm wondering how -- if I revise  
4 the locations of the remote stations, do I come  
5 back before the board, revise it, send it back  
6 to board --

7 CHAIRMAN MORELOCK: Yes.

8 MR. CLIPSE: -- and go through all  
9 this all over again, I guess.

10 CHAIRMAN MORELOCK: Yes. Any  
11 technical change to your manual will have to  
12 come back to the board. So if you expand, if  
13 you add more remote stations, more boilers, more  
14 controls -- anything that would change from this  
15 manual would require it to come back to the  
16 board for reapproval.

17 MR. CLIPSE: Correct. 45 days in  
18 advance of the meeting, correct?

19 CHAIRMAN MORELOCK: Yes.

20 MR. CLIPSE: Okay. That was my  
21 question.

22 CHAIRMAN MORELOCK: And if you'll  
23 hang tight with us, we've got a couple items  
24 coming up discussing the time that you have to  
25 get stuff into the state. So that's coming up.

1 But it's a good question, and that's good  
2 problem to have; that's means you're growing.  
3 It's good to hear.

4 MR. CLIPSE: Correct.

5 CHAIRMAN MORELOCK: That's good  
6 news. Any other questions or comments? Hearing  
7 none, I'm going to call for the vote.  
8 Mr. Baughman?

9 MR. BAUGHMAN: Aye.

10 CHAIRMAN MORELOCK: Mr. Bowers?

11 MR. BOWERS: Aye.

12 CHAIRMAN MORELOCK: Mr. Fox?

13 MR. FOX: Aye.

14 CHAIRMAN MORELOCK: Mr. Henry?

15 MR. HENRY: No.

16 CHAIRMAN MORELOCK: Mr. Clipse, you  
17 and Crown have a contingently approved variance  
18 for your business, and it is contingent on  
19 making any additional corrections to the manual  
20 based on the comments provided by the Tennessee  
21 Board today and a future site visit from the  
22 boiler unit, okay?

23 MR. CLIPSE: Okay. When we get  
24 everything in place, I'm to notify the -- do I  
25 notify the Boiler Board in writing, or call?

1                   CHAIRMAN MORELOCK: You can call  
2 Chief Chapman or Assistant Chief OGuin and work  
3 with them to get a site visit scheduled.

4                   MR. CLIPSE: Okay.

5                   MR. BOWERS: Yeah, the only comment  
6 I wish to make -- this is Harold Bowers, Board  
7 Member.

8                   The only comment I was going to make  
9 is if you do any changes before the Chief makes  
10 it out there, I'd call the Chief and say "Hey,  
11 we've made these changes, so we're not going to  
12 waste your time, you coming out here to do an  
13 approval when it's not going to be like it says  
14 in the manual."

15                   That way -- 'cause it looks like  
16 you're going really quick, and you might  
17 actually may save -- I know Mr. Chapman and  
18 Mr. OGuin are kind of backed up right now, and  
19 it might be a little bit before they get out  
20 there, and if you go make any changes, notify  
21 them to save a them little time coming out  
22 there.

23                   MR. CLIPSE: I understand that. I  
24 wasn't going to do last minute changes and  
25 change on them and waste our time coming out.

1                   CHAIRMAN MORELOCK: That is good.  
2 Any other comments? Well, gentlemen, thank you  
3 for working with us on this. You've got a much  
4 improved manual, and it's good to see that, so  
5 go back and take all these comments and make  
6 your revisions to the manual again.

7                   And make sure you've got a good  
8 clean manual that reflects everything that we  
9 voted and discussed and share that with the  
10 boiler unit when they do their site inspection.  
11 So thank you.

12                  MR. CLIPSE: So I don't have to send  
13 the manual in? Just revise it and have it ready  
14 for the inspection?

15                  CHAIRMAN MORELOCK: No, if y'all  
16 revise it and send to the boiler unit to Chief  
17 Chapman or the Assistant Chief OGuin, send that  
18 to them so that they'll have it when they come  
19 to the site --

20                  MR. CLIPSE: For the visit.

21                  CHAIRMAN MORELOCK: Yes.

22                  MR. CLIPSE: Okay. I'll do that.

23                  CHAIRMAN MORELOCK: Thank you.

24                  MR. CLIPSE: Thank you, guys.

25                  CHAIRMAN MORELOCK: Thank y'all.

1           MR. OGUIN: Chairman, I've got  
2 (indiscernible) all they'll need is two copies  
3 of the variance instead of ten when they  
4 resubmit them to the boiler unit.

5           CHAIRMAN MORELOCK: You're correct.  
6 That's a good add. Thank you for that comment.  
7 Okay. So that completes our old business.  
8 Moving on to new business.

9           Our next item, our first new  
10 business is Item 20-08, and this is review of  
11 Workplace Regulation and Compliance Boiler Unit  
12 Policy WRC 010 regarding procedures for  
13 submission of documentation to Board of Boiler  
14 Rules. And who is go to present that item?

15           MR. OGUIN: I will, Chairman.  
16 Chris.

17           CHAIRMAN MORELOCK: So Assistant  
18 Chief OGuin will present that item.

19           MR. OGUIN: Chairman, I found a typo  
20 on the rules. In the first paragraph, it should  
21 be 08000303-08, Section 11, paragraph B. I left  
22 the "03" out.

23           CHAIRMAN MORELOCK: Okay.

24           MR. OGUIN: All right. Boiler Board  
25 Rules Policy No. WRC 010. The purpose of this



1 policy to establish a procedure for submitting a  
2 written request to be placed on Board of Boiler  
3 Rules meeting agenda pursuant to Tennessee  
4 Department of Labor and Workforce Development  
5 Division of Work Place Regulation and  
6 Compliance. Boiler unit Board of Boiler Rules,  
7 Rule 0800-03-03-08, second, paragraph B. "It is  
8 goal of the board to conduct business in the  
9 orderly, productive and timely manner.  
10 Therefore a written request needs to be  
11 submitted to the Chief Inspector, his Designee,  
12 45 days prior to the next scheduled Board of  
13 Boiler Rules meeting. In order for the board  
14 members to have adequate time to familiarize  
15 themselves with the specifics of the new agenda  
16 item, the request should be accompanied by 10  
17 copies of supporting documentation, i.e., board  
18 interpretations, manuals, presentations, et  
19 cetera. Failure to submit this supporting  
20 documentation may result in request being place  
21 on a future board meeting agenda."

22 And, Chairman, we would like y'all's  
23 approval before we actually make this policy  
24 effective. This is the way we've been  
25 conducting business. We just put it in a policy

1 form.

2 CHAIRMAN MORELOCK: Thank you,  
3 Mr. OGuin.

4 So do I have a motion to discuss?

5 MR. BAUGHMAN: Motion to discuss.

6 CHAIRMAN MORELOCK: Thank you,  
7 Mr. Baughman. Do I have a second?

8 MR. BOWERS: Second.

9 CHAIRMAN MORELOCK: Thank you,  
10 Mr. Bowers. So what comments do you have on  
11 this proposed Boiler Rules Policy?

12 MR. BOWERS: How does the Boiler  
13 Rules Policy come into play? Would this be --  
14 you know, like our -- would this go into our  
15 boiler rules or would this be as Martin has --  
16 Mr. Toth has submitted, an interpretation? How  
17 would this come to play? Be open to the public?  
18 You know, if it's interpretation which should be  
19 posted the on the website, or if this is going  
20 to be a rule, a policy rule, does this actually  
21 have to go into the boiler rules?

22 CHAIRMAN MORELOCK: So, Mr. OGuin,  
23 can you or Mr. Chapman or Mr. Herrod help us?  
24 How would this be published?

25 MR. OGUIN: The way we would handle

1 this, it would be attached to the checklist. So  
2 when they print the checklist out, it would be  
3 with it.

4 MR. BOWERS: But I'm not sure -- I  
5 guess we need to take it to an attorney. If  
6 this is not in the rules, can we just make rules  
7 without doing an interpretation? Because we can  
8 arbitrarily make rules as we go along if this is  
9 not documented under the boiler law and under  
10 the boiler rules. Am I correct or not correct?

11 MR. OGUIN: Mr. Bowers, Chris OGuin.  
12 Dan Bailey, Legal Counsel, was  
13 involved on writing this the policy, so he may  
14 be able to speak more on your question.

15 MR. BAILEY: Well, first of all, it  
16 is policy, which is not a rule. A rule will  
17 trump a policy, and a statute will trump a rule.  
18 So as far as being enforceable, it really is  
19 more of a suggestion if this is how we want to  
20 the process to proceed. But because it's not a  
21 rule, it really is not -- there is no rule  
22 enforcement mechanism to it. It's more of a  
23 this is how, you know, we would like the orderly  
24 process of the events to occur to bring  
25 something to an agenda item for the next board

1 meeting.

2           If it were, you know, I mean, if  
3 y'all want to make it a rule, we certainly can  
4 go through that process again. You know how  
5 lengthy it is, but we can certainly do that.  
6 Now, if an -- if somebody doesn't actually  
7 follow this policy, you know, we'd have to defer  
8 to the rules as far as to whether an item gets  
9 on the agenda.

10           The board would also have to decide  
11 whether or not they received it in time to  
12 thoroughly exam it so that, you know, they could  
13 address it at the next board meeting. If they  
14 don't feel like they can, then that item would  
15 have to be bumped to, you know, the following  
16 board meeting.

17           So I guess it's kind of a suggestion  
18 to the people that, "Look, if you want to make  
19 sure your item's on the next board meeting,  
20 here's the process. If you follow this process  
21 you will be there. If you don't, you might or  
22 you might not." It would depend on the  
23 comfortableness of the board and whether or not  
24 they got it early enough and had enough time to  
25 exam it, to feel like they could intelligently

1 discuss it at that next board meeting.

2 CHAIRMAN MORELOCK: Mr. Toth, were  
3 you raising your hand?

4 MR. TOTH: Well, I was. But I was  
5 actually talking to somebody else too. I'm glad  
6 you called on me. Thank you, sir. And I tell  
7 you, I absolutely agree with this. I know I am  
8 dead set in the middle of all this and necessity  
9 for this. And I think this is something that is  
10 necessary to make sure that it's not just a word  
11 of mouth that something is written. As  
12 Mr. Bowers has alluded to.

13 I do have the board interpretation  
14 that's out there for review later on in the  
15 meeting, and I think that's what perpetuated  
16 this line item. As Mr. Bailey did allude to,  
17 I'm very aware of the statute, rule, policy, how  
18 that here's goes and that was the intent of the  
19 interpretation submittal. And it really goes to  
20 the heart of "let's be clear, precise, give the  
21 communication out there." If we put it in a  
22 guideline, that's not even a policy, that's even  
23 below the policy.

24 So as we talked about under the last  
25 item where Mr. Bowers made reference to the

1 manual references and things of that -- because  
2 that's a guideline. I put it in there; other  
3 people that submit put them in there because it  
4 is helpful to the board members. And by all  
5 means, we want to be helpful to the board  
6 members so they give us a positive response to  
7 our submittals.

8           But where I'm going with this is  
9 that we need a way that we can require people to  
10 do it, right? But not go through the process of  
11 having to change the rule, per se. I know Mr.  
12 Bailey will probably object to that, but I  
13 believe that when we looked at interpretations  
14 in the past, that we had those pretty much carry  
15 a lot of weight, do they not? Because it's a  
16 rule by the board.

17           And I think Assistant Chief OGuin,  
18 Chief Chapman and rest of the boiler board will  
19 get the result that they want for  
20 interpretation, and that's why I submitted is  
21 because if the requirement is not only do you  
22 request 45 days in advance, you also supply the  
23 supplemental documentation. As everyone is  
24 aware -- and those that aren't aware, they are  
25 on the call -- as a former Chief Inspector

1 myself, there were many times that we would get  
2 the request in 45 days in advance with the  
3 understanding that the manuals and (inaudible)  
4 have been following, to get those in. If they  
5 don't show up in a timely manner to where the  
6 board members had a chance to review it, they  
7 got bumped.

8 Well, now what we do, by the  
9 interpretation stating "Yeah, everything has to  
10 be turned in 45 days in advance," myself, my  
11 clients, others that are submitting are held to  
12 the same standard.

13 And that's why I think it's  
14 critically important that we not just go by a  
15 policy, but we are actually enforcing it through  
16 the board, which is one step above a policy in  
17 the way of interpretations. And I will go ahead  
18 and return back to the chairman. Thank you.

19 MR. BAILEY: Mr. Chairman, if I  
20 could address that a little bit. A board  
21 interpretation doesn't overrule a written rule.  
22 So a board interpretation is -- if it conflicted  
23 with a written rule or statute it would the  
24 statute or written rule would govern. So a  
25 board interpretation in my view is not much

1 different than a policy. Neither one of them is  
2 really enforceable. If the rule addresses that  
3 issue and specifically addresses it or the  
4 statute specifically addresses it, then that's  
5 going to govern.

6 MR. TOTH: Mr. Chairman, if I may.  
7 Marty Toth, ECS Consulting.

8 I did not state that, Mr. Bailey,  
9 and I'm sorry if it came across that way. The  
10 purpose for board cases and board  
11 interpretations back when I was chief and we  
12 implemented that was for the purpose of clarity.  
13 It was not to trump rules.

14 If there is a written rule that is  
15 out there that stipulates a certain way that  
16 you're supposed to go, you have to go that way.  
17 The interpretations and board cases -- whereas  
18 this would technically be a board case, but  
19 could also be a board interpretation. That's  
20 why I believe the boiler unit is assigned to the  
21 BI number instead of BC number.

22 And the intent was to bring clarity  
23 to the existing rule. And that clarity is from  
24 Rule .08 paragraph 11B that states "45 days in  
25 advance." What we're saying is what is the



1 interpretation of that? The interpretation of  
2 that is 45 days is X. "X" being that includes  
3 not only the request, that includes all  
4 supplemental documentation. So what we're doing  
5 is, is we're interpreting what does 45 days  
6 mean.

7 CHAIRMAN MORELOCK: Okay. Thank  
8 you. I guess the thing that I would like to  
9 clarify, I'm not opposed to the policy, but how  
10 do we track the policies if we're going to use  
11 this? And will they be published so the public  
12 can see them like our board interpretations and  
13 board cases are today?

14 How will we track them and how will  
15 we publish them so that people can have access  
16 to them and know what these policies are when  
17 they're trying to comply with the Rule  
18 0800-03-03.

19 Will these be published along with  
20 the board interpretations and board cases? We  
21 have board cases, board interpretations, and WRC  
22 policies in this list now? Is that what we're  
23 is striving to do?

24 MR. OGUIN: May I speak, Chairman?

25 CHAIRMAN MORELOCK: Yes.

1           MR. OGUIN: Majority of the people  
2 don't look at the interpretations. When we, you  
3 know, when they call about a rule, we will guide  
4 them to the interpretation so they can look at  
5 the board's decision on that rule when we  
6 changed it.

7           So the purpose behind this was they  
8 got a printed checklist to make a manual. So  
9 this policy prints off with this checklist out  
10 of our system, then they will see "Hey, this is  
11 what we got to do. You know, I don't have to  
12 call the chief or assistant chief to find out  
13 the policy I got to follow to be sure I'm on the  
14 board." They just kind of get a little more  
15 info with the checklist when they get it.

16           CHAIRMAN MORELOCK: So just bear  
17 with me here a minute. So what would be the  
18 difference in passing this policy or just  
19 changing the guidis document to the checklist  
20 and add this to that checklist as a revision?  
21 Because, I mean, based on what your telling me,  
22 this would go with the checklist, so you print  
23 that off. You get the guidis document; any  
24 changes to that guidis document and the form  
25 here as a policy and the checklist itself,

1 correct?

2 MR. OGUIN: Yes, sir.

3 CHAIRMAN MORELOCK: Okay. I mean,  
4 that's very helpful and I'm on board with that.  
5 So that's my question.

6 So if we continue to do policies  
7 like this, just where will we put them once we  
8 get them passed? Like, this one will be  
9 attached to the guidis documents to the  
10 variances. So what if we had a policy  
11 pertaining to Empire Steam Boilers or something?  
12 Would we attach that to 0800-03-3? Where would  
13 put it once we passed it? And how would we  
14 track them to make sure we got a clear path to  
15 get to all these policies?

16 MR. CHAPMAN: It would be on the  
17 checklist.

18 CHAIRMAN MORELOCK: This one would  
19 go to the checklist, but it didn't pertain to  
20 the checklist -- if you had a policy that didn't  
21 pertain to the checklist, where would it go?

22 MR. BOWERS: I think there's really  
23 no problem with this one, per se, but we're  
24 talking about the policies in general.

25 CHAIRMAN MORELOCK: Yes.

1           MR. BOWERS: You know, we're  
2 starting to make policies. Where can the public  
3 access those policies to make sure which  
4 direction we're going to? Now, we do have an  
5 access to our board interpretation. We do have  
6 an access to the Board of Law. We have a board  
7 access -- the public has access to the board  
8 rules.

9           But when we start doing the policy,  
10 then you get sticky situation. Most clients --  
11 most people would never question it, but there  
12 might be, if we have a particular policy come  
13 down a little later on, some corporation, some  
14 lawyer might say "How could this be a policy?  
15 It's not -- it's nowhere on your site, nowhere  
16 in your books. How do you come about this?"

17           And it's like -- may not be  
18 enforceable, but still it's a policy out there.  
19 And I think we have no problem with this one.  
20 This one here is just being defined to better  
21 level anyhow.

22           MR. HERROD: Mr. Chairman.

23           CHAIRMAN MORELOCK: Yes, sir.

24           MR. HERROD: Tom Herrod, Assistant  
25 Commissioner.

1           We can -- once again, we can update  
2           our website to include policies, make it  
3           available just like we do the other rules and  
4           the statutes and such. It would be a good  
5           upgrade once again to our website to have that  
6           quickly available. And that way everybody have  
7           the same opportunity to view that, and anything  
8           that's added will just be updated, and we adopt  
9           it through our boiler board meetings.

10           CHAIRMAN MORELOCK: Okay. Mr. Toth.

11           MR. TOTH: I just want to make sure  
12           it's enforceable. As Mr. Bailey said, policies  
13           can be very hard to enforce, and I want to make  
14           sure it's enforceable.

15           That's what I would like as a  
16           citizen in the industry, something that is  
17           enforceable. Well, it's not -- and the reason I  
18           say that is I'll say is because just last week,  
19           like, on the last item, the guidelines as --  
20           just you said, Mr. Chairman, are guidelines.

21           CHAIRMAN MORELOCK: That's true.  
22           True statement. Mr. Bailey, did you have a  
23           comment?

24           MR. BAILEY: Well, again, as far as  
25           it being enforceable, you'd have to put it in a

1 rule. And as Mr. Toth was stating earlier, that  
2 this is an interpretation of the 45-day -- you  
3 know, 45-day period that is already in the rule.  
4 I can see that as being a valid argument for  
5 that, but -- and as I said earlier, this is  
6 letting people know that if you want to make  
7 sure you're guaranteed to be on the very next  
8 board meeting, this -- is follow this process  
9 and you'll be there.

