

March 16, 2026

Roger Bumgardner
3496 Dry Bone Rd
Peebles, OH 45660

**Re: Bumgardner – Dry Bone Road Tire Dump
Notice of Violation (NOV)
NOV
Scrap Tires
Pike County
ST025366**

Subject: Notice of Violation #2 - Open Dumping of Scrap Tires

Dear Mr. Bumgardner:

On February 9, 2026, I conducted a follow-up inspection at your 16.63-acre property (parcel #120122000000) at 3496 Dry Bone Road, Peebles in Pike County. I was accompanied by Ryan Williams, Pike County General Health District and Sara Anderson, Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management. The goal of the inspection was to determine compliance with Ohio's laws as found in Ohio Revised Code (ORC) Chapter 3734 and Ohio Administrative Code (OAC) Chapter 3745-27.

Findings

Ohio EPA has identified the following violations of Ohio's environmental laws. In order to resolve these violations, we recommend addressing the citations below promptly.

1. **ORC Chapter: 3734**

OAC Rule: 3745-27-05(D) states that “no person shall conduct, permit, or allow open dumping. In the event that open dumping is occurring or has occurred at a property, the person responsible for the open dumping, the owner of the property, or the person who allow or allowed open dumping to occur, shall promptly remove and dispose or otherwise manage the solid waste in accordance with Chapter 3734. of the Revised Code and shall submit verification that the solid waste has been properly managed.”

(a) **Description:** At the time of the inspection, I observed multiple piles and stacks of scrap tires which are largely off-the-road (OTR) tires dumped in various areas around the 16.63 acres of your property. Please see attached photos and map highlighting the approximate areas where these scrap tires are located on your property. Based on these findings, you are currently in violation of the prohibition on open dumping scrap tires. As required by rule, Ohio EPA requests that you

promptly cause the removal of these tires by a registered scrap tire transporter, dispose of these tires at a licensed scrap tire disposal or recovery facility, and submit verification that these scrap tires are being properly managed.

(b) Further Information: I did not observe that any noticeable action has been taken to remove the scrap tires from the property since my previous site visit on September 4, 2025.

Conclusion

Ohio EPA requests you promptly undertake the necessary measures to resolve the violations of Ohio's environmental laws and regulations. Within 14 days of receipt of this letter, please provide documentation to Ohio EPA of the actions taken to resolve the violations cited above. If you have already resolved the violations listed above, thank you, and please provide documentation supporting compliance. If you have not yet addressed the violations, please submit a compliance plan on how you plan to correct the violations cited above.

Documentation of steps taken to return to compliance includes written correspondence, disposal receipts, and photographs, as appropriate, and may be submitted via the postal service or electronically to christian.bradford@epa.ohio.gov.

Failure to comply with ORC Chapter 3734 and rules promulgated thereunder may result in an administrative or civil penalty. If circumstances delay resolution of violations, please submit written correspondence describing the steps that will be taken by a date certain to attain compliance.

Please note that the submission of any requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek administrative or civil penalties specified in the ORC.

If you have any questions, please contact me at christian.bradford@epa.ohio.gov or 740.380.5287.

Sincerely,

A handwritten signature in blue ink that reads "Christian Bradford". The signature is cursive and includes a long horizontal flourish at the end.

Christian Bradford, EHSIT
Environmental Specialist
Division of Materials and Waste Management

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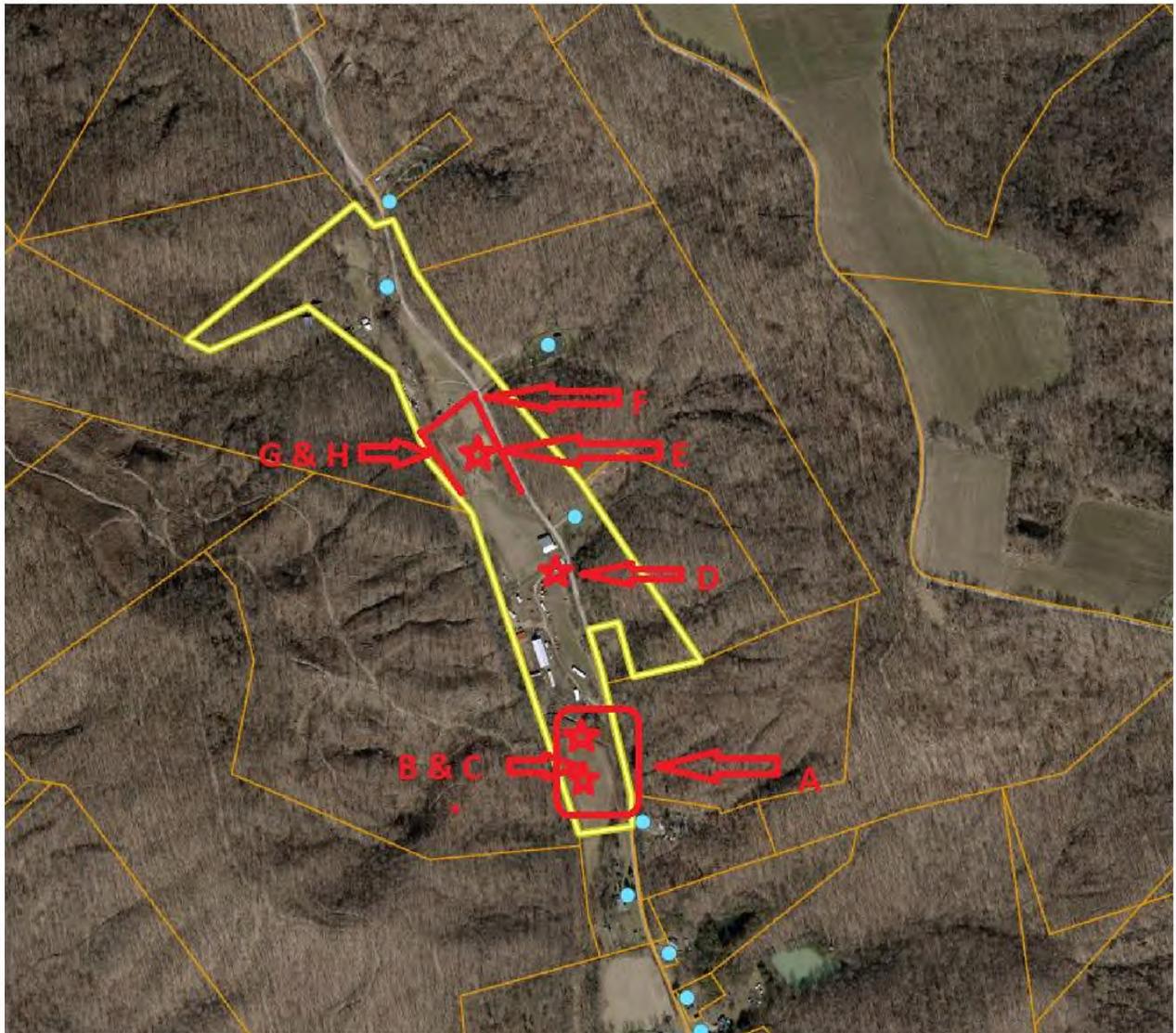
CB/kp

