

6.0 POST-CLOSURE PLAN

The closed landfill has been maintained under post-closure care since September 10, 1984. As defined in the Part I, RCRA Post-Closure Permit, post-closure care continues until September 10, 2014 unless otherwise specified by the Director. At the request of MDNR, a Class 2 Permit Modification request was submitted and approved to extend the post-closure care period until the final remedy for the Facility is selected, documented in a Statement of Basis, and the long-term management requirements for the landfill established in a Missouri Environmental Covenants Act (MoECA) covenant, or other appropriate means.

6.1 POST-CLOSURE CONTACT

The post-closure contact and person responsible for the inspection, monitoring, maintenance, and record keeping activities at AK Steel is:

Patrick Gallo
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6.2 POST-CLOSURE SECURITY

The only overland access to the RCRA Landfill is via easements through The Andersons, Inc. and Blue Summit LLC. The easements are reached via overland access from Interstate 435 (I-435). From I-435, the Front Street exit is taken and followed east to North Century Avenue; North Century Avenue is taken south to Gardner Avenue/Hawthorne Road; then Gardner Avenue/Hawthorne Road is followed west to an unmarked access road just east of the City of Kansas City, Missouri Wastewater Treatment Plant (WWTP) located on Hawthorne Road; moving through a locked gate maintained by the WWTP, the unmarked access road is followed south across Blue River and east across parcels owned by The Andersons, Inc. and Blue Summit LLC. After passing through these easements, access to AK Steel's property east of I-435 is restricted by fencing (approximately 6-ft tall with barbed wire) and a locked

gate. Additionally, the following methods are employed to restrict access to the Facility and the RCRA Landfill.

1. A security service is contracted by AK Steel to monitor the Facility periodically.
2. Chain-link fencing (6-ft tall with barbed wire) or natural barriers (river or creek with levees) enclose the closed RCRA Landfill. The only overland access to the RCRA Landfill is through locked gates and a locked chain-link fence.
3. Signs that are legible from a distance of at least 25 feet are posted at the landfill. The signs read, DANGER – UNAUTHORIZED PERSONNEL KEEP OUT.

6.3 INSPECTION PLAN

Inspection of the closed landfill will be performed on a quarterly basis. These inspections will check runoff control measures, vegetative cover conditions, grading, ponding, functioning of the cover drainage system, subsidence, and displacement and the condition and integrity of the monitoring wells.

During each inspection a log assessing the status of each of the above items will be completed. A copy of the quarterly inspection log is provided as Exhibit 6-1. Any items that need correction will be highlighted for management review and future action.

A three month inspection interval is normally adequate to address potential effects to the landfill cap and landfill monitoring system components due to climatic and seasonal changes. However, if an unusually adverse weather event occurs, the regular schedule will be modified to promptly inspect the landfill and verify the integrity of its cover and monitoring well system. Copies of recent quarterly inspection logs are provided in Appendix S of the Part B Permit Renewal Application (BMcD, 2003).

6.4 MONITORING PLAN

Since the closed unit does not have a leachate collection or leachate detection system, the landfill monitoring plan included only groundwater. Details on the completion of the groundwater detection monitoring program for the RCRA Landfill were presented in Section 4.0 of the Part B Permit Renewal Application (BMcD, 2003).

6.5 MAINTENANCE PLAN

During the post-closure period, AK Steel will provide maintenance to the final cover. This will include filling and regrading of settled areas to maintain slopes and prevent ponding, regrading to eliminate erosion, and reseeding as necessary.

The RCRA Landfill is mowed approximately every 4 to 6 weeks during the growing season to minimize weed growth. The mowing schedule is dependent upon the weather, and the rate of vegetation growth.

Since the waste is inorganic, no gas generation is expected.

All bench marks, permanent survey markers, and Monitoring Wells 2, 3 (3A), 6, 7, 9, and 10 will be maintained during the post-closure period to ensure the integrity of the landfill and the post-closure monitoring system. Since groundwater monitoring requirements ceased in 1998 with a Class 2 Permit Modification, the monitoring wells may be abandoned in accordance with MDNR requirements and this maintenance ceased.

By nature and design, this landfill should be a no or low maintenance facility. The landfill contains only bulk material and one type of waste; thus, subsidence should be uniform. Likewise, the low final cap slope of three (3) percent with crown vetch grass should provide good run-off control yet eliminate or minimize potential soil erosion. If the landfill cap or any landfill monitoring system shows significant deterioration, (e.g., soil erosion of 4-inches or greater) corrective maintenance activities will be implemented.

6.6 PERSONNEL TRAINING

Since the landfill is a closed facility, no waste handling activities occur. Therefore, an active training program is not required for the routine inspection, monitoring, maintenance, and record keeping activities for the closed landfill. The Manager of Environmental Affairs will contract qualified contractor personnel for required maintenance and monitoring activities.

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Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell), 2003. *Part B Post-Closure Permit Renewal Application for the Emission Control Dust Landfill at AK Steel Kansas City Facility, MOD 007118029.* August

AK STEEL KANSAS CITY
HAZARDOUS WASTE EMISSION CONTROL DUST FACILITY

**CLOSED LANDFILL – RCRA
QUARTERLY INSPECTION LOG**

DATE _____ TIME _____ INSPECTOR _____

ITEM	REMARKS
RUN OFF CONTROL	(Note distressed or inappropriate vegetation - example: large weeded areas, trees, etc.)
Vegetation	
Grading	
COVER CONDITION	(Drainage – Water moving away from landfill, no ponding at bottom)
Ponding	
Drainage	
Erosion	
Cracks	
Burrowing animal holes	
General Condition	
MONITORING WELLS (11 total)	(Present/Absent & Condition)
Well Locks	
Casing Damage	
Pad Condition	
Standing Water	

Signed _____ Date _____

Cc: Pat Gallo & Larry Schutte