10           You know, if you don't follow that  
11 process, there's no guarantee you will be on it.  
12 You might; you might not. So, you know, in some  
13 ways it is, as Mr. Toth said, an interpretation  
14 of the 45 days. But, you know, if -- when you  
15 say it's got to be enforceable, in other words,  
16 you know, if somebody comes in and, you know,  
17 and they submit -- and they submit everything  
18 40 days ahead of time, you know, is it something  
19 to where the board -- you know, if the board has  
20 plenty of time to, you know, study it and be  
21 prepared to address it at the next board  
22 meeting, is it something that you just make  
23 somebody wait just because they, you know,  
24 missed five few days? I don't know. I guess  
25 that's something the board would have to decide.

1                   CHAIRMAN MORELOCK: Well, and  
2 Mr. Bailey that's the age-old question right  
3 there. It's like, where do you draw the line in  
4 the sand? And some of these manuals can be  
5 straightforward, some of them can be -- well,  
6 when we get to the Valero manual, you'll see  
7 it's pretty voluminous. So good discussion.

8                   MR. HERROD: Mr. Chairman.

9                   CHAIRMAN MORELOCK: Yes.

10                  MR. HERROD: This is Tom Herrod  
11 again.

12                  I would suggest that we go ahead and  
13 try to adopt it as a policy, put it on the  
14 website, and then, between now and the next  
15 meeting, decide the effectiveness of it, and  
16 whether or not we need to pursue a rule. We can  
17 at least put a policy in place and then get a  
18 proposal for a rule change that would make it  
19 enforceable if that's what we want to go to,  
20 which is fine. But I think we need a policy in  
21 place initially just to cover that time period  
22 between now and the rules change. So if we  
23 could go ahead and adopt a policy, I think that  
24 could get us at least halfway there.

25                  MR. BAILEY: Mr. Chairman, I would

1 agree. I mean, it's, I guess, one of those  
2 things where, if it's not a problem, you know,  
3 if people follow that policy and it's not an  
4 issue, then it doesn't necessarily need to be  
5 addressed by a rule. But if it becomes an  
6 issue, we can always address it by rule.

7           And, you know, you're aware the rule  
8 making process is very cumbersome. It's even  
9 more cumbersome right now because the governor's  
10 office released a whole bunch -- it used to be  
11 six questions. Now, it's like 20 questions.  
12 And it's a whole analysis you got to go through  
13 just to get approval from the governor's office  
14 right now.

15           So unless it's something that it's  
16 like, "We got to put this in a rule," I would --  
17 you know, if it's not broke, don't fix it is the  
18 old saying I'm getting at.

19           If this policy is -- doesn't become  
20 an issue, I would not recommend trying to put it  
21 into a rule. If it becomes an issue, we can put  
22 it in a rule at that point in time.

23           CHAIRMAN MORELOCK: Okay. I guess  
24 one thing I would say -- and I'll let the other  
25 board members speak -- if it's something that



1 people can find on the website under the boiler  
2 unit or Board of Boiler Rules or something -- if  
3 it's something they can find easily, I think  
4 that's fine. That's the biggest thing, if we do  
5 initiate this policy, we just have to make sure  
6 that people can find it and use it and  
7 understand it.

8 That's would be my only statement.  
9 What do the other board members -- you've got  
10 comments that you want to make?

11 MR. BOWERS: This is Harold Bowers.

12 Yeah, I totally agree. I don't  
13 think there will be any problem on this one.  
14 Because it pretty well says in the rule 45 days.  
15 And basically the policy's just saying, "Hey, if  
16 you want to comply to the rule, this is what we  
17 want." And I don't think there will ever be a  
18 problem in this situation.

19 CHAIRMAN MORELOCK: Okay. Any other  
20 comments. Do I have a motion for this item?

21 MR. BAUGHMAN: So moved.

22 CHAIRMAN MORELOCK: So,  
23 Mr. Baughman, what are you moving?

24 MR. BAUGHMAN: Do we accept WRC 010  
25 policy?

1                   CHAIRMAN MORELOCK: Thank you, sir.

2 Do I have a second?

3                   MR. FOX: I second that.

4                   CHAIRMAN MORELOCK: All right. Last  
5 call for comments or questions. All right. I'm  
6 going to call the question. Mr. Baughman?

7                   MR. BAUGHMAN: Aye.

8                   CHAIRMAN MORELOCK: Mr. Bowers?

9                   MR. BOWERS: Aye.

10                  CHAIRMAN MORELOCK: Mr. Fox?

11                  MR. FOX: Aye.

12                  CHAIRMAN MORELOCK: Mr. Henry?

13                  MR. HENRY: Aye.

14                  CHAIRMAN MORELOCK: All right. The  
15 item passes, and I'm showing 10:42. I think  
16 people would probably like to take a 10 or  
17 15-minute break. So let's reconvene right at  
18 11. Give you a few minutes.

19                               (Brief break was observed.)

20                  CHAIRMAN MORELOCK: Okay. I think  
21 pretty much everyone is back on, so let's go to  
22 our next new business item, which is the 20-09  
23 Honest Origins in Antioch is requesting a new  
24 variance for two high-pressure boilers that  
25 operate under requirements that check the

1 0800-03-03.811.

2 So, Mr. Toth, if you and  
3 representatives from Honest Origins will  
4 introduce yourself and present your item.

5 MR. TOTH: Hello, Chairman, members  
6 of the board. Again, my name is Marty Toth.  
7 I'm with ECS Consulting & Boisco Training Group.  
8 My pleasure to have with me Mr. Ken Rich. Ken  
9 Rich is over the maintenance department there at  
10 Honest Origins.

11 We request for the approval of  
12 remote variances for the boiler operations there  
13 at Honest Origins. As you see, we have two  
14 high-pressure burning boilers that are used for  
15 the process there at the plant. They are not  
16 operated 24/7. They're operated as necessary,  
17 usually during normal working hours. Mr. Rich  
18 will be able to elaborate further on that.

19 What we have is we have a remote  
20 station that's located at the main reception,  
21 which you'll see from the site plan, it's very  
22 close proximity of the boiler room itself.

23 At that station we have an  
24 administrative assistant who will man that post.  
25 If for any reason she is outside of the range of

1 that post for an extended period of time, being  
2 anything over the allotted 20-minute period, we  
3 will go back to the 20-minute rule or on another  
4 individual who is qualified as a remote  
5 attendant will be in that position. At the  
6 current time, Mr. Rich would serve that role.  
7 His office is in the vicinity of the reception  
8 area, so he will man that post.

9           If at any time in the future it is  
10 felt that we need to extend those qualified  
11 individuals, we have it in place. We would  
12 revise the manual. And that would be an  
13 editorial not a technical change with that. I  
14 have spoken with the client about that  
15 possibility in the future.

16           The maintenance tech personnel are  
17 the qualified boiler attendants that will be  
18 performing various duties throughout the plant.  
19 During the operation of the variance, they will  
20 be visiting the boiler room and taking readings  
21 within every four hours. If for some reason we  
22 do not have that remote station manned, they  
23 will go back to the 20-minute rule and monitor  
24 those boilers once every 20 minutes and document  
25 their visits there. The manual has an example

1 of our four-hour log that is required for each  
2 boiler variances.

3           Honest Origins is a food processing  
4 location that works within -- I would want to  
5 say rehydration of bean products at this time.  
6 And it's a nice looking boiler room as well. As  
7 you'll see from the manual, we provided some  
8 photographs of not only the two burning boilers  
9 but also the registered aerator that is located  
10 at the facility. And we are open to any  
11 questions that you may have.

12           CHAIRMAN MORELOCK: Thank you,  
13 Mr. Toth. Let me ask the board members, does  
14 any board member have a conflict of interest on  
15 this particular item? All right. Hearing none.

16           Do I have a motion to discuss this  
17 variances?

18           MR. BAUGHMAN: So move.

19           CHAIRMAN MORELOCK: Thank you,  
20 Mr. Baughman.

21           Do I have a second?

22           MR. BOWERS: Second.

23           CHAIRMAN MORELOCK: Thank you,  
24 Mr. Bowers. What questions or comments do you  
25 have for this proposed attendant variances?

1 While you-all are thinking, Mr. Toth, if you  
2 look at Appendix J, it states that -- the title  
3 is "Glossary Terms," but actually, it's your  
4 checklist.

5 MR. TOTH: I do apologize, sir.  
6 We'll make sure we revise that.

7 CHAIRMAN MORELOCK: No problem.

8 MR. TOTH: I did list -- the  
9 contents is listed. I'm going to have fire my  
10 administrative assistant on that.

11 CHAIRMAN MORELOCK: So Appendix I  
12 will be your Glossary of Terms. And the only  
13 other comment I have is Item 32 on the checklist  
14 is requesting a record log listing of manual  
15 holders. And I found a narrative in Section 1  
16 paragraph 2, but I -- and I may have overlooked  
17 it -- but I don't see a -- I don't see a log for  
18 the manual holders.

19 MR. TOTH: Thank you, Mr. Chairman,  
20 for bringing that up. There is not a log, nor  
21 have as any manuals that have been submitted to  
22 the board thus far have a log. Again, this is a  
23 guideline.

24 What we do is we mention the actual  
25 locations within Section 1 as you alluded to.

1 That stipulates where those manuals will be  
2 stationed that are mandatory. In this case, it  
3 will be the remote station, Mr. Rich's office,  
4 and also the boiler room. Those are the  
5 mandatory requirements. There may be logs  
6 located elsewhere, such as the electronic portal  
7 that Mr. Rich and members of their management  
8 company will have access to.

9           Again, this is something that ECS --  
10 I know I can't speak for other companies, but  
11 this is something we've done for quite a while  
12 now.

13           CHAIRMAN MORELOCK: Okay. I just  
14 revised the your checklist to strike Appendix H  
15 as a manual reference.

16           MR. TOTH: Say that again, sir.

17           CHAIRMAN MORELOCK: In the checklist  
18 you listed the manual reference as Appendix H,  
19 so you just need to take that out.

20           MR. TOTH: Thank you.

21           CHAIRMAN MORELOCK: Thank you. What  
22 other questions do the board members have?

23           MR. BAUGHMAN: Mr. Rich, this is  
24 Dave Baughman, Board Member.

25           To the operations of the plant

1     itself, we said it operates on demand during  
2     normal weekday work hours. Are there any other  
3     hours that there might be -- that would fall  
4     under abnormal, in other words, is there ever a  
5     time when the boiler would operate during the  
6     evening or in hours that wouldn't be considered  
7     normally during the day?

8                   MR. RICH: Yes, sir. It does but  
9     we -- since we only have an administrative  
10    support within a certain -- because we're so  
11    small, we have administrative support, including  
12    myself, in that -- within that window that you  
13    see in the manual, we go back to the 20-minute  
14    inspections at that point.

15                   MR. BAUGHMAN: So there would be  
16    personnel there at the plant 24/7 that would be  
17    considered operating the boiler under the  
18    20-minute rule during that the time when there's  
19    not an administrative assistant or somebody  
20    listed as a remote attendant.

21                   MR. RICH: That is correct.

22                   MR. BAUGHMAN: Very good. It states  
23    that Honest Origins has certified boiler remote  
24    and boiler attendants. How does Honest Origins  
25    certify or what certification does Honest



1 Origins provide?

2 MR. RICH: Us the company.

3 MR. BAUGHMAN: And I was just  
4 interested in what that criteria was, how that  
5 certification -- what that process is?

6 MR. RICH: We go through Marty's  
7 company to assist us with that.

8 MR. BAUGHMAN: Okay. So Mr. Toth is  
9 providing certification then that they're  
10 qualified as boiler attendants and remote  
11 attendants?

12 MR. RICH: That is correct.

13 MR. BAUGHMAN: I guess I have a  
14 question on why the remote station is not  
15 located somewhere else besides the  
16 administrative assistant's office? In other  
17 words, it just seems like an area that -- let's  
18 say that during the day the administrative  
19 assistant, who by description has a lot of  
20 different tasks, whenever they leave and if by  
21 chance you're not in your office, somebody's on  
22 the time clock then as far as the 20-minute  
23 rule, and so how is that all attended to because  
24 that's a very difficult proposition?

25 MR. TOTH: Mr. Baughman, I'd like to

1 allude to that and answer that question. It was  
2 something that was discussed during the  
3 development of this process, and the young lady  
4 that occupies that position does have  
5 responsibilities, but because of the placement  
6 of the remote panel, it was sought that that  
7 would be the best position because of the  
8 necessary operation of the boiler during the day  
9 shift.

10           We have discussed other  
11 opportunities as the company grows. And as the  
12 company goes to a more operating shifts within  
13 the necessity of the boiler, at that time we  
14 would come back to the board with those  
15 revisions and those updates to the system.

16           It was just felt that as a business  
17 decision with Mr. Rich and the plant manager  
18 that this location would be the best location.  
19 I definitely grilled them quite extensively as  
20 to the operations, when will this individual be  
21 leaving? Would they leave the location for more  
22 than 20-minute period? Would somebody be  
23 occupying -- if there's other individuals that  
24 are located within the area such as the  
25 inventory manager that's within the area of the

1 reception.

2 It would prudent for us to maybe  
3 look at extending her responsibilities as also  
4 remote attendant.

5 So this is something we have talked  
6 very extensively about. And it was just a  
7 business decision to put her at the remote  
8 station because Stephanie is at that location  
9 pretty much the majority of her time. But we  
10 also have it in place how to handle the  
11 situations if she has to leave for an extended  
12 period of time.

13 Of course it means right now at this  
14 juncture that Mr. Rich will be responsible for  
15 manning that post. Okay? If he is unavailable  
16 to man that post, that's when was the  
17 communication goes out. That's when we start  
18 occupying the boiler at the 20-minute rule,  
19 which is how they handle it right now. So they  
20 are very aware of rules.

21 MR. BAUGHMAN: Because I can foresee  
22 if Mr. Rich is out on vacation or whatever the  
23 situation may be, if Ms. Stephanie -- and I take  
24 it we've got more than one administrative  
25 assistant because, if she's out, then that

1 leaves us with no administrative assistant to  
2 man that remote station, and then it falls upon  
3 Mr. Rich's shoulders. And if he happens to be  
4 out, then I take it we're operating under the  
5 20-minute rule. And so I understand how the  
6 flow goes. Whether that happens in real life or  
7 not is another thing that you hope it does and  
8 that's why all these mechanism are in place.  
9 The next question I have is: Is that remote  
10 station -- I take it because it's at the  
11 reception area, and I take it the reception area  
12 is locked at certain times -- is there a time  
13 when the doors are locked during times that  
14 you're not there, or that she's not there, or  
15 both, that don't give us access to that remote  
16 station or during that time that we are actually  
17 operating under that 20-minute rule?

18 MR. TOTH: If I may, I'll allude  
19 to that, and if you want Mr. Rich to elaborate  
20 further, we can.

21 The reception station area is  
22 open-air station. The only access, the locked  
23 access, that you'll see is there is an entrance  
24 going into the building. That building has a  
25 magnetic mechanism that will lock behind. There

1 is no individual office for the reception  
2 station. As I said, it's open air. Behind the  
3 reception desk is the inventory manager. To the  
4 right of the reception area as you're walking  
5 in, is the plant manager's office. Mr. Rich's  
6 office is right there within the vicinity. So  
7 at no time would we find ourselves in a  
8 situation where this would be locked and  
9 unavailable if the case needs.

10 MR. BAUGHMAN: Is the boiler room  
11 itself ever locked?

12 MR. RICH: It is not.

13 CHAIRMAN MORELOCK: Very good.  
14 Thank you, Mr. Rich. Thank you, Mr. Toth.

15 MR. TOTH: You're welcome, sir.

16 CHAIRMAN MORELOCK: Any other  
17 questions or comments on this proposed variance?  
18 Hearing none.

19 Do I have a motion for this  
20 variance.

21 MR. FOX: This is Terry Fox, Board  
22 Member.

23 I make a motion to approve of this  
24 variance.

25 CHAIRMAN MORELOCK: Thank you, Mr.

1 Fox. Do I have a second?

2 MR. BAUGHMAN: Second.

3 CHAIRMAN MORELOCK: Thank you,  
4 Mr. Baughman. I do have a second. Any last  
5 comments?

6 MR. BAILEY: Mr. Chairman, did you  
7 ask about conflicts?

8 CHAIRMAN MORELOCK: I did.

9 MR. BAILEY: Okay.

10 CHAIRMAN MORELOCK: Thanks for the  
11 reminder.

12 MR. TOTH: You didn't get him that  
13 time, Dan.

14 CHAIRMAN MORELOCK: He'll have  
15 plenty of opportunity. Don't worry.

16 I'm going to call the question then.  
17 Mr. Baughman?

18 MR. BAUGHMAN: Aye.

19 CHAIRMAN MORELOCK: Mr. Bowers?

20 MR. BOWERS: Aye.

21 CHAIRMAN MORELOCK: Mr. Fox?

22 MR. FOX: Aye.

23 CHAIRMAN MORELOCK: Mr. Henry.

24 MR. HENRY: Aye.

25 CHAIRMAN MORELOCK: Gentlemen, have

1 you contingently approved boiler attendant  
2 variance subject to any revisions to the manual  
3 based on the comments from the Tennessee board  
4 meeting today and a successful site visit with  
5 the boiler unit.

6 Thank you, gentlemen.

7 MR. TOTH: Thank you, gentlemen.

8 MR. RICH: Thank you.

9 CHAIRMAN MORELOCK: So that takes us  
10 to new business Item 20-10, Boiler of Memphis  
11 Refinery is requesting renewal of a boiler  
12 inspection variance for two gas-fired boilers,  
13 boiler number 10 and boiler number 11. So do we  
14 have representatives to present this variance?

15 Do we know if Valero was going to  
16 make it to the Zoom meeting today? Do we have  
17 any confirmation from them? None?

18 MR. OGUIN: I haven't heard either  
19 way. Chairman, this is Chris.

20 CHAIRMAN MORELOCK: Thank you, sir.  
21 Well, since we don't have any representatives  
22 for this, I am going to move this item, 20-10,  
23 to the 12/9/2020 meeting.

24 So Item 10 on our agenda is board  
25 interpretation 20-01 to be presented by

1 Mr. Toth, ECS Consulting. You have the floor,  
2 sir.

3 MR. TOTH: Thank you, Mr. Chairman.  
4 I'm kind of -- I would say at a loss for words,  
5 but then everybody on the board would start  
6 laughing out loud. But, I'm just kind of  
7 curious where we're going to go with the  
8 requirements for the WRC policy, things like  
9 that.

10 But I would like to address some of  
11 these questions, some of these interpretations,  
12 and handle it as we intended back at  
13 December 2019 meeting. What I have is -- I do  
14 have the letter from of -- the submittal from  
15 November 2019, and I guess I can share my  
16 screen.

17 Is that normal process? Do we want  
18 to do it that way and kind of go through the  
19 document since we're not in person? Does all  
20 the members still have that document from 2019  
21 that they can look at? But then also have it  
22 available for those others that are on the call.  
23 How would you like to proceed, sir.

