

May 2, 2022

Tennessee Board of Boiler Rules
Dept. of Labor and Workforce Development
Division of Workplace Regulations & Compliance
220 French Landing Drive
Nashville, TN 37243

Submitted By: Marty Toth, ECS Consulting, LLC

Subject: Automatic Bottom Blowoff

Statement of Need: ECS Consulting, LLC requests the Board of Boiler Rules provide an interpretation of the installation and utilization of automatic bottom blowoff valves on boilers installed in Tennessee.

Background: Although it is common practice in the industry for surface blowdown of impurities to be drained from the boiler employing continuous blowdown or automatic means, the same can not be said for bottom blowoff. There are boiler manufacturers that provide the option of automatic bottom blowoff equipment with their boiler installation. There is a need for a clear understanding of the Board of Boiler Rules and the Tennessee Boiler Unit's position on their use within the state.

Inquiry (1): Are automatic bottom blowoff valves allowed to be installed and utilized in Tennessee?

Reply (1): No.

Inquiry (2): Is a qualified owner/user attendant (operator) required to be present at the boiler while a manual bottom blowoff is being performed?

Reply (2): Yes