Attachments: Map & Photographs

ec: Ryan Williams, Pike County General Health District
Sara Anderson, DMWM
Aaron Shear, DMWM
Kelly Jeter, DMWM

cc: Property Owners:
Ray Bumgardner
Ruby Simpson
Doris Skaggs
Ruth Fillmore
Russell Bumgardner
William Edward Goodman
Cassandra Knisley Henderson

DMWM12164



Map of 3496 Dry Bone Road. Parcel #120122000000 is highlighted in yellow. Primary tire locations are highlighted by the red lines and red stars. Red lines highlight how tires are stacked to varying heights on the perimeter of the property, while red stars indicate large piles of the scrap tires.

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Photo #1 – Bumgardner – Dry Bone Road Open Dump

2/9/2026 - Photograph taken by: Christian Bradford

Point A. Photo taken from south of 3496 Dry Bone Road looking north. Tires in foreground of photo, covered slightly by trees and shrubs.

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Photo #2 – Bumgardner – Dry Bone Road Open Dump

2/9/2026 - Photograph taken by: Christian Bradford

Points B & C. Tires stacked along perimeter of southern portion of parcel. Large piles also seen dumped in the middle of the field.

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Photo #3 – Bumgardner – Dry Bone Road Open Dump

2/9/2026 - Photograph taken by: Christian Bradford

Another pile of OTR tires in the middle of the property, with additional tires scattered throughout.

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Photo #4 – Bumgardner – Dry Bone Road Open Dump

2/9/2026 - Photograph taken by: Christian Bradford

Point D. More OTR tires stacked around the barn next to the road, with additional tires seen stacked in background next to tractor trailer.

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Photo #5 – Bumgardner – Dry Bone Road Open Dump

2/9/2026 - Photograph taken by: Christian Bradford

Point E. Image taken just north of the barn alongside Dry Bone Rd. OTR tires stacked along roadside and back near creek/tree line. Small pile of tires in middle of field as well.

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Photo #6 – Bumgardner – Dry Bone Road Open Dump

2/9/2026 - Photograph taken by: Christian Bradford

Points E & F. Image shows more tires stacked along roadside as noted in Photo #5, and highlights point F, where tires have been dumped in piles in the middle of this northern side of the parcel.

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Photo #7 – Bumgardner – Dry Bone Road Open Dump

2/9/2026 - Photograph taken by: Christian Bradford

Points G & H. More OTR tires stacked property perimeter. Shows how tires have been stacked and illegally dumped across the entirety of parcel #120122000000.

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**Photo #8 – Bumgardner – Dry Bone Road Open Dump
9/4/2025 - Photograph taken by: Christian Bradford**

Picture taken toward the middle of the parcel. This image highlights how tires have been stacked along roadside for an extended period of time now.

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Photo #9 – Bumgardner – Dry Bone Road Open Dump

9/4/2025 - Photograph taken by: Christian Bradford

Picture of tires on northern side of parcel. Taken in similar location to Photo #7, highlighting tires stacked around the perimeter of northern portion of the parcel.

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Photo #10 – Bumgardner – Dry Bone Road Open Dump

9/4/2025 - Photograph taken by: Christian Bradford

Compare to Photo #5, as it is from similar location, as boom truck parked in field acts as marker for both images.

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Photo #11 – Bumgardner – Dry Bone Road Open Dump

9/4/2025 - Photograph taken by: Christian Bradford

Picture of tires along tree line. Tires piled up in the middle of the property as well. Taken in similar location as Photo #2.