24 CHAIRMAN MORELOCK: Well, I know  
25 that board members have the November 15, 2019,



1 document. It was part of our packet. However,  
2 if there are people that do not have access to  
3 that document, I'm certainly agreeable to you  
4 sharing your screen to discuss the item -- or  
5 present the item, and then we can stop sharing  
6 so I can see how the board members want to vote.

7 MR. TOTH: I'm going to go ahead and  
8 hit the share screen button. Hopefully it  
9 works; I'm not as up to speed on Zoom. You  
10 would think that in the last six months we would  
11 be. Let me see if I can locate it. I had it up  
12 just a moment ago. I've got too many things  
13 open on my screen.

14 CHAIRMAN MORELOCK: It should be at  
15 the very bottom. There you go.

16 MR. TOTH: As we can see here the  
17 request that I have for this --

18 CHAIRMAN MORELOCK: Shrink it down a  
19 little bit.

20 MR. TOTH: Shrink it down?

21 CHAIRMAN MORELOCK: Yeah, look up at  
22 the top. It's like at 153 percent. There you  
23 go.

24 MR. TOTH: You do realize I turn 52  
25 this year, right, Mr. Chairman? So I'm --

1                   CHAIRMAN MORELOCK: Hey, you have no  
2 excuse. I turn 58 in March, so.

3                   MR. TOTH: Goodness. I didn't know  
4 if you were like a grandfather like Mr. Fox yet  
5 though.

6                   CHAIRMAN MORELOCK: Not yet.

7                   MR. TOTH: (Indiscernible) Terry.  
8 Anyway, so what we have here is a request to  
9 provide interpretation of -- submission of  
10 request of the Boiler Board rules.

11                   There has been some confusion, and I  
12 would say that I'm probably the lead in that  
13 confusion as to the requirements surrounding the  
14 request to appear before the board and/or the  
15 supporting documentation submission. In recent  
16 years there's been verbiage included in the  
17 rules that require 45 days prior to the next  
18 meeting. I'm kind of subphrasing there a little  
19 bit. We talked extensively about that earlier  
20 so I don't think I need to bring that up again.

21                   The confusion is neither the statute  
22 rule or the board guidelines stipulates the  
23 supporting documentation are required for  
24 submitting at the time of the request. The hope  
25 is that the following interpretation inquiries

1 will clarify any confusion, submission  
2 requirement consistency, and to be more uniform.

3           Let me just kind of elaborate. As  
4 we mentioned, board interpretations is something  
5 that is not new. It's something that's been  
6 around for a number of years. It was not  
7 utilized as a tool for a number of years. I  
8 think we turned the corner on that, and we'll go  
9 back to it. I would like to hope that we  
10 promote that to the public. And it sounds like  
11 Mr. Tom is really thinking that's very important  
12 as well. And so I think there will be some more  
13 marketing of that out to public.

14           If we could go to -- Inquiry Number  
15 1 is a required for the submitter or his  
16 representative of a request to appear before the  
17 Board of Boiler Rules to make sure such request  
18 in writing to the Chief Inspector or his  
19 Designee 45 days prior to meeting. I think  
20 we're all agreement that's a yes.

21           And again, I want to emphasize that  
22 when I put together an inquiry like in this,  
23 this is not my personal beliefs as to how it  
24 should be handled, it's my personal  
25 interpretation of how the rule is written. So

1 the next inquiry is a great example of that.

2 Is it required for the submitter or  
3 variance representative of a request to appear  
4 before the Board of Boiler Rules to include  
5 supporting documentation at the time of the  
6 request? The reply is: No. However, the  
7 supporting documentation must be submitted in an  
8 adequate and timely matter to allow all members  
9 the opportunity to review the documents prior to  
10 the the scheduled meeting. Failure to do so may  
11 result in a delay in approval acceptance of the  
12 submitter's request.

13 Again, it's not a personal belief,  
14 it's an interpretation as to operations in the  
15 past and also how I read that reply.

16 Inquiry Number 3: Is it allowed for  
17 the submitter or his representative of a request  
18 or to appear before the Board of Boiler Rules to  
19 submit supporting documentation directly to  
20 board members? Reply 3: Yes, but only at the  
21 direction and/or authorization of the Chief  
22 Inspector or his Designee.

23 Inquiry 5: Is it required for the  
24 submitter of a board case or interpretation to  
25 submit the inquiry to the Chief Inspector or his

1 Designee 45 days prior to scheduled board  
2 meeting? No, however the supporting  
3 documentation must be submitted in an adequate  
4 and timely manner to allow all members the  
5 opportunity to review the inquiry and prepare  
6 prior to the scheduled meeting. Failure to do  
7 so may result in delay in a response by the  
8 board to the inquiry.

9           Number 5: Is it allowed for remote  
10 variance manuals to be submitted to a Chief  
11 Inspector or his Designee in electronic format  
12 for distribution to board members? No.

13           Seven -- 7: Printed copies of  
14 manual must be submitted to Chief Inspector or  
15 his Designee. However, an electronic copy may  
16 also be included optionally.

17           Number 6 and final: Is it required  
18 for an individual to request in writing to the  
19 Chief Inspector or his Designee 45 days prior to  
20 board meeting for an open-discussion item to be  
21 added to the board meeting agenda? No, however  
22 the request at the meeting must be made prior to  
23 the adoption of the agenda, and it is at the  
24 discretion of the board chairman to accept the  
25 addition at such time.

1           So, Mr. Chairman, I request -- or I  
2 suggest that we the board looks at each inquiry  
3 individually and accept individually any  
4 suggestions we can make to this document at this  
5 time. We would vote in for acceptance or we can  
6 handle it at the next meeting, however the board  
7 so chooses.

8           CHAIRMAN MORELOCK: The question I  
9 have is this interpretation goes exactly with  
10 that policy then we're just making the  
11 interpretation kind of a redundant, but does  
12 it -- be contrary to that policy statement  
13 earlier that we talked about?

14           MR. TOTH: Are you asking me that  
15 question, Mr. Bowers?

16           MR. BOWERS: Yes.

17           MR. TOTH: My knee jerk reaction to  
18 that would be yes and no. I hate to say it that  
19 way. Yes, there is some redundancy there.  
20 Let's realize that this is interpretation  
21 request was submitted November 2019 for the  
22 December 2019 meeting. The policy that was put  
23 together by the boiler unit was done so  
24 afterwards.

25           I think that Chief Chapman and his

1 staff looked at the opportunity to handle it  
2 other than in interpretation. And, you know,  
3 however the board sees fit, I'm all in favor.  
4 Again, we go back to a WRC policy is WRC policy.  
5 And maybe Mr. Bailey can educate me on that. Is  
6 a WRC policy a Board of Boiler Rules policy as  
7 well? And that is a question.

8 MR. BOWERS: But the question I had  
9 is -- this is Harold Bowers.

10 The question I have is, you know --  
11 well, my statement, I guess, is if this  
12 interpretation was exactly as the policy, I see  
13 no problem with that. But you can't have --  
14 talks about the policy of being ten copies, and  
15 we're talking about the interpretation being  
16 seven copies. It has to match exactly what the  
17 policy says. We can't have a conflict between;  
18 we got interpretation saying one thing, and then  
19 we have a policy saying something else.

20 MR. TOTH: I absolutely agree with  
21 Mr. Bowers. And that's why I said, at the time  
22 of writing this, the initial requirements --  
23 because the number of copies has changed over  
24 the years, okay? The numbers of copies has went  
25 from seven copies because we have a Chief

1 Inspector and six board members, to nine copies  
2 to ten. At one point there was actually a  
3 number of 14 copies under a previous  
4 administration that blew my mind.

5           So when -- in writing this, I went  
6 back to the historical seven copies only as a,  
7 Hey, if it's ten, let's put that in writing,  
8 this ten copies. Because I understand that the  
9 ten copies we're distributed be that to a number  
10 of different people now. I know the Chief  
11 Inspector, the assistant Chief Inspector, that  
12 takes us to eight. If it goes to the board  
13 secretary, that takes us to nine. If it goes to  
14 records that takes -- whatever it is, okay?

15           But to answer your question, I'm  
16 absolutely in favor of that. And I agree  
17 100 percent. If there's policy that is out  
18 there that handles the submission of various  
19 documentation that goes into the guidelines for  
20 variance documentation, it needs to be exactly  
21 what we have in this interpretation. Verbatim  
22 verbiage, no confusion whatsoever.

23           Let's recognize though, too, we have  
24 additional interpretations within this that are  
25 not technically covered under the guidelines for



1 variances. That needs to be addressed as well.

2 CHAIRMAN MORELOCK: So what I'm  
3 hearing from Mr. Bowers and Mr. Toth is -- they  
4 need to agree. They don't need to contradict or  
5 negate each other. So with the November 15th  
6 request for interpretation, to me, Inquiry 1,  
7 you can leave as is. Inquiry 2, you would have  
8 to revise the proposed answer of no.

9 MR. TOTH: It would actually be yes,  
10 Mr. Chairman. So that would be simple because  
11 then that reply is a simple yes.

12 CHAIRMAN MORELOCK: You could just  
13 make that a yes. Three is fine. Four, you  
14 would have to change the reply to yes. And  
15 Inquiry 5, you would have to make the reply ten  
16 instead of seven. And then I think you would  
17 have harmony between the two documents.

18 MR. TOTH: Absolutely. Because  
19 Number 4 is, you know, the board -- if you feel  
20 that it is necessary to have any interpretation  
21 board cases, absolutely, because that goes out  
22 on the agenda. That is an agenda item. It  
23 gives board members the opportunity to look  
24 over, do their own research, and then we end up  
25 not spending as much time on the discussion

1 during the board meeting. The work is done  
2 prior to.

3           So I agree 100 percent that Number 4  
4 needs to be yes. I agree if that's what the  
5 board needs in regards to Number 5, if that  
6 helps support the operations of the boiler unit.  
7 If it needs to be ten -- ten, we have had ten.  
8 I just want to bring it to the board's attention  
9 and also the boiler unit's attention is that  
10 printing of these documents, okay, is not an  
11 extension. In the grand scheme of things, it  
12 is, but when your talking sending something like  
13 this out to a printer, you know, companies want  
14 to make it look good, the representation.  
15 You're talking about \$30 a copy. Okay. So if  
16 we're taking these copies and just chucking them  
17 after everything is done, and nobody is looking  
18 at it -- I just want the board to take that into  
19 consideration when the decision is made.

20           So if it's ten, let's put ten and  
21 then that would be -- that would follow whatever  
22 is required in the guidelines, and I think that  
23 would be satisfactory.

24           MR. BAUGHMAN: This is Dave  
25 Baughman, Board Member.

1           Just to add my comment, just as I'm  
2 reading this. So that the WRC 010 policy really  
3 covers Inquiry 1; it addresses Inquiry 2; it  
4 addresses Inquiry 5, and so what we're looking  
5 at then is Inquiry 3, and 4, and 6. So we  
6 adopted WRC 010. One, 2, and 5 are addressed,  
7 and really we just need to look at 3, 5, and 6.  
8 I'm sorry. Three, 4, 5, and 6.

9           MR. TOTH: Here's the thing, if I  
10 may interrupt, Mr. Baughman. And this is where  
11 it gets back to is -- and I'm applying this  
12 interpretation. If your answer for 1, 2, 4, 5,  
13 10 -- whichever one is, see policy WRC whatever,  
14 then you need to do that. Okay. If that's what  
15 you want.

16           We at (inaudible)IC, we have  
17 situations like Brian and I run up against all  
18 the time where people will ask a question that's  
19 already been asked and answered in past, and  
20 we'll point them in that direction. If you want  
21 to do that, that's fine.

22           The thing is this is an  
23 interpretation. Okay? I asked Mr. Bailey -- I  
24 have not received an answer back -- I asked  
25 Mr. Bailey if the WRC policy is the policy for

1 the boiler unit or boiler board or both. And  
2 that's the request that I have, because I am  
3 sending this request to the boiler board, not  
4 the boiler unit.

5 I agree with the policy -- putting  
6 the policy out there. Okay? But the boiler  
7 board is the overseeing body, I thought, of the  
8 rules and regulations. And that's where I'm  
9 coming with this. If we don't want to do  
10 interpretations anymore, don't do it.

11 MR. BOWERS: This is Harold Bowers,  
12 Board Member.

13 I agree as long as it's redundant,  
14 it doesn't hurt anything because a lot of people  
15 would access the boiler interpretations. That's  
16 how they get their information. So even if  
17 it -- as long as it doesn't conflict, it doesn't  
18 hurt to have it in the interpretation and have a  
19 policy. As long as -- if it is redundant, yes.  
20 As long as it's the same, it really didn't hurt  
21 anything to have it. Because a lot of people  
22 will go to -- when they go online, they will  
23 look at those interpretations.

24 And if you say, Well, you have to  
25 refer to this policy. You're just making Joe

1 Public make an extra step that they really don't  
2 have to do it. As long as it doesn't conflict,  
3 it doesn't hurt to have it in both places, as  
4 long as it's the same.

5 MR. BAUGHMAN: I guess my comment to  
6 that is that we want to limit the amount of  
7 interpretations that we have that coincide with  
8 things that we've already got. So -- and my end  
9 of it is as much information for the public is  
10 great, but I look at this from trying to put  
11 myself in the public's shoes also is, if we got  
12 a policy in place already, we could refer -- I  
13 don't know.

14 I'm just trying to limit the amount  
15 of redundancy that's really there, but maybe  
16 that's what we do need to have. And we've got  
17 two different things in this interpretation -- a  
18 request for interpretation, we've got some that  
19 refers to our boiler variances, and we've got  
20 some that refers to other items that don't --

21 MR. TOTH: But, Mr. Baughman, it all  
22 refers to submission of documentation. That's  
23 what it has to do. If the board sees fit that  
24 they want to remove this because, again, this  
25 something that put forth last year. It was

1 pushed off the agenda, okay, multiple times. I  
2 understand the pandemic. I get that, okay. But  
3 then it was brought up after the fact that we  
4 put in a boiler unit policy. If the board sees  
5 that we're answering that question fully, I'll  
6 pull it. That's fine. But what I don't want to  
7 get back to -- and I'm going to warn everybody  
8 here -- is we get back to the point where we  
9 have internal boiler unit control with no  
10 communication for the public.

11 I've lived under that, okay, when I  
12 was a deputy inspector, and I warn you of it.  
13 Because then you go down the road where you have  
14 individuals that are out there like Mr. Bowers  
15 said. People go out and look at  
16 interpretations. They read interpretations.  
17 Okay. I know Chief OGuin said that they don't,  
18 but they do. And so if we want to pull this,  
19 okay, go for it. If that's what you think is  
20 right -- if you think it's redundant, because  
21 the question was asked in 2019, and we feel that  
22 it's answered, answer it that way.

23 Just like with the MBIC, we get a  
24 submittal -- the submittal comes in, we'll even  
25 go to point where we have a committee that

1 changes the question. Okay. So that we can  
2 answer it properly. As I said to Mr. Baughman,  
3 if you want to take this, and you want your  
4 answers to be either, yes, or see policy  
5 whatever number you want to put out there, now,  
6 they get to go and try to find that policy, go  
7 for it.

8 MR. OGUIN: Chairman, this is Chris.  
9 May I speak?

10 CHAIRMAN MORELOCK: Yes.

11 MR. OGUIN: You know, everybody is  
12 talking about guiding people to the policy, if  
13 the policy is attached to the variance  
14 checklist, then they're going to have the policy  
15 when they're trying to make a manual because  
16 they have get the checklist to make a manual.

17 MR. TOTH: But how do you get to the  
18 checklist, Chris?

19 MR. OGUIN: I'm not done yet,  
20 Mr. Marty. If you hold on a minute.

21 And my other concern was Number 3 is  
22 already addressed in policy. Now, if you want  
23 to change Number 3, we need to address the  
24 policy because in the policy it has the request  
25 should be accompanied by ten copies to the

1 boiler unit. And that's to kind of address the  
2 confusion we had with the Mr. Fox two meetings  
3 ago. That's all I've got.

4 CHAIRMAN MORELOCK: Well, I guess  
5 the only comments I would add is, yes, ASM  
6 National Board has similar processes to process  
7 interpretations. The other thing that ASM  
8 National Board cautions people is that you do  
9 not want to have identical words two places,  
10 because if it gets updated in one place, it may  
11 not get updated in the other.

12 So I would be in favor of this  
13 inquiry that has the same goal that the reply  
14 would be "see WRC 010." That way you only got  
15 that information in one place, and you don't  
16 have a chance to change the information in one  
17 place and it not be changed in another. And  
18 we've seen, even in the Tennessee board, we went  
19 back and revised board interpretations, and we  
20 might not catch the linkage all the time if you  
21 got that same information in two places.

22 So with the policy being passed, I  
23 think it would make sense that we would have  
24 redundant language the reply here would be to  
25 see that WRC policy. If they're saying the same



1 thing, providing the usual with the same  
2 information, I think that would be probably  
3 clarify the concerns that I'm hearing. What do  
4 you-all think?

5 MR. TOTH: As the submitter,  
6 Mr. Chairman, I agree 100 percent. If that's  
7 what you want to do, do it. But that's  
8 responsibility of the board -- responsibility of  
9 secretary of the board to revise that  
10 information and then submit that information  
11 back to the submitter.

12 I'm perfectly fine with that if that  
13 is the case, as Mr. Tom put out there, that it's  
14 going to be something that going to be published  
15 on the website, I think that's great. And that  
16 does answer the questions. I've never had a  
17 problem with that.

18 Again, it's -- the response of these  
19 are simple yes and no. I think that there is a  
20 problem with having an interpretation as  
21 Mr. Baughman alluded to, to trying to get away  
22 from interpretation. No, I don't agree with  
23 that. I think the interpretation -- the only  
24 way you get interpretations is with rule  
25 changes. The only way you get away from board

1 cases, is with rule updates. Okay. You don't  
2 get away from them because those are intended  
3 for communication and getting the word out  
4 there. You don't want to get away from  
5 interpretations; you want to utilize those as a  
6 tool to make your document better. Okay?

7           And so in this case here, it's an  
8 interpretation that somebody goes out and sees  
9 that -- as I said to Assistant Chief OGuin --  
10 and I do apologize for interrupting. I thought  
11 you were done -- was that when we talk about,  
12 okay, it's out on the guidelines. I was part of  
13 the creating those guidelines, so I agree  
14 with -- 100 with revising those guidelines that  
15 they need to be revised.

16           I've mentioned many times that those  
17 guidelines needed to also mention exactly what  
18 you as a board need. Okay? That looks like  
19 it's being done. Amen to that. But it doesn't  
20 mean that interpretation that's being asked by a  
21 citizen of the State of Tennessee isn't due it's  
22 due diligence of response, which is I asked a  
23 question; you respond to it. If it's "go see  
24 WRC 010," that's what the answer is. It could  
25 even say "Yes, go see" -- it doesn't matter.

