

March 26, 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: Walkways, Runways, & Platforms

Statement of Need: ECS Consulting, LLC requests the Board of Boiler Rules provide an interpretation on the requirements for walkways, runways, and platforms above boilers installed in the State of Tennessee.

Background: Though there are very specific installation requirements within Part 1 (Installation) of the National Board Inspection Code (NBIC) regarding walkways, runways, and platforms provided between or over the top of boilers, heaters, or vessels that are more than 8 ft. (2.4 m) above the operating floor, the enforcement of these requirements is often not enforced uniformly throughout the state or between inspectors.

Inquiry (1): In the State of Tennessee, is it required for all boilers, heaters, or vessels where the top of the unit is more than 8 ft. (2.4 m) above the operating floor required to be provided with walkways, runways, and/or platforms?

Reply (1): Yes, per the requirements in NBIC Part 1, Section 1.6.4, *Ladders and Runways*.

Inquiry (2): If response to 1 is yes, are provided walkways, runways, or platforms required to have two (2) means of exit?

Reply (2): Only those runways and platforms that exceed 6 feet (1.8 m) in length are required to have at least two (2) permanently installed means of exit.