



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490  
www.epa.state.oh.us

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

August 27, 2008

**RE: MUSKINGUM COUNTY  
TIRE - CAMPBELL SCRAP TIRE RECOVERY**

Mr. Dave Campbell  
Dave Campbell Scrap Tires  
3905 Avalon Drive  
Zanesville, OH 43701

Dear Mr. Campbell:

On May 21, 2008, I conducted an inspection of your Class 2, Scrap Tire Recovery Facility, as required by Ohio Administrative Code Rule 3745-37-08(D)(5). The purpose of my inspection was to determine the status of your compliance with Ohio EPA's scrap tire regulations and laws. Based on the above referenced inspection, the following violations of Ohio Administrative Code (OAC) Rule 3745-27-65 were observed:

- 1) OAC Rule 3745-27-65(B) states in part that the owner or operator shall operate the scrap tire recovery facility in strict compliance with the terms and conditions of the registration certificate.**

Condition #2 of your Facility Registration states that at the end of each operating day, all scrap tire storage at the facility shall be conducted within the confines of a locked building, and/or portable containers. All scrap tires remaining outside at the end of each business day shall be placed and stored in portable containers (i.e., dumpsters, roll off boxes, and/or locked trailers) as an alternative method to achieve compliance with the setbacks outlined in OAC Rules 3745-27-62(A)(80(a) and 3745-27-62(A)(9)(c), (d), and (e). The portable storage containers shall be placed on the property in accordance with the requirements of OAC Rule 3745-27-60.

During my inspection, I observed a large number of scrap tires placed along the north side of your building that are not stored within confines of a locked building, and/or portable containers at the end of each business day. This is a violation of the above stated registration condition and OAC Rule 3745-27-65(B). This violation also existed during my May 21, 2008, inspection. I am again requesting that you take appropriate action to bring your scrap tire facility into compliance with condition #2 of your facility registration certificate.

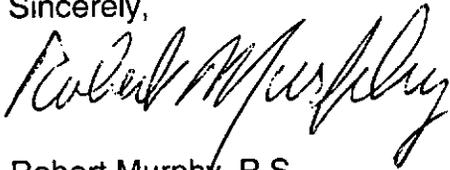
- 2. OAC Rule 3745-27-65(C)(6) states that the owner or operator shall limit access to the facility to authorized personnel except during operating hours and when operating personnel are present. The owner or operator shall submit a written plan that details what security measures will be implemented to protect the scrap tires and facility.**

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Based on my August 21, 2008, inspection, it appears that scrap tires are being stored outside your building in an unsecured location that does not limit access to the facility during times when operating personnel are not present. This violation also existed during my May 21, 2008, inspection. I am again requesting that you take appropriate action to bring your scrap tire facility into compliance with OAC Rule 3745-27-65(C)(6).

Please correct the above cited violation of OAC Rule 3745-27-65 and contact me to schedule a follow up inspection. I have enclosed a copy of the inspection checklist. Should you have any questions or if I can be of assistance, please contact me at (740) 380-5408.

Sincerely,



Robert Murphy, R.S.  
Environmental Specialist II  
Division of Solid and Infectious Waste Management  
Ohio Environmental Protection Agency  
Southeast District Office

RM/jg

Enclosure

cc: Muskingum County Health Department

## Scrap Tire Recovery Facility Inspection Checklist

Facility Name: Dave Campbell Scrap Tire ID #: 60STR-001 Date: 08-21-08 County: Muskingum  
 Facility Address: 2485 Maysville Pike, So. Zanesville, Ohio 43701 Facility Phone #: 740-849-2230  
 Operator Name: Dave Campbell Operator Phone #: \_\_\_\_\_  
 Corporate Address: 3905 Avondale Dr., Zanesville, OH 43701 Corp. Phone # (If Diff.): \_\_\_\_\_  
 Health District: Musk. Co. (Ohio EPA Program) Inspector(s): Bob Murphy

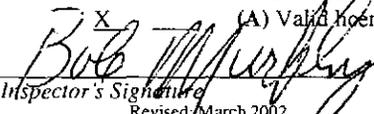
Is this facility being operated in compliance with the following regulations (YES or NO)? Place an X in the appropriate column to denote compliance status. Placing an X in the NO column indicates that a violation has been noted. Write N/A on the lines that are not applicable to this facility. This checklist is not all inclusive of regulations applicable to scrap tire recovery facility operations.

This is a:  Comprehensive Inspection  Partial Inspection  Comments on Back  
 This Facility is a:  Class I Facility  Class II Facility  
 This Facility is subject to an approved facility compliance (drawdown) plan:  Yes  No

**NOTE:** This form represents an accurate recording of the conditions found at this facility at the time of this inspection. If this facility is subject to an approved facility compliance plan, the conditions noted on this form may not necessarily be violations of the State of Ohio's Scrap Tire rules and regulations. If the comments box found above is checked, additional comments concerning this inspection may be found on the back of this form. Any violations of Ohio laws and a summary of the facility's progress as related to its compliance plan (if applicable) will be detailed in a follow up letter to the facility operator.

