# Preliminary Evaluation of Spent Silver Mordenite Disposal Forms Resulting from Gaseous Radioiodine Control at Hanford's Waste Treatment Plant

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December 2002

Prepared for Bechtel National, Inc. under Contract No. 24590-101-TSA-W0000-0004

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Test specification: 24590-WTP-TSP-RT-01-013

Test plan: TP-RPP-WTP-109

Test exceptions: Three

R&T focus area: HLW Offgas Secondary System

Test Scoping Statement(s): HLW Trend (TN-24590-01-00007m RT-

01)—Risk Register HLW-20

Battelle - Pacific Northwest Division Richland, Washington 99352

# **Completeness of Testing**

This report describes the results of work and testing specified by 24590-WTP-TSP-RT-01-013 and TP-RPP-WTP-109. The work and any associated testing followed the quality assurance requirements outlined in the Test Specification/Plan. The descriptions provided in this test report are an accurate account of both the conduct of the work and the data collected. Test plan results are reported. Also reported are any unusual or anomalous occurrences that are different from expected results. The test results and this report have been reviewed and verified.

Approved:	
Gordon H. Beeman, Manager WTP R&T Support Project	
G. Todd Wright, Manager	Date
Research and Technology	

## **Abstract**

Battelle's Pacific Northwest Division determined the performance of selected spent-silver mordenite disposal forms in support of Bechtel National, Inc.'s efforts to identify a regulatory-compliant waste form for spent-silver mordenite used to control radioiodine releases from Hanford's Waste Treatment Plant. The objective of this work did not include optimization of the disposal form. In our qualification testing of silver mordenite, reduced silver mordenite, fluoride-treated silver mordenite, iodine-loaded reduced silver mordenite, and their grouted forms, we found that grouted silver mordenite with added calcium iodide and grouted iodine-loaded reduced silver mordenite released the U.S. Environmental Protection Agency and Washington State regulated metals at levels below the EPA's and Washington State's Universal Treatment Standards for land disposal.

# **Summary**

### **Objectives**

Battelle's Pacific Northwest Division (PNWD) performed an initial scoping study to identify potential waste forms for disposal of spent-silver mordenite. This was done to support Bechtel National, Inc.'s (BNI) effort to identify and develop a regulatory-compliant waste form for disposal of the silver mordenite<sup>(a)</sup> to be used to control radioiodine emissions from Hanford's Waste Treatment Plant (WTP). The WTP is being designed to vitrify some of Hanford's stored high level waste (HLW). The objective of this scoping study was to identify a potential disposal form for spent hydrogen-reduced silver mordenite (Ag°Z) and did not include optimization of the disposal form. This work successfully accomplished the goals of the test specification 24590 WTP-TSP-RT-01-013<sup>(b)</sup> and test plan TP-RPP-WTP-109<sup>(c)</sup> by determining that a regulatory-compliant waste form is available.

For this testing, BNI chose grout for immobilizing spent-silver mordenite. For land disposal, any silver mordenite disposal form must meet both Federal (40 CFR 268; 40 CFR 261) and Washington State (WAC 2000a; WAC 2000b) regulatory limits; WAC 173-303-140 (WAC 2000b) limits treated waste TCLP releases by reference to Federal standards.

### **Conduct of Testing**

In this study, PNWD purchased C\*Chem<sup>®</sup>'s IONEX Type Ag-900 silver mordenite (AgZ) and prepared Ag°Z, hydrogen fluoride-treated AgZ (AgZF), elemental iodine loaded Ag°Z (Ag°ZI), grout without additives, grouted AgZ, grouted AgZ with added calcium iodide, grouted Ag°Z, grouted AgZF, and grouted Ag°ZI. The halogen-loaded silver mordenites were chosen to provide materials at least partially representative of spent-silver mordenite after exposure to the mixed halogen-containing melter off-gas (MOG). The effects of NO<sub>x</sub> and SO<sub>x</sub> were not studied. We prepared triplicate 100-g grout samples at a 25-wt% waste loading.

To assess the AgZ waste-disposal form's performance, PNWD contracted a Washington State accredited laboratory (Severn-Trent STL) to measure the Resource Conservation and Recovery Act (RCRA) hazardous and Washington State Dangerous Metal Toxicity Characteristics as determined using the U.S. Environmental Protection Agency's (EPA's) Toxicity Characteristic Leach Procedure (TCLP) Method 1311 (EPA 2001). The TCLP testing laboratory measured the metals, excluding mercury, using EPA's procedures 6010B (EPA 2001). The laboratory used the EPA's method 7470A to measure mercury (EPA 2001).

<sup>(</sup>a) The text "silver mordenite" is used in this document to represent the family of silver mordenite forms tested where the acronym AgZ is used for discussions regarding unreduced or as-received silver mordenite.

<sup>(</sup>b) Test Specification: *Stabilization of Spent Silver Mordenite Disposal*, 24590-WTP-TSP-RT-01-013, S Kelly, Jr. September 20, 2001, Bechtel National Incorporated, Richland, Washington.

<sup>(</sup>c) Test Plan: *Disposal Treatment Requirements for Spent Silver Mordenite*, TP-RPP-WTP-109, Rev 0, RD Scheele, October 11, 2001, Battelle Pacific Northwest Division, Richland, Washington.

We submitted 100-g triplicate samples to the TCLP-testing laboratory to determine the concentrations of metals regulated as underlying hazardous constituents (UHCs) in the EPA's Universal Non-Wastewater Treatment Standard (UTS) (40 CFR 268). The metals regulated as UHCs include all the metals regulated based on their toxicity characteristic (TC). The UTS metals are silver, arsenic, barium, beryllium, cadmium, chromium, nickel, lead, antimony, selenium, thallium, and mercury. Vanadium and zinc are not considered UHCs even though they appear in the UTS (40 CFR 268); we provide vanadium and zinc for information only. Washington State as an authorized state uses the same waste codes as the EPA for TC metals.

#### **Results and Performance against Objectives**

All of the UHCs, excluding silver, released during TCLP testing were below Washington State and Federal regulatory levels for untreated and treated wastes. Silver was the only Washington State or EPA UHC found in TCLP leachates above regulatory levels. As Table S.1 and Figure S.1 show, some of the silver mordenite disposal forms released silver levels below all regulatory limits. Of the ungrouted silver mordenites, only Ag°Z had silver TCLP releases below the Washington State and the EPA toxicity characteristic designation level of 5.0 mg Ag/L leachate; however, Ag°Z did exceed the EPA's UTS of 0.14 mg Ag/L. Grouting reduced the silver TCLP release concentrations of AgZ and Ag°ZI to below 5 mg Ag/L and successfully lowered the silver release from Ag°ZI to less than 0.14 mg Ag/L. Adding CaI<sub>2</sub> to the grouted AgZ yielded similar success, reducing the grouted AgZ's release level to below the UTS TC level. This latter result indicates that adding a grout-compatible soluble iodide can effectively aid in reducing the silver release to below regulatory designation levels.

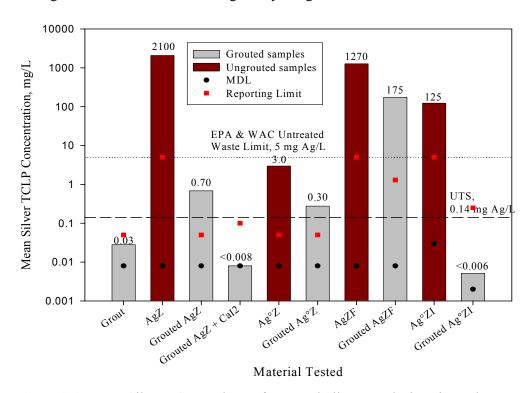


Figure S.1. Mean Silver TCLP Releases for Tested Silver Mordenite Disposal Test Forms

We recommend additional studies to fill in missing knowledge gaps on the behavior of potential spent  $Ag^{\circ}Z$  forms and to optimize the spent  $Ag^{\circ}Z$  disposal form. The recommended studies include testing untreated and grouted HF-treated  $Ag^{\circ}Z$  and chlorine-loaded  $Ag^{\circ}Z$ , possibly investigating the effects of exposure to  $NO_x$  and/or  $SO_x$  on  $Ag^{\circ}Z$ , investigating the effects of exposure to a fully representative simulated MOG, and optimizing grout composition and performance related to regulatory compliance.

In summary, PNWD's studies on identifying a regulatory-compliant disposal form for spent silver mordenite from the WTP indicates that a disposal form can be developed that will limit Washington State dangerous and EPA hazardous constituents to below regulatory limits. These studies found that silver was the only UHC released above regulatory levels and that by adding a grout-compatible soluble iodide, silver TCLP releases can be reduced to below regulatory designation levels.

#### **Quality Requirements**

PNWD implemented the RPP-WTP quality requirements by performing work in accordance with the quality assurance project plan (QAPjP) approved by the RPP-WTP Quality Assurance (QA) organization. This work was conducted to the quality requirements of NQA-1-1989 and NQA-2a-1990, Part 2.7, as instituted through PNWD's Waste Treatment Plant Support Project Quality Assurance Requirements and Description (WTPSP) Manual.

The TCLP analyses for silver were performed in accordance with EPA Test Methods for Evaluating Solid Waste - Physical Chemical Methods, SW-846, Third Edition and applicable elements of Bechtel's Quality Assurance Project Plan for Testing Programs Generating Environmental Regulatory Data, PL-24590-QA00001, as delineated in the subcontract to the performing laboratory.

PNWD addressed verification activities by conducting an Independent Technical Review of the final data report in accordance with procedure QA-RPP-WTP-604. This review verified that the reported results were traceable, that inferences and conclusions were soundly based, and the reported work satisfied the Test Plan objectives. The TCLP data were validated in accordance with the Data Validation Procedure for Chemical Analysis of Tank Waste and Related Samples, ADMIN-RPP-WTP-02-006, Rev 0.

**Table S.1.** Mean TCLP Releases for Tested Silver Mordenite Disposal Test Forms. See 40 CFR 261 and 40 CFR 268 for Federal hazardous waste limits and WAC 173-303-090 (WAC 2000a) and WAC 173-303-140 (WAC 2000b) for Washington State dangerous waste limits.

	Mean TCLP Release Concentration, mg/L <sup>(b)</sup>					Regulatory TCLP Designation Limits, mg/L						
Underlying Hazardous Constituents	${ m AgZ}$	Grout	Grouted AgZ	Grouted AgZ + CaI2	Ag°Z	Grouted Ag°Z	Grouted AgZF	AgZF	Ag°ZI	Grouted Ag°ZI	EPA Hazardous & Washington State Dangerous Waste	EPA Universal Treatment Standard
Silver	2090		0.69 <sup>J</sup>	$< 0.008^{UJ}$	$3.0^{\mathrm{J}}$	0.28	175 <sup>J</sup>	1280	124 <sup>J</sup>	< 0.006 <sup>J, UJ</sup>	5.0	0.14
Arsenic	< 0.004	< 0.004	< 0.0054	< 0.004	$0.013^{B}$	< 0.004	< 0.0064	< 0.008	< 0.03 <sup>UJ</sup>	$0.005^{J}$	5.0	5.0
Barium	$0.028^{B}$	0.71	$0.35^{B}$	0.56	$0.052^{B}$	0.52	0.81	$0.036^{B}$	<0.2 <sup>UJ</sup>	0.71 <sup>J</sup>	100.0	21
Beryllium	$0.0019^{B}$	< 0.0009	< 0.0012	< 0.0005	$0.0032^{B}$	< 0.0005	< 0.00084	0.029 <sup>B</sup>	< 0.006 <sup>UJ</sup>	< 0.0006 <sup>J, UJ</sup>	None	1.22
Cadmium	< 0.0005	< 0.0005	< 0.0013	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	<0.008 <sup>J, UJ</sup>	$0.0023^{J}$	1.0	0.11
Chromium	< 0.005	$0.013^{B}$	$0.017^{B}$	$0.0082^{B}$	< 0.0053	$0.0081^{B}$	0.047 <sup>J, B</sup>	$0.062^{B}$	<0.02 <sup>J, UJ</sup>	$0.017^{J}$	5.0	0.60
Nickel	< 0.03	$0.084^{B}$	< 0.03	< 0.03	< 0.03	$0.049^{B}$	< 0.07	< 0.04	0.046 <sup>J, B</sup>	$0.027^{J}$	None	11
Lead	0.01 <sup>B</sup>	< 0.004	< 0.003	0.0043 <sup>B</sup>	0.057 <sup>J, B</sup>	< 0.0031 UJ	< 0.012 <sup>J</sup>	0.011 <sup>UJ, B</sup>	0.057 <sup>UJ, B</sup>	< 0.006 <sup>UJ</sup>	5.0	0.75
Antimony	< 0.009	< 0.009	< 0.009	< 0.009	< 0.009	< 0.009	< 0.009	< 0.009	< 0.07 <sup>UJ</sup>	< 0.0075 <sup>J, UJ</sup>	None	1.15
Selenium	< 0.011	$0.010^{B}$	$0.013^{B}$	$0.015^{B}$	$0.0085^{B}$	$0.0094^{B}$	$0.035^{B}$	< 0.011	< 0.03 <sup>UJ</sup>	$0.0081^{UJ}$	1.0	5.7
Thallium	< 0.01	< 0.011	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005 <sup>UJ</sup>	< 0.005	$< 0.08^{J,  UJ}$	< 0.008 <sup>UJ</sup>	None	0.20
Vanadium <sup>(a)</sup>	< 0.02	< 0.02 <sup>UJ</sup>	< 0.02	< 0.02	< 0.02	< 0.02	< 0.02 <sup>UJ</sup>	< 0.04	<0.04 <sup>UJ, J</sup>	< 0.006 <sup>J, UJ</sup>	None	1.6
Zinc <sup>(a)</sup>	$0.06^{\mathrm{UJ,B}}$	< 0.02 <sup>UJ</sup>	< 0.02 <sup>UJ</sup>	< 0.02 <sup>UJ</sup>	0.054 <sup>UJ, B</sup>	< 0.02	< 0.02 <sup>J</sup>	0.01 <sup>B</sup>	0.16 <sup>UJ, B</sup>	$0.011^{\mathrm{UJ}}$	None	4.3
Mercury	<0.0003 <sup>UR</sup>	<0.0003 <sup>UJ</sup>	<0.0001 <sup>UJ</sup>	<0.0001 <sup>UJ</sup>	<0.0002 <sup>UJ</sup>	<0.0002	<0.001	<0.0001 <sup>UJ</sup>	<0.0002 <sup>UJ</sup>	< 0.00002	0.2	0.025

<sup>(</sup>a) Vanadium and zinc are not UHCs for wastes exhibiting the silver toxicity characteristic. The results are presented for information only.

