
**Title 40 CFR Part 191
Subparts B and C
Compliance Recertification Application 2014
for the
Waste Isolation Pilot Plant**

**Appendix MgO-2014
Magnesium Oxide as an Engineered Barrier**



**United States Department of Energy
Waste Isolation Pilot Plant**

**Carlsbad Field Office
Carlsbad, New Mexico**

Compliance Recertification Application 2014
Appendix MgO-2014

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Acronyms and Abbreviations

%	percent
µm	micrometer
AMWTP	Advanced Mixed Waste Treatment Program
aq	aqueous
atm	atmosphere(s)
BRAGFLO	Brine and Gas Flow
C	Celsius
CCA	Compliance Certification Application
CFR	Code of Federal Regulations
CH-TRU	contact-handled transuranic
CPR	cellulosic, plastic, and rubber
CRA	Compliance Recertification Application
DOE	U.S. Department of Energy
ECO	Engineering Change Order
EPA	U.S. Environmental Protection Agency
ERDA	Energy Research and Development Administration
FMT	Fracture-Matrix Transport
g	gaseous or gram
GWB	Generic Weep Brine
HDPE	high-density polyethylene
K _d	matrix distribution coefficient
kg	kilogram
L	liter
lb	pound
M	molar
m ³	cubic meters
mL	milliliter
mm	millimeter
mol	mole
PA	performance assessment
PABC	Performance Assessment Baseline Calculations

PAVT	Performance Assessment Verification Test
ppm	parts per million
RH	relative humidity
RH-TRU	remote-handled transuranic
s	second(s) or solid
SPC	Salado Primary Constituents
TIC	total inorganic carbon
TRU	transuranic
WDS	Waste Data System
WIPP	Waste Isolation Pilot Plant
WTS	Washington TRU Solutions, LLC
XRD	X-ray diffraction

Elements and Chemical Compounds

Am	americium
An	actinide
Br	bromine
C	carbon
Ca	calcium
CaO	calcium oxide or lime
CaSO ₄	anhydrite
CH ₄	methane
Cl ⁻	chloride ion
Cl	chlorine
CO ₂	carbon dioxide
CO ₃ ²⁻	carbonate ion
f _{co₂}	fugacity of CO ₂
Fe	iron
H ⁺	hydrogen ion
H ₂ O	water
H ₂ S	hydrogen sulfide
Mg	magnesium

Mg(OH) ₂	brucite
Mg ₂ (OH) ₃ Cl·4H ₂ O	phase 3
Mg ₃ (OH) ₅ Cl·4H ₂ O	phase 5
Mg ₄ (CO ₃) ₃ (OH) ₂ ·3H ₂ O	hydromagnesite (4323)
Mg ₅ (CO ₃) ₄ (OH) ₂ ·4H ₂ O	hydromagnesite (5424)
MgCO ₃	magnesite
MgCO ₃ ·3H ₂ O	nesquehonite
MgO	magnesium oxide
N ₂	nitrogen
Na	sodium
Na ₂ Ca(SO ₄) ₂	glauberite
NaCl	sodium chloride or halite
Np	neptunium
O ₂	oxygen
Pb	lead
pH	the negative, common logarithm of the activity of H ⁺
Pu	plutonium
SO ₄	sulfate
Th	thorium
U	uranium

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1 **MgO-1.0 Introduction**

2 The U.S. Department of Energy (DOE) is emplacing magnesium oxide (MgO) in the Waste
3 Isolation Pilot Plant (WIPP) repository to provide an engineered barrier that decreases the
4 solubilities of the actinide (An) elements in transuranic (TRU) waste in any brine present in the
5 postclosure repository (Compliance Certification Application (CCA), Appendix BACK and
6 Appendix SOTERM (U.S. DOE 1996); the 2004 Compliance Recertification Application (CRA-
7 2004) Appendix BARRIERS-2004, Appendix PA-2004, and Attachment SOTERM-2004 (U.S.
8 DOE 2004); and the CRA-2009 Appendix MgO-2009 and Appendix SOTERM-2009 (U.S. DOE
9 2009)). Because it will decrease An solubilities, MgO helps meet the U.S. Environmental
10 Protection Agency (EPA) requirement for multiple natural and engineered barriers, one of the
11 assurance requirements for radioactive waste repositories in 40 CFR § 191.14(d) (U.S. EPA
12 1993).