1 All I'm saying is don't just disregard or we're  
2 not going to answer it. That's not the proper  
3 process in due diligence. Thank you.

4 CHAIRMAN MORELOCK: Thank you,  
5 Mr. Toth. What other questions or comments does  
6 the board have?

7 So based on what we discussed I  
8 think we would have agreement with the passage  
9 of WRC 010. And I think Mr. Toth would be  
10 agreeable where we have redundancy, we could  
11 revise the reply in his board interpretation to  
12 whatever redundant statement. Instead of having  
13 information two places, we could just point the  
14 user to the policy, and then the other ones we  
15 can revise as needed.

16 For instance, on reply Number 2 we  
17 could say "see Policy WRC 010," and you don't  
18 even have to have any more sentences after that.  
19 You just point to that policy. Reply 4 would be  
20 "yes." And that's all you would have to put  
21 there. And for Number 5, you would change 7 to  
22 10. Four point -- I don't know if the policy  
23 covers all that or not, but it wouldn't take a  
24 lot of revision to get Mr. Toth's interpretation  
25 in good order.

1 MR. BAUGHMAN: Mr. Chairman. Dave  
2 Baughman.

3 So what I see is that we would  
4 reference WRC 010 to inquiry Number 1, inquiry  
5 Number 2, and inquiry Number 5. And then we  
6 still have to address these other inquires  
7 individually; is that correct.

8 CHAIRMAN MORELOCK: That is correct.

9 MR. OGUIN: Chairman, Mr. Bailey  
10 never had an opportunity to answer Marty.

11 CHAIRMAN MORELOCK: Okay.  
12 Mr. Bailey, we'll give you the floor.

13 MR. BAILEY: Well, the question was  
14 whether there is policy of WRC or the board.  
15 With the board voting to adopt that policy or  
16 accept that policy, then I say it's a policy of  
17 both of them.

18 CHAIRMAN MORELOCK: Thank you,  
19 Mr. Bailey. That's fair statement. So,  
20 Mr. Toth, this is your item. What is your  
21 recommended course to do this --

22 MR. TOTH: Mr. Chairman, but just as  
23 interpretation need to stand on their own.

24 CHAIRMAN MORELOCK: Yes.

25 MR. TOTH: I'll be back on the table

1 of the board to handle it as you see fit. I  
2 agree as Mr. Baughman alerted to 1, 2, and 5 are  
3 simply references to WRC. I'd say that I think  
4 I've spoken enough on this. I think that you  
5 summarized all the necessary changes. And now  
6 it's pretty much in the board's hands and the  
7 board secretary's hands to revise as to what  
8 your wishes are and then submit it back and  
9 publish.

10 CHAIRMAN MORELOCK: Well, as you  
11 well know, being on the national board  
12 committees, we would be asked to take this back  
13 and provide a clean copy before we decided on  
14 it.

15 MR. TOTH: Right. Are you wanting  
16 me to do a clean copy? I could do a clean copy  
17 right now if you'd like.

18 So if we go and we look at this  
19 document -- if we were to go up this here would  
20 be a simple change of WRC -- I probably need to  
21 go -- let me go to a different -- I'll have to  
22 pull it up. I'm sorry. I pulled up -- I should  
23 have pulled up the word document not the PDF  
24 document, but I -- this could be changed to  
25 WRC -- please give me the reference again.

1 CHAIRMAN MORELOCK: WRC 010.

2 MR. TOTH: All right. WRC 010. Is  
3 it a hyphen or anything?

4 MR. BAUGHMAN: Space 010.

5 MR. TOTH: Okay. Thank you,  
6 Mr. Baughman. (Indiscernible) to recognize your  
7 voice today without seeing your face.

8 Okay. So here, and then you said 5,  
9 Mr. Baughman? No.

10 CHAIRMAN MORELOCK: Yes, sir.

11 MR. TOTH: Which one was it?

12 MR. BAUGHMAN: Five.

13 MR. TOTH: Five is just to -- so  
14 this -- we don't need to put -- just say --  
15 because the policy reads ten copies? Is that  
16 what the policy reads or what the guideline  
17 reads?

18 MR. BAUGHMAN: What the policy  
19 reads.

20 MR. TOTH: Okay. All right. And  
21 then, okay. Is this one satisfactory the way  
22 it's written?

23 MR. BAUGHMAN I don't believe so.  
24 I'm sorry.

25 MR. TOTH: (Reading.) Okay. So

1 this should be a no?

2 MR. BAUGHMAN: That's what I  
3 believe, Marty.

4 MR. TOTH: And so even if, okay.  
5 So even if the chief says send it directly --  
6 okay. That sounds good. Okay. Is this one  
7 also C -- WRC 010 is this something different?  
8 Because I'm pretty sure this is covered by the  
9 policy as well; is it not?

10 MR. BAUGHMAN: Number 4 is relating  
11 to the board cases or interpretations, not the  
12 variances.

13 MR. TOTH: 010 is different then. I  
14 would say it needs to be 45 days. I'll be  
15 honest with you. Again, this is my personal  
16 opinion, not what I believe that the  
17 interpretation is. My personal opinion is that  
18 you should submit it for interpretations. You  
19 don't want to get a submission because -- for  
20 interpretation a week before the board meeting,  
21 and it's not on the agenda. And you as a board  
22 member haven't had time to review it. That --  
23 again, that's my personal opinion, if you want  
24 to put no, however, it needs to be sent in the  
25 meantime, that's fine. And add it as an an item

1 under interpretations and cases.

2 CHAIRMAN MORELOCK: Well, the  
3 question is, is it required for submitter of the  
4 board case or interpretation to submit the  
5 inquiry to the Chief Inspector who has  
6 designated 45 days prior to the scheduled board  
7 meeting, and that would support the policy, so  
8 if you change the no to yes and strike all that  
9 language, it's just a yes for Number 4, right?

10 MR. TOTH: Well, I mean, we have  
11 seen the policy -- I didn't read the policy. I  
12 guess I didn't pay attention --

13 (Reporter emergency.)

14 (End of Volume I.)

15

16

17

18

19

20

21

22

23

24

25



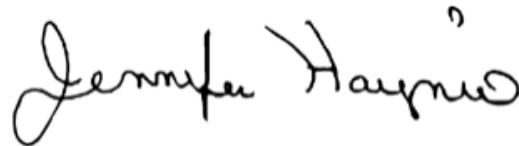
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

REPORTER'S CERTIFICATE

I certify that foregoing Transcript was taken at the time and place therein named; that the testimony of said witnesses was reported by me, a Shorthand Reporter and Notary Public of the State of Tennessee authorized to administer oaths and affirmations, and said testimony, pages 3 through 104 was thereafter transcribed into typewriting.

I further certify that I am not counsel or attorney for either or any of the parties to said deposition, nor in any way interested in the outcome of the cause named in said deposition.

IN WITNESS WHEREOF, I have hereunto set my hand the 7th Day of December, 2020.



JENNIFER HAYNIE (License No. 403)  
My Commission Expires: 11/08/2022

<hr/> <b>\$</b> <hr/>	<b>11/08/2022</b> 105:24	<b>2021</b> 16:18 17:4,12	<hr/> <b>6</b> <hr/>
<b>\$30</b> 90:15	<b>11B</b> 56:24	<b>226</b> 21:11	<b>6</b> 36:12 85:17 91:5,7,8
<b>\$450,000</b> 13:5	<b>11th</b> 21:14	<b>24</b> 18:22 19:6 21:8	<hr/> <b>7</b> <hr/>
<hr/> <b>(</b> <hr/>	<b>12</b> 17:18	<b>24/7</b> 67:16 72:16	<b>7</b> 85:13 99:21
<b>(inaudible)ic</b> 91:16	<b>12/9/2020</b> 79:23	<b>24th</b> 19:2 20:1,4,21 29:6	<b>72,770</b> 21:6
<hr/> <b>0</b> <hr/>	<b>134</b> 21:25	<hr/> <b>3</b> <hr/>	<b>7th</b> 105:16
<b>010</b> 48:12,25 65:24 91:2,6 96:14 98:24 99:9,17 100:4 102:1, 2,4 103:7,13	<b>14</b> 21:7 88:3	<b>3</b> 33:21 34:17,22 42:9 84:16,20 91:5,7 95:21,23 105:8	<hr/> <b>8</b> <hr/>
<b>03</b> 48:22	<b>14th</b> 21:3,6	<b>3,036</b> 21:9	<b>8</b> 10:18 28:12 30:14
<b>08</b> 56:24	<b>15</b> 80:25	<b>32</b> 70:13	<hr/> <b>9</b> <hr/>
<b>0800-03-03</b> 15:12 57:18	<b>15-minute</b> 66:17	<b>323</b> 21:3	<b>90</b> 16:15,19
<b>0800-03-03-08</b> 49:7	<b>153</b> 81:22	<b>37</b> 22:3	<b>9:17</b> 5:13
<b>0800-03-03.14</b> 12:6	<b>154</b> 21:4	<hr/> <b>4</b> <hr/>	<b>9th</b> 10:20,22 28:14
<b>0800-03-03.811</b> 28:18 67:1	<b>15th</b> 89:5	<b>4</b> 12:3 18:15,20 30:13 33:21 34:17,23 36:14 39:4 40:3 89:19 90:3 91:5,8,12 99:19 103:10 104:9	<hr/> <b>A</b> <hr/>
<b>0800-03-3</b> 59:12	<b>16</b> 5:15	<b>4.1</b> 21:10	<b>a.m.</b> 5:12,13
<hr/> <b>1</b> <hr/>	<b>172</b> 21:5	<b>40</b> 62:18	<b>abnormal</b> 72:4
<b>1</b> 16:18,20 17:3,11 29:25 30:11 34:21 70:15,25 83:15 89:6 91:3,12 100:4 101:2	<b>1st</b> 21:2,14	<b>403</b> 105:24	<b>absolutely</b> 53:7 87:20 88:16 89:18,21
<b>1,212</b> 21:8	<hr/> <b>2</b> <hr/>	<b>45</b> 22:18 44:17 49:12 54:22 55:2,10 56:24 57:2,5 62:14 65:14 82:17 83:19 85:1,19 103:14 104:6	<b>accept</b> 20:3,6 65:24 85:24 86:3 100:16
<b>1,828</b> 21:8	<b>2</b> 30:7,11,13 34:21 42:9 70:16 89:7 91:3, 6,12 99:16 100:5 101:2	<b>45-day</b> 62:2,3	<b>acceptance</b> 84:11 86:5
<b>1.7</b> 21:10	<b>20</b> 12:24 64:11 68:24	<hr/> <b>5</b> <hr/>	<b>access</b> 23:8 57:15 60:3,5,6,7 71:8 76:15, 22,23 81:2 92:15
<b>10</b> 49:16 66:16 79:13, 24 91:13 99:22	<b>20-01</b> 10:19 28:13 79:25	<b>5</b> 18:21,22 20:22 40:3 84:23 85:9 89:15 90:5 91:4,6,7,8,12 99:21 100:5 101:2 102:8	<b>accompanied</b> 49:16 95:25
<b>100</b> 88:17 90:3 97:6 98:14	<b>20-02</b> 10:21 28:13	<b>50</b> 29:11	<b>accountabilities</b> 38:13
<b>104</b> 105:8	<b>20-06</b> 28:14	<b>51</b> 21:4	<b>action</b> 15:14
<b>10:17</b> 5:12	<b>20-08</b> 48:10	<b>52</b> 81:24	<b>active</b> 21:6 22:2
<b>10:42</b> 66:15	<b>20-09</b> 66:22	<b>58</b> 82:2	<b>actual</b> 70:24
<b>11</b> 48:21 66:18 79:13	<b>20-10</b> 79:10,22		<b>add</b> 15:10 19:4 26:14 32:25 41:17 44:13 48:6 58:20 91:1 96:5

103:25	85:21,23 89:22 94:1 103:21	<b>AO</b> 10:19	<b>ATC</b> 8:16
<b>added</b> 29:11,20,23 30:10,11,12,13,14,23, 24 38:19,20 39:1 40:2 61:8 85:21	<b>agents</b> 21:8	<b>apologize</b> 70:5 98:10	<b>attach</b> 59:12
<b>addition</b> 39:20 85:25	<b>agree</b> 25:2 53:7 64:1 65:12 87:20 88:16 89:4 90:3,4 92:5,13 97:6,22 98:13 101:2	<b>Appendix</b> 30:14,23 37:19 38:12,22 39:8, 11,14 40:1 70:2,11 71:14,18	<b>attached</b> 51:1 59:9 95:13
<b>additional</b> 12:19 13:6 34:18 45:19 88:24	<b>agreeable</b> 81:3 99:10	<b>applicant</b> 33:13,24 34:2	<b>attend</b> 17:24
<b>additions</b> 11:14 19:6	<b>agreement</b> 83:20 99:8	<b>apply</b> 38:22	<b>attendance</b> 13:14,19 30:25
<b>address</b> 19:11 33:19 35:18 52:13 55:20 62:21 64:6 80:10 95:23 96:1 100:6	<b>ahead</b> 7:6 55:17 62:18 63:12,23 81:7	<b>applying</b> 91:11	<b>attendant</b> 22:10 36:15,19,22 38:6,10, 12 39:16,25 68:5 69:25 72:20 75:4 79:1
<b>addressed</b> 64:5 89:1 91:6 95:22	<b>air</b> 77:2	<b>approval</b> 12:19 18:22 46:13 49:23 64:13 67:11 84:11	<b>attendant/ maintenance</b> 39:14
<b>addresses</b> 56:2,3,4 91:3,4	<b>alarm</b> 36:24,25 38:2	<b>approve</b> 14:14,19 16:10,24 17:13 43:5 77:23	<b>attendants</b> 33:4 38:15,16 68:17 72:24 73:10,11
<b>adequate</b> 49:14 84:8 85:3	<b>alarms</b> 41:15	<b>approved</b> 15:12 20:21 22:4 45:17 79:1	<b>attended</b> 73:23
<b>adjourn</b> 14:18	<b>alerted</b> 101:2	<b>approves</b> 16:5,6	<b>attendees</b> 4:9
<b>adjourning</b> 14:13	<b>alerts</b> 6:4,8	<b>approximate</b> 30:5,9	<b>attending</b> 17:18
<b>Admin</b> 8:13	<b>Allied</b> 8:1	<b>approximately</b> 12:13	<b>attention</b> 90:8,9 104:12
<b>administer</b> 105:6	<b>allotted</b> 68:2	<b>arbitrarily</b> 51:8	<b>attorney</b> 16:8 51:5 105:11
<b>administration</b> 88:4	<b>allowed</b> 84:16 85:9	<b>area</b> 68:8 73:17 74:24,25 76:11,21 77:4	<b>audio</b> 4:18
<b>administrative</b> 67:24 70:10 72:9,11, 19 73:16,18 75:24 76:1	<b>allude</b> 53:16 74:1 76:18	<b>argument</b> 62:4	<b>audits</b> 22:4
<b>adopt</b> 11:3 61:8 63:13,23 100:15	<b>alluded</b> 53:12 70:25 97:21	<b>ASM</b> 96:5,7	<b>August</b> 17:18
<b>adopted</b> 91:6	<b>amazing</b> 26:23 27:1	<b>assigned</b> 56:20	<b>authorization</b> 84:21
<b>adoption</b> 10:17 85:23	<b>Amen</b> 98:19	<b>assist</b> 73:7	<b>authorized</b> 105:6
<b>advance</b> 22:18 44:18 54:22 55:2,10 56:25	<b>amended</b> 20:5,22	<b>assistant</b> 7:19 8:13 9:22 21:22 25:25 46:2 47:17 48:17 54:17 58:12 60:24 67:24 70:10 72:19 73:19 75:25 76:1 88:11 98:9	<b>aware</b> 18:2 22:24 23:13 53:17 54:24 64:7 75:20
<b>aerator</b> 69:9	<b>amount</b> 93:6,14	<b>assistant's</b> 73:16	<b>aye</b> 11:19,21,23,25 20:13,15,17,19 32:13, 17,19,21 45:9,11,13 66:7,9,11,13 78:18, 20,22,24
<b>affected</b> 17:22	<b>analysis</b> 64:12	<b>associate</b> 37:20,23 38:2 39:7	<hr/> <b>B</b> <hr/>
<b>affirmations</b> 105:7	<b>and/or</b> 82:14 84:21	<b>assume</b> 24:22,24	<b>back</b> 16:10 33:17 35:19 37:5 44:5,12,15 47:5 55:18 56:11 66:21 68:3,23 72:13 74:14 80:12 83:9 87:4 88:6 91:11,24 94:7,8
<b>age-old</b> 63:2	<b>announcement</b> 6:22	<b>assuming</b> 17:11	
<b>agenda</b> 10:15,16,17, 20,23,25 11:3,14 12:2 18:6,16 25:12 27:8 28:14 49:3,15,21 51:25 52:9 79:24	<b>announcements</b> 5:22 6:13	<b>assure</b> 42:18	
	<b>annual</b> 30:18		
	<b>annually</b> 13:6		
	<b>answering</b> 94:5		
	<b>answers</b> 34:16 35:23 95:4		
	<b>Antioch</b> 66:23		
	<b>anymore</b> 92:10		