<sup>(</sup>b) < values indicate at least one result was less than the MDL and the mean is estimated using the MDL.

U – At least one result in the mean was analyzed for but was not detected. The data should be considered usable for decision-making purposes.

UJ - At least one result in the mean was analyzed for and was not detected. Due to a QC deficiency identified during validation, the value reported may not accurately reflect the minimum detectable activity. The data should be considered usable for decision-making purposes.

J - At least one result in the mean was analyzed for and detected. The associated value is estimated due to a QC deficiency identified during data validation. The data should be considered usable for decision-making purposes.

UR - At least one result in the mean was analyzed for and not detected; however, due to an identified QC deficiency, the data should be considered unusable for decision-making purposes.

B – At least one result in the mean was an estimated value less than the reporting limit and greater than the method detection limit.

# Acronyms

AgZ Silver Ion Exchanged Mordenite

AgZF Fluoride-loaded Silver Ion Exchanged Mordenite

Ag°Z Hydrogen Reduced Silver Mordenite (Metallic Silver Present)

Ag°ZI Iodine-loaded Hydrogen Reduced Silver Mordenite

BNI Bechtel National, Inc.

CFR Code of Federal Regulations

DOE U.S. Department of Energy

DOG Dissolver Off-gas

EPA U.S. Environmental Protection Agency

EQL Estimated Quality Level

HLW High Level Waste

HWVP Hanford Waste Vitrification Plant

MDL Analytical Method Detection Limit

MOG Melter Off-Gas

PNL Pacific Northwest Laboratory

PNWD Pacific Northwest Division

QAPjp Quality Assurance Project Plan

RCRA Resource Conservation and Recovery Act

TC Toxicity Characteristic

TCLP Toxicity Characteristic Leaching Procedure (SW-846 Method 1311)

UHC Underlying Hazardous Constituent

UTS Universal Non-Wastewater Treatment Standard (40 CFR 268.48)

WTPSP Waste Treatment Plant Support Project

WAC Washington Administrative Code

WTP Waste Treatment Plant

# **Acknowledgements**

This project had a short-term deadline early in the schedule that needed to deliver some key results for the customer. This deadline was successfully met. There are numerous individuals within the Pacific Northwest Division (PNWD), and outside PNWD, that contributed to this accomplishment.

We would like to thank the many vendors that put through rush orders for us to have the materials and equipment necessary for this work. PNWD craft services performed an outstanding job of delivering services and completed work in a short time. Special thanks must go to Greg Brodaczynski, Mike Krouse, Stu Murphy, Monty Fleming, Ron Lucas, and Diana Wallace from PNWD craft services for an outstanding job in support of this work. Angie Dickson in Contracts contributed to our success. Special mention must go to Karla Smith for working miracles in procurement of materials and services and to Taffy Almeida for Quality Assurance support for reviewing this document and performing the qualification assessment on Severn-Trent Laboratories.

Severn Trent Laboratories – St Louis, Inc. performed the Toxicity Characteristic Leach Procedure and performed the analyses and was responsible for some quick turnaround times in the analysis. Special thanks to Marti Ward for her attention to our needs as we all worked toward meeting the early deadline.

We want to thank Wayne Cosby for editing this report, and Dean Kurath, Mike McCoy, and Lee Burger for reviewing the report for technical and regulatory accuracy and content.

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## 1.0 Introduction

Bechtel National, Inc. (BNI) in support of the U.S. Department of Energy's (DOE) planned disposal of the radioactive wastes stored on the Hanford site located in southeast Washington State, is designing a high level waste (HLW) treatment plant (WTP) to vitrify some of Hanford's HLW. BNI requested that Battelle's Pacific Northwest Division (PNWD) investigate the disposal path for silver mordenite, which is to be used to control radioiodine emissions from the WTP. The need to develop a Resource Conservation and Recovery Act (RCRA) (40 CFR 268; 40 CFR 261) compliant disposal route for spent silver mordenite was identified by HLW trend, TN-24590-01-00007mRT-01. The work by PNWD was authorized by Requisition# 24590-101-TSA-W000-004 Task 4. The focus area is HLW Offgas Secondary System.

Gaseous radioactive iodine, <sup>129</sup>I with a half-life of 17 million years, will be released from Hanford's high-level waste during vitrification. Based on information provided by L. Bostic of BNI, radioiodine releases to the environment from the WTP are regulated by Washington State (WAC 1998) and the U.S. Environmental Protection Agency (EPA) (40 CFR 61). The designers of the WTP have chosen reduced silver mordenite (Ag°Z) technology to control gaseous radioiodine releases.

Silver mordenite is a zeolite that has been found in laboratory testing to efficiently remove iodine and resist the acidic gases in simulated dissolver off-gas (DOG) streams for a nuclear fuel reprocessing plant (Burger and Scheele 1983; Scheele, Burger, and Matsuzaki 1983; Scheele, Burger, and Soldat 1984; Scheele, Burger, and Halko 1988). Because of AgZ's and Ag°Z's chemical resistances to the constituent gases in a vitrification plant's melter off-gas (MOG), which are similar to a reprocessing plant's DOG, and its high retention factors (RFs) (> 10<sup>4</sup> for iodine in laboratory-scale systems) Burger and Scheele (1991) recommended AgZ or Ag°Z for use in treating the Hanford Waste Vitrification Plant's (HWVP) MOG.

The MOG is a complex mixture of highly oxidizing acidic gases such as  $NO_x$ , substantial amounts of gaseous water, and various other inorganics, including chlorine, sulfur, and fluorine. The halogens will compete with iodine for the silver sites or could affect the stability of the AgZ. Burger and Scheele (1991) provide the predicted MOG composition for the HWVP MOG with halogen concentrations of  $6 \times 10^{-6}$  mol Cl/L,  $4.4 \times 10^{-5}$  mol F/L, and  $2.4 \times 10^{-11}$  mol I/L.

Because silver is regulated with respect to land disposal by Washington State (WAC 2000a; WAC 2000c), and by the RCRA additional information is required to determine the appropriate disposal-treatment requirements for spent Ag°Z. Based on earlier AgZ disposal testing (Burger, Scheele, and Weimers 1981), BNI selected grout to treat and immobilize the spent AgZ.

To develop the needed disposal information, through Test Specification 24590 WTP-TSP-RT-01-013<sup>(a)</sup> BNI requested that Battelle's PNWD prepare several reference, candidate, and worst-case silver-mordenite waste forms and determine their toxicity characteristic (TC) using Washington State and EPA testing and analytical procedures. The test disposal forms selected for evaluation were the untreated

1.1

<sup>(</sup>a) Test Specification: *Stabilization of Spent Silver Mordenite Disposal*, 24590-WTP-TSP-RT-01-013, S Kelly, Jr. September 20, 2001, Bechtel National Incorporated, Richland, Washington.

disposal forms of AgZ, Ag°Z, HF treated AgZ (AgZF), and elemental iodine-loaded Ag°Z (Ag°ZI) and the treated disposal forms of grout, grouted AgZ, grouted AgZ with added  $CaI_2$ , grouted Ag°Z, grouted AgZF, and grouted Ag°ZI. Following test plan TP-RPP-WTP-109, we purchased or prepared these materials and used the EPA's Toxicity Characteristic Leach Procedure (TCLP) (SW-846 Method 1311) coupled with the EPA's analytical methods SW-846 Methods 6010B and 7470A (EPA 2001) to measure the releases of RCRA and Washington State underlying hazardous constituents (UHCs).

This report provides the results of the TCLP testing performed on the selected materials. The objective of this work did not include optimization of the disposal form.

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<sup>(</sup>b) Test Plan: *Disposal Treatment Requirements for Spent Silver Mordenite*, TP-RPP-WTP-109, Rev 0, RD Scheele, October 11, 2001, Battelle Pacific Northwest Division, Richland, Washington.

# 2.0 Regulatory Land-Disposal Limits

Because both Washington State and EPA regulate the land disposal of silver as a dangerous (WAC 2000a; WAC 2000c) and a hazardous constituent (40 CFR 261; 40 CFR 268), the land disposal of the spent silver mordenite must satisfy existing disposal requirements. The applicable regulations require that wastes having the silver-containing wastes be tested to determine if a disposal form exhibits a TC. If the process waste exhibits a TC (WAC 2000a; 40 CFR 261), then for that waste to be land disposed, it must be treated, and the treated waste must satisfy the requirements provided in the Washington State's WAC 173-303-140 (WAC 2000c) and EPA's 40 CFR 268. To determine if a waste exhibits a TC or once treated can be land disposed, the waste form must be tested using the EPA's TCLP with the extract characterized for the Washington State (WAC 2000c) or RCRA (40 CFR 268) UHCs provided in Table 2.1 using EPA procedures (EPA 2001); Washington State invokes this procedure for their testing requirements (WAC 2000c).

Washington State's WAC 173-303-090 (WAC 2000a) and the EPA's 40 CFR 261 provide the Washington State and EPA Toxicity Characteristic criteria for land disposal of untreated hazardous waste, respectively. The EPA's Universal Non-Wastewater Treatment Standard (UTS) (40 CFR 268; WAC 2000c) provides the Washington State and Federal performance requirements for a treated hazardous waste, such as grouted silver mordenite; WAC 173-303-140 (WAC 2000c) incorporates the UTS by reference. Table 2.1 summarizes the Federal and Washington Toxicity Characteristic designation criteria and land-disposal criteria.

**Table 2.1.** Regulatory TCLP Release Limits for Untreated and Treated Hazardous Waste (40 CFR 261; WAC 2000a; 40 CFR 268; WAC 2000c)

Permissible TCLP Extract Concentrations, mg/L					
Underlying	EPA & Washington State	EPA & Washington State			
Hazardous	<b>Untreated Waste Toxicity</b>	Universal Non-Wastewater			
Constituents	Characteristic	Treatment Standard			
Silver	5.0	0.14			
Arsenic	5.0	5.0			
Barium	100.0	21			
Beryllium	None	1.22			
Cadmium	1.0	0.11			
Chromium	5.0	0.60			
Nickel	None	11			
Lead	5.0	0.75			
Antimony	None	1.15			
Selenium	1.0	5.7			
Thallium	None	0.20			
Vanadium <sup>(a)</sup>	None	1.6			
Zinc <sup>(a)</sup>	None	4.3			
Mercury	0.2	0.025			
(a) Vanadium and sing are not LUICs for wester a while it is the silver to visity share staristic. The					

<sup>(</sup>a) Vanadium and zinc are not UHCs for wastes exhibiting the silver toxicity characteristic. The results are presented for information only.

The first column in Table 2.1 provides the UTS hazardous constituents for all treated wastes. The second column provides the Washington State and Federal Toxicity Characteristic criteria for untreated waste; if a waste is hazardous or dangerous based on the silver-toxicity-characteristic criteria in Column 2 of Table 2.1, zinc and vanadium are not defined as underlying hazardous constituents and therefore are not subject to the UTS and are provided for information only. The third column in Table 2.1 provides both the Washington State and Federal allowable TCLP release limits for any UTS hazardous constituents for both untreated and treated waste forms. For this report, we placed silver at the top of the list in the table since it is the predominant hazardous/dangerous constituent in silver mordenite at 15 wt%.