13 In 40 CFR § 191.12 (U.S. EPA 1993), the EPA defined barriers as “any material or structure that
14 prevents or substantially delays movement of water or radionuclides toward the accessible
15 environment. For example, a barrier may be a geologic structure, a canister, a waste form...or a
16 material placed over and around waste provided that the material or structure substantially delays
17 movement of water or radionuclides.”

18 The DOE proposed four engineered barriers in the WIPP CCA, submitted to the EPA in October
19 1996 (U.S. DOE 1996). The barriers proposed were MgO, panel closures, shaft seals, and
20 borehole plugs. The EPA specified MgO as the only engineered barrier in the WIPP disposal
21 system that meets the assurance requirement in its May 1998 certification rulemaking (U.S. EPA
22 1998a and U.S. EPA 1998b) because it considered panel closures, shaft seals, and borehole plugs
23 to be part of the disposal-system design.

24 As used in the WIPP, MgO will decrease An solubilities by consuming essentially all of the
25 carbon dioxide (CO₂) that would be produced should microbial activity consume all of the
26 cellulosic, plastic, and rubber (CPR) materials in the TRU waste, waste containers, and waste-
27 emplacement materials in the repository. Although MgO will consume essentially all the CO₂,
28 minute quantities (relative to the quantity that would be produced by microbial consumption of
29 all of the CPR materials) will persist in the aqueous (aq) and gaseous (g) phases. The residual
30 quantities would be so small relative to the initial quantity that the term “essentially” is hereafter
31 omitted in this appendix.

32 Consumption of CO₂ will decrease An solubilities by (1) buffering the fugacity of CO₂ (f_{CO_2}) at a
33 value or within a range of values favorable from the standpoint of the speciation and solubilities
34 of the An elements (the fugacity of a gaseous species, f_i , is similar to the partial pressure of that
35 species, p_i); (2) controlling the pH at a value favorable from the standpoint of An solubilities;
36 and (3) preventing the production of carbonate ion (CO₃²⁻) in significant quantities. The effect of
37 this residual CO₃²⁻ on the solubilities of An elements is described in Appendix SOTERM-2014,
38 Section SOTERM-3.2.1 and Section SOTERM-3.3.1.3.

39 The effects of MgO carbonation (consumption of CO₂) have been included in WIPP performance
40 assessment (PA) calculations by assuming that there will be no CO₂ in the repository. This
41 assumption has been implemented in PA by (1) removing CO₂ from the gaseous phase in the

1 Brine and Gas Flow (BRAGFLO) calculations, thereby somewhat reducing the predicted
2 pressurization of the repository; and (2) using the values of f_{CO_2} and pH predicted for reactions
3 among MgO, brine, and aqueous or gaseous CO_2 to calculate An solubilities. The assumption
4 that there will be no CO_2 has been implemented in all compliance-related WIPP PA calculations.
5 These include (1) the CCA PA calculations (Appendix SOTERM) (Novak, Moore, and Bynum
6 1996; U.S. DOE 1994); (2) the CCA Performance Assessment Verification Test (PAVT) (Novak
7 1997; U.S. EPA 1998c, U.S. EPA 1998d, and U.S. EPA 1998e); (3) the PA calculations for the
8 CRA-2004 (Appendix PA and Attachment SOTERM) (Brush and Xiong 2003a, Brush and
9 Xiong 2003b, Brush and Xiong 2003c, and Brush and Xiong 2003d; U.S. DOE 2004); (4) the
10 CRA-2004 Performance Assessment Baseline Calculations (PABC) (Brush and Xiong 2005a and
11 Brush and Xiong 2005b; Brush 2005; Leigh et al. 2005); (5) the PA calculations for the CRA-
12 2009 (Appendix SOTERM-2009) (U.S. DOE 2009); (6) the CRA-2009 PABC calculations
13 (Brush and Xiong 2009a and Brush and Xiong 2009b; Brush, Xiong, and Long 2009; U.S. DOE
14 2009); and (7) the CRA-2014 PA calculations (Appendix SOTERM-2014) (Brush, Domski, and
15 Xiong 2012; Brush and Domski 2013a and Brush and Domski 2013b).

