



State of Ohio Environmental Protection Agency

Southeast District Office

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

March 26, 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 March 12, 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 EPAs 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). Please take whatever action is required to bring your scrap tire facility into compliance with condition #2 of your facility registration certificate.

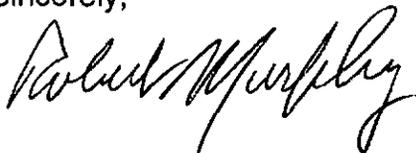
OAC Rule 3745-27-65(C)(6) states that the owner or operator shall limit access to the facility to authorized personnel except during operating hours and when operating personnel are present. The owner or operator shall submit a written plan that details what security measures will be implemented to protect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

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Based on my March 12, 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. Therefore, you are in violation of 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: 03-12-08 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

3745-27-65 Operation of a Recovery Facility

(C) Compliance with operational criteria

- (1) Accepts only scrap tire waste
- (d)(ii) modification on file for acceptance of other rubber products OR appropriate authorization on file to transfer or dispose non-rubber waste
- (4) Copy of approved PTI or Reg. on file at facility
- (5) Maintenance of access roads
- (6) Control of access to facility
- (8) Minimization of work area
- (9) Nuisance, health hazard, or water pollution
- (10) Instructions posted at entrance
- (11) Exclusion of animals
- (13) Appropriate leachate management

(D) General scrap tire management

- (1) No submergence / no soil cover
- (2) Fire lanes are clear and accessible
- (3) Tires are dry or treated for mosquitoes
- (5) Sufficient drainage around tires
- (6) Tires are 50 ft. from ignition sources
- (7) Portable containers located ≥ 100 ft. from buildings/structures not owned or leased by the owner or operator
- (9) Access for emergency vehicles

(E) Maximum temporary storage area

- (3)(a)(i) Class II facility, outside storage: max. storage ≤ 7 times the DDIC or 10,000 ft², whichever is greater
- (ii) 10,000 ft² of TDC or TDF
- (b) Class II facility, inside or containerized storage: max. storage ≤ 15 times DDIC or 10,000 ft², whichever is greater
- (c)(i) Class I facility: max storage ≤ 15 times DDIC or 10,000 ft² whichever is greater
- (ii) 20,000 ft² agg. processed ST storage of TDC or TDF

YES NO

(F) Additional requirements

- (1) Tires stored **outside**:
 - (a) Pile size ≤ 2500 ft² in basal area
 - (b) Pile height ≤ 14 ft.
 - (c) If length & width of pile ≤ 25 ft. and pile height ≤ 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
- (3) Tires stored **in building or covered structure**:
 - (a) Piles less than 2500 ft²
 - (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
- (4) TDC or TDF stored **inside**:
 - (a) Piles ≤ 250 ft long and 50 ft wide
 - (b) Aisles between piles ≤ 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

(G) Fire contingency plans on site

- (1) Effective mosquito/vector control
- (2) Tires dry or proof of larvicide application
- (4) Records available

(I) Proper fire equipment on site

(J)(2) Keeping of daily Logs
3745-27-57 Shipping Paper System

- (C) Use of shipping papers
- (D) Proper completion of forms and all required information
- (E) Records retention (3 years)

3745-37-01 License

- (A) Valid license

Bob Murphy

Print Name of Inspector Completing Form

Inspector's Signature

Revised: March 2002

March 26, 2008

Date

File: tire recovery ckl