# 3.0 Description of Testing

In this scoping study to determine whether a Washington State- and RCRA-compliant waste form could be produced from the spent silver mordenite, we tested reference, suspected worst-case, and candidate silver mordenite disposal forms as required by WAC 173-303-110 (WAC 2000b) and 40 CFR 268. This was done following the EPA's SW-846 TCLP Method 1311 and the EPA's acid digestion Methods 7760 for analysis of silver and 3010A for the other metals; it was also performed with analysis per EPA Methods 6010B for metals other than mercury and 7470A for mercury (EPA 2001). The original test plan did not identify method 7470 so it was later added by Test Exception. Table 3.1 lists the materials tested. The objective of this work was not to optimize the waste form but to determine whether a regulatory-compliant waste disposal form existed or if one offered sufficient promise to merit further development.

Material **Number of Replicates** Replicate Size, g **Material Size** Grout sans mordenite (control) 100 < 1 cm 3 3 0.16 cm dia extrudate 100 AgZ3 Grouted AgZ 100 < 1 cm AgZF 3 100 0.16 cm dia extrudate Grouted AgZF 3 100 < 1 cm 3 Grouted AgZ + 10 wt% CaI<sub>2</sub> 100 < 1 cm  $Ag^{\circ}Z$ 3 100 0.16 cm dia extrudate 3 Grouted Ag°Z 100 Ag°ZI 3 100 0.16 cm dia extrudate 3 Grouted Ag°ZI 100

**Table 3.1.** Silver Mordenite and Reference Materials Tested

PNWD implemented the RPP-WTP quality requirements by performing work in accordance with the quality assurance project plan (QAPjP) approved by the RPP-WTP Quality Assurance (QA) organization. This work was conducted to the quality requirements of NQA-1-1989 and NQA-2a-1990, Part 2.7 as instituted through PNWD's Waste Treatment Plant Support Project Quality Assurance Requirements and Description (WTPSP) Manual. The measurement and test equipment were compliant with the QA program requirements.

The TCLP analyses for silver were performed in accordance with EPA Test Methods for Evaluating Solid Waste - Physical Chemical Methods, SW-846, Third Edition and applicable elements of Bechtel's Quality Assurance Project Plan for Testing Programs Generating Environmental Regulatory Data, PL-24590-QA00001, as delineated in the subcontract to the performing laboratory.

The testing of AgZ and grouted AgZ provides reference cases as untreated and treated given the ionic nature of silver in AgZ. Thomas et al. (1977) describe the preparation of AgZ as 1) ion exchange of sodium or hydrogen mordenite by exposure at 60°C to an excess of a soluble silver salt, such as silver nitrate, followed by 2) washing the prepared AgZ with deionized water to remove any residual silver ions, and then 3) baking at 150°C to remove free water. The silver will be in AgZ as ionic silver with limited solubility in pure water.

During TCLP testing, significant silver could be removed from the AgZ because of silver acetate's solubility. In TCLP testing, the 100 g AgZ sample containing 15 g Ag was extracted with 2 L of either 0.064 M sodium acetate, 0.035 M acetic acid, or 0.1 M glacial acetic acid (EPA 2001). The solubility of silver acetate is 0.062 M or 6.7 g Ag/L (Dean 1973) or 13.4 g silver in 2 L. Thus, it is possible to extract nearly all the silver (88%) during TCLP testing of AgZ.

HF-treated AgZ and  $I_2$ -loaded Ag°Z should represent the two bounding cases for spent Ag°Z exposed to halogens. AgZF should represent the worst case for spent silver mordenite because AgF, the assumed sorption product, is very soluble at 14  $\underline{M}$  (Weast 1984), although the silver concentration could be controlled by silver acetate's solubility, which is less than silver fluoride's. AgZI should provide the best performance of all the possible spent Ag°Z forms because of the very low solubility of AgI,  $k_{sp} = 8.3 \times 10^{-17}$ , again assuming AgI formation (Dean 1973). Using Burger's predicted MOG composition for the HWVP (Burger and Scheele 1991), chlorine is the other significant halogen in the MOG, and although AgCl is quite insoluble,  $k_{sp}$  of  $1.8 \times 10^{-10}$  (Dean 1973), it is more soluble than silver iodide. At the predicted ratio of Cl:I of  $10^5$ , chlorine should be the predominant halogen in the spent Ag°Z (Burger and Scheele 1991).

Originally we planned to test HF-treated  $Ag^{\circ}Z$  to represent the worst-case halogen-treated spent  $Ag^{\circ}Z$ ; however, when we calculated the Gibbs free energy for the reaction of HF with silver metal, we found that the reaction with HF was not thermodynamically favored. The calculated free energy at 500 K for the reaction provided in Equation 1 was endothermic ( $\Delta G$ =+100 kJ/mol F) using Barin's (1989) free-energy data. To improve the likelihood that the HF-treated silver mordenite contained fluoride, in concert with the BNI cognizant engineer, we changed to AgZ because HF reacts exothermically via Equation 2 with  $Ag_2O$  ( $\Delta G$ =-1.1 kJ/mol F). We used silver oxide as the surrogate representative for the ionic silver in AgZ. We know of no available thermodynamic data for silver, neither in AgZ nor for silver silicate or aluminate. Although oxygen and oxides of nitrogen are present in the MOG, we did not consider their effects on the reaction of HF with  $Ag^{\circ}Z$  because these would likely have to proceed via a two-step mechanism, and we do not know how this will affect the capability of  $Ag^{\circ}Z$  to sorb HF.

$$2HF + 2Ag^{\circ} \leftrightarrow 2AgF + H_2$$
  $\Delta G = +200 \text{ kJ}$  (1)

$$2HF + Ag_2O \leftrightarrow 2AgF + H_2O \qquad \Delta G = -2.3 \text{ kJ}$$
 (2)

The grout without any added silver mordenite provides the background levels and serves as the control for the grouted samples. To assess the performance of a waste form, it is important to know the behavior of each individual waste form component.

We submitted the samples for TCLP testing and analysis per SW-846 methods 1311, 6010B, and 7470A to a National Environmental Laboratory Accreditation Conference and Washington State Department of Ecology accredited laboratory; Appendix A provides a copy of the Washington State accreditation certificate. Before submittal, the grout without AgZ and the grouted samples were sized to pass through a 9.5-mm sieve as required by SW-846 1311 for TCLP testing. SW-846 Method 1311 required no additional sizing for the AgZ, Ag°Z, AgZF, and Ag°ZI since they were 0.16-cm dia extrudate and would pass through the 9.5-mm sieve. Although suggested by Method 1311, we did not refrigerate the submitted samples because the high birth temperatures and conditions of AgZ, Ag°Z, AgZF, and Ag°ZI provide sufficient chemical and thermal stability to prevent degradation of tested materials by reaction with air or by thermal decomposition during their short transport by next-day delivery and before

their analysis within 3 days. Being inorganic and highly stable materials resistant to oxidation, the grouts were not refrigerated.

To assure control of aliquot and sample identities, subsamples were stored or contained in uniquely labeled cans that shielded the material from light. We did not refrigerate nor use any other special storage or shipping protections because the materials are stable at ambient conditions since they were prepared at ambient conditions or at elevated temperatures.

PNWD addressed TCLP test results verification activities by conducting an Independent Technical Review of the final data report in accordance with procedure QA-RPP-WTP-604. This review verified that the reported results were traceable, that inferences and conclusions were soundly based, and that the reported work satisfied the Test Plan objectives. The TCLP data were validated in accordance with the Data Validation Procedure for Chemical Analysis of Tank Waste and Related Samples, ADMIN-RPP-WTP-02-006, Rev 0.

## 3.1 Preparation of TCLP Tested Materials

Of the materials TCLP tested, AgZ is the only material commercially available. PNWD prepared the remaining materials as described in this section.

## 3.1.1 AgZ

Silver-exchanged mordenite was purchased from C\*Chem<sup>®</sup>. Based on the vendor-supplied analysis, the as-received IONEX Type Ag 900 AgZ contained 15.2-wt% silver (16.4-wt% silver on a dry basis). The AgZ was purchased without any special sizing as a 0.16-cm-dia extrudate. The as-received AgZ was a light gray as shown in Figure 3.1.

The AgZ was stored at ambient conditions in the C\*Chem® supplied container until used to prepare the various silver mordenite samples (see Figure 3.2) or subdivided into three 100-g aliquots for TC determination. The three aliquots that were submitted for TC determination were partitioned into three individual uniquely labeled metal containers that prevented light from impinging on the AgZ, and they were stored and shipped at ambient conditions.

## 3.1.2 Ag°Z Preparation

The Ag°Z was prepared using methods developed by Thomas and coworkers (1977) and successfully used by Scheele, Burger, and Matsuzaki (1983). First, we treated the purchased AgZ with Ar or  $N_2$  for 3 to 4 h at 300°C to remove residual air and moisture. After drying, flowing  $H_2$  bathed the AgZ for 24 h at 500°C to convert ionic silver within the zeolite to metallic silver. Third, we purged the AgZ with flowing Ar or  $N_2$  to remove residual  $H_2$ . The resulting Ag°Z was brown as shown in Figure 3.2.



Figure 3.1. Silver Mordenite



Figure 3.2. Reduced Silver Mordenite

The apparatus shown schematically in Figure 3.3 consisted of an inert gas ( $N_2$  or Ar) supply for removing residual oxygen from the AgZ, a supply of hydrogen, a thermometer/thermocouple combination, valves, gas flowmeters, a preheater, a column of AgZ, and pressure gauges at the preheater inlet and AgZ column outlet. Tube furnaces were used for the preheater and to heat the AgZ column.

The first batch of prepared Ag°Z was stored in a labeled individual metal container that limited exposure of the Ag°Z to light until submitted for TCLP testing or grouted. The 100-g aliquots submitted for TC determination were removed from the common container and placed into individual labeled metal cans and stored at ambient temperature.

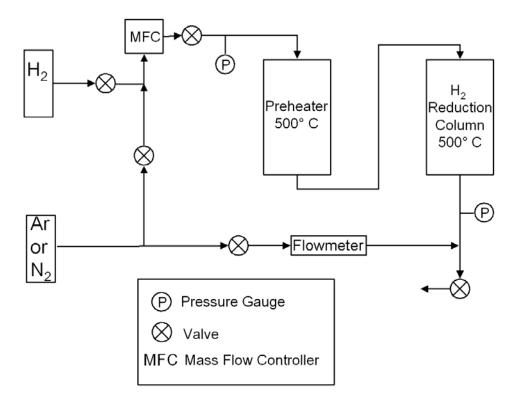


Figure 3.3. Schematic of Hydrogen Reduction System

#### 3.1.3 AgZF Preparation

We prepared the AgZF by treating AgZ with HF at the operational parameters and concentrations provided in Table 3.2 (Scheele and Burger 1987). The operational parameters are based on past operational parameter-optimization studies at the Pacific Northwest Laboratory (PNL) and the Idaho National Engineering Laboratory. We used the HF concentration predicted by Burger and Scheele (1991) for the HWVP MOG. The face velocity and HF concentration are for the gas at 20°C.

**Table 3.2.** Conditions for Preparation of AgZF and Ag°ZI (Scheele and Burger 1987; Burger and Scheele 1991)

Operating Parameter	Level
Bed Temperature	150°C
Packing Size	0.16 cm dia extrudate
Bed Diameter	5 cm
Bed length	15 to 25 cm
Face Velocity (Non-Critical)	5 to 7.5 m/min
Halogen (F as HF, I as I <sub>2</sub> ) concentration	$4-5 \times 10^{-5}$ mole/L

The bulk of the gas was slightly humidified to 2 to 20 torr H<sub>2</sub>O by bubbling a portion of the supplied air through ambient-temperature water. The stream was slightly humidified to assure that sufficient water was present for any reactions that may involve water and to assure that water is present to provide at least a minimum amount of mobility to the silver within the pores of the zeolite. Because zeolites are good desiccants, the pores should be well saturated with water, and increasing the water concentration in the gas stream should add very little more water to the zeolites. The stream was not fully humidified to the plant level per guidance of the BNI Cognizant Engineer.

The AgZ was treated with a 10% molar excess of the stoichiometric amount of HF (assuming AgF forms) to assure that the material was fully loaded with the HF. In anticipation of AgF formation with its slight yellow color, we visually monitored the column during HF loading; but found no evidence of a color front. A portion of the effluent stream was passed through a laboratory-scale fritted bubbler containing a sodium hydroxide solution to remove the HF and analyzed using a fluoride ion specific electrode. The resulting AgZF was a brownish gray as shown in Figure 3.4.

We used the apparatus shown schematically in Figure 3.5 to prepare the HF-treated AgZ. The system was composed of

- valves to regulate gas flow
- pressure gauges to leak test the apparatus and to monitor pressure drop across the bed
- a 150°C oven
- an air supply (bottled air)
- a water bubbler system to humidify the gases

- a bottle of diluted HF
- calibrated mass-flow controllers to control the HF flow through the AgZ
- mass-flow controllers and gas flowmeters for the bulk gases
- a preheater column
- an AgZ column
- a sodium hydroxide aqueous scrubber for the effluent gases.