16 In this appendix, “MgO” refers to the bulk, granular material being emplaced in the WIPP to
17 serve as the engineered barrier. MgO comprises periclase (pure, crystalline MgO—the main,
18 reactive constituent of the WIPP engineered barrier) and various impurities described in
19 Appendix MgO-2009, Section MgO-3.0 (U.S. DOE 2009). Pure, crystalline MgO is always
20 referred to as periclase in this Appendix. The term periclase, and other mineral names used
21 herein are, strictly speaking, restricted to naturally occurring forms of the materials that meet all
22 the other requirements of the definition of a mineral (see, for example, Bates and Jackson 1984).
23 However, mineral names are used in this report for convenience.

1 **MgO-2.0 Description of the Engineered Barrier System**

2 This section describes the emplacement of MgO in the WIPP disposal rooms (Section MgO-2.2)
3 and the vendors that provided or are providing MgO to the WIPP (Section MgO-2.2).

4 Washington TRU Solutions, LLC (WTS) (WTS 2009b) provided the current specifications for
5 the prepackaged MgO emplaced in the WIPP.

6 **MgO-2.1 Emplacement of MgO**

7 Sections 2.1.1 through 2.1.4 provide a history of the changes related to emplacement of MgO in
8 the WIPP.

9 **MgO-2.1.1 Supersacks**

10 The DOE originally emplaced MgO in polypropylene supersacks atop each stack of waste
11 containers. According to the original WTS specifications, each supersack contained 1905 ± 23
12 kilograms (kg) (4200 ± 50 pounds ([lb]) of MgO (WTS 2009b). (Section MgO-2.1.4 describes
13 changes since the CRA-2009 in the placement of the supersacks on every other waste stack
14 instead of every waste stack, and the weight of some of the supersacks.) Forklifts are used to
15 place the supersacks on top of the waste stacks. Figure MgO-1 shows supersacks of MgO
16 emplaced on top of the waste stacks.



17

18 **Figure MgO-1. Supersacks of MgO Emplaced on Top of the Waste Stacks**

19 The use of supersacks facilitates handling and emplacement of the MgO, minimizes potential
20 worker exposure to dust, and minimizes the exposure of periclase to atmospheric CO₂ and water
21 (H₂O) during handling and emplacement, and prior to panel closure. WTS (WTS 2009b)
22 provides the most current, detailed specifications for the supersacks. In particular, WTS (WTS
23 2009b) specifies that the supersacks “shall provide a barrier to atmospheric moisture and carbon
24 dioxide (CO₂) ... equivalent to or better than that provided by a standard commercial cement

1 bag,” and “must be able to retain [their] contents for a period of two years after emplacement
2 without rupturing from [their] own weight.” The specifications also require a certificate of
3 compliance with all requirements of WTS (WTS 2009b) for every shipment of MgO (see Section
4 MgO-3.1), and a certified chemical analysis for each new lot of MgO. The supersacks are
5 subject to random receipt inspection at the WIPP to ensure compliance with the dimensions and
6 labeling specified by WTS (WTS 2009b), and to identify any damage incurred during shipping.

7 The supersacks contain dry, granular MgO, of which less than 0.5% can exceed 9.5 millimeters
8 (mm) (3/8 inch) in diameter (WTS 2009b). Emplacement of granular MgO instead of powder
9 reduces the likelihood of dust formation and release in the event of premature supersack rupture,
10 and ensures that the permeability of the material is high enough to promote complete reaction
11 with aqueous or gaseous CO₂.

12 Creep closure of WIPP disposal rooms will rupture the supersacks and disperse the MgO among
13 and within the ruptured waste containers. This will, in turn, expose the MgO to the room’s
14 atmosphere, to any CO₂ produced by the microbial consumption of CPR materials, and to H₂O
15 vapor and any brine present.

16 **MgO-2.1.2 Minisacks**

17 From the first receipt of TRU waste at the WIPP in March 1999 until January 2001, the DOE
18 emplaced MgO in both supersacks and 11-kg (25-lb) minisacks. During this period, the
19 minisacks were emplaced among the waste containers and between the waste containers and the
20 ribs (sides) of the disposal rooms. The MgO supersacks and minisacks constituted about 85%
21 and 15%, respectively, of the total quantity of MgO emplaced in the repository.