96:19 97:11 100:25 101:8,12	<b>bent</b> 26:19	13 50:11,12,15,21 51:9,10 54:18 56:20 61:9 65:1,2 67:12,22 68:17,20 69:2,6 71:4 72:5,17,23,24 73:10 74:8,13 75:18 77:10 79:1,5,10,11,13 82:10 83:17 84:4,18 86:23 87:6 90:6,9 92:1,3,4, 6,15 93:19 94:4,9 96:1	<b>building</b> 5:25 6:1 76:24	
<b>backed</b> 46:18	<b>BI</b> 56:21	<b>boilers</b> 44:13 59:11 66:24 67:14 68:24 69:8 79:12	<b>bumped</b> 52:15 55:7	
<b>backward</b> 26:19	<b>biggest</b> 65:4	<b>Boisco</b> 9:17 15:23 67:7	<b>bunch</b> 64:10	
<b>Bailey</b> 7:21,22 13:11, 13,17,18,23,24 14:5, 22 15:10,19,24 16:7 17:2 18:4,11 32:4,8 51:12,15 53:16 54:12 55:19 56:8 61:12,22, 24 63:2,25 78:6,9 87:5 91:23,25 100:9, 12,13,19	<b>bit</b> 33:16 36:21 46:19 55:20 81:19 82:19	<b>books</b> 60:16	<b>burner</b> 41:19	
<b>based</b> 45:20 58:21 79:3 99:7	<b>blew</b> 88:4	<b>bottom</b> 4:14 5:7 81:15	<b>burning</b> 67:14 69:8	
<b>basically</b> 16:21 17:10 65:15	<b>board</b> 5:15 6:15,18, 20 7:2,5,12 8:2,9,16, 23 10:23 12:12 14:13, 19 16:3,5,6 18:8 19:8 22:18 25:4 28:23 29:10,16 31:3,15 32:11 33:7,9 35:19 40:23 41:24 43:3 44:5,6,12,16 45:21,25 46:6 48:13,24 49:2,6, 8,12,13,17,21 51:25 52:10,13,16,19,23 53:1,13 54:4,5,16,18 55:6,16,20,22,25 56:10,17,18,19 57:12, 13,20,21 58:14 59:4 60:5,6,7 61:9 62:8,19, 21,25 64:25 65:2,9 67:6 69:13,14 70:22 71:22,24 74:14 77:21 79:3,24 80:5,25 81:6 82:10,14,22 83:4,17 84:4,18,20,24 85:1,8, 12,20,21,24 86:2,6 87:3,6 88:1,12 89:19, 21,23 90:1,5,18,25 92:1,3,7,12 93:23 94:4 96:6,8,18,19 97:8,9,25 98:18 99:6, 11 100:14,15 101:1,7, 11 103:11,20,21 104:4,6	<b>board's</b> 58:5 90:8 101:6	<b>Bowers</b> 8:7,8 11:8, 10,20,21 13:16,21 14:1 16:2,3,23 17:14 20:14,15 23:4,6,23 24:7,20 26:16,17 31:16,20,22 32:16,17 43:4,10 45:10,11 46:5,6 50:8,10,12 51:4,11 53:12,25 59:22 60:1 65:11 66:8,9 69:22,24 78:19,20 86:15,16 87:8,9,21 89:3 92:11 94:14	<b>business</b> 10:18,21 28:12 45:18 48:7,8,10 49:8,25 66:22 74:16 75:7 79:10
<b>basics</b> 42:19	<b>body</b> 92:7	<b>Bowers'</b> 43:11	<b>busy</b> 41:10	
<b>Baughman</b> 7:25 8:1 11:18,19 20:9,10,12, 13 32:12,13 33:8,9,23 34:4,8,20 35:6,16 36:10 37:4,9,15,18 38:11,21,24 39:3,13 40:14 42:14,25 43:13, 16 45:8,9 50:5,7 65:21,23,24 66:6,7 69:18,20 71:23,24 72:15,22 73:3,8,13,25 75:21 77:10 78:2,4, 17,18 90:24,25 91:10 93:5,21 95:2 97:21 100:1,2 101:2 102:4, 6,9,12,18,23 103:2,10	<b>boiler</b> 5:15 7:16,20 8:2,4 12:17,20 20:23 22:11,13,21,25 24:1 28:17 29:12,25 30:2 33:4 36:15,16,17,18, 19,22,24 37:5,13 38:3,4,5,6,9,15 39:14, 16,25 41:19 42:20 45:22,25 47:10,16 48:4,11,13,24 49:2,6,	<b>box</b> 4:21	<b>button</b> 81:8	
<b>Baughman's</b> 35:8	<b>board's</b> 58:5 90:8 101:6	<b>boxes</b> 34:16	<b>C</b>	
<b>BC</b> 56:21	<b>board's</b> 58:5 90:8 101:6	<b>Branch</b> 30:25	<b>C-L-I-P-S</b> 19:3	
<b>bean</b> 69:5	<b>body</b> 92:7	<b>break</b> 66:17,19	<b>C-L-I-P-S-E</b> 19:4	
<b>bear</b> 58:16	<b>boiler</b> 5:15 7:16,20 8:2,4 12:17,20 20:23 22:11,13,21,25 24:1 28:17 29:12,25 30:2 33:4 36:15,16,17,18, 19,22,24 37:5,13 38:3,4,5,6,9,15 39:14, 16,25 41:19 42:20 45:22,25 47:10,16 48:4,11,13,24 49:2,6,	<b>Brian</b> 7:3 19:8 33:24 91:17	<b>call</b> 5:14 11:11,15 15:3 20:12 25:6 27:4 32:11 36:16,17,20 37:1,2,10,17 45:7,25 46:1,10 54:25 58:3,12 66:5,6 78:16 80:22	
<b>Beatty</b> 9:6	<b>boiler</b> 5:15 7:16,20 8:2,4 12:17,20 20:23 22:11,13,21,25 24:1 28:17 29:12,25 30:2 33:4 36:15,16,17,18, 19,22,24 37:5,13 38:3,4,5,6,9,15 39:14, 16,25 41:19 42:20 45:22,25 47:10,16 48:4,11,13,24 49:2,6,	<b>bring</b> 51:24 56:22 82:20 90:8	<b>called</b> 4:10,11,23 53:6	
<b>begin</b> 4:19	<b>boiler</b> 5:15 7:16,20 8:2,4 12:17,20 20:23 22:11,13,21,25 24:1 28:17 29:12,25 30:2 33:4 36:15,16,17,18, 19,22,24 37:5,13 38:3,4,5,6,9,15 39:14, 16,25 41:19 42:20 45:22,25 47:10,16 48:4,11,13,24 49:2,6,	<b>bringing</b> 70:20	<b>calling</b> 36:19 37:8	
<b>belief</b> 84:13	<b>boiler</b> 5:15 7:16,20 8:2,4 12:17,20 20:23 22:11,13,21,25 24:1 28:17 29:12,25 30:2 33:4 36:15,16,17,18, 19,22,24 37:5,13 38:3,4,5,6,9,15 39:14, 16,25 41:19 42:20 45:22,25 47:10,16 48:4,11,13,24 49:2,6,	<b>broke</b> 64:17	<b>capacities</b> 30:16	
<b>beliefs</b> 83:23	<b>boiler</b> 5:15 7:16,20 8:2,4 12:17,20 20:23 22:11,13,21,25 24:1 28:17 29:12,25 30:2 33:4 36:15,16,17,18, 19,22,24 37:5,13 38:3,4,5,6,9,15 39:14, 16,25 41:19 42:20 45:22,25 47:10,16 48:4,11,13,24 49:2,6,	<b>brought</b> 31:3 41:25 94:3	<b>capture</b> 19:23	
<b>beneficial</b> 6:5	<b>boiler</b> 5:15 7:16,20 8:2,4 12:17,20 20:23 22:11,13,21,25 24:1 28:17 29:12,25 30:2 33:4 36:15,16,17,18, 19,22,24 37:5,13 38:3,4,5,6,9,15 39:14, 16,25 41:19 42:20 45:22,25 47:10,16 48:4,11,13,24 49:2,6,		<b>care</b> 29:8 36:23,25 38:8	
<b>Bennett</b> 7:12 26:5 27:18 28:5	<b>boiler</b> 5:15 7:16,20 8:2,4 12:17,20 20:23 22:11,13,21,25 24:1 28:17 29:12,25 30:2 33:4 36:15,16,17,18, 19,22,24 37:5,13 38:3,4,5,6,9,15 39:14, 16,25 41:19 42:20 45:22,25 47:10,16 48:4,11,13,24 49:2,6,		<b>Carlene</b> 7:10,12 26:5 27:16	
	<b>boiler</b> 5:15 7:16,20 8:2,4 12:17,20 20:23 22:11,13,21,25 24:1 28:17 29:12,25 30:2 33:4 36:15,16,17,18, 19,22,24 37:5,13 38:3,4,5,6,9,15 39:14, 16,25 41:19 42:20 45:22,25 47:10,16 48:4,11,13,24 49:2,6,		<b>carry</b> 54:14	
	<b>boiler</b> 5:15 7:16,20 8:2,4 12:17,20 20:23 22:11,13,21,25 24:1 28:17 29:12,25 30:2 33:4 36:15,16,17,18, 19,22,24 37:5,13 38:3,4,5,6,9,15 39:14, 16,25 41:19 42:20 45:22,25 47:10,16 48:4,11,13,24 49:2,6,		<b>case</b> 56:18 71:2 77:9 84:24 97:13 98:7 104:4	
	<b>boiler</b> 5:15 7:16,20 8:2,4 12:17,20 20:23 22:11,13,21,25 24:1 28:17 29:12,25 30:2 33:4 36:15,16,17,18, 19,22,24 37:5,13 38:3,4,5,6,9,15 39:14, 16,25 41:19 42:20 45:22,25 47:10,16 48:4,11,13,24 49:2,6,		<b>cases</b> 25:4 56:10,17 57:13,20,21 89:21 98:1 103:11 104:1	
	<b>boiler</b> 5:15 7:16,20 8:2,4 12:17,20 20:23 22:11,13,21,25 24:1 28:17 29:12,25 30:2 33:4 36:15,16,17,18, 19,22,24 37:5,13 38:3,4,5,6,9,15 39:14, 16,25 41:19 42:20 45:22,25 47:10,16 48:4,11,13,24 49:2,6,		<b>catch</b> 96:20	
	<b>boiler</b> 5:15 7:16,20 8:2,4 12:17,20 20:23 22:11,13,21,25 24:1 28:17 29:12,25 30:2 33:4 36:15,16,17,18, 19,22,24 37:5,13 38:3,4,5,6,9,15 39:14, 16,25 41:19 42:20 45:22,25 47:10,16 48:4,11,13,24 49:2,6,		<b>cautions</b> 96:8	
	<b>boiler</b> 5:15 7:16,20 8:2,4 12:17,20 20:23 22:11,13,21,25 24:1 28:17 29:12,25 30:2 33:4 36:15,16,17,18, 19,22,24 37:5,13 38:3,4,5,6,9,15 39:14, 16,25 41:19 42:20 45:22,25 47:10,16 48:4,11,13,24 49:2,6,		<b>cell</b> 36:16,19	
	<b>boiler</b> 5:15 7:16,20 8:2,4 12:17,20 20:23 22:11,13,21,25 24:1 28:17 29:12,25 30:2 33:4 36:15,16,17,18, 19,22,24 37:5,13 38:3,4,5,6,9,15 39:14, 16,25 41:19 42:20 45:22,25 47:10,16 48:4,11,13,24 49:2,6,		<b>certificate</b> 17:21	

105:1	63:18,22 68:13 89:14 95:23 96:16 99:21 101:20 104:8	<b>clarify</b> 36:20 57:9 83:1 97:3	<b>commissioned</b> 24:25
<b>certification</b> 12:25 72:25 73:5,9	<b>changed</b> 27:23 28:2, 4 58:6 87:23 96:17 101:24	<b>clarity</b> 25:15 56:12, 22,23	<b>Commissioner</b> 9:23 12:9 25:25 60:25
<b>certifications</b> 12:12	<b>changing</b> 58:19	<b>clean</b> 25:3 47:8 101:13,16	<b>committee</b> 17:8 94:25
<b>certified</b> 72:23	<b>Chapman</b> 7:15 20:24,25 21:22 23:20, 23 26:6,18 27:4,24,25 46:2,17 47:17 50:23 54:18 59:16 86:25	<b>cleaning</b> 30:19	<b>committees</b> 101:12
<b>certify</b> 72:25 105:2,10	<b>Chapter</b> 28:18	<b>clear</b> 25:10,20 53:20 59:14	<b>communication</b> 53:21 75:17 94:10 98:3
<b>cetera</b> 49:19	<b>chart</b> 33:1,2 39:11	<b>click</b> 4:21 5:6	<b>companies</b> 29:9 71:10 90:13
<b>Chair</b> 7:4	<b>chat</b> 4:21	<b>client</b> 68:14	<b>company</b> 4:22,25 7:4 8:9 71:8 73:2,7 74:11, 12
<b>chairman</b> 5:1,3 7:10, 14,17,21,24 8:3,6,10, 14,18,21,24 9:4,8,11, 14,18,20,21 10:2,7,12 11:5,9,22,24 12:1 14:21 15:9 17:16 18:13 19:13,15,18,22, 25 20:7,10,14,16,18, 20,25 21:21 22:7 23:20,22 24:18 25:8, 21,22,23 26:12,13 27:16 28:8 31:8,18, 21,23 32:1,6,10,15, 18,20,22 33:6,20 34:3,6,9,15 35:5,8,17 39:2,21 40:18,22,24 42:8,13 43:1,9,15,20 44:7,10,19,22 45:5, 10,12,14,16 46:1 47:1,15,21,23,25 48:1,5,15,17,19,23 49:22 50:2,6,9,22 53:2 55:18,19 56:6 57:7,24,25 58:16 59:3,18,25 60:22,23 61:10,20,21 63:1,8,9, 25 64:23 65:19,22 66:1,4,8,10,12,14,20 67:5 69:12,19,23 70:7,11,19 71:13,17, 21 77:13,16,25 78:3, 6,8,10,14,19,21,23,25 79:9,19,20 80:3,24 81:14,18,21,25 82:1,6 85:24 86:1,8 89:2,10, 12 95:8,10 96:4 97:6 99:4 100:1,8,9,11,18, 22,24 101:10 102:1, 10 104:2	<b>check</b> 30:17 66:25	<b>clients</b> 55:11 60:10	<b>completion</b> 13:12 35:11
<b>chance</b> 55:6 73:21 96:16	<b>checked</b> 30:17 34:16	<b>Clipse</b> 8:24 9:2 18:25 28:19 29:2,4 31:9 32:24 33:5 34:13,19 35:25 36:2,22 37:7, 11,16,19,22 38:18,23 39:12,22 40:13,15,16, 20 41:8 42:3,12 43:18,23 44:8,17,20 45:4,16,23 46:4,23 47:12,20,22,24	<b>compared</b> 27:2
<b>change</b> 14:2 43:24 44:11,14 46:25 54:11	<b>checklist</b> 30:25 33:10,17,22 34:11,12, 14 35:9,11,14 42:17, 18 51:1,2 58:8,9,15, 19,20,22,25 59:17,19, 20,21 70:4,13 71:14, 17 95:14,16,18	<b>clock</b> 73:22	<b>complaints</b> 40:22
	<b>Chemical</b> 7:3	<b>close</b> 67:22	<b>complete</b> 35:15
	<b>chief</b> 7:16,20 20:23, 24 21:21,22 23:24 27:25 46:2,9,10 47:16,17 48:18 49:11 54:17,18,25 56:11 58:12 83:18 84:21,25 85:10,14,19 86:25 87:25 88:10,11 94:17 98:9 103:5 104:5	<b>coal</b> 21:13	<b>completed</b> 22:4
	<b>Chief's</b> 21:20	<b>cohesive</b> 40:4	<b>completes</b> 48:7
	<b>chooses</b> 86:7	<b>coincide</b> 93:7	<b>Compliance</b> 9:24 48:11 49:6
	<b>Chris</b> 7:17,19 21:18 26:6 27:21 48:16 51:11 79:19 95:8,18	<b>comfortableness</b> 52:23	<b>compliant</b> 24:17
	<b>chucking</b> 90:16	<b>comment</b> 13:15,20 14:7,8,9,11,17 15:11 16:1 18:8,18 22:8 23:2 27:17 28:7 32:25 39:3 46:5,8 48:6 61:23 70:13 91:1 93:5	<b>comply</b> 24:11 57:17 65:16
	<b>citizen</b> 14:22 61:16 98:21	<b>commented</b> 20:4	<b>computerized</b> 42:19
	<b>City</b> 9:3 28:16 29:5	<b>comments</b> 10:25 11:13 13:9 19:5 20:1, 11 22:22 29:17 31:3, 14 32:3,24 33:6 40:19 43:2,17 45:6,20 47:2, 5 50:10 65:10,20 66:5 69:24 77:17 78:5 79:3 96:5 99:5	<b>concern</b> 41:25 95:21
	<b>Civil</b> 8:22	<b>Commission</b> 105:24	<b>concerns</b> 18:19 97:3
			<b>conditions</b> 43:5
			<b>conduct</b> 49:8
			<b>conducting</b> 49:25
			<b>confirmation</b> 79:17
			<b>conflict</b> 28:24 32:5 69:14 87:17 92:17 93:2
			<b>conflicted</b> 55:22
			<b>conflicts</b> 29:1 78:7
			<b>confusion</b> 30:1 82:11,13,21 83:1 88:22 96:2

<b>congratulate</b> 6:13,16	<b>corrections</b> 10:18 45:19	<b>Deborah</b> 5:7,9 8:3,4 26:6 27:11	<b>diligence</b> 98:22 99:3
<b>connection</b> 41:22	<b>costs</b> 12:22	<b>December</b> 10:20,22 28:14 80:13 86:22 105:16	<b>dimensions</b> 29:23 30:5,9
<b>consideration</b> 90:19	<b>counsel</b> 7:23 51:12 105:10	<b>decide</b> 52:10 62:25 63:15	<b>direction</b> 60:4 84:21 91:20
<b>considered</b> 72:6,17	<b>couple</b> 10:17 44:23	<b>decided</b> 101:13	<b>directly</b> 84:19 103:5
<b>consistency</b> 83:2	<b>Court</b> 4:2,4 7:9 8:19	<b>decision</b> 37:17 58:5 74:17 75:7 90:19	<b>disapprove</b> 14:14,20 17:10
<b>consulting</b> 9:17 15:23 24:19 41:23 56:7 67:7 80:1	<b>cover</b> 12:22 63:21	<b>decisions</b> 37:3	<b>disconnects</b> 40:11
<b>contact</b> 17:25	<b>covered</b> 88:25 103:8	<b>defer</b> 52:7	<b>discretion</b> 85:24
<b>contents</b> 29:20,24 70:9	<b>covers</b> 91:3 99:23	<b>defined</b> 60:20	<b>discuss</b> 13:11 31:19, 20 50:4,5 53:1 69:16 81:4
<b>contingent</b> 45:18	<b>COVID-19</b> 5:19	<b>delay</b> 84:11 85:7	<b>discussed</b> 47:9 74:2, 10 99:7
<b>contingently</b> 45:17 79:1	<b>created</b> 30:1	<b>deletions</b> 11:14 19:6	<b>discussing</b> 44:24
<b>continue</b> 12:15 59:6	<b>creating</b> 98:13	<b>delinquent</b> 21:10,11 23:17,19	<b>discussion</b> 13:22 14:2 31:17 32:11 43:8 63:7 89:25
<b>continued</b> 6:17	<b>criteria</b> 73:4	<b>delinquents</b> 21:7,9	<b>disregard</b> 99:1
<b>contractor</b> 37:8,17	<b>critically</b> 55:14	<b>demand</b> 72:1	<b>distributed</b> 88:9
<b>contradict</b> 89:4	<b>cross</b> 39:8	<b>denote</b> 33:2	<b>distribution</b> 85:12
<b>contrary</b> 86:12	<b>Crown</b> 9:2,7,9,12 28:15 29:5,7 33:22 34:10 45:17	<b>department</b> 14:24 15:4,6,7 17:25 24:23 41:10 49:4 67:9	<b>Division</b> 49:5
<b>control</b> 41:20 42:4 94:9	<b>cumbersome</b> 64:8,9	<b>depend</b> 52:22	<b>document</b> 58:19,23, 24 68:24 80:19,20 81:1,3 86:4 98:6 101:19,23,24
<b>controls</b> 37:14 42:7 44:14	<b>curious</b> 41:5 80:7	<b>deposition</b> 105:12, 14	<b>documentation</b> 48:13 49:17,20 54:23 57:4 82:15,23 84:5,7, 19 85:3 88:19,20 93:22
<b>conversation</b> 5:6 28:9 42:15	<b>current</b> 26:10 68:6	<b>deputy</b> 94:12	<b>documented</b> 51:9
<b>cooperative</b> 27:11	<b>D</b>	<b>describes</b> 39:5	<b>documents</b> 59:9 84:9 89:17 90:10
<b>copies</b> 48:2 49:17 85:13 87:14,16,23,24, 25 88:1,3,6,8,9 90:16 95:25 102:15	<b>Dan</b> 7:22 9:12 13:10 51:12 78:13	<b>description</b> 39:17 73:19	<b>doors</b> 76:13
<b>copy</b> 10:16 85:15 90:15 101:13,16	<b>date</b> 24:13	<b>descriptions</b> 39:1	<b>dormant</b> 22:3
<b>corner</b> 83:8	<b>dates</b> 22:24 23:10,14	<b>designated</b> 104:6	<b>draw</b> 63:3
<b>corporation</b> 10:19, 21 60:13	<b>Dave</b> 8:1 33:8 71:24 90:24 100:1	<b>Designee</b> 49:11 83:19 84:22 85:1,11, 15,19	<b>due</b> 5:18 21:12 22:14 41:15 98:21,22 99:3
<b>correct</b> 14:4 17:1 34:19 37:12 38:23 44:17,18 45:4 48:5 51:10 59:1 72:21 73:12 100:7,8	<b>day</b> 72:7 73:18 74:8 105:16	<b>desked</b> 77:3	<b>duties</b> 38:13,20 39:15,16 68:18
<b>corrected</b> 19:17	<b>days</b> 16:15,19 22:18 44:17 49:12 54:22 55:2,10 56:24 57:2,5 62:14,18,24 65:14 82:17 83:19 85:1,19 103:14 104:6	<b>developed</b> 42:18	
<b>correction</b> 18:24	<b>dead</b> 53:8	<b>development</b> 49:4 74:3	
	<b>deadline</b> 36:4	<b>difference</b> 58:18	
		<b>difficult</b> 33:17 73:24	