Both the column and preheater were placed in a 150°C temperature-controlled oven. Teflon® and plastic tubing were used to deliver HF and air to the oven. The preheater was a



**Figure 3.4.** Fluoride Loaded Silver Mordenite

nominal 90-cm stainless steel coil of 6.35-mm OD tubing. The tubing between the preheater and the column was stainless. The AgZ was contained in an acrylic column.

The amount of fluoride loaded onto the AgZ is not well known. Based on mass difference and assuming the 7.1-wt% water content of the AgZ on its day of receipt, 45% of the fluoride loaded onto the AgZ. Using our analysis of the 1 M NaOH scrubber and assuming efficient scrubbing of HF by 1 M NaOH indicates that the AgZ column sorbed nearly all of the HF, including the 10% molar excess (assuming AgF formation) that passed into the column. A small amount of fluoride was found in the hydroxide scrubber.

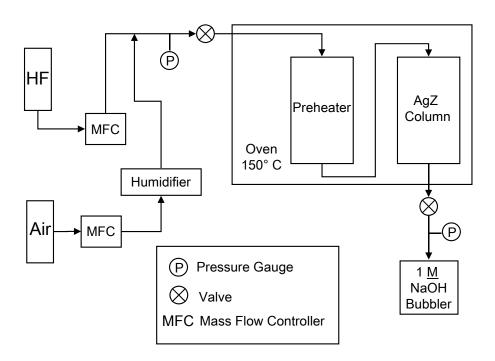


Figure 3.5. HF System Schematic

Before submitting for TCLP testing, the prepared HF-treated mordenite was mixed using a spatula in an attempt to provide a homogenous mix and then stored in a labeled individual metal container until submitted for TC determination or grouted. The 100-g aliquots that were submitted for TC determination were removed from the common container and placed into individual labeled metal jars that eliminated light exposure and stored at ambient conditions.

### Ag°ZI Preparation

The Ag°ZI was prepared by treating Ag°Z with a 10% molar excess, assuming AgI formation, of elemental iodine gas at the operational parameters and concentrations provided in Table 3.2 (Scheele and Burger 1987). The operational parameters are based on past operational parameter optimization studies at PNL and the Idaho National Engineering Laboratory. To shorten the length of time required to load the Ag°Z with  $I_2$ , we input the iodine at Burger and Scheele's (1991) predicted HWVP MOG fluoride concentration of  $4.5 \times 10^{-05}$  mol F/L rather than the predicted  $2.4 \times 10^{-11}$  mol I/L. The face velocity and  $I_2$  concentration are for the gas at  $20^{\circ}$ C.

To prepare the  $Ag^{\circ}ZI$ , we passed an  $I_2$ -containing humidified gas stream through a preheater and then through a  $150^{\circ}C$  column of  $Ag^{\circ}Z$  using the apparatus presented schematically in Figure 3.6. A pump provided the bulk, or 92%, of the air. We delivered the required amount of gaseous  $I_2$  by passing air through a  $65^{\circ}C$  solution of KI saturated with  $I_2$ , which provided near equilibrium  $I_2$  concentration of  $6.2 \times 10^{-04}$  mole I/L and humidified the air. Both the column and preheater were placed inside a  $150^{\circ}C$  temperature-controlled oven. We partitioned the column effluent into two streams, with one portion bubbled through a solution of sodium hydroxide using a laboratory-scale fritted bubbler to remove the  $I_2$  and the second portion passed through a small silver faujasite column to indicate iodine in the effluent. We weighed the bed before and after I loading and analyzed the sodium hydroxide trap solution using an iodide-specific ion electrode and found 96% and 99.5%, respectively, of the theoretical iodine loading, assuming the formation of AgI.

We used chemically compatible materials to transport the gases. Plastic tubing delivered the bulk of the air to the stainless steel preheater. The  $I_2$ -laden gas, delivered to the oven in glass tubing, and the preheated air were blended and transported to the glass column in glass tubing.

We visually monitored the  $I_2$  loading on the column by following the bright yellow front as the iodine loaded onto the  $Ag^{\circ}Z$ . Figure 3.8 shows the bright yellow color of the fully loaded  $Ag^{\circ}Z$  at temperature after we concluded the preparation while Figure 3.7 shows how  $Ag^{\circ}ZI$  appears at room temperature.

The Ag°ZI was well mixed to provide a nominally homogenous mix before being packaged into three 100-g aliquots for TCLP testing and analysis and before being grouted. The grouted Ag°ZI monoliths were prepared immediately.

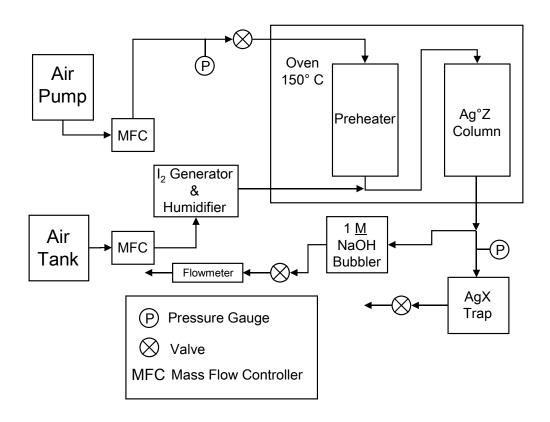


Figure 3.6. Iodine System Schematic



**Figure 3.7**. I<sub>2</sub>-Loaded Ag°Z at 150°C



**Figure 3.8**. I<sub>2</sub>-Loaded Ag°Z at 20°C

## 3.1.4 Grout Preparation

We prepared six separate grouts for testing per Table 3.1. For each grouted material, we planned to prepare three nominal 110-g replicate grout monoliths using the target composition provided in Table 3.3. Using the target composition proved troublesome in some instances because the treated silver mordenites were dried by reduction or exposure to the halide gases. In consultation with the Cognizant BNI Engineer, the water:cement ratio was allowed to increase until a workable mix was achieved.

Grout	Portland Type III cement
Water: cement ratio (dry mass basis)	0.30
Waste Loading, mass %	25
Curing time, h	72

**Table 3.3.** Target Grout Composition

The procedure for preparing the grouts was simple. The ingredients were mixed using a spatula to prepare a uniform mixture, transferred to labeled plastic containers, and cured 72 h per direction of the BNI Cognizant Engineer in a 100% humidity atmosphere. We found that it is best if the dry ingredients are mixed together before adding the water. A monolith of grout without any added silver mordenite, which is presented in Figure 3.9 and Figure 3.10, presents grouted AgZ with added CaI<sub>2</sub> sized for TCLP testing.

As shown in Table 3.1, in addition to the AgZ-, Ag°Z-, AgZF-, and Ag°ZI-containing grouts, we prepared a reference set of grouts without any silver mordenite loading and a second set of grouted AgZ with 10 wt% CaI<sub>2</sub>. We added CaI<sub>2</sub> to test a potential approach to reduce silver's solubility. The unloaded grout was prepared to provide a baseline behavior for the grout itself.



Figure 3.9. Portland Type III Grout Monolith



**Figure 3.10.** Grouted  $AgZ + CaI_2$  Sized for TCLP Testing

Table 3.4 provides the final make-up compositions of the prepared grouts. We were able to prepare the grout without added silver mordenite using the recipe provided in Table 3.3 without difficulty. As shown in Table 3.4, we had to adjust the water-to-cement ratio for the remaining grouts to accommodate the mordenites' desire for water.

**Table 3.4.** Grout Make-Up Preparations

Mordenite	Water,	Dry Cement,	Mordenite,	CaI <sub>2</sub> ,	Water:Cement
Added	wt%	wt%	wt%	wt%	ratio
None	23	77	0	0	0.3
AgZ	21	54	25	0	0.4
AgZ, CaI <sub>2</sub>	19	44	26	11	0.44
Ag°Z	21	54	25	0	0.39
AgZF	21	54	25	0	0.39
Ag°ZI	24	51	25	0	0.47

After curing, the cement monoliths were size reduced to less than 1 cm for the TCLP testing and leachate analysis. The three grout monoliths were individually and independently size reduced using a hammer and chisel inside a container to prevent the loss of material. We sieved the size-reduced grout to yield three 100-g replicates required by SW-846, Method 1311. Each recovered individual replicate was assigned and labeled with a unique identity to control, store, and maintain the identity of the samples. The sized grouts were stored in plastic bags inside metal containers at room temperature.

# 4.0 Results of Toxicity Characterization Determination

All of the grouted and ungrouted samples were submitted, in triplicate, to a National Environmental Laboratory Accreditation Conference and Washington State Department of Ecology accredited laboratory for TCLP testing. The laboratory reported the method detection limit (MDL) and the analyte reporting limit or estimated quality limit (EQL) for each sample run. If a measurement was below the MDL, then it is reported here as less than the MDL.

The MDL is determined according to standard EPA guidelines, and the reporting limit is determined by the analyst to be a value that is statistically different from the MDL (typically 10 times the MDL). The MDL may vary from sample to sample because the analyst may change the dilution of a sample to bring the concentration to within the instrument's calibration range. In practice, the reporting limit or EQL is the level at and above which the analyst believes the method provides an accurate measure of the analyte. Below the reporting limit and above the MDL, the analyst considers the reported value to be an estimate.

In several instances, the matrix spike recoveries for silver and/or mercury in grout-derived solutions were outside the target control range of 75 to 125%, while the laboratory control-sample recoveries were always within the target control range. Based on the laboratory-control-sample recoveries being within control ranges, the instrumentation was functioning properly. When the matrix spike recovery is out of the control range, this suggests that the matrix is releasing an element or combination of elements that interferes with the measurement of an analyte. To eliminate the matrix interference, options include reanalysis using alternative analytical approaches, such as calibrating the instrument with calibration standards in a representative sample matrix or by adding known amounts of analyte to the sample solution; this latter method is known as "known addition" (Kolthoff et al. 1969). It is interesting that the matrix spike recovery outside of normal control levels is not universal for all grout-derived TCLP solutions. We have no explanation for this difference in behavior.

The implications of an out-of-control-range spike recovery depend on the measured concentration in the TCLP extract. Method 1311 recommends that the matrix spike level be at or near the regulatory level (EPA 2001). At this spike level, a poor spike recovery on a sample with a much higher than regulatory level has no impact on the interpretation. If the sample has an analyte concentration near the spike level, the user of the data must evaluate the results and spike recovery. Adjusting the measured result using the matrix recovery is not a valid approach to provide an accurate measure of the true concentration but should be useful to provide a very rough estimate.

The TCLP testing results were validated by PNWD Quality Assurance Staff using a PNWD-authored and BNI-accepted procedure. The data qualifiers applied as a result of this data validation are:

- U The constituent was analyzed for but was not detected. The data should be considered usable for decision-making purposes.
- UJ The constituent was analyzed for and was not detected. Due to a QC deficiency identified during validation, the value reported may not accurately reflect the minimum detectable activity. The data should be considered usable for decision-making purposes.
- J Indicated that the constituent was analyzed for and detected. The associated value is estimated due to a QC deficiency identified during data validation. The data should be considered usable for decision-making purposes.

- UR Indicate that the constituent was analyzed for and not detected; however, due to an identified QC deficiency, the data should be considered unusable for decision-making purposes.
- R Indicates that the constituent was analyzed for and detected; however, due to an identified QC deficiency, the data should be considered unusable for decision-making purposes.

Throughout the discussion in this section, the results are compared to either the untreated waste Toxicity Characteristic limits for the ungrouted samples or the UTS for the grouted samples; the Washington State and EPA limits are the same for each waste disposal form, treated or untreated. See Table 2.1 for these limits. The results of these tests follow.

# 4.1 Silver Mordenite (AgZ)

Three replicate samples of as-received AgZ were submitted for TCLP testing and leachate analysis. As shown in Table 4.1, all of the UHCs except silver are below both the Washington State and Federal regulatory limits (Table 2.1). Ranging from 1920 to 2250 mg Ag/L, the silver release is several orders of magnitude above the regulatory limits. Because of the poor matrix-spike recovery for mercury of 20%, the mercury result for AgZ must be rejected, even though no mercury was observed in the samples.