22 In 2000, the DOE requested EPA approval to eliminate the minisacks (Triay 2000; U.S. DOE
23 2000); the EPA approved this request in 2001 (Marcinowski 2001; U.S. EPA 2001). Appendix
24 MgO-2009, Section MgO-2.1.2 provides details on the DOE’s request and the EPA’s approval of
25 this request.

26 **MgO-2.1.3 Use of Racks to Emplace Additional MgO**

27 In March 2004, the EPA approved the emplacement in the WIPP of compressed
28 (supercompacted) waste from the Advanced Mixed Waste Treatment Project (AMWTP) at the
29 Idaho National Engineering and Environmental Laboratory (Marcinowski 2004; Trinity
30 Engineering Associates 2004; U.S. EPA 2004). However, the EPA required that the DOE
31 maintain an MgO excess factor (Section MgO-6.0) of 1.67 on a room-by-room basis. Some of
32 the AMWTP waste contains concentrations of CPR materials that are high relative to the average
33 concentration of CPR materials in TRU waste, thereby necessitating the emplacement of
34 additional MgO in the repository. To account for this, the DOE has emplaced additional MgO
35 supersacks on racks among the waste containers. Each rack contains five supersacks identical to
36 those placed on top of the waste containers, and spans the same vertical distance normally
37 occupied by the waste stack and the supersack emplaced atop the waste stack. Thus, emplacing
38 additional MgO in the repository uses space normally occupied by contact-handled transuranic
39 (CH-TRU) waste. Figure MgO-2 shows a rack used to emplace additional MgO in the WIPP.

1 In February 2008, the EPA approved the DOE's request for a reduction of the MgO excess factor
2 from 1.67 to 1.2 (see Appendix MgO-2009, Section MgO-6.2.4.6) (U.S. DOE 2009).



3
4 **Figure MgO-2. Racks Used to Emplace Additional MgO**

5 **MgO-2.1.4 Changes since the CRA-2009**

6 In February 2012, the DOE submitted a planned change notice with an alternative placement
7 scheme for MgO supersacks (Franco 2012). This scheme consists of emplacing the MgO
8 supersacks on every other row of waste stacks, and adjusting this frequency if necessary to
9 accommodate high-CPR waste streams. The DOE proposed this new process because the data it
10 had obtained by tracking the amounts of CPR materials and MgO emplaced in the repository for
11 the last four years demonstrated that the MgO excess factor had exceeded the value of 1.2
12 approved by the EPA in February 2008 (see Appendix MgO-2009, Section MgO-6.2.4.6) (U.S.
13 DOE 2009). The DOE stated that its new emplacement scheme would: (1) continue to calculate
14 the excess factor at the end of each shift when waste-emplacement data are uploaded to the
15 WIPP Waste Data System (WDS), (2) continue to allow designated personnel to direct that
16 additional MgO be emplaced during the next shift if necessary, and (3) result in a more efficient
17 distribution of MgO based on the CPR contents of the emplaced waste containers. The DOE's
18 change notice included an analysis based on Kanney and Vugrin (Kanney and Vugrin 2006) that
19 showed that molecular diffusion of microbially produced CO₂ through brine following a human
20 intrusion into the repository would be sufficient to transport CO₂ from the waste to the MgO
21 supersacks placed on every other row of waste stacks.

22 In July 2012, the EPA concurred with the DOE's change notice to emplace MgO supersacks on
23 every other row of waste stacks and adjust this frequency if necessary for high-CPR waste
24 streams (Peake 2012).