<hr/> <b>E</b> <hr/>	<p><b>enlarge</b> 29:22</p> <p><b>ensure</b> 4:5</p> <p><b>enter</b> 4:22</p> <p><b>entrance</b> 76:23</p> <p><b>equipment</b> 43:6</p> <p><b>establish</b> 49:1</p> <p><b>evening</b> 72:6</p> <p><b>events</b> 51:24</p> <p><b>exam</b> 52:12,25</p> <p><b>exceed</b> 13:2</p> <p><b>excellent</b> 24:9 28:8,9</p> <p><b>excuse</b> 82:2</p> <p><b>Executive</b> 8:13</p> <p><b>existing</b> 56:23</p> <p><b>expand</b> 44:12</p> <p><b>expertise</b> 6:19</p> <p><b>expiration</b> 23:10,14 24:13</p> <p><b>expire</b> 27:7</p> <p><b>expires</b> 24:2 105:24</p> <p><b>explain</b> 27:9</p> <p><b>explanation</b> 31:10</p> <p><b>extend</b> 68:10</p> <p><b>extended</b> 68:1 75:11</p> <p><b>extending</b> 75:3</p> <p><b>extension</b> 11:17 90:11</p> <p><b>extensive</b> 25:18</p> <p><b>extensively</b> 74:19 75:6 82:19</p> <p><b>extra</b> 93:1</p> <hr/> <p style="text-align: center;"><b>F</b></p> <hr/> <p><b>F-1</b> 37:19</p> <p><b>face</b> 102:7</p> <p><b>face-to-face</b> 5:18</p> <p><b>facility</b> 69:10</p>	<p><b>fact</b> 15:11 29:10 39:6 94:3</p> <p><b>Failure</b> 49:19 84:10 85:6</p> <p><b>fair</b> 100:19</p> <p><b>fall</b> 72:3</p> <p><b>falls</b> 76:2</p> <p><b>familiarize</b> 49:14</p> <p><b>fast</b> 43:25</p> <p><b>fastest</b> 29:8</p> <p><b>favor</b> 87:3 88:16 96:12</p> <p><b>fee</b> 12:24,25 14:10,14, 20 15:13 16:1,17</p> <p><b>feel</b> 52:14,25 89:19 94:21</p> <p><b>fees</b> 12:6,11,12,14,21 13:1,2</p> <p><b>felt</b> 68:10 74:16</p> <p><b>Figure</b> 30:7</p> <p><b>file</b> 16:11,15 17:5</p> <p><b>filed</b> 16:13</p> <p><b>fill</b> 35:13</p> <p><b>filler</b> 41:8</p> <p><b>final</b> 85:17</p> <p><b>find</b> 35:20 58:12 65:1, 3,6 77:7 95:6</p> <p><b>finding</b> 24:12,13</p> <p><b>fine</b> 63:20 65:4 89:13 91:21 94:6 97:12 103:25</p> <p><b>fire</b> 70:9</p> <p><b>fiscal</b> 16:20</p> <p><b>fit</b> 87:3 93:23 101:1</p> <p><b>fix</b> 64:17</p> <p><b>floor</b> 5:10 29:21 30:8 80:1 100:12</p> <p><b>flow</b> 76:6</p> <p><b>FM</b> 8:9,22</p> <p><b>folks</b> 26:3 40:8</p>	<p><b>follow</b> 22:13 23:16,18 26:22 52:7,20 58:13 62:8,10 64:3 90:21</p> <p><b>follow-up</b> 22:1</p> <p><b>food</b> 69:3</p> <p><b>foregoing</b> 105:2</p> <p><b>foresee</b> 75:21</p> <p><b>form</b> 5:23 50:1 58:24</p> <p><b>format</b> 85:11</p> <p><b>forward</b> 15:6 34:25</p> <p><b>found</b> 21:13 48:19 70:15</p> <p><b>four-hour</b> 69:1</p> <p><b>Fox</b> 8:21,22 11:22,23 19:8,14,16,20,24 20:6,16,17 32:18,19 45:12,13 66:3,10,11 77:21 78:1,21,22 82:4 96:2</p> <p><b>frequency</b> 22:10</p> <p><b>front</b> 39:23</p> <p><b>fully</b> 94:5</p> <p><b>function</b> 4:12</p> <p><b>funding</b> 12:16</p> <p><b>future</b> 41:6 45:21 49:21 68:9,15</p> <hr/> <p style="text-align: center;"><b>G</b></p> <hr/> <p><b>G-1</b> 38:22</p> <p><b>gas-fired</b> 79:12</p> <p><b>gel</b> 29:14</p> <p><b>general</b> 41:18 59:24</p> <p><b>General's</b> 16:8</p> <p><b>gentleman</b> 41:2</p> <p><b>gentlemen</b> 47:2 78:25 79:6,7</p> <p><b>George</b> 4:1,2,5 7:8,9 8:20</p> <p><b>give</b> 5:10 18:16 21:9, 19 26:19 30:8 53:20 54:6 66:18 76:15</p>
----------------------	---	---	--

100:12 101:25	<b>guidelines</b> 42:19 61:19,20 82:22 88:19, 25 90:22 98:12,13,14, 17	43:2 45:6 69:15 77:18 89:3 97:3	<hr/> <b>I</b> <hr/>
<b>giving</b> 21:9	<b>guiding</b> 95:12	<b>heart</b> 53:20	<b>I-1</b> 38:22
<b>glad</b> 53:5	<b>guidis</b> 58:19,23,24 59:9	<b>heats</b> 29:14	<b>i.e.</b> 49:17
<b>Global</b> 8:9	<b>guys</b> 47:24	<b>held</b> 55:11	<b>identical</b> 96:9
<b>Glossary</b> 70:3,12	<hr/> <b>H</b> <hr/>	<b>helpful</b> 31:12 54:4,5 59:4	<b>identified</b> 35:2
<b>goal</b> 49:8 96:13	<b>H-1</b> 38:22	<b>helps</b> 90:6	<b>implementation</b> 30:10
<b>good</b> 4:1 24:8 26:21 28:9 31:9 32:15 36:10 37:15,18 38:11 39:7 45:1,3,5 47:1,4,7 48:6 61:4 63:7 72:22 77:13 90:14 99:25 103:6	<b>halfway</b> 63:24	<b>Henry</b> 6:14 8:15,16 11:24,25 20:18,19 31:25 32:2,20,21 45:14,15 66:12,13 78:23,24	<b>implemented</b> 56:12
<b>Goodness</b> 82:3	<b>hand</b> 5:6 20:23 28:25 53:3 105:16	<b>hereunto</b> 105:15	<b>important</b> 55:14 83:11
<b>gosh</b> 21:1	<b>handle</b> 50:25 75:10, 19 80:12 86:6 87:1 101:1	<b>Herrod</b> 9:20,22 10:4, 11 12:7,8 25:22,24 50:23 60:22,24 63:8, 10	<b>improved</b> 47:4
<b>govern</b> 55:24 56:5	<b>handled</b> 83:24	<b>Hey</b> 46:10 58:10 65:15 82:1 88:7	<b>inaudible</b> 55:3
<b>Government</b> 17:7	<b>handles</b> 88:18	<b>high-pressure</b> 21:11 28:17 29:12 66:24 67:14	<b>include</b> 61:2 84:4
<b>governor's</b> 64:9,13	<b>hands</b> 101:6,7	<b>hiring</b> 21:17	<b>included</b> 15:13 42:20 82:16 85:16
<b>grand</b> 90:11	<b>hang</b> 44:23	<b>historical</b> 88:6	<b>includes</b> 57:2,3
<b>grandfather</b> 82:4	<b>happen</b> 17:20	<b>hit</b> 81:8	<b>including</b> 72:11
<b>great</b> 14:24 15:5 26:1, 10 28:7 84:1 93:10 97:15	<b>hard</b> 21:2 29:21 30:11 61:13	<b>hitting</b> 23:12	<b>incorrect</b> 19:14
<b>grilled</b> 74:19	<b>hardwire</b> 41:21	<b>hold</b> 18:5,15,20 95:20	<b>increase</b> 16:17
<b>Group</b> 9:17 15:23 67:7	<b>hardwired</b> 42:4,11	<b>holders</b> 17:21 22:12, 23 70:15,18	<b>increased</b> 12:21
<b>grow</b> 44:3	<b>Hargrove</b> 6:14	<b>honest</b> 14:23 66:23 67:3,10,13 69:3 72:23,24,25 103:15	<b>increases</b> 12:11,14, 24 13:4 14:10,14,20 15:2,13 16:1
<b>growing</b> 29:8 43:25 45:2	<b>harmony</b> 89:17	<b>hooked</b> 36:7	<b>independent</b> 37:8
<b>grows</b> 74:11	<b>Harold</b> 8:8 16:3 23:6 26:15 31:22 46:6 65:11 87:9 92:11	<b>hope</b> 10:15 76:7 82:24 83:9	<b>indiscernible</b> 41:7 48:2 82:7 102:6
<b>growth</b> 41:11	<b>hate</b> 86:18	<b>hoped</b> 5:17	<b>individual</b> 68:4 74:20 77:1 85:18
<b>guarantee</b> 62:11	<b>Haynie</b> 4:4 8:19 105:24	<b>host</b> 4:3	<b>individually</b> 86:3 100:7
<b>guaranteed</b> 62:7	<b>He'll</b> 78:14	<b>hours</b> 67:17 68:21 72:2,3,6	<b>individuals</b> 68:11 74:23 94:14
<b>guess</b> 14:3 31:4 36:13 44:9 51:5 52:17 57:8 62:24 64:1,23 73:13 80:15 87:11 93:5 96:4 104:12	<b>healthy</b> 5:20	<b>hurt</b> 92:14,18,20 93:3	<b>industry</b> 14:22 61:16
<b>guidance</b> 35:13	<b>hear</b> 8:25 12:5 13:25 43:21 45:3	<b>hyphen</b> 102:3	<b>inevitably</b> 10:9
<b>guide</b> 35:15 58:3	<b>heard</b> 9:1 41:2 79:18		<b>info</b> 58:15
<b>guideline</b> 42:22,23 53:22 54:2 70:23 102:16	<b>hearing</b> 6:24 11:1 12:4 13:12 20:2 28:25		<b>information</b> 17:15,17 22:20 26:20,22 27:3,6 30:15 34:18 92:16 93:9 96:15,16,21 97:2,10 99:13



<b>initial</b> 87:22	83:25 84:14,24 86:9, 11,20 87:2,12,15,18 88:21 89:6,20 91:12, 23 92:18 93:17,18 97:20,22,23 98:8,20 99:11,24 100:23 103:17,20 104:4		<b>larger</b> 30:6
<b>initially</b> 63:21		<hr/> <b>J</b> <hr/>	<b>laughing</b> 80:6
<b>initials</b> 26:5		<b>Jamie</b> 8:11,12 26:5	<b>law</b> 24:17 51:9 60:6
<b>initiate</b> 65:5		<b>Jason</b> 9:9,11	<b>lawyer</b> 60:14
<b>input</b> 6:20 38:25		<b>Jeff</b> 6:14 8:16 9:12	<b>lead</b> 82:12
<b>inquires</b> 100:6	<b>interpretations</b> 25:4 49:18 54:13 55:17 56:11,17 57:12,20,21 58:2 80:11 83:4 88:24 92:10,15,23 93:7 94:16 96:7,19 97:24 98:5 103:11,18 104:1	<b>Jennifer</b> 4:4 8:18,19 105:24	<b>leaders</b> 29:7
<b>inquiries</b> 82:25		<b>jerk</b> 86:17	<b>leave</b> 10:9 14:15 17:4 35:3 73:20 74:21 75:11 89:7
<b>inquiry</b> 83:14,22 84:1,16,23,25 85:5,8 86:2 89:6,7,15 91:3,4, 5 96:13 100:4,5 104:5		<b>job</b> 4:5 24:9 38:13 39:10	<b>leaves</b> 76:1
<b>inside</b> 41:18	<b>interpreting</b> 57:5	<b>Joe</b> 92:25	<b>leaving</b> 74:21
<b>inspect</b> 13:2	<b>interrupt</b> 91:10	<b>Johnson</b> 9:3 28:15 29:5	<b>left</b> 9:19 48:21
<b>inspection</b> 13:1 21:1 22:1,21 30:19 43:7 47:10,14 79:12	<b>interrupting</b> 98:10	<b>joins</b> 14:16	<b>Legal</b> 7:22 51:12
<b>inspections</b> 12:12 21:11 72:14	<b>introduce</b> 6:25 28:20 67:4	<b>Jones</b> 8:4	<b>legislature</b> 12:19
<b>inspector</b> 7:16,20 21:4,8 24:24 25:5 49:11 54:25 83:18 84:22,25 85:11,14,19 88:1,11 94:12 104:5	<b>introduced</b> 7:5	<b>Josh</b> 9:6	<b>lengthy</b> 52:5
<b>inspectors</b> 12:20 15:7 20:23 21:17 23:15,16 26:24	<b>introducing</b> 9:15	<b>July</b> 16:18,20 17:3,11	<b>letter</b> 23:25 24:1,5 80:14
<b>instance</b> 99:16	<b>introductions</b> 6:12, 24 10:14	<b>June</b> 18:22 19:2,6 20:1,4,21 21:5 29:6	<b>letting</b> 62:6
<b>insurance</b> 8:9 21:4,8 23:15 26:24 27:13	<b>inventory</b> 74:25 77:3	<hr/> <b>K</b> <hr/>	<b>level</b> 60:21
<b>intelligently</b> 52:25	<b>involved</b> 51:13	<b>Ken</b> 67:8	<b>license</b> 105:24
<b>intended</b> 80:12 98:2	<b>issue</b> 56:3 64:4,6,20, 21	<b>kind</b> 16:17 26:18,23 35:23 46:18 52:17 58:14 80:4,6,18 82:18 83:3 86:11 96:1	<b>life</b> 76:6
<b>intent</b> 53:18 56:22	<b>issues</b> 4:18	<b>Kingston</b> 19:20	<b>life-saver</b> 6:9
<b>intentional</b> 10:10	<b>item</b> 5:23 6:5 10:19, 21,22 12:3,7 15:18 18:5,15,20,21,22 20:22 28:11,14,24 29:3 32:5 35:22 42:9 48:9,10,14,18 49:16 51:25 52:8,14 53:16, 25 61:19 65:20 66:15, 22 67:4 69:15 70:13 79:10,22,24 81:4,5 85:20 89:22 100:20 103:25	<b>knee</b> 86:17	<b>lift</b> 30:18
<b>interest</b> 28:24 32:5 69:14	<b>item's</b> 52:19	<b>knowledge</b> 40:10 41:18	<b>lifted</b> 30:22
<b>interested</b> 73:4 105:12	<b>items</b> 5:5 11:11 28:10,12 33:12 34:5, 7,12,14 44:23 93:20	<hr/> <b>L</b> <hr/>	<b>limit</b> 93:6,14
<b>internal</b> 22:21 94:9	<b>Ivan</b> 8:25 9:2 18:25 29:4	<b>Labor</b> 17:25 49:4	<b>limits</b> 13:3
<b>interpretation</b> 50:16, 18 51:7 53:13,19 54:20 55:9,21,22,25 56:19 57:1 58:4 60:5 62:2,13 79:25 82:9,25		<b>Laboratories</b> 9:3,7, 10,13 28:15 29:5	<b>link</b> 40:6
		<b>lady</b> 74:3	<b>linkage</b> 39:8 96:20
		<b>language</b> 96:24 104:9	<b>list</b> 10:8 23:8 24:22 25:3,7 27:21 28:3 36:17,20 37:1,10,14 39:16,18 57:22 70:8
			<b>listed</b> 19:11 33:11,18 34:22 35:21 37:20 38:12,14,18 70:9 71:18 72:20
			<b>listing</b> 70:14
			<b>lists</b> 39:14
			<b>lived</b> 94:11