Underlying Hazardous Constituents	Concentration, mg/L									
	Universal	AgZ <sup>(c)</sup> #1	AgZ <sup>(c)</sup> #2	AgZ <sup>(c)</sup> #3	Reporting Limit	Method				
	Treatment	TCLP Extract	TCLP Extract	TCLP Extract		Detection				
	Standard	Concentration	Concentration	Concentration	Limit	Limit				
Silver <sup>(a)</sup>	0.14	2250	2090	1920	5	0.008				
Arsenic	5.0	< 0.004	< 0.004	< 0.004	0.75	0.004				
Barium	21	0.019	0.031	0.032	0.5	0.003				
Beryllium	1.22	0.0016	0.0016	0.0023	0.13	0.0005				
Cadmium	0.11	< 0.0005	< 0.0005	< 0.0005	0.13	0.0005				
Chromium	0.60	< 0.005	< 0.005	< 0.005	0.25	0.005				
Nickel	11	< 0.03	< 0.03	< 0.03	1	0.03				
Lead	0.75	0.0079	0.011	0.011	0.25	0.003				
Antimony	1.15	< 0.009	< 0.009	< 0.009	0.25	0.009				
Selenium	5.7	< 0.007	0.012	0.014	0.13	0.007				
Thallium	0.20	< 0.005	0.014	0.0092	0.5	0.005				
Vanadium <sup>(b)</sup>	1.6	< 0.02	< 0.02	< 0.02	1.3	0.02				
Zinc <sup>(b)</sup>	4.3	0.045 <b>UJ</b>	0.068 UJ	0.067 UJ	0.5	0.02				
Mercury <sup>(a)</sup>	0.025	<0.0003 UR	<0.0003 UR	<0.0003 UR	0.001	0.0003				

**Table 4.1.** Results of AgZ TCLP Testing

- (a) Silver spike level <100× matrix silver concentration. Matrix spike recovery was 20% for Mercury.
- (b) Vanadium and zinc are not UHCs for wastes exhibiting the silver toxicity characteristic. The results are presented for information only.
- (c) Data reported between the reporting limit and the method detection limit are estimated.
- UJ At least one result in the mean was analyzed for and was not detected. Due to a QC deficiency identified during validation, the value reported may not accurately reflect the minimum detectable activity. The data should be considered usable for decision-making purposes.
- UR At least one result in the mean was analyzed for and not detected; however, due to an identified QC deficiency, the data should be considered unusable for decision-making purposes.

# 4.2 Grout Without Silver Mordenite

We submitted triplicate grout samples of Portland Type III Cement with no added silver mordenite for TCLP testing and leachate analysis. This testing was to determine the TCs of the UTS hazardous constituents of the cement used to prepare the grouted silver mordenites tested.

Table 4.2 provides the results of the TCLP tests on the grout. Note that several of the UHCs were found in the TCLP leachates above reporting levels and the MDLs but below the UTS. The reporting limit and MDL in columns 4 and 5 are for the first two samples with the reporting limit, and MDL for the 3<sup>rd</sup> sample are in columns 7 and 8.

We are surprised by measured silver in the pure Portland cement grout extract. Possible explanations for its presence include silver in the grout or silver from a previous sample with a substantial silver concentration in the transfer line. To explain the observation of silver, further testing is required. To help explain the presence of silver in two of the three replicates, we recommend chemically analyzing the Portland cement used to prepare the grout and/or prepare and TCLP test fresh pure grout samples.

When silver was observed, silver was still below the UTS. The matrix spike recoveries for the batch containing grout, AgZ in grout, and AgZ in grout with CaI<sub>2</sub> amendment for these samples were 54% for silver and 74% for mercury; the sample used for the matrix spike was Grout Without Additives #2. The analyst believes that the grout releases constituents that interfere with the extract analysis since the liquid control spikes were within existing control levels. If one were to use the matrix spike recovery to adjust the measured silver concentration, which is not a valid practice, the mean release is 0.05 mg Ag/L, which remains below the 0.14 mg Ag/L UTS regulatory level. Applying the same approach to mercury does not change the conclusions with respect to mercury concentrations with respect to regulatory levels.

**Table 4.2.** Grout TCLP Results

	Concentration, mg/L									
Underlying Hazardous Constituents		Grout <sup>(c)</sup> #1	Grout <sup>(c)</sup> #2			Grout <sup>(c)</sup> #3				
		TCLP Extract Concentration	TCLP Extract Concentration	Reporting Limit	Method Detection Limit	TCLP Extract Concentration	Reporting Limit	Method Detection Limit		
Silver <sup>(a)</sup>	0.14	0.06 <b>J</b>	<0.008 UJ	0.05	0.008	0.016	0.05	0.008		
Arsenic	5.0	< 0.004	< 0.004	0.75	0.004	< 0.004	0.75	0.004		
Barium	21	0.66	0.78	0.5	0.003	0.69	0.5	0.003		
Beryllium	1.22	< 0.0005	0.0015	0.13	0.0005	< 0.0005	0.13	0.0005		
Cadmium	0.11	< 0.0005	< 0.0005	0.13	0.0005	< 0.0005	0.13	0.0005		
Chromium	0.60	0.01	0.016	0.25	0.005	0.012	0.25	0.005		
Nickel	11	0.083	0.083	1	0.03	0.086	1	0.03		
Lead	0.75	0.0045	< 0.003	0.25	0.003	0.004	0.25	0.003		
Antimony	1.15	< 0.009	< 0.009	0.25	0.009	< 0.009	0.25	0.009		
Selenium	5.7	0.012	0.007	0.13	0.007	0.012	0.13	0.007		
Thallium	0.20	0.014	< 0.005	0.5	0.005	0.009	0.5	0.005		
Vanadium <sup>(b)</sup>	1.6	<0.02 UJ	<0.02 UJ	1.25	0.02	< 0.02	1.25	0.02		
Zinc <sup>(b)</sup>	4.3	<0.02 UJ	<0.02 UJ	0.5	0.02	<0.02 UJ	0.5	0.02		
Mercury <sup>(a)</sup>	0.025	<0.0003 UJ	<0.0003 UJ	0.001	0.00003	<0.00006 UJ	0.001	0.00006		

- (a) Matrix spike recoveries were 54% and 74% for silver and mercury, respectively.
- (b) Vanadium and zinc are not UHCs for wastes exhibiting the silver toxicity characteristic. The results are presented for information only.
- (c) Data reported between the reporting limit and the method detection limit are estimated.
- UJ At least one result in the mean was analyzed for and was not detected. Due to a QC deficiency identified during validation, the value reported may not accurately reflect the minimum detectable activity. The data should be considered usable for decision-making purposes.
- J At least one result in the mean was analyzed for and detected. The associated value is estimated due to a QC deficiency identified during data validation. The data should be considered usable for decision-making purposes.

#### 4.3 Grouted Silver Mordenite

As shown in Table 4.3, except for silver, the amount of UHCs released during TCLP testing for each of the triplicate grouted AgZ samples are below Washington State and Federal regulatory limits. The performance of the grouted AgZ with respect to these metals is consistent with the performances of AgZ and grout by themselves.

Grouted AgZ is an improved disposal form compared to ungrouted AgZ. The silver released by the grouted AgZ ranged from 0.62 to 0.75 mg Ag/L, all below the EPA's untreated waste toxicity characteristic levels but exceeding the UTS's 0.14 mg Ag/L. These TCLP concentrations are well below the 2000-mg Ag/L measured for the AgZ by itself. This reduction indicates significant protection of the AgZ by the grout or a substantially lower release of silver as a result of treatment.

The matrix spike recoveries for the batch containing grout, AgZ in grout, and AgZ in grout with CaI<sub>2</sub> amendment for these samples were 54% for silver and 74% for mercury; the sample used for the matrix spike was Grout without additives #2. For the grouted AgZ, this poor recovery will not affect the

interpretation of the TCLP results with respect to regulatory requirements because all the reported results are above the regulatory levels.

**Table 4.3.** Grouted Silver Mordenite TCLP Results

Underlying -		Concentration, mg/L								
Hazardous	Universal	Grouted AgZ <sup>(c)</sup> #1	Grouted AgZ <sup>(c)</sup> #2	Grouted AgZ <sup>(c)</sup> #3	Reporting	Method				
Constituents	Treatment	TCLP Extract	TCLP Extract	TCLP Extract	Limit	Detection				
	Standard	Concentration	Concentration	Concentration	Lilling	Limit				
Silver <sup>(a)</sup>	0.14	0.62 <b>J</b>	0.75 <b>J</b>	0.68 <b>J</b>	0.05	0.008				
Arsenic	5.0	< 0.004	< 0.004	0.0082	0.75	0.004				
Barium	21	0.33	0.35	0.35	0.5	0.003				
Beryllium	1.22	< 0.0005	< 0.0005	0.0026	0.13	0.0005				
Cadmium	0.11	< 0.0005	< 0.0005	0.0029	0.13	0.0005				
Chromium	0.60	0.016	0.016	0.019	0.25	0.005				
Nickel	11	< 0.03	< 0.03	< 0.03	1	0.03				
Lead	0.75	< 0.003	< 0.003	0.003	0.25	0.003				
Antimony	1.15	< 0.009	< 0.009	< 0.009	0.25	0.009				
Selenium	5.7	0.013	0.013	0.013	0.13	0.007				
Thallium	0.20	< 0.005	< 0.005	< 0.005	0.5	0.005				
Vanadium <sup>(b)</sup>	1.6	< 0.02	< 0.02	< 0.02	1.3	0.02				
Zinc <sup>(b)</sup>	4.3	<0.02 UJ	<0.02 UJ	<0.02 UJ	0.5	0.02				
Mercury <sup>(a)</sup>	0.025	<0.00006 UJ	<0.00006 <b>UJ</b>	<0.00006 UJ	0.001	0.00006				

<sup>(</sup>a) Matrix spike recoveries were 54% and 74% for silver and mercury, respectively.

Data reported between the reporting limit and the method detection limit are estimated.

Using the poor matrix spike recovery of 54% for silver to adjust the silver concentration, which is not a valid practice, would only increase the suspected result, which is already above the UTS regulatory level and would not affect the conclusion regarding treatment performance with respect to regulatory criteria. Using the 74% matrix spike recovery for mercury to adjust the measured amount would not raise the mercury concentration near the UTS regulatory level of 0.025 mg Hg/L. These rough estimates suggest that no further testing is required to improve matrix spike recoveries.

### 4.4 Grouted Silver Mordenite with Calcium Iodide Amendment

The addition of 10-wt% CaI<sub>2</sub> to grouted 25 wt% AgZ improves the performance of the grouted AgZ disposal form. Adding CaI<sub>2</sub> reduced the silver concentration in the TCLP leachate to <0.008 mg Ag/L as shown in Table 4.4, which is less than the UTS limits. As with grouted AgZ, all of the other UHCs fall below the Washington State and Federal UTS TCLP concentration limits; see Table 2.1.

<sup>(</sup>b) Vanadium and zinc are not UHCs for wastes exhibiting the silver toxicity characteristic. The results are presented for information only.

UJ - At least one result in the mean was analyzed for and was not detected. Due to a QC deficiency identified during validation, the value reported may not accurately reflect the minimum detectable activity. The data should be considered usable for decision-making purposes.

J - At least one result in the mean was analyzed for and detected. The associated value is estimated due to a QC deficiency identified during data validation. The data should be considered usable for decision-making purposes.

The matrix spike recoveries for the batch containing grout, AgZ in grout, and AgZ in grout with CaI<sub>2</sub> amendment for these samples were 54% for silver and 74% for mercury; the sample used for the matrix spike was Grout without additives #2. Using the matrix spike recoveries to estimate silver and mercury concentrations would not affect conclusions regarding compliance with regulatory levels. These rough estimates suggest that no further testing is required to improve matrix spike recoveries.

The reduction in silver release by adding  $CaI_2$  is accomplished due to the very low solubility product of AgI,  $k_{sp}$ =8.3 × 10<sup>-17</sup> (Dean 1973).  $CaI_2$  is soluble in pure room temperature water at 7  $\underline{M}$  (Weast 1984); the calcium in the cement will reduce this solubility by an unknown amount because of its own limited solubility. With iodide in solution, any silver that is dissolved will react with the available iodide within the grout, thus effectively preventing the release of silver to the TCLP extract.

**Table 4.4.** Grouted Silver Mordenite with Calcium Iodide Amendment TCLP Results

			Concen	tration, mg/L		
Underlying Hazardous	Universal Treatment	Grouted AgZ with CaI2 <sup>(c)</sup> #1	Grouted AgZ with CaI2 <sup>(c)</sup> #2	Grouted AgZ with CaI2 <sup>(c)</sup> #3	Reporting	Method Detection
Constituents	Standard	TCLP Extract	TCLP Extract	TCLP Extract	Limit	Limit
	Standara	Concentration	Concentration	Concentration		Ziiii
Silver <sup>(a)</sup>	0.14	<0.008 <b>UJ</b>	<0.008 <b>UJ</b>	<0.008 <b>UJ</b>	0.1	0.008
Arsenic	5.0	< 0.004	< 0.004	< 0.004	0.75	0.004
Barium	21	0.57	0.59	0.52	0.5	0.003
Beryllium	1.22	< 0.0005	< 0.0005	< 0.0005	0.13	0.0005
Cadmium	0.11	< 0.0005	< 0.0005	< 0.0005	0.13	0.0005
Chromium	0.60	0.008	0.0073	0.0092	0.25	0.005
Nickel	11	< 0.03	< 0.03	< 0.03	1	0.03
Lead	0.75	0.0036	0.0045	0.0048	0.25	0.003
Antimony	1.15	< 0.009	< 0.009	< 0.009	0.25	0.009
Selenium	5.7	0.014	0.014	0.015	0.13	0.007
Thallium	0.20	< 0.005	< 0.005	< 0.005	0.5	0.005
Vanadium <sup>(b)</sup>	1.6	< 0.02	< 0.02	< 0.02	1.3	0.02
Zinc <sup>(b)</sup>	4.3	<0.02 <b>UJ</b>	<0.02 <b>UJ</b>	<0.02 UJ	0.5	0.02
Mercury <sup>(a)</sup>	0.025	<0.00006 <b>UJ</b>	<0.00006 <b>UJ</b>	<0.00006 <b>UJ</b>	0.001	0.00006

<sup>(</sup>a) Matrix spike recoveries were 54% and 74% for silver and mercury, respectively.

