



State of Ohio Environmental Protection Agency

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JAN - 8 2009

P.O. Box 1049
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ENTERED DIRECTOR'S JOURNAL

CERTIFIED MAIL

January 8, 2009

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

Mr. Carl Batliner
530 North Second Street
Cambridge, Ohio 43725

By: [Signature] Date: 1-8-09

**Re: Amended Closure Plan Approval
AK Steel Corporation
OHD 058 842 501**

Dear Mr. Batliner:

On October 6, 2008, AK Steel Corporation submitted to Ohio EPA an amended closure plan for the former drum storage area located at 530 North Second Street, Cambridge, Ohio. The amended closure plan was submitted pursuant to rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that the AK Steel Corporation proposal for amended closure complies with the requirements of OAC rules 3745-66-11 and 3745-66-12.

The owner or operator and the public were given the opportunity to submit written comments regarding the amended closure plan in accordance with the hazardous waste rule requirements. No public comments were received by Ohio EPA.

Based upon review of AK Steel Corporation's submittal, I conclude that the amended closure plan for the hazardous waste facility at 530 North Second Street, Cambridge, Ohio, as modified herein, meets the performance standard contained in OAC rule 3745-66-11 and complies with the pertinent parts of OAC rule 3745-66-12.

The amended closure plan submitted to Ohio EPA on October 6, 2008, by AK Steel Corporation is hereby approved with the following modifications:

1. In Section 4.1, the proposed closure plan states that "VOCs in soil that are constituents of concern include..." The plan shall be modified to include all breakdown products of trichloroethylene (such as vinyl chloride) as constituents of concern. In addition, the plan shall be modified to state that all VOCs detected with SW-846 method 8260 will be reported.

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



2. The analysis on VOCs in soil in Section 4.1 is hereby modified to state that the detected values less than the method detection limit ("J" qualified data) will be reported.
3. The analysis method for hexavalent chromium (Cr^{+6}) in Section 4.2 is hereby modified to be done using U.S. EPA Method 3060A.
4. Section 4.2. Ohio EPA generally approves the random sampling plan as described in the closure plan with the following modifications. Of the randomly selected sampling points, AK Steel will ensure that 3 to 5 sampling points are biased to be located in areas of historic elevated concentrations of contaminants (e.g., source areas or hot spots such as PZ-9).
5. The quality assurance and quality control (QA/QC) requirements listed in the Standard Operating Procedure (SOP) are hereby modified to include matrix spike and matrix spike duplicates to be done during the laboratory analysis.

Compliance with the approved closure plan, especially including the modifications specified herein, is expected. Ohio EPA will monitor such compliance. Ohio EPA expressly reserves the right to take action, pursuant to Chapters 3734 and 6111 of the Ohio Revised Code, and other applicable law, to enforce such compliance and to seek appropriate remedies in the event of noncompliance with the provisions and modifications of this approved closure plan. Please be advised that approval of this amended closure plan does not release AK Steel Corporation from any responsibilities regarding corrective action for all releases of hazardous waste or constituents from any waste management unit, regardless of the time at which waste was placed in the unit.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section.

An appeal may be filed with the Environmental Review Appeals Commission at the following address:

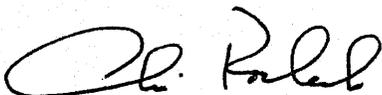
Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

When closure is completed, OAC rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of Ohio EPA, certification by the owner or operator and an independent, registered professional engineer, that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC rule 3745-50-42(D). These certifications should be submitted to:

Ohio Environmental Protection Agency
Division of Hazardous Waste Management
Attention: Jeremy A. Carroll, P.E.
Manager, Regulatory and Information Services Section
P.O. Box 1049
Columbus, Ohio 43216-1049

Ohio EPA, Division of Hazardous Waste Management, strongly encourages you to consider pollution prevention options for any processes at your facility that generate waste. While implementation of pollution prevention options is not required by Ohio laws and regulations, the application of waste minimization practices may help reduce the expense of remedial activities. Additionally, implementation of pollution prevention options may prevent the creation of new units and, as a result, eliminate the requirement to submit a closure plan in the future. For assistance in identifying and implementing pollution prevention options, contact Cole Miller at (614) 644-2976.

Sincerely,



Chris Korleski
Director

cc: Ed Lim, Manager, ERAS, DHWM, CO
Rich Stewart, DHWM, SEDO
Cole Miller, DHWM, CO
Supervisor, Engineering Unit, DHWM, CO
John Schierberl, Supervisor, Enforcement Unit, DHWM, CO