

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
Northern Virginia Regional Office

To: 2015-N-2086
From: Jeffrey Modliszewski
Date: June 1, 2015
Ref: T.C. Catlett & Sons Lumber Company
9330 Elys Ford Road
Fredericksburg, Virginia 22407

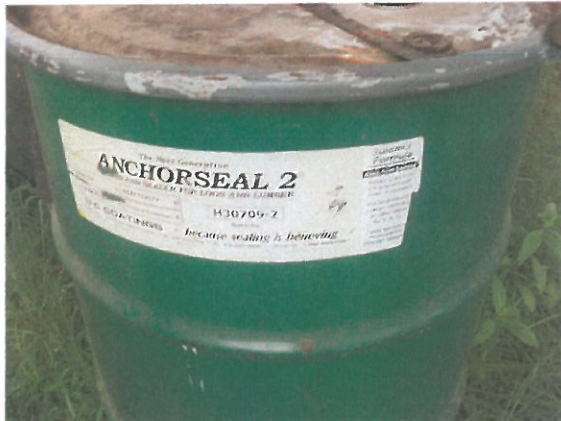
On May 29, 2015, Beth Biller (Water Permit Writer), Mark Miller (Prep Coordinator), and Jeff Modliszewski (Solid Waste Inspector) performed a site visit and inspection of the referenced facility. The DEQ employees were greeted by Robert and Philip Catlett. Beth Biller performed an inspection of the water permit, VAR050794 with Mr. Robert Catlett (this memo does not cover that inspection). Mr. Philip Catlett escorted Mark Miller and Jeff Modliszewski around the property. The following pictures document the site visit.



Aboveground Storage Tanks



Approximately 30 tires were observed on the site



Two drums of Anchorseal 2



Covered area where Anchorseal 2 was applied.



Sawdust



Area where third party indicated there might have been a petroleum spill; however no petroleum spill was evident.



Area where third party indicated there might have been a petroleum spill; however no petroleum spill was evident.



Trailer containing what Mr. Catlett indicated were empty five gallon containers.



Trailer containing what appeared to be household trash.



Two regulated ASTs (site contains an additional regulated AST which is not pictured). These ASTs are registered.



Mulch and wood debris pile

FINDINGS AND RECOMMENDATIONS

The unregulated aboveground storage tanks contain less than 660 gallons and are not required to be registered.

During the initial site visit by the DEQ, the facility had more than 100 tires, which was an issue according to the Code of Virginia, §10.1-1418.2 *Improper disposal of tires; exemption; penalty*. On May 29, 2015, approximately 30 tires were present on the property. Mr. Catlett had receipts for the disposal of tires since the initial site visit.

The facility uses Anchorseal 2[®] to prevent the splitting of cut wood during the drying process. During the application of the material it appears that the excess was left on the ground. The presence of Anchorseal 2[®] on the ground at the facility is considered to be a housekeeping issue since the product is not a characteristic or listed hazardous waste. The material on the ground should be managed as a solid waste and be cleaned up.

The owner should confirm that all of the five-gallon containers are empty and managed to prevent any improper storage in the containers.

The trailer containing household waste should be cleaned up and all solid waste disposed of in a legal manner at a permitted facility.

During the site visit, there was no evidence of discharges of oil or petroleum products in the areas previously indicated.

The following was also observed but photographs were not collected:

- approximately 12 55-gallon drums of used oil were present. Mr. Catlett indicated that the used oil was given away for use as fuel in space heaters;
- USTs that were not in use and were stored above ground (the USTs were closed in 2002); equipment in various stages of use;
- five gallon containers which contained water and vegetation;
- logs;
- a recreational vehicle; and
- an outhouse.