<b>local</b> 6:8	60:2,3 61:2,11,13	<b>marketing</b> 83:13	<b>Memphis</b> 79:10
<b>locate</b> 81:11	62:6,22 63:18 65:5,10	<b>Martin</b> 50:15	<b>mention</b> 70:24 98:17
<b>located</b> 4:13 28:15 67:20 69:9 71:6 73:15 74:24	70:6 77:23 79:16 83:17 86:4 89:13,15 90:14 93:1 95:15,16 96:23 98:6	<b>Marty</b> 9:16 24:19 26:16 40:25 56:7 67:6 95:20 100:10 103:3	<b>mentioned</b> 21:16 25:9 83:4 98:16
<b>location</b> 30:5,8 69:4 74:18,21 75:8	<b>makes</b> 6:20 27:15 33:16 35:18 46:9	<b>Marty's</b> 73:6	<b>met</b> 22:16
<b>locations</b> 24:10 30:12 44:4 70:25	<b>Makey</b> 9:12	<b>match</b> 87:16	<b>microprocessor</b> 30:4 36:9 41:4,9,14 42:6
<b>lock</b> 76:25	<b>making</b> 38:1 42:1 45:19 64:8 86:10 92:25	<b>matter</b> 29:9 84:8 98:25	<b>middle</b> 21:18 53:8
<b>locked</b> 76:12,13,22 77:8,11	<b>man</b> 67:24 68:8 75:16 76:2	<b>MBIC</b> 94:23	<b>mind</b> 41:2 43:24 88:4
<b>log</b> 30:19 69:1 70:14, 17,20,22	<b>management</b> 41:20 71:7	<b>means</b> 45:2 54:5 75:13	<b>mindful</b> 6:2
<b>logon</b> 18:17	<b>management's</b> 37:17	<b>meant</b> 41:5	<b>minute</b> 6:12 11:12 38:7 46:24 58:17 95:20
<b>logs</b> 71:5	<b>manager</b> 74:17,25 77:3	<b>meantime</b> 103:25	<b>minutes</b> 18:23 19:2, 3,7,10,23 20:2,4,21 31:11 66:18 68:24
<b>long</b> 15:3 92:13,17, 19,20 93:2,4	<b>manager's</b> 77:5	<b>Mechanical</b> 8:23	<b>missed</b> 35:6 62:24
<b>looked</b> 54:13 87:1	<b>mandatory</b> 34:8 71:2,5	<b>mechanism</b> 51:22 76:8,25	<b>missing</b> 38:17
<b>loss</b> 80:4	<b>manned</b> 68:22	<b>meeting</b> 4:17 5:14, 15,18,20 6:6 12:10 13:14,19 14:12,16,18 17:24 18:17,23 19:2, 10 20:4 26:7,8 29:7, 10,16 31:3 40:17 44:18 49:3,13,21 52:1,13,16,19 53:1,15 62:8,22 63:15 79:4, 16,23 80:13 82:18 83:19 84:10 85:2,6, 20,21,22 86:6,22 90:1 103:20 104:7	<b>modest</b> 12:15 13:4
<b>lot</b> 23:12 54:15 73:19 92:14,21 99:24	<b>manner</b> 23:1 49:9 55:5 85:4	<b>meetings</b> 4:18 61:9 96:2	<b>moment</b> 81:12
<b>loud</b> 80:6	<b>manning</b> 75:15	<b>member</b> 8:2,9,17,23 16:3 19:9 21:1 33:9 46:7 69:14 71:24 77:22 90:25 92:12 103:22	<b>monitor</b> 33:3 39:6 41:15 42:6 68:23
<hr/> <b>M</b> <hr/>	<b>manual</b> 22:16 24:6,12 25:17 29:19 31:10 33:10,15,25 34:1,22 35:2,10,15,20 37:21 39:23 40:4,7,9,12 42:9,17,21 43:8 44:11,15 45:19 46:14 47:4,6,8,13 54:1 58:8 63:6 68:12,25 69:7 70:14,18 71:15,18 72:13 79:2 85:14 95:15,16	<b>members</b> 7:2 18:8 21:13 28:23 31:15 33:7 35:19 40:23 43:3 49:14 54:4,6 55:6 64:25 65:9 67:5 69:13 71:7,22 80:20,25 81:6 84:8,20 85:4,12 88:1 89:23	<b>monitoring</b> 36:1 39:5,24 42:20
<b>made</b> 18:24 31:13 46:11 53:25 85:22 90:19	<b>manuals</b> 49:18 55:3 63:4 70:21 71:1 85:10	<b>memory</b> 10:3	<b>monthly</b> 27:19,21
<b>magnetic</b> 76:25	<b>manufacturer's</b> 37:22 38:2		<b>months</b> 16:25 25:19 81:10
<b>main</b> 67:20	<b>manufacturing</b> 37:19 39:7		<b>Morelock</b> 5:2,3 7:3, 10,14,17,21,24 8:3,6, 10,14,18,21,24 9:4,8, 11,14,18,21 10:2,7,12 11:5,9,20,22,24 12:1 15:9 17:16 18:13 19:13,15,18,22,25 20:7,10,14,16,18,20 21:21 22:7 23:22 25:21,23 26:12 27:16 28:8 31:8,18,21,23 32:1,6,10,15,18,20,22 33:6,20 34:3,6,9,15 35:8,17 39:2,21 40:18,22 42:8,13 43:1,9,15,20 44:7,10, 19,22 45:5,10,12,14, 16 46:1 47:1,15,21,
<b>maintenance</b> 67:9 68:16	<b>March</b> 82:2		
<b>majority</b> 34:24 58:1 75:9			
<b>make</b> 4:15 5:7,9 6:6 13:8 14:9,11 18:2,7 20:6 22:13,15,16,23 24:16 25:10,14,19 26:14,17 27:21 29:14 37:2,25 40:3,7,12 41:20 42:24 43:8,23 46:6,8,20 47:5,7 49:23 51:6,8 52:3,18 53:10 58:8 59:14			

23,25 48:5,17,23 50:2,6,9,22 53:2 57:7, 25 58:16 59:3,18,25 60:23 61:10,21 63:1,9 64:23 65:19,22 66:1, 4,8,10,12,14,20 69:12,19,23 70:7,11 71:13,17,21 77:13,16, 25 78:3,8,10,14,19, 21,23,25 79:9,20 80:24 81:14,18,21 82:1,6 86:8 89:2,12 95:10 96:4 99:4 100:8,11,18,24 101:10 102:1,10 104:2	<b>needed</b> 14:25 98:17 99:15 <b>negate</b> 89:5 <b>news</b> 45:6 <b>nice</b> 25:3 33:1 69:6 <b>Nineteen</b> 22:2 <b>Nitrogen</b> 22:5 <b>normal</b> 16:14 67:17 72:2 80:17 <b>northeast</b> 29:9 <b>Notary</b> 105:5 <b>noted</b> 33:10 <b>notes</b> 18:25 31:2 <b>notice</b> 17:19,23 <b>notification</b> 25:9,11, 12 <b>notify</b> 45:24,25 46:20 <b>November</b> 80:15,25 86:21 89:5 <b>number</b> 4:8 36:14 56:21 79:13 83:6,7,14 84:16 85:9,17 87:23 88:3,9 89:19 90:3,5 95:5,21,23 99:16,21 100:4,5 103:10 104:9	21:19,22,24 22:8 23:3 26:6,18,21 27:4 46:2, 18 47:17 48:1,15,18, 19,24 50:3,22,25 51:11 54:17 57:24 58:1 59:2 79:18 94:17 95:8,11,19 98:9 100:9  <b>online</b> 37:6 92:22 <b>open</b> 14:1,7,15 31:16 50:17 69:10 77:2 81:13 <b>open-air</b> 76:22 <b>open-discussion</b> 85:20 <b>operate</b> 28:17 66:25 72:5 <b>operated</b> 67:16 <b>operates</b> 72:1 <b>operating</b> 42:21 72:17 74:12 76:4,17 <b>operation</b> 29:19 41:19 68:19 74:8 <b>operations</b> 17:7 67:12 71:25 74:20 84:14 90:6 <b>opinion</b> 103:16,17,23 <b>opportunities</b> 74:11 <b>opportunity</b> 5:10 13:8 17:23 18:17 61:7 78:15 84:9 85:5 87:1 89:23 100:10 <b>opposed</b> 18:9 57:9 <b>opposition</b> 18:19 <b>optionally</b> 85:16 <b>order</b> 5:14 11:10 49:13 99:25 <b>orderly</b> 49:9 51:23 <b>organizational</b> 33:1, 2 39:11 <b>Origins</b> 66:23 67:3, 10,13 69:3 72:23,24 73:1 <b>outcome</b> 105:13	<b>outlines</b> 23:9 <b>outsider</b> 40:9 <b>overdue</b> 15:15 <b>overheard</b> 41:25 <b>overlook</b> 5:8 <b>overlooked</b> 70:16 <b>overrule</b> 55:21 <b>overseeing</b> 92:7 <b>owners</b> 24:15 <hr/> <b>P</b> <hr/> <b>packet</b> 81:1 <b>pages</b> 40:2 105:8 <b>paging</b> 38:9 <b>pandemic</b> 94:2 <b>panel</b> 36:6 74:6 <b>paragraph</b> 42:10 48:20,21 49:7 56:24 70:16 <b>part</b> 12:9 15:1 35:10 81:1 98:12 <b>partial</b> 29:21 30:8 <b>participant</b> 4:13 10:8 <b>participate</b> 5:5 28:20 <b>parties</b> 105:11 <b>passage</b> 99:8 <b>passed</b> 59:8,13 96:22 <b>passes</b> 66:15 <b>passing</b> 58:18 <b>past</b> 54:14 84:15 91:19 <b>path</b> 59:14 <b>patience</b> 10:13 <b>pay</b> 104:12 <b>PDF</b> 101:23 <b>people</b> 5:19 17:19,21 18:7,17 23:18 27:1 30:2 37:2,25 41:9 52:18 54:3,9 57:15
<hr/> <b>N</b> <hr/> <b>named</b> 105:3,13 <b>Nan</b> 4:2 5:4 7:5,8 <b>narrative</b> 70:15 <b>Nashville</b> 5:13,18 <b>national</b> 96:6,8 101:11 <b>nature</b> 12:15 <b>necessarily</b> 40:9 64:4 <b>necessity</b> 53:8 74:13	<hr/> <b>O</b> <hr/> <b>O8000303-08</b> 48:21 <b>oaths</b> 105:7 <b>object</b> 54:12 <b>observed</b> 66:19 <b>occupies</b> 74:4 <b>occupying</b> 74:23 75:18 <b>occur</b> 51:24 <b>office</b> 8:5 16:8,12,13, 16 17:6 64:10,13 68:7 71:3 73:16,21 77:1,5, 6 <b>OGUIN</b> 7:18,19		

58:1 60:11 62:6 64:3 65:1,6 66:16 81:2 88:10 91:18 92:14,21 94:15 95:12 96:8	<b>policies</b> 57:10,16,22 59:6,15,24 60:2,3 61:2,12	<b>Presson</b> 8:12 26:5	<b>proposal</b> 63:18
<b>percent</b> 12:24 21:10 81:22 88:17 90:3 97:6	<b>policy</b> 48:12,25 49:1, 23,25 50:11,13,20 51:13,16,17 52:7 53:17,22,23 55:15,16 56:1 57:9 58:9,13,18, 25 59:10,20 60:9,12, 14,18 63:13,17,20,23 64:3,19 65:5,25 80:8 86:10,12,22 87:4,6, 12,14,17,19 88:17 91:2,13,25 92:5,6,19, 25 93:12 94:4 95:4,6, 12,13,14,22,24 96:22, 25 99:14,17,19,22 100:14,15,16 102:15, 16,18 103:9 104:7,11	<b>pretty</b> 5:11 25:18 54:14 63:7 65:14 66:21 75:9 101:6 103:8	<b>propose</b> 13:9
<b>perfectly</b> 97:12	<b>policy's</b> 65:15	<b>previous</b> 88:3	<b>proposed</b> 10:25 12:10 14:7,10,20 16:1 50:11 69:25 77:17 89:8
<b>performed</b> 21:1,3,5	<b>portal</b> 71:6	<b>print</b> 30:6 41:15 51:2 58:22	<b>proposition</b> 73:24
<b>performing</b> 68:18	<b>position</b> 39:18 40:1 68:5 74:4,7	<b>printed</b> 58:8 85:13	<b>provide</b> 22:19 24:22 34:18 73:1 82:9 101:13
<b>period</b> 62:3 63:21 68:1,2 74:22 75:12	<b>positions</b> 12:20	<b>printer</b> 41:14 90:13	<b>provided</b> 45:20 69:7
<b>perpetuated</b> 53:15	<b>positive</b> 54:6	<b>printing</b> 90:10	<b>providing</b> 12:16 73:9 97:1
<b>person</b> 80:19	<b>possibility</b> 68:15	<b>prints</b> 58:9	<b>proximity</b> 67:22
<b>personal</b> 83:23,24 84:13 103:15,17,23	<b>post</b> 27:19 67:24 68:1,8 75:15,16	<b>prior</b> 4:16 14:12 49:12 82:17 83:19 84:9 85:1,6,19,22 90:2 104:6	<b>prudent</b> 18:5 75:2
<b>personnel</b> 30:24 39:15 68:16 72:16	<b>posted</b> 50:19	<b>problem</b> 27:12 36:23 37:5 38:9 45:2 59:23 60:19 64:2 65:13,18 70:7 87:13 97:17,20	<b>public</b> 14:8,23 17:19, 23 18:1,18 50:17 57:11 60:2,7 83:10,13 93:1,9 94:10 105:5
<b>pertain</b> 59:19,21	<b>power</b> 35:4	<b>problems</b> 10:3	<b>public's</b> 93:11
<b>pertaining</b> 59:11	<b>precedent</b> 35:1	<b>procedure</b> 36:12 49:1	<b>publish</b> 57:15 101:9
<b>phone</b> 6:7	<b>precise</b> 53:20	<b>procedures</b> 48:12	<b>published</b> 50:24 57:11,19 97:14
<b>phones</b> 36:16,19	<b>preference</b> 18:10	<b>proceed</b> 51:20 80:23	<b>pull</b> 94:6,18 101:22
<b>photographs</b> 69:8	<b>prepare</b> 85:5	<b>proceedings</b> 4:6	<b>pulled</b> 101:22,23
<b>piece</b> 17:17	<b>prepared</b> 62:21	<b>process</b> 13:11,22 14:3,4 16:5,24 17:5 21:17 24:8 51:20,24 52:4,20 54:10 62:8,11 64:8 67:15 73:5 74:3 80:17 96:6 99:3	<b>purchased</b> 41:3
<b>place</b> 5:25 13:3 23:7 36:1 41:11 44:2 45:24 49:5,20 63:17,21 68:11 75:10 76:8 93:12 96:10,15,17 105:3	<b>present</b> 12:7 13:7 29:2 48:14,18 67:4 79:14 81:5	<b>processes</b> 96:6	<b>purpose</b> 48:25 56:10, 12 58:7
<b>placement</b> 74:5	<b>presentation</b> 28:21	<b>processing</b> 69:3	<b>pursuant</b> 49:3
<b>places</b> 93:3 96:9,21 99:13	<b>presentations</b> 49:18	<b>produced</b> 4:7	<b>pursue</b> 63:16
<b>plan</b> 29:21 30:8 67:21	<b>presented</b> 15:16 79:25	<b>product</b> 37:25 38:1	<b>push</b> 23:17 24:16 38:5
<b>plant</b> 67:15 68:18 71:25 72:16 74:17 77:5	<b>presenting</b> 12:10,23 15:18	<b>productive</b> 49:9	<b>pushed</b> 94:1
<b>play</b> 17:1 50:13,17		<b>products</b> 29:8,15 69:5	<b>put</b> 19:1 29:22 49:25 53:21 54:2,3 59:7,13 61:25 63:13,17 64:16, 20,21 75:7 83:22 86:22 88:7 90:20 93:10,25 94:4 95:5 97:13 99:20 102:14 103:24
<b>pleasure</b> 67:8		<b>promote</b> 83:10	<b>putting</b> 92:5
<b>plenty</b> 62:20 78:15		<b>proper</b> 15:16 99:2	
<b>point</b> 11:10 14:5 18:3 26:18 64:22 72:14 88:2 91:20 94:8,25 99:13,19,22		<b>properly</b> 4:16 95:2	

<b>Q</b>	<p><b>real</b> 76:6</p> <p><b>realize</b> 81:24 86:20</p> <p><b>reappointed</b> 6:15</p> <p><b>reapproval</b> 44:16</p> <p><b>reason</b> 61:17 67:25 68:21</p> <p><b>recalling</b> 10:5</p> <p><b>received</b> 17:22 41:3 52:11 91:24</p> <p><b>recent</b> 82:15</p> <p><b>recently</b> 12:18</p> <p><b>reception</b> 67:20 68:7 75:1 76:11,21 77:1,3, 4</p> <p><b>recognize</b> 88:23 102:6</p> <p><b>recommend</b> 18:12 64:20</p> <p><b>recommended</b> 100:21</p> <p><b>reconvene</b> 66:17</p> <p><b>record</b> 15:20 25:10, 14 26:15 70:14</p> <p><b>records</b> 88:14</p> <p><b>red-line</b> 16:9</p> <p><b>redundancy</b> 86:19 93:15 99:10</p> <p><b>redundant</b> 86:11 92:13,19 94:20 96:24 99:12</p> <p><b>refer</b> 92:25 93:12</p> <p><b>reference</b> 33:15 34:1 35:20 41:6 53:25 71:15,18 100:4 101:25</p> <p><b>references</b> 33:11 34:17,22 35:2,10 39:9 54:1 101:3</p> <p><b>refers</b> 93:19,20,22</p> <p><b>Refinery</b> 79:11</p> <p><b>reflects</b> 47:8</p> <p><b>regard</b> 13:21</p>	<p><b>registered</b> 69:9</p> <p><b>Regulation</b> 48:11 49:5</p> <p><b>regulations</b> 9:23 92:8</p> <p><b>rehydration</b> 69:5</p> <p><b>reinspection</b> 22:2 25:13,16</p> <p><b>relates</b> 36:11</p> <p><b>relating</b> 103:10</p> <p><b>released</b> 64:10</p> <p><b>relief</b> 30:15</p> <p><b>remember</b> 10:1</p> <p><b>remembered</b> 32:7</p> <p><b>reminder</b> 22:9 78:11</p> <p><b>remote</b> 30:9,12,24 33:3 36:5,8 37:23,24 38:5,12,15 39:4,6,24 41:22 42:10 44:2,4,13 67:12,19 68:4,22 71:3 72:20,23 73:10,14 74:6 75:4,7 76:2,9,15 85:9</p> <p><b>remove</b> 93:24</p> <p><b>removed</b> 15:14 29:24</p> <p><b>renewal</b> 22:10,14,24 79:11</p> <p><b>reorganized</b> 15:11</p> <p><b>repeat</b> 35:6</p> <p><b>reply</b> 84:6,15,20 89:11,14,15 96:13,24 99:11,16,19</p> <p><b>report</b> 20:23 21:19, 20,23 22:6 25:1</p> <p><b>reported</b> 105:4</p> <p><b>reporter</b> 4:4 8:20 104:13 105:5</p> <p><b>REPORTER'S</b> 105:1</p> <p><b>Reporting</b> 4:3 7:9</p> <p><b>represent</b> 4:23 15:21,22</p> <p><b>representation</b></p>	<p>90:14</p> <p><b>representative</b> 27:13 83:16 84:3,17</p> <p><b>representatives</b> 67:3 79:14,21</p> <p><b>request</b> 30:25 49:2, 10,16,20 54:22 55:2 57:3 67:11 81:17 82:8,10,14,24 83:16, 17 84:3,6,12,17 85:18,22 86:1,21 89:6 92:2,3 93:18 95:24</p> <p><b>requested</b> 24:21 25:1 26:16 29:13</p> <p><b>requesting</b> 25:16 28:16 66:23 70:14 79:11</p> <p><b>require</b> 22:2 35:10 44:15 54:9 82:17</p> <p><b>required</b> 35:1 69:1 82:23 83:15 84:2,23 85:17 90:22 104:3</p> <p><b>requirement</b> 54:21 83:2</p> <p><b>requirements</b> 22:17 28:18 35:22 39:10 40:2 66:25 71:5 80:8 82:13 87:22</p> <p><b>requiring</b> 22:1</p> <p><b>research</b> 89:24</p> <p><b>respond</b> 34:11 38:7 98:23</p> <p><b>responded</b> 34:13</p> <p><b>response</b> 33:14,15, 24 34:2 54:6 85:7 97:18 98:22</p> <p><b>responses</b> 31:1 33:18,21</p> <p><b>responsibilities</b> 74:5 75:3</p> <p><b>responsibility</b> 24:14 39:24 97:8</p> <p><b>responsible</b> 24:15 26:25 75:14</p> <p><b>rest</b> 54:18</p>
<b>R</b>	<p><b>raise</b> 13:5</p> <p><b>raise-hand</b> 4:12</p> <p><b>raised</b> 5:6</p> <p><b>raising</b> 53:3</p> <p><b>range</b> 67:25</p> <p><b>reaction</b> 86:17</p> <p><b>read</b> 21:2 29:22 40:7, 8 84:15 94:16 104:11</p> <p><b>reading</b> 18:24 40:12 91:2 102:25</p> <p><b>readings</b> 68:20</p> <p><b>reads</b> 102:15,16,17, 19</p> <p><b>ready</b> 47:13</p>		