YES	NO		YES	NO
<b>3745-27-65 Operation of a Recovery Facility</b>				
<b>(C) Compliance with operational criteria</b>				
<input checked="" type="checkbox"/>	_____	(1) Accepts only scrap tire waste	_____	_____
<input checked="" type="checkbox"/>	_____	(d)(ii) modification on file for acceptance of other rubber products OR appropriate authorization on file to transfer or dispose non-rubber waste	<input checked="" type="checkbox"/>	_____
<input checked="" type="checkbox"/>	_____	(4) Copy of approved PTI or Reg. on file at facility	<input checked="" type="checkbox"/>	_____
<input checked="" type="checkbox"/>	_____	(5) Maintenance of access roads	_____	_____
_____	<input checked="" type="checkbox"/>	(6) Control of access to facility	<input checked="" type="checkbox"/>	_____
<input checked="" type="checkbox"/>	_____	(8) Minimization of work area	_____	_____
<input checked="" type="checkbox"/>	_____	(9) Nuisance, health hazard, or water pollution	_____	_____
<input checked="" type="checkbox"/>	_____	(10) Instructions posted at entrance	_____	_____
<input checked="" type="checkbox"/>	_____	(11) Exclusion of animals	<input checked="" type="checkbox"/>	_____
<input checked="" type="checkbox"/>	_____	(13) Appropriate leachate management	_____	_____
<b>(D) General scrap tire management</b>				
<input checked="" type="checkbox"/>	_____	(1) No submergence / no soil cover	<input checked="" type="checkbox"/>	_____
<input checked="" type="checkbox"/>	_____	(2) Fire lanes are clear and accessible	<input checked="" type="checkbox"/>	_____
<input checked="" type="checkbox"/>	_____	(3) Tires are dry or treated for mosquitoes	<input checked="" type="checkbox"/>	_____
<input checked="" type="checkbox"/>	_____	(5) Sufficient drainage around tires	<input checked="" type="checkbox"/>	_____
<input checked="" type="checkbox"/>	_____	(6) Tires are 50 ft. from ignition sources	_____	_____
<input checked="" type="checkbox"/>	_____	(7) Portable containers located $\geq 100$ ft. from buildings/structures not owned or leased by the owner or operator	_____	_____
_____	_____	(9) Access for emergency vehicles	_____	_____
<b>(E) Maximum temporary storage area</b>				
<input checked="" type="checkbox"/>	_____	(3)(a)(i) Class II facility, <u>outside</u> storage: max. storage $\leq 7$ times the DDIC or 10,000 ft <sup>2</sup> , whichever is greater	<input checked="" type="checkbox"/>	_____
_____	_____	(ii) 10,000 ft <sup>2</sup> of TDC or TDF	_____	_____
_____	<input checked="" type="checkbox"/>	(b) Class II facility, <u>inside or containerized</u> storage: max. storage $\leq 15$ times DDIC or 10,000 ft <sup>2</sup> , whichever is greater	<input checked="" type="checkbox"/>	_____
<input checked="" type="checkbox"/>	_____	(c)(i) Class I facility: max storage $\leq 15$ times DDIC or 10,000 ft <sup>2</sup> whichever is greater	<input checked="" type="checkbox"/>	_____
_____	_____	(ii) 20,000 ft <sup>2</sup> agg. processed ST storage of TDC or TDF	<input checked="" type="checkbox"/>	_____
<b>(F) Additional requirements</b>				
<b>(1) Tires stored outside:</b>				
_____	_____	(a) Pile size $\leq 2500$ ft <sup>2</sup> in basal area	_____	_____
_____	_____	(b) Pile height $\leq 14$ ft.	_____	_____
_____	_____	(c) If length & width of pile $\leq 25$ ft. and pile height $\leq 6$ ft.: fire lane is at least 50 ft. between piles and between piles and buildings	_____	_____
_____	_____	(d) If pile width or length $>25$ ft. OR pile height $>6$ ft.: fire lane at least 100ft pile to pile and pile to buildings, or of other acceptable distance subject to this rule	_____	_____
_____	_____	(e) Approved alternative stacking plan	_____	_____
<b>(3) Tires stored in building or covered structure:</b>				
_____	_____	(a) Piles less than 2500 ft <sup>2</sup>	_____	_____
_____	_____	(b) Aisles between piles at least 8 ft.	_____	_____
_____	_____	(c) 18 in. between top of pile & sprinklers	_____	_____
_____	_____	(d) 3 ft. between top of pile & roof	_____	_____
_____	_____	(e) 3 ft. between top of pile and heaters/ducts/flues	_____	_____
<b>(4) TDC or TDF stored inside:</b>				
_____	_____	(a) Piles $\leq 250$ ft long and 50 ft wide	_____	_____
_____	_____	(b) Aisles between piles $\leq 8$ ft.	_____	_____
_____	_____	(c) 18 in. between top of pile & sprinklers	_____	_____
_____	_____	(d) 3 ft. between top of pile & sprinklers	_____	_____
_____	_____	(e) 3 ft. between top of pile and heaters/duct/flues	_____	_____
<b>(G) Fire contingency plans on site</b>				
<b>(H) Mosquito/vector control</b>				
_____	_____	(1) Effective mosquito/vector control	_____	_____
_____	_____	(2) Tires dry or proof of larvicide application	_____	_____
_____	_____	(4) Records available	_____	_____
<b>(I) Proper fire equipment on site</b>				
<b>(J)(2) Keeping of daily Logs</b>				
<b>3745-27-57 Shipping Paper System</b>				
_____	_____	(C) Use of shipping papers	_____	_____
_____	_____	(D) Proper completion of forms and all required information	_____	_____
_____	_____	(E) Records retention (3 years)	_____	_____
<b>3745-37-01 License</b>				
_____	_____	(A) Valid license	_____	_____

Bob Murphy  
Print Name of Inspector Completing Form

  
 Inspector's Signature  
 Revised March 2002

August 27, 2008  
 Date  
 File: tire recovery ckl