1 The DOE continues to emplace waste in several types of containers (Appendix DATA-2014,
2 Attachment B), and is now emplacing MgO in 3000- and 4200-lb supersacks. WTS specified the
3 addition of 1361 ± 23 kg (3000 ± 50 lb) supersacks in Engineering Change Order (ECO) 12137
4 (WTS 2009a). WTS added the 3000-lb supersacks after calculations using past MgO
5 emplacement data and an MgO excess factor of 1.2 instead of 1.67 established that using both
6 3000- and 4200-lb supersacks would be more economical than using only 4200-lb supersacks.
7 Furthermore, the WDS calculations showed that using both sizes would decrease the number of
8 racks required (see Appendix MgO-2014, Section 2.1.3). Waste Handling Operations is now
9 using the WDS to calculate which sizes of supersacks to emplace on every other row of waste
10 stacks in order to maintain an MgO excess factor of 1.2 and to minimize the use of racks. ECO
11 12137 (WTS 2009a) also specified the addition of the reactivity test for periclase and lime
12 (Appendix MgO-2014, Section 2.3.1) that was required by the EPA when it approved the DOE's
13 request for a reduction of the MgO excess factor from 1.67 to 1.2 (Appendix MgO-2009, Section
14 MgO-6.2.4.6) (U.S. DOE 2009). ECO 12137 necessitated the replacement of the previous
15 specifications for prepackaged MgO emplaced in the WIPP (WTS 2005) with the current
16 specifications (WTS 2009b). The first 3000-lb supersack was emplaced on August 25, 2009, in
17 Panel 5 of Room 6. The DOE informed the EPA of this change during the EPA's annual
18 inspection of the WIPP site on June 28, 2010 (U.S. EPA 2010a).

19 As of December 31, 2012, the DOE had emplaced 84,892.57 cubic meters (m^3) of CH-TRU
20 waste in 17,108 stacks, and 309.68 m^3 of remote-handled transuranic (RH-TRU) waste in 620
21 boreholes in the repository. As of the same date, the DOE had emplaced 12,550 25-lb minisacks,
22 3,807 3,000-lb sacks, 71 4,100-lb supersacks, and 13,776 4,200-lb supersacks, and 142 racks.
23 The overall MgO excess factor (see MgO-6.0) as of December 31, 2012, was 1.810 (Kouba
24 2013).

25 **MgO-2.2 MgO Vendors**

26 National Magnesia Chemicals in Moss Landing, CA, was the first vendor to provide MgO for the
27 WIPP. National Magnesia supplied MgO from the opening of the WIPP in March 1999 through
28 mid-April 2000; during this period, waste was emplaced only in Panel 1, Room 7. This vendor
29 was sometimes referred to as National Refractory Materials (e.g., Papenguth 1999). Note that in
30 every seven-room WIPP panel, waste is first emplaced in Room 7, at the back of the panel, and
31 is last emplaced in Room 1, at the front of the panel.

32 After National Magnesia stopped producing MgO, WTS considered Martin Marietta Magnesia
33 Specialties LLC, currently headquartered in Baltimore, MD, and Premier Chemicals of Gabbs,
34 NV, as potential vendors. At the request of the DOE Carlsbad Area Office, Papenguth
35 (Papenguth 1999) carried out a technical evaluation of MgO from both Martin Marietta and
36 Premier to support the selection of a new vendor. The criteria used for this evaluation included
37 density, particle size, purity, and reactivity, quantified using a test developed by Krumhansl
38 (Krumhansl et al. 1997). Based on cost and the results of the technical evaluation, WTS selected
39 Premier Chemicals. Appendix MgO-2009, Section MgO-3.2 (U.S. DOE 2009) provides the
40 results of the characterization of Premier MgO. This vendor supplied MgO from mid-April 2000
41 (Panel 1, Room 7) through January 2005 (Panel 2, Room 2).

1 Premier Chemicals informed WTS in 2004 that it would soon be unable to provide MgO that met
2 the requirement for the minimum concentration of MgO specified by WTS (WTS 2003): “The
3 sum of MgO plus calcium oxide (CaO) shall be a minimum of 95%, with MgO being no less
4 than 90%.”

5 Martin Marietta Magnesia Specialties, LLC, was selected and has supplied MgO to the WIPP
6 since January 2005 (Panel 2, Room 2). The company was selected based on cost and a technical
7 evaluation of suitability (Wall 2005). Appendix MgO-2009, Section MgO-3.3.2 (U.S. DOE
8 2009) contained the results of the evaluation and a detailed characterization of Martin Marietta
9 MgO.

10 Martin Marietta is still providing MgO to the WIPP.

1 **MgO-3.0 Characteristics of MgO**

2 The CRA-2009, Appendix MgO-2009, Section MgO-3.0 (U.S. DOE 2009) described the
3 characteristics of the MgO provided to the WIPP by National Magnesia Chemicals (Section
4 MgO-3.1), Premier Chemicals (Section MgO-3.2), and Martin Marietta Magnesia Specialties,
5 LLC (the current vendor). There is no new information since the CRA-2009 regarding the
6 characteristics of these vendors and materials provided.