<b>restart</b> 36:15	49:3,6,13 50:11,13, 15,21 51:6,8,10 52:8 56:13 60:8 61:3 63:22 65:2 75:20 82:10,17 83:17 84:4,18 87:6 92:8	<b>September</b> 5:15 21:2,5,7,14	<b>situation</b> 60:10 65:18 75:23 77:8
<b>resubmit</b> 48:4		<b>serve</b> 6:19 7:4 68:6	<b>situations</b> 75:11 91:17
<b>result</b> 49:20 54:19 84:11 85:7		<b>service</b> 6:17 10:6	<b>skin</b> 29:7
<b>return</b> 55:18	<b>run</b> 91:17	<b>serving</b> 33:3	<b>slips</b> 10:9
<b>revenue</b> 12:16 13:6		<b>set</b> 4:16 53:8 105:16	<b>small</b> 72:11
<b>review</b> 16:9 22:17 48:10 53:14 55:6 84:9 85:5 103:22	<hr/> <b>S</b> <hr/>	<b>setting</b> 35:1	<b>smart</b> 6:7
<b>revise</b> 44:3,5 47:13, 16 68:12 70:6 89:8 97:9 99:11,15 101:7	<b>safe</b> 5:19,25	<b>Seventy-seven</b> 22:1	<b>Smith</b> 10:19
<b>revised</b> 30:4,7 71:14 96:19 98:15	<b>safety</b> 5:23 6:5,10	<b>severe</b> 6:9	<b>smooth</b> 27:2
<b>revising</b> 98:14	<b>Sam</b> 7:14,15 20:24 26:6 27:21,24 28:7	<b>share</b> 6:23 42:15 47:9 80:15 81:8	<b>sold</b> 41:3
<b>revision</b> 29:19 31:11, 13 58:20 99:24	<b>same-day</b> 10:6	<b>sharing</b> 81:4,5	<b>solutions</b> 29:14
<b>revisions</b> 44:1 47:6 74:15 79:2	<b>sand</b> 63:4	<b>sheet</b> 31:11	<b>somebody's</b> 73:21
<b>Rhone</b> 26:6	<b>satisfactory</b> 90:23 102:21	<b>shift</b> 74:9	<b>sought</b> 74:6
<b>Rich</b> 67:8,9,17 68:6 71:7,23 72:8,21 73:2, 6,12 74:17 75:14,22 76:19 77:12,14 79:8	<b>save</b> 46:17,21	<b>shifts</b> 74:12	<b>sounds</b> 83:10 103:6
<b>Rich's</b> 71:3 76:3 77:5	<b>schedule</b> 22:17	<b>shoes</b> 93:11	<b>southeast</b> 26:25
<b>road</b> 42:1 94:13	<b>scheduled</b> 46:3 49:12 84:10 85:1,6 104:6	<b>short-term</b> 10:3	<b>Space</b> 102:4
<b>role</b> 68:6	<b>scheme</b> 90:11	<b>Shorthand</b> 105:5	<b>speak</b> 4:10 5:11 23:20 24:23 36:3 41:2 51:14 57:24 64:25 71:10 95:9
<b>roll</b> 11:11 32:11	<b>scope</b> 39:18 40:1	<b>show</b> 18:7 24:5 30:21 31:12 33:25 34:2 39:10 55:5	<b>SPEAKER</b> 11:4
<b>room</b> 7:16,20 9:5 24:2 67:22 68:20 69:6 71:4 77:10	<b>screen</b> 4:13,14 80:16 81:4,8,13	<b>showing</b> 66:15	<b>specifically</b> 39:15 56:3,4
<b>rule</b> 12:5,10 14:2,7 49:7 50:20 51:16,17, 21 52:3 53:17 54:11, 16 55:21,23,24 56:2, 14,23,24 57:17 58:3,5 62:1,3 63:16,18 64:5, 6,7,16,21,22 65:14,16 68:3,23 72:18 73:23 75:18 76:5,17 82:22 83:25 97:24 98:1	<b>seconds</b> 20:11	<b>Shrink</b> 81:18,20	<b>specifics</b> 49:15
<b>rule-making</b> 12:4 13:12	<b>secretary</b> 7:13 16:12, 13,16 17:6 88:13 97:9	<b>shut</b> 38:3,4	<b>speed</b> 81:9
<b>rules</b> 5:16 13:15,20, 23 16:14 48:14,20,25	<b>secretary's</b> 101:7	<b>shutdown</b> 30:18	<b>spelled</b> 19:3
	<b>Section</b> 10:18 48:21 70:15,25	<b>side</b> 41:23	<b>spelling</b> 18:23
	<b>sees</b> 87:3 93:23 94:4 98:8	<b>signature</b> 30:20	<b>spending</b> 89:25
	<b>send</b> 16:10 23:25 44:5 47:12,16,17 103:5	<b>similar</b> 96:6	<b>spoke</b> 9:25
	<b>sending</b> 90:12 92:3	<b>simple</b> 89:10,11 97:19 101:20	<b>spoken</b> 68:14 101:4
	<b>sense</b> 40:12 96:23	<b>simply</b> 101:3	<b>Springs</b> 19:20
	<b>sentence</b> 39:5	<b>sir</b> 7:24 9:4 18:12 21:24 23:22 25:20 53:6 59:2 60:23 66:1 70:5 71:16 72:8 77:15 79:20 80:2,23 102:10	<b>St</b> 22:5
	<b>sentences</b> 99:18	<b>site</b> 45:21 46:3 47:10, 19 60:15 67:21 79:4	<b>staff</b> 27:14 87:1
		<b>sites</b> 23:12	<b>Stairs</b> 10:21
			<b>stand</b> 100:23
			<b>standard</b> 5:13 55:12
			<b>standby</b> 29:25 30:3

<b>start</b> 7:2 38:9 60:9 75:17 80:5	<b>storms</b> 6:2	<b>Supervisor</b> 8:5	45:20 49:3 79:3 96:18 98:21 105:6
<b>starting</b> 4:17 23:17 60:2	<b>straight</b> 32:14	<b>supplemental</b> 54:23 57:4	<b>term</b> 6:15
<b>state</b> 4:24 15:21 16:20 21:3,7 24:17, 21,25 25:6 42:3 44:25 56:8 98:21 105:6	<b>straightforward</b> 63:5	<b>supply</b> 8:2 41:13 54:22	<b>Terms</b> 70:3,12
<b>State's</b> 16:12,13,16 17:6	<b>strike</b> 71:14 104:8	<b>support</b> 72:10,11 90:6 104:7	<b>Terry</b> 8:22 19:8 77:21 82:7
<b>stated</b> 26:15 29:6	<b>striving</b> 57:23	<b>supporting</b> 49:17,19 82:15,23 84:5,7,19 85:2	<b>testimony</b> 105:4,7
<b>statement</b> 23:5 29:24 35:12 61:22 65:8 86:12 87:11 99:12 100:19	<b>stronger</b> 6:21	<b>supposed</b> 24:7 56:16	<b>text</b> 39:9
<b>statements</b> 40:5	<b>structure</b> 12:11	<b>surrounding</b> 82:13	<b>thing</b> 57:8 64:24 65:4 76:7 87:18 91:9,22 96:7 97:1
<b>states</b> 24:2 25:15 27:2 36:14 42:10 56:24 70:2 72:22	<b>study</b> 62:20	<b>system</b> 39:5 41:20 42:4,20,21 58:10 74:15	<b>things</b> 24:20 27:11,12 54:1 64:2 80:8 81:12 90:11 93:8,17
<b>stating</b> 55:9 62:1	<b>stuff</b> 6:2 42:5 44:25	<b>T</b>	<b>thinking</b> 70:1 83:11
<b>station</b> 30:9,24 37:23 39:24 41:22 42:10 67:20,23 68:22 71:3 73:14 75:8 76:2,10, 16,21,22 77:2	<b>submit</b> 16:7 49:19 54:3 62:17 84:19,25 97:10 101:8 103:18 104:4	<b>table</b> 29:20,24 100:25	<b>Thomas</b> 22:5
<b>station's</b> 36:6	<b>submittal</b> 53:19 80:14 94:24	<b>takes</b> 28:14 79:9 88:12,13,14	<b>Thou</b> 35:12 42:23
<b>stationed</b> 71:2	<b>submittals</b> 54:7	<b>taking</b> 41:11 68:20 90:16	<b>thought</b> 30:2 34:13 40:16 92:7 98:10
<b>stations</b> 37:24 44:2, 4,13	<b>submitted</b> 49:11 50:16 54:20 70:21 84:7 85:3,10,14 86:21	<b>talk</b> 5:23 14:4 33:19 98:11	<b>tie</b> 39:22,25
<b>statute</b> 16:19 51:17 53:17 55:23,24 56:4 82:21	<b>submitter</b> 83:15 84:2,17,24 97:5,11 104:3	<b>talked</b> 53:24 75:5 82:19 86:13	<b>tight</b> 44:23
<b>statutes</b> 61:4	<b>submitter's</b> 84:12	<b>talking</b> 53:5 59:24 87:15 90:12,15 95:12	<b>time</b> 5:13 6:1 10:6 13:3,10 14:6,8,16 15:16,25 16:11 25:9, 11 29:21 36:4,7 41:12 44:24 46:12,21,25 49:14 52:11,24 62:18, 20 63:21 64:22 68:1, 6,9 69:5 72:5,18 73:22 74:13 75:9,12 76:12,16 77:7 78:13 82:24 84:5 85:25 86:5 87:21 89:25 91:18 96:20 103:22 105:3
<b>statutory</b> 13:3	<b>submitting</b> 49:1 55:11 82:24	<b>talks</b> 87:14	<b>timeframe</b> 25:16
<b>Steam</b> 59:11	<b>subphrasing</b> 82:18	<b>tasks</b> 73:20	<b>timely</b> 23:1 49:9 55:5 84:8 85:4
<b>step</b> 17:5 34:21 55:16 93:1	<b>successful</b> 79:4	<b>tech</b> 68:16	<b>times</b> 25:14 55:1 76:12,13 94:1 98:16
<b>Stephanie</b> 75:8,23	<b>sufficient</b> 12:16 35:17	<b>technical</b> 44:11 68:13	<b>title</b> 70:2
<b>sticky</b> 60:10	<b>sufficiently</b> 12:22	<b>technically</b> 56:18 88:25	<b>today</b> 4:3,9 5:18,21 6:10 8:20 12:23 17:18,20 19:1 21:24 45:21 57:13 79:4,16 102:7
<b>stipulates</b> 56:15 71:1 82:22	<b>suggest</b> 38:25 63:12 86:2	<b>telling</b> 58:21	
<b>Stone</b> 4:2,5 7:9 8:20	<b>suggestion</b> 26:1,11 51:19 52:17	<b>ten</b> 12:13 48:3 87:14 88:2,7,8,9 89:15 90:7, 20 95:25 102:15	
<b>stop</b> 38:5 81:5	<b>suggestions</b> 86:4	<b>Tennessee</b> 7:4,16 9:3 10:23 17:20 19:12,21 21:18 22:18 27:1 28:16 29:5,9	
	<b>summarized</b> 101:5		

<b>told</b> 43:24			
<b>Tom</b> 9:22 12:7 17:6 21:16 25:24 60:24 63:10 83:11 97:13			
<b>tool</b> 83:7 98:6			
<b>top</b> 39:17 81:22			
<b>topic</b> 6:10			
<b>total</b> 21:6,9			
<b>totally</b> 65:12			
<b>Toth</b> 9:15,16 14:21 15:10,20,22 24:18,19 26:13,16 35:5 40:24, 25 41:17 50:16 53:2,4 56:6,7 61:10,11 62:1, 13 67:2,5,6 69:13 70:1,5,8,19 71:16,20 73:8,25 76:18 77:14, 15 78:12 79:7 80:1,3 81:7,16,20,24 82:3,7 86:14,17 87:20 89:3, 9,18 91:9 93:21 95:17 97:5 99:5,9 100:20, 22,25 101:15 102:2,5, 11,13,20,25 103:4,13 104:10			
<b>Toth's</b> 15:10 99:24			
<b>track</b> 57:10,14 59:14			
<b>training</b> 9:17 15:23 30:10,12,13,24 40:2 67:7			
<b>transcribed</b> 105:8			
<b>transcript</b> 4:6 105:2			
<b>trouble</b> 10:5			
<b>troubleshoot</b> 37:5			
<b>true</b> 61:21,22			
<b>trump</b> 51:17 56:13			
<b>turn</b> 5:2 13:10 31:4 81:24 82:2			
<b>turned</b> 55:10 83:8			
<b>typewriting</b> 105:9			
<b>typically</b> 5:23 16:14			
<b>typo</b> 48:19			
	<hr/> <b>U</b> <hr/>		
	<b>unable</b> 36:15,23,24	26:21 28:16 29:13,18 45:17 48:3 66:24 68:19 77:17,20,24 79:2,12,14 84:3 85:10 88:20 95:13	<b>waiting</b> 36:8
	<b>unavailable</b> 75:15 77:9	<b>variances</b> 21:25 22:9,10 23:8,11,14 59:10 67:12 69:2,17, 25 89:1 93:19 103:12	<b>walking</b> 77:4
	<b>understand</b> 10:11 16:23 36:13,18 42:24 46:23 65:7 76:5 88:8 94:2	<b>vein</b> 22:9	<b>wanted</b> 6:16 18:2 22:19 35:18
	<b>understanding</b> 12:21 25:18 41:21 55:3	<b>verbally</b> 4:24	<b>wanting</b> 5:19 34:24 101:15
	<b>UNIDENTIFIED</b> 11:4	<b>verbatim</b> 4:6 88:21	<b>warn</b> 94:7,12
	<b>uniform</b> 83:2	<b>verbiage</b> 35:13 39:23 82:16 88:22	<b>waste</b> 46:12,25
	<b>unit</b> 12:17 22:11,14, 25 45:22 47:10,16 48:4,11 49:6 56:20 65:2 79:5 86:23 90:6 92:1,4 94:4,9 96:1	<b>verification</b> 30:20	<b>watching</b> 10:8
	<b>unit's</b> 90:9	<b>version</b> 16:9	<b>waving</b> 28:25
	<b>units</b> 27:19	<b>vessels</b> 13:1 21:6	<b>ways</b> 62:13
	<b>unmute</b> 4:24	<b>veto</b> 17:10	<b>weather</b> 6:3,4,7,9
	<b>update</b> 61:1	<b>vicinity</b> 68:7 77:6	<b>website</b> 26:3,9 50:19 61:2,5 63:14 65:1 97:15
	<b>updated</b> 22:15 27:21 61:8 96:10,11	<b>video</b> 4:18	<b>week</b> 27:7 61:18 103:20
	<b>updates</b> 27:20 43:7 74:15 98:1	<b>view</b> 26:10 55:25 61:7	<b>weekday</b> 72:2
	<b>upgrade</b> 61:5	<b>violation</b> 21:13	<b>weight</b> 54:15
	<b>user</b> 99:14	<b>virtually</b> 17:18	<b>West</b> 22:5
	<b>usual</b> 97:1	<b>visit</b> 45:21 46:3 47:20 79:4	<b>whatsoever</b> 88:22
	<b>utilize</b> 98:5	<b>visiting</b> 68:20	<b>WHEREOF</b> 105:15
	<b>utilized</b> 83:7	<b>visits</b> 68:25	<b>whichever</b> 91:13
	<hr/> <b>V</b> <hr/>	<b>voice</b> 102:7	<b>willingness</b> 6:18
	<b>vacation</b> 75:22	<b>Volume</b> 104:14	<b>window</b> 72:12
	<b>Valero</b> 63:6 79:15	<b>voluminous</b> 63:7	<b>wire</b> 30:11
	<b>valid</b> 62:4	<b>volunteer</b> 26:3	<b>wiring</b> 36:6
	<b>valves</b> 30:15,16	<b>vote</b> 11:11 14:13,19 32:8,13,17 43:21 45:7 81:6 86:5	<b>wishes</b> 14:6,9,16 15:25 101:8
	<b>variance</b> 21:19,23 22:4,6,12,21,23 23:10 24:4,14 25:11,13	<b>voted</b> 47:9	<b>witnesses</b> 105:4
		<b>voting</b> 11:17 18:15 100:15	<b>wondering</b> 44:3
		<hr/> <b>W</b> <hr/>	<b>Woodby</b> 9:9
		<b>wait</b> 62:23	<b>word</b> 53:10 98:3 101:23
			<b>words</b> 33:12 62:15 72:4 73:17 80:4 96:9
			<b>work</b> 7:3 23:1 46:2 49:5 72:2 90:1
			<b>Workforce</b> 49:4



**working** 47:3 67:17

**Workplace** 9:23  
48:11

**works** 69:4 81:9

**worry** 78:15

**WRC** 8:13 27:19  
48:12,25 57:21 65:24  
80:8 87:4,6 91:2,6,13,  
25 96:14,25 98:24  
99:9,17 100:4,14  
101:3,20,25 102:1,2  
103:7

**writing** 45:25 51:13  
83:18 85:18 87:22  
88:5,7

**written** 49:2,10 53:11  
55:21,23,24 56:14  
83:25 102:22

---

**Y**

---

**y'all** 24:8 47:15,25  
52:3

**y'all's** 49:22

**yeah/nay** 11:17

**year** 6:1 16:20,25  
30:17 81:25 93:25

**years** 12:13 22:11  
82:16 83:6,7 87:24

**yes/no** 34:16

**you-all** 6:3 14:19  
17:13 28:19 31:5 70:1  
97:4

**you-guys** 29:18 31:7

**young** 74:3

---

**Z**

---

**Zoom** 4:3,16 17:24  
79:16 81:9