### 4.5 Reduced Silver Mordenite

As Table 4.5 shows, Ag°Z performed well in TCLP testing with respect to all UHCs except for silver. The amounts of all UHCs except silver were below Washington State and Federal UTS concentration limits.

<sup>(</sup>b) Vanadium and zinc are not UHCs for wastes exhibiting the silver toxicity characteristic. The results are presented for information only.

<sup>(</sup>c) Data reported between the reporting limit and the method detection limit are estimated.

UJ - At least one result in the mean was analyzed for and was not detected. Due to a QC deficiency identified during validation, the value reported may not accurately reflect the minimum detectable activity. The data should be considered usable for decision-making purposes.

The silver concentrations in the TCLP leachates for the three Ag°Z samples ranged from 2.9 to 3.0 mg Ag/L TCLP leachate or below the Washington State and EPA toxicity characteristic criteria of 5.0 mg Ag/L. The silver concentrations exceeded the EPA's 0.14 mg Ag/L UTS limit for treated wastes. Ag°Z with its 3 mg Ag/L release level performed far better than AgZ with its 2000 mg Ag/L release concentration.

Table 4.5. Reduced Silver Mordenite TCLP Results

	Concentration, mg/L									
Underlying	Universal	Ag°Z <sup>(c)</sup> #1	A	g°Z <sup>(c)</sup> #2		Ag°Z <sup>(c)</sup> #3				
Hazardous Constituents	Treatment	TCLP Extract Concentration			Method Detection Limit	TCLP Extract Concentration	Reporting Limit	Method Detection Limit		
Silver <sup>(a)</sup>	0.14	2.9 <b>J</b>	3.0 <b>J</b>	0.05	0.008	3.0 <b>J</b>	0.05	0.008		
Arsenic	5.0	0.017	0.012	0.75	0.004	0.0072	0.75	0.004		
Barium	21	0.065	0.038	0.5	0.003	0.051	0.5	0.003		
Beryllium	1.22	0.0035	0.0031	0.125	0.0005	0.003	0.125	0.0005		
Cadmium	0.11	< 0.0005	< 0.0005	0.125	0.0005	< 0.0005	0.125	0.0005		
Chromium	0.60	0.0058	< 0.005	0.25	0.005	< 0.005	0.25	0.005		
Nickel	11	< 0.03	< 0.03	1	0.03	< 0.03	1	0.03		
Lead	0.75	0.055 <b>J</b>	0.057 <b>J</b>	0.25	0.003	0.059 <b>J</b>	0.25	0.003		
Antimony	1.15	< 0.009	< 0.009	0.25	0.009	< 0.009	0.25	0.009		
Selenium	5.7	0.0082	0.01	0.125	0.007	0.0072	0.125	0.007		
Thallium	0.20	< 0.005	< 0.005	0.5	0.005	< 0.005	0.5	0.005		
Vanadium <sup>(b)</sup>	1.6	< 0.02	< 0.02	1.25	0.02	< 0.02	1.25	0.02		
Zinc <sup>(a)</sup>	4.3	0.057 UJ	0.051 <b>UJ</b>	0.5	0.02	0.054 <b>UJ</b>	0.5	0.02		
Mercury <sup>(a)</sup>	0.025	<0.00006 <b>UJ</b>	<0.00006 <b>UJ</b>	0.001	0.00006	<0.0003 <b>UJ</b>	0.01	0.0003		

<sup>(</sup>a) Matrix spike recoveries were 136% for one silver spike and 74% for mercury.

### 4.6 Grouted Reduced Silver Mordenite

Grouting Ag°Z improved the performance of the waste disposal form with respect to silver release compared to Ag°Z by itself. Comparing the silver-release from Ag°Z found in Table 4.5 with that from grouted Ag°Z in Table 4.6 shows a reduction in silver concentration from 3 to 0.3 mg Ag/L. Table 4.6 also shows that all UHCs except silver were below the UTS limits.

The silver release level of 0.3 mg Ag/L was below the Toxicity Characteristic designation level of 5.0 mg Ag/L. The silver concentration for each replicate sample was a factor of 2 over the UTS limit for treated wastes.

<sup>(</sup>b) Vanadium and zinc are not UHCs for wastes exhibiting the silver toxicity characteristic. The results are presented for information only.

<sup>(</sup>c) Data reported between the reporting limit and the method detection limit are estimated.

UJ - At least one result in the mean was analyzed for and was not detected. Due to a QC deficiency identified during validation, the value reported may not accurately reflect the minimum detectable activity. The data should be considered usable for decision-making purposes.

J - At least one result in the mean was analyzed for and detected. The associated value is estimated due to a QC deficiency identified during data validation. The data should be considered usable for decision-making purposes.

Table 4.6. Grouted Reduced Silver Mordenite TCLP Results

		Concentration, mg/L								
		Grouted Ag°Z <sup>(b)</sup>	Grouted Ag°Z <sup>(b)</sup>	Grouted Ag°Z <sup>(b)</sup>						
Underlying	Universal	#1	#2	#3		Method				
Hazardous	Treatment	TCLP Extract	TCLP Extract	TCLP Extract	Reporting	Detection				
Constituents	Standard	Concentration	Concentration	Concentration	Limit	Limit				
Silver	0.14	0.28	0.38	0.17	0.05	0.008				
Arsenic	5.0	< 0.004	< 0.004	< 0.004	0.75	0.004				
Barium	21	0.45	0.56	0.56	0.5	0.003				
Beryllium	1.22	< 0.0005	< 0.0005	< 0.0005	0.125	0.0005				
Cadmium	0.11	< 0.0005	< 0.0005	< 0.0005	0.125	0.0005				
Chromium	0.60	0.0085	0.0086	0.007	0.25	0.005				
Nickel	11	0.045	0.05	0.051	1	0.03				
Lead	0.75	0.0033 <b>UJ</b>	0.003 <b>UJ</b>	<0.003 UJ	0.25	0.003				
Antimony	1.15	< 0.009	< 0.009	< 0.009	0.25	0.009				
Selenium	5.7	0.0079	0.0091	0.011	0.125	0.007				
Thallium	0.20	< 0.005	< 0.005	< 0.005	0.5	0.005				
Vanadium <sup>(a)</sup>	1.6	< 0.02	< 0.02	< 0.02	1.25	0.02				
Zinc <sup>(a)</sup>	4.3	< 0.02	< 0.02	< 0.02	0.5	0.02				
Mercury	0.025	< 0.00006	< 0.00006	< 0.00006	0.001	0.00006				

<sup>(</sup>a) Vanadium and zinc are not UHCs for wastes exhibiting the silver toxicity characteristic. The results are presented for information only.

### 4.7 Silver Mordenite Loaded with Fluoride

The HF-treated AgZ was expected to perform the worst of any halogen-loaded silver mordenite with respect to silver release during TCLP testing because AgF is the most soluble halide,  $14.3 \, \underline{M}$  at  $15.5^{\circ}$ C (Weast 1984). As expected, the silver concentration was quite high with releases ranging from 250 to 1830 mg Ag/L; see

<sup>(</sup>b) Data reported between the reporting limit and the method detection limit are estimated.

UJ - At least one result in the mean was analyzed for and was not detected. Due to a QC deficiency identified during validation, the value reported may not accurately reflect the minimum detectable activity. The data should be considered usable for decision-making purposes.

Table 4.7. Two of the three replicates released near the 2200 mg Ag/L concentration that was released by AgZ.

The matrix spike recoveries for silver and mercury for AgZF were outside of the control limits. The extract from AgZF#1 was used as the matrix. Spike levels were 2.5 mg Ag/L and 0.025 mg/L for mercury. The silver spike level was <1% of the measured silver concentration and so is within the analytical error for the method. Because the silver level is far above the regulatory criteria, the recovery has no impact on conclusions regarding the regulatory status of the material. Measured mercury levels are well below regulatory criteria, and thus the matrix recovery should have no impact on assessments regarding disposal.

All the UHCs except silver are below the Washington State and Federal regulatory limits. Silver is well above the 5.0 mg Ag/L limit for the untreated waste Toxicity Characteristic limit and above the UTS limit of 0.14 mg Ag/L.

**Table 4.7.** Silver Mordenite Loaded with Fluoride TCLP Results

Undonlying		Concentration, mg/L								
Underlying Hazardous	Universal	AgZF <sup>(c)</sup> #1	AgZF <sup>(c)</sup> #2	AgZF <sup>(c)</sup> #3	Reporting	Method				
Constituents	Treatment	TCLP Extract	TCLP Extract	TCLP Extract	Limit	Detection				
	Standard	Concentration	Concentration	Concentration	Limit	Limit				
Silver <sup>(a)</sup>	0.14	248	1740	1830	5	0.008				
Arsenic	5.0	0.016	< 0.004	< 0.004	0.75	0.004				
Barium	21	0.043	0.046	0.018	0.5	0.003				
Beryllium	1.22	0.033	0.027	0.026	0.125	0.0005				
Cadmium	0.11	< 0.0005	< 0.0005	< 0.0005	0.125	0.0005				
Chromium	0.60	0.091	0.049	0.046	0.25	0.005				
Nickel	11	0.046	< 0.03	< 0.03	1	0.03				
Lead	0.75	0.019 <b>UJ</b>	0.0067 <b>UJ</b>	0.0056 UJ	0.25	0.003				
Antimony	1.15	< 0.009	< 0.009	< 0.009	0.25	0.009				
Selenium	5.7	0.015	< 0.007	0.0082	0.125	0.007				
Thallium	0.20	< 0.005	< 0.005	< 0.005	0.5	0.005				
Vanadium <sup>(b)</sup>	1.6	0.074	< 0.02	< 0.02	1.25	0.02				
Zinc <sup>(b)</sup>	4.3	0.23	0.043	0.025	0.5	0.02				
Mercury <sup>(a)</sup>	0.025	<0.00006 UJ	<0.00006 UJ	<0.00006 UJ	0.001	0.00006				

<sup>(</sup>a) Matrix spike recoveries for silver at 2.5 mg/L and mercury at 0.025 mg/L less than 75%. Silver spike was <1% of silver content in matrix.

### 4.8 Grouted Silver Mordenite Loaded with Fluoride

As with grouted AgZ, measured TCLP releases of the UHCs with the exception of silver fell below the Washington State and Federal regulatory limits; compare Table 4.8 with Table 2.1. In Table 4.8, we grouped Samples 1 and 3 together with their reporting and minimum detection limits and Sample 2 grouped with its reporting limit and MDL. TCLP silver release concentrations ranged from 0.51 to 523 mg Ag/L with two of the samples at 0.51 and 0.76 mg Ag/L. Thus in two cases, the silver release was less than the Toxicity Characteristic limit for untreated waste. All three silver concentrations exceeded the UTS limit of 0.14 mg Ag/L.

Although the 523-mg Ag/L result is inconsistent with the other results, we have no basis to discard any individual analytical result. For the grouted AgZF, the assessment of the material's performance with respect to regulatory requirements will be unaffected by any of the three results since all exceed the treated waste limit of 0.14 mg Ag/L extract. The two lower results do suggest that it may be possible to reduce the silver release by optimizing the waste form.

<sup>(</sup>b) Vanadium and zinc are not UHCs for wastes exhibiting the silver toxicity characteristic. The results are presented for information only.

<sup>(</sup>c) Data reported between the reporting limit and the method detection limit are estimated.

UJ - At least one result in the mean was analyzed for and was not detected. Due to a QC deficiency identified during validation, the value reported may not accurately reflect the minimum detectable activity. The data should be considered usable for decision-making purposes.

The matrix silver spike recovery at 48% was outside control limits; the sample used for the matrix spike was grouted AgZF #1. Because the measured silver levels are above the 0.14-mg Ag/L UTS UHC criteria, the poor silver spike recovery should have no impact on evaluating the results with respect to disposal criteria.

It is interesting that the constituents released from Grouted AgZF#2 were typically higher than from its two replicate siblings. In fact, Grouted AgZF#2 is also the only sample out of all samples tested that shows a mercury concentration at or above the reportable limit. We have no explanation for the typically higher measured levels in Grouted AgZF #2. The analysts were confident in the measurements, and we could not identify any differences between grout-sample preparations.

