

Bryan B. Carter - Environmental Protection Specialist

Division of Water Resources

Johnson City Environmental Field Office

2305 Silverdale Drive, Johnson City, TN 37601

Dear Bryan Carter,

This report is being provided as a follow up to the verbal notification that was provided to Tina Robinson on July 21, 2022:

Description of Events

At approximately 4:00 PM on July 18, 2022, it was discovered that a diesel fuel spill had occurred outside of emergency generator #5. Secondary containment held the majority of the diesel fuel, but some did escape and pooled on the basement floor. Diesel fuel that escaped secondary containment was isolated utilizing absorbent booms and pads. American Environmental was contacted to respond and collect isolated diesel fuel. A small amount of diesel fuel was found to have reached a floor drain, but that drain, upon inspection, was determined to be obstructed, therefore the diesel fuel was not discharged. Inspections of downstream drains were conducted throughout the clean-up operation confirming no discharge.

On the morning of July 20th, a contractor was working to clear two external stormwater grates that were obstructed. It was later observed in the storm water flow basin, a small amount of diesel was present in two locations. Individual amounts were estimated to be between five and ten gallons. American Environmental was contacted and the diesel fuel was collected and removed from the two locations with additional spill containment in the form of absorbent booms and pads being placed as a precautionary measure due to forecasted rainfall. There was no observable sheen present. After the rain event the evening of July 20, 2022, the outfall was inspected the morning of July 21, 2022, and a faint oil sheen was observed.

The appropriate notifications were made to Tennessee Department of Environment and Conservation - Division of Water Quality (TDEC) and the National Response Center (NRC) (NRC Report Number 1342120).

After notifications were made, representatives from Cardinal FG and American Environmental contacted the adjacent landowner and with their permission walked the creek to check for the presence of diesel

fuel or sheen in the waters between Cardinal FG property and the north fork of the Holston River. The investigation yielded no findings of diesel fuel or sheen present despite the numerous natural collection points (vegetation, fallen trees, etc) in the creeks path.

With unknown weather patterns for the weekend, absorbent booms were left in place as a precautionary measure. There have been no further observations of sheen.

Potential Corrective Measures

Potential corrective measures to prevent a repeat incident include the following:

1. Permanently isolate and cover the floor drain adjacent to emergency diesel generator #5.
2. Investigate improvements to fill system for all emergency diesel generators including alarming to detect the presence of overfill and leaks into secondary containment.

Cardinal FG wants to express that we are dedicated to putting permanent corrective measures in place to significantly reduce, if not completely prevent, the possibility of this type event reoccurring in the future. Feel free to contact Butch Hatcher or Luke Hughes with any questions regarding any of the information provided or anything additional that is required.

Respectfully,



Michael L. Barry
Assistant Plant Manager