# 4.9 Iodine-Loaded Ag°Z

The TCLP releases of the UHCs for all but silver from the three Ag°ZI replicates fell below the Toxicity Characteristic limits as shown in

Table 4.9. Silver releases were nominally 120 mg Ag/L and significantly above the Toxicity Characteristic limit. As would be expected based on the relative solubilities of AgI and AgF, the silver release from Ag°ZI was significantly less than that from AgZF, 120 vs. 1270 mg Ag/L.

### 4.10 Grouted Reduced Silver Mordenite Loaded with Iodine

Grouting  $Ag^{\circ}ZI$  reduced the TCLP silver release to less than both Washington State and EPA regulatory levels. The silver concentrations for two of the replicates were below the MDL of 0.0012 mg Ag/L, and the third was 0.013 mg Ag/L. All of the results were below the UTS TCLP release concentration of 0.14 mg Ag/L that is the most restrictive of the three regulatory standards provided in

Table 4.10. As with the other tested materials, the concentrations of the other UHCs were below all regulatory designation limits.

**Table 4.8.** Grouted Silver Mordenite Loaded with Fluoride

	Concentration, mg/L										
Underlying	Universal	Grouted AgZF <sup>(c)</sup> #1		ed AgZF <sup>(c)</sup> #		Grouted AgZF <sup>(c)</sup> #2					
Hazardous Constituents	Treatment	TCLP Extract Concentration	TCLP Extract Concentration	Reporting Limit	Method Detection Limit	TCLP Extract Concentration	Reporting Limit	Method Detection Limit			
Silver <sup>(a)</sup>	0.14	0.51 <b>J</b>	0.76J	0.05	0.008	523	1.3	0.008			
Arsenic	5.0	< 0.004	< 0.004	0.75	0.004	0.011	0.75	0.004			
Barium	21	0.4	0.33	0.5	0.002	1.7	0.5	0.003			
Beryllium	1.22	< 0.0005	< 0.0005	0.13	0.0005	0.0015	0.13	0.0005			
Cadmium	0.11	< 0.0005	< 0.0005	0.13	0.0005	< 0.0005	0.13	0.0005			
Chromium	0.60	0.0088	0.01	0.25	0.005	0.12 <b>J</b>	0.25	0.005			
Nickel	11	< 0.03	< 0.03	1	0.025	0.13	1	0.03			
Lead	0.75	< 0.003	< 0.003	0.25	0.002	0.029 <b>J</b>	0.25	0.003			
Antimony	1.15	< 0.009	< 0.009	0.25	0.009	< 0.009	0.25	0.009			
Selenium	5.7	0.0073	0.012	0.13	0.007	0.083	0.13	0.007			
Thallium	0.20	< 0.005	< 0.005	0.5	0.005	<0.005 UJ	0.5	0.005			
Vanadium <sup>(b)</sup>	1.6	< 0.02	< 0.02	1.3	0.01	<0.02 UJ	1.3	0.02			
Zinc <sup>(b)</sup>	4.3	< 0.02	< 0.02	0.5	0.011	<0.02 <b>J</b>	0.5	0.02			
Mercury	0.025	< 0.00006	< 0.00006	0.001	0.00005	0.001	0.001	0.00006			

<sup>(</sup>a) Matrix silver spike recovery was 48%.

<sup>(</sup>b) Vanadium and zinc are not UHCs for wastes exhibiting the silver toxicity characteristic. The results are presented for information only.

<sup>(</sup>c) Data reported between the reporting limit and the method detection limit are estimated.

UJ - At least one result in the mean was analyzed for and was not detected. Due to a QC deficiency identified during validation, the value reported may not accurately reflect the minimum detectable activity. The data should be considered usable for decision-making purposes.

J - At least one result in the mean was analyzed for and detected. The associated value is estimated due to a QC deficiency identified during data validation. The data should be considered usable for decision-making purposes.

Table 4.9. Iodine Loaded Reduced Silver Mordenite TCLP Results

Underlying			Concentration								
Hazardous	Universal	Ag°ZI <sup>(c)</sup> #1	Ag°ZI <sup>(c)</sup> #2	Ag°ZI <sup>(c)</sup> #3	Reporting	Method					
Constituents	Treatment	TCLP Extract	TCLP Extract	Extract TCLP Extract		Detection					
	Standard	Concentration	Concentration	Concentration	Limit	Limit					
Silver <sup>(a)</sup>	0.14	119 <b>J</b>	126 <b>J</b>	126 <b>J</b>	5	0.03					
Arsenic	5.0	<0.03 UJ	<0.03 UJ	<0.03 UJ	7.5	0.03					
Barium	21	<0.2 UJ	<0.2 UJ	<0.2 UJ	5	0.2					
Beryllium	1.22	<0.006 UJ	<0.006 <b>UJ</b>	<0.006 <b>UJ</b>	1.3	0.006					
Cadmium	0.11	<0.005 UJ	0.009 <b>J</b>	0.0088 <b>J</b>	1.3	0.005					
Chromium	0.60	<0.009 UJ	<0.009 <b>UJ</b>	0.028 <b>J</b>	2.5	0.009					
Nickel	11	0.046 <b>J</b>	0.044 <b>J</b>	0.047 <b>J</b>	10	0.04					
Lead	0.75	0.07 UJ	0.045 <b>UJ</b>	0.054 <b>UJ</b>	2.5	0.04					
Antimony	1.15	<0.07 UJ	<0.07 UJ	<0.07 UJ	2.5	0.07					
Selenium	5.7	<0.03 UJ	<0.03 UJ	<0.03 UJ	1.3	0.03					
Thallium	0.20	<0.08 UJ	<0.08 <b>J</b>	<0.08 UJ	5	0.08					
Vanadium <sup>(b)</sup>	1.6	<0.04 UJ	<0.04 UJ	<0.04 UJ	12.5	0.04					
Zinc <sup>(b)</sup>	4.3	0.23 UJ	0.12 <b>UJ</b>	0.11 <b>UJ</b>	5	0.06					
Mercury	0.025	0.0005	< 0.00002	< 0.00002	0.001	0.00002					

<sup>(</sup>a) Matrix silver concentration >4× spike level.

<sup>(</sup>b) Vanadium and zinc are not UHCs for wastes exhibiting the silver toxicity characteristic. The results are presented for information only.

<sup>(</sup>c) Data reported between the reporting limit and the method detection limit are estimated.

UJ - At least one result in the mean was analyzed for and was not detected. Due to a QC deficiency identified during validation, the value reported may not accurately reflect the minimum detectable activity. The data should be considered usable for decision-making purposes.

J - At least one result in the mean was analyzed for and detected. The associated value is estimated due to a QC deficiency identified during data validation. The data should be considered usable for decision-making purposes.

Table 4.10. Grouted Reduced Silver Mordenite Loaded with Iodine TCLP Results

Underlying			Concentration,	mg/L		
Hazardous	Universal	Grouted Ag°ZI <sup>(a)</sup> #1 TCLP Extract	Grouted Ag°ZI <sup>(a)</sup> #2	Grouted Ag°ZI <sup>(a)</sup> #3	Donorting	Method
Constituents	Treatment	TCLP Extract	TCLP Extract	TCLP Extract	Limit	
Constituents	Standard	Concentration	Concentration	Concentration	Lillit	Limit
Silver	0.14	0.013 <b>J</b>	<0.002 UJ	<0.002 UJ	0.25	0.002
Arsenic	5.0	0.0034 <b>J</b>	0.0058 <b>J</b>	0.0041 <b>J</b>	0.75	0.003
Barium	21	0.7 <b>J</b>	0.68 <b>J</b>	0.73 <b>J</b>	0.5	0.02
Beryllium	1.22	<0.0005 UJ	<0.0005 <b>UJ</b>	0.0008 <b>J</b>	0.13	0.0005
Cadmium	0.11	0.002 <b>J</b>	0.0015 <b>J</b>	0.0032 <b>J</b>	0.13	0.0005
Chromium	0.60	0.017 <b>J</b>	0.016 <b>J</b>	0.018 <b>J</b>	0.25	0.0009
Nickel	11	0.025 <b>J</b>	0.026 <b>J</b>	0.029 <b>J</b>	1	0.004
Lead	0.75	0.0089 <b>UJ</b>	<0.004 UJ	<0.004 UJ	0.25	0.004
Antimony	1.15	0.0084 <b>J</b>	<0.007 UJ	<0.007 UJ	0.25	0.007
Selenium	5.7	0.0094 UJ	0.0053 UJ	0.0094 UJ	0.13	0.003
Thallium	0.20	<0.008 UJ	<0.008 UJ	<0.008 UJ	0.5	0.008
Vanadium	1.6	0.0054 <b>J</b>	<0.004 UJ	0.0063 <b>J</b>	1.3	0.004
Zinc	4.3	0.012 UJ	0.01 <b>UJ</b>	0.0094 UJ	0.5	0.006
Mercury	0.025	< 0.00002	< 0.00002	< 0.00002	0.001	0.00002

<sup>(</sup>a) Data reported between the reporting limit and the method detection limit are estimated.

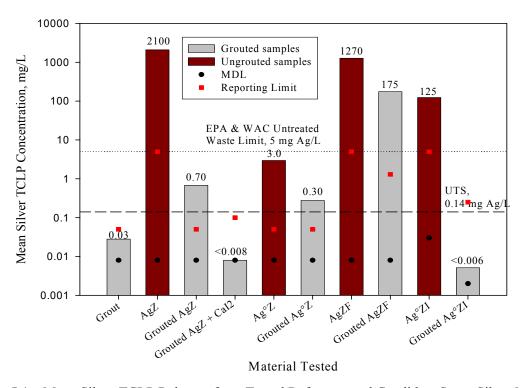
UJ - At least one result in the mean was analyzed for and was not detected. Due to a QC deficiency identified during validation, the value reported may not accurately reflect the minimum detectable activity. The data should be considered usable for decision-making purposes.

J - At least one result in the mean was analyzed for and detected. The associated value is estimated due to a QC deficiency identified during data validation. The data should be considered usable for decision-making purposes.

### 5.0 Conclusions and Recommendations

In support of BNI's efforts to identify a disposal form for spent silver mordenite arising from radioiodine control operations in the planned Hanford WTP, PNWD evaluated several reference and potential disposal forms. The tested materials were as-purchased silver mordenite, hydrogen-reduced silver mordenite, iodine and fluoride-loaded silver mordenites, and their grouted forms at a 25 wt% loading. This testing found that the tested forms will not release Washington State and EPA hazardous or dangerous constituents above UTS limits, with the exception of silver. Silver releases varied from material to material with all but two silver mordenite-containing materials exceeding the UTS silver release limits.

As illustrated in Table 5.1 and Figure 5.1, grouting with the addition of a grout-compatible soluble iodide such as CaI<sub>2</sub> will reduce the TCLP silver release from the worst-case AgZ to below EPA UTS and Washington State Dangerous waste designation levels. The TCLP silver release from AgZ was 2200 mg Ag/L. Simple grouting reduced the release of the disposal form to 0.7 mg Ag/L. Adding 10 wt% CaI<sub>2</sub> to grouted AgZ further reduced the silver release to <0.008 mg Ag/L.



**Figure 5.1.** Mean Silver TCLP Releases from Tested Reference and Candidate Spent Silver Mordenite Disposal Forms

The TCLP results for the grouted  $Ag^{\circ}ZI$  offer promise with its silver release of <0.005 mg Ag/L, which is less than UTS. This suggests that when grouted  $Ag^{\circ}Z$  is exposed to halogens that react with silver to form insoluble halides such as AgCl and AgI, it will produce a spent-silver-mordenite disposal form that will release silver at levels below UTS levels. Testing chlorine treated  $Ag^{\circ}Z$  is needed to validate this hypothesis. It would also be valuable to validate the thermodynamic calculations that indicate that HF will not react with the metallic silver in  $Ag^{\circ}Z$  with TCLP testing of HF-treated  $Ag^{\circ}Z$ ; the HF-loading behavior indicates that HF is sorbed by AgZ as predicted by thermodynamics.

**Table 5.1.** Average TCLP releases of Underlying Hazardous Constituents. See 40 CFR 261 (2002) and 40 CFR 268 (2002) for Federal hazardous waste limits and WAC 173-303-090 (WAC 2000a) and WAC 173-303-140 (WAC 2000c) for Washington State dangerous waste limits.

		Mean TCLP Release Concentration, mg/L <sup>(b)</sup>										Regulatory TCLP Designation Limits, mg/L	
Underlying Hazardous Constituents	m AgZ	Grout	Grouted AgZ	Grouted AgZ + CaI2	Ag°Z	Grouted Ag°Z	Grouted AgZF	AgZF	Ag°ZI	Grouted Ag°ZI	EPA Hazardous & Washington State Dangerous Waste	EPA Universal Treatment Standard	
Silver	2090	< 0.028 <sup>J, UJ</sup>	0.69 <sup>J</sup>	< 0.008 <sup>UJ</sup>	$3.0^{\mathrm{J}}$	0.28	175 <sup>J</sup>	1280	124 <sup>J</sup>	<0.006 <sup>J, UJ</sup>	5.0	0.14	
Arsenic	< 0.004	< 0.004	< 0.0054	< 0.004	$0.013^{B}$	< 0.004	< 0.0064	< 0.008	< 0.03 <sup>UJ</sup>	$0.005^{J}$	5.0	5.0	
Barium	$0.028^{\rm B}$	0.71	$0.35^{B}$	0.56	$0.052^{B}$	0.52	0.81	$0.036^{B}$	<0.2 <sup>UJ</sup>	0.71 <sup>J</sup>	100.0	21	
Beryllium	$0.0019^{B}$	< 0.0009	< 0.0012	< 0.0005	$0.0032^{B}$	< 0.0005	< 0.00084	$0.029^{B}$	< 0.006 <sup>UJ</sup>	< 0.0006 <sup>J, UJ</sup>	None	1.22	
Cadmium	< 0.0005	< 0.0005	< 0.0013	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	<0.008 <sup>J, UJ</sup>	$0.0023^{J}$	1.0	0.11	
Chromium	< 0.005	$0.013^{B}$	$0.017^{B}$	$0.0082^{B}$	< 0.0053	$0.0081^{B}$	0.047 <sup>J, B</sup>	$0.062^{B}$	<0.02 <sup>J, UJ</sup>	$0.017^{J}$	5.0	0.60	
Nickel	< 0.03	$0.084^{B}$	< 0.03	< 0.03	< 0.03	$0.049^{B}$	< 0.07	< 0.04	0.046 <sup>J, B</sup>	$0.027^{J}$	None	11	
Lead	0.01 <sup>B</sup>	< 0.004	< 0.003	0.0043 <sup>B</sup>	0.057 <sup>J, B</sup>	< 0.0031 UJ	< 0.012 <sup>J</sup>	0.011 <sup>UJ, B</sup>		< 0.006 <sup>UJ</sup>	5.0	0.75	
Antimony	< 0.009	< 0.009	< 0.009	< 0.009	< 0.009	< 0.009	< 0.009	< 0.009	< 0.07 <sup>UJ</sup>	< 0.0075 <sup>J, UJ</sup>	None	1.15	
Selenium	< 0.011	$0.010^{B}$	$0.013^{B}$	$0.015^{B}$	$0.0085^{B}$	$0.0094^{B}$	$0.035^{B}$	< 0.011	< 0.03 <sup>UJ</sup>	$0.0081^{UJ}$	1.0	5.7	
Thallium	< 0.01	< 0.011	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005 <sup>UJ</sup>	< 0.005	< 0.08 <sup>J, UJ</sup>	< 0.008 <sup>UJ</sup>	None	0.20	
Vanadium <sup>(a)</sup>	< 0.02	< 0.02 <sup>UJ</sup>	< 0.02	< 0.02	< 0.02	< 0.02	< 0.02 <sup>UJ</sup>	< 0.04	<0.04 <sup>UJ, J</sup>	< 0.006 J, UJ	None	1.6	
Zinc <sup>(a)</sup>	0.06 <sup>UJ, B</sup>	$< 0.02^{UJ}$	< 0.02 <sup>UJ</sup>	< 0.02 <sup>UJ</sup>	0.054 <sup>UJ, B</sup>	< 0.02	< 0.02 <sup>J</sup>	$0.01^{B}$	0.16 <sup>UJ, B</sup>	$0.011^{UJ}$	None	4.3	
Mercury	<0.0003 <sup>UR</sup>	<0.0003 <sup>UJ</sup>	<0.0001 <sup>UJ</sup>	<0.0001 <sup>UJ</sup>		< 0.0002	<0.001	<0.0001 <sup>UJ</sup>	<0.0002 <sup>UJ</sup>	< 0.00002	0.2	0.025	

<sup>(</sup>c) Vanadium and zinc are not UHCs for wastes exhibiting the silver toxicity characteristic. The results are presented for information only.

<sup>(</sup>d) < values indicate at least one result was less than the MDL and the mean is estimated using the MDL.

U – At least one result in the mean was analyzed for but was not detected. The data should be considered usable for decision-making purposes.

UJ - At least one result in the mean was analyzed for and was not detected. Due to a QC deficiency identified during validation, the value reported may not accurately reflect the minimum detectable activity. The data should be considered usable for decision-making purposes.

J - At least one result in the mean was analyzed for and detected. The associated value is estimated due to a QC deficiency identified during data validation. The data should be considered usable for decision-making purposes.

UR - At least one result in the mean was analyzed for and not detected; however, due to an identified QC deficiency, the data should be considered unusable for decision-making purposes.

B – At least one result in the mean was an estimated value less than the reporting limit and greater than the method detection limit.

The best performing of the untreated wastes was unexposed Ag°Z. The silver release during TCLP testing was 0.28 mg Ag/L, which is below the EPA's and Washington State's untreated waste standard of 5.0 mg Ag/L TCLP extract but above the UTS level of 0.14 mg Ag/L TCLP extract. Although the Ag°Z is below the untreated waste standard, it is not fully representative of spent Ag°Z exposed to halogens, and based on our studies, it represents a best-case model for spent halogen-exposed Ag°Z. Its performance likely can be explained by the low solubility of metallic silver.

The observed behavior of AgZF and grouted AgZF is consistent with our expectations that the HF-treated AgZ should represent a worst case for the halogen-treated silver mordenites because of the high solubility of AgF (14 M). AgZF performed better than AgZ but when grouted released more silver (175 mg Ag/L) than grouted AgZ (0.7 mg Ag/L). This material could be used as representative of the worst-case basis for spent halogen-treated silver mordenite in studies to optimize the disposal form for spent Ag°Z.

As expected, Ag°ZI released less silver than AgZF; however, the 125 mg Ag/L TCLP extract was much higher than the untreated waste Toxicity Characteristic of 5.0 mg Ag/L. The AgZF released an average 1300 mg Ag/L during TCLP. The Ag°ZI could, in waste-form optimization studies, be used to represent the best-case basis for waste-form optimization.

Testing HF- and chlorine-treated  $Ag^{\circ}Z$  disposal forms would complete disposal studies with respect to all the potential behaviors of halogen effects on spent  $Ag^{\circ}Z$  and should provide a basis for choosing a disposal form without any added  $CaI_2$ . Assuming Burger's predicted HWVP MOG composition (Burger and Scheele 1991), chlorine should be the predominant halogen in the MOG ( $Cl:I = 10^{5}$ ) that will react with the metallic silver in  $Ag^{\circ}Z$ . Thus, the chlorine-loaded  $Ag^{\circ}Z$  should be most representative of the spent  $Ag^{\circ}Z$ . The HF-treated  $Ag^{\circ}Z$  would complete the study of halogen effects.

The testing of  $Ag^{\circ}Z$  exposed to a fully representative simulated MOG would provide the most representative material for waste-form performance and optimization studies and confirmation of other bounding materials testing. The current and possible future testing of HF treated  $Ag^{\circ}Z$ , chlorine-loaded  $Ag^{\circ}Z$ , and  $Ag^{\circ}ZI$  would provide bounding behaviors. The one unknown complication is the effect of  $NO_x$ .

Adding CaI<sub>2</sub> to grouted silver mordenite to limit silver release provides another attractive strategy for assuring a regulatory-compliant spent-silver mordenite disposal form. Further studies of CaI<sub>2</sub> concentration levels may be valuable and are suggested for waste-form optimization studies.

Most studies of  $NO_x$  effects on AgZ and  $Ag^oZ$  have been focused on their effects on iodine trapping and have been fairly short term because iodine concentrations were higher than expected in a DOG. This may not be important because the chlorine concentrations in the MOG will consume available silver and could reduce exposure time to  $NO_x$  times already studied. We recommend comparing expected use times to those already studied.

Because this study was not designed to develop the optimum spent-silver-mordenite disposal form, we recommend further studies to optimize disposal-form compositions and thus performance with respect to regulatory levels. These studies should investigate the effects of CaI<sub>2</sub> concentration, waste loading, water content, and preparation procedure, e.g., order of mixing, including when to add water.

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# Appendix A

# **Toxic Characterization Leach Procedure Laboratory Accreditation**



This is to certify that

# STL St. Louis Earth City, MO

has complied with provisions set forth in Chapter 173-50 WAC and is hereby recognized by the Department of Ecology as an ACCREDITED LABORATORY for the analytical parameters listed on the accompanying Scope of Accreditation. This certificate is effective August 31, 2001, and shall expire August 30, 2002.

Witnessed under my hand on October 9, 2001.

Perry F. Brake, Chemist

Lab Accreditation Unit Supervisor

Lab Accreditation Number C116

### **Scope of Accreditation**

### STL St. Louis

### Earth City, MO

is accredited by the State of Washington Department of Ecology to perform analyses for the parameters listed below using the analytical methods indicated. This Scope of Accreditation applies to non-potable water analyses only. Accreditation for all parameters is final unless indicated otherwise in a note. Accreditation is for the latest version of a method unless otherwise specified in a note. EPA refers to the U.S. Environmental Protection Agency. SM refers to American Public Health Association's publication, Standard Methods for the Examination of Water and Wastewater, 19th edition, unless otherwise noted. ASTM stands for the American Society of Testing and Materials. PSEP stands for Puget Sound Estuary Program. Other references are detailed in the notes section.

Parameter Name	Reference	Method Number	Notes
Alkalinity, Total	EPA	310.1	
Ammonia	EPA	350.1	2
Biochemical Oxygen Demand, BOD/CBOD	EPA	405.1	2
Bromide	EPA	300.0	
Calcium	EPA	200.7/6010	
Chemical Oxygen Demand (COD)	EPA	410.4(7.3)	
Chloride	EPA	300.0	
Cyanide, Total	EPA	335.2(8.10)	
Fluoride	EPA	300.0	
Hardness, Total (as CaCO3)	EPA	130.2	2
Magnesium	EPA	200.7/6010	
Nitrate	EPA	353.1	
Nitrate + Nitrite	EPA	353.1	
Nitrite	EPA	353.1	
Oil & Grease	EPA	413.1	
Orthophosphate	EPA	365.1	
Phenolics, Total Recoverable	EPA	420.2	
Phosphorus, Total	EPA	365.1	
Potassium	EPA	200.7/6010	
Silica	EPA	200.7	
Silica	EPA	6010	
Sodium	EPA	200.7/6010	
Solids, Total Dissolved	EPA	160.1	
Solids, Total Suspended	EPA	160.2	
Specific Conductance	EPA	120.1	2
Sulfide	EPA	376.1	

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Parameter Name	Reference	Method Number	Notes
Total Organic Carbon	EPA	415.1	2
Total Organic Halides	EPA	450.1	
Turbidity	EPA	180.1	
Aluminum	EPA	200.7/6010	
Antimony	EPA	200.7/6010	
Arsenic	EPA	206.2/7060	
Barium	EPA	200.7/6010	
Beryllium	EPA	200.7/6010	
Cadmium	EPA	200.7/6010	
Chromium	EPA	200.7/6010	
Cobalt	EPA	200.7/6010	
Copper	EPA	200.7/6010	
Iron	EPA	200.7/6010	
Lead	EPA	200.7/6010	
Manganese	EPA	200.7/6010	
Mercury	EPA	245.1/7470	
Molybdenum	EPA	200.7/6010	
Nickel	EPA	200.7/6010	
Selenium	EPA	270.2/7740	
Silver	EPA	200.7/6010	
Thallium	EPA	279.2/7841	
Tin	EPA	200.7	
Tin	EPA	6010	1
Vanadium	EPA	200.7/6010	
Zinc	EPA	200.7/6010	
Chlorinated Herbicides	EPA	8151	
Organochlorine Pesticides	EPA	8081	
Polychlorinated Biphenyls	EPA	608/8082	
Polycyclic Aromatic HC (HPLC)	EPA	610/8310	
BNA Extr (Semivolatile) Organics	EPA	625/8270	
Volatile Organic Compounds	EPA	624/8260	
Alpha, Gross	EPA	900.0	
Beta, Gross	EPA	900.0	
Cesium-134/Cesium-137	EPA	901.0	
Gamma	HASL	300	
Radium-226	EPA	903.1	
Radium-228	EPA	904.0	

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 Parameter Name
 Reference
 Method Number
 Notes

 Strontium-89/90
 EPA
 905.0

 Tritium
 EPA
 906.0

 Uranium
 ASTM
 D5174-91

### **Accredited Parameter Note Detail**

(1) Method modified to ensure digestion and quantification of metal which is not included in EPA method. (2) Provisional pending submission of acceptable performance evaluation sample analysis results (WAC 173-50-110).

**Authentication Signature** 

Perry Brake -- Unit Supervisor, Washington State Department of Ecology -- Lab Accreditation Unit

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