7 **MgO-3.1 Changes since the CRA-2009**

8 A new test to determine the concentration of the reactive constituents of the MgO (periclase and
9 lime, or CaO) was developed by Sandia National Laboratories to satisfy one of the EPA's
10 requirements that it specified when it approved the DOE's request for a reduction of the MgO
11 excess factor from 1.67 to 1.2 (see Appendix MgO-2009, Section MgO-6.2.4.6) (U.S. DOE
12 2009). WTS specified the use of this test, entitled "Reactivity (mole % Periclase + Lime)
13 Acceptance Test," in ECO 12137 (WTS 2009a), and it was incorporated in the current
14 specifications for prepackaged MgO emplaced in the WIPP (WTS 2009b). An independent
15 outside laboratory carries out the reactivity test to ensure that the MgO fulfills the EPA's
16 requirement that the MgO contain a minimum of 96 mole (mol) % of reactive constituents.
17 Since the implementation of the reactivity test in April 2009 through December 31, 2012, Waste
18 Handling Operations purchased 37 shipments containing 250 tons of MgO. A total of 370
19 samples from these shipments were analyzed; the average reactivity of these samples was 97.4
20 mol % (Chavez 2013). These results are archived in the WIPP WDS.

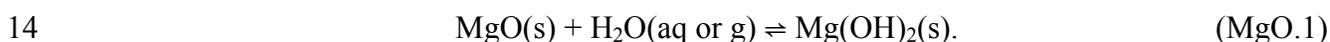
1 **MgO-4.0 Hydration and Carbonation of MgO**

2 This section provides the results of the DOE studies of the hydration and carbonation of MgO
3 (Section MgO-4.1 and Section MgO-4.2, respectively).

4 **MgO-4.1 Hydration of MgO**

5 The CRA-2009, Appendix MgO-2009, Section MgO-4.1 (U.S. DOE 2009) described the
6 hydration of MgO provided by Premier Chemicals (the previous MgO vendor) and Martin
7 Marietta Magnesia Specialties, LLC (the current vendor). There is no new information since the
8 CRA-2009 regarding the hydration of Premier or Martin Marietta MgO (see Appendix MgO-
9 2009 for discussions of the hydration of these products). However, some of the previous text is
10 retained herein to provide background information for new results on the relative stabilities of
11 two of the MgO hydration products expected in the WIPP.

12 Based on previous experiments (Appendix MgO-2009, Sections 4.1.1 and 4.1.2), the most
13 important hydration reaction expected in the WIPP is



15 Reaction (MgO.1) was the only hydration reaction observed in the humid experiments. Reaction
16 (MgO.1) was also the only hydration reaction observed in the inundated runs with ERDA-6 brine
17 (Snider 2003b). ERDA-6 brine is a synthetic brine representative of fluids in brine reservoirs in
18 the Castile Formation (Popielak et al. 1983). In inundated experiments with Generic Weep Brine
19 (GWB), however, hydration produced both brucite and a crystalline Mg-OH-Cl-H₂O phase
20 (Snider 2003a). GWB is the average composition of intergranular fluids collected from the
21 Salado Formation at the original stratigraphic horizon of the repository (Krumhansl, Kimball,
22 and Stein 1991; Snider 2003b). X-ray diffraction (XRD) analysis identified this phase as
23 Mg₃(OH)₅Cl·4H₂O, referred to herein as “phase 5” because its OH/Cl ratio (the molar ratio of
24 OH to Cl) is five (Snider et al. 2003a). On the other hand, the thermodynamic speciation and
25 solubility code Fracture-Matrix Transport (FMT) (Babb and Novak 1997 and addenda; Wang
26 1998), which was used at the time to predict near-field chemical conditions and An solubilities in
27 the WIPP, predicted that both brucite and a similar Mg-OH-Cl-H₂O phase, Mg₂(OH)₃Cl·4H₂O
28 (phase 3), would be present in GWB and Salado Primary Constituents (SPC) brine after these
29 brines equilibrate with the solids in WIPP disposal rooms (Section MgO-5.1). SPC brine (Novak
30 1997) is similar to Brine A, another synthetic fluid that was used to represent intergranular
31 Salado brines (see Section MgO-5.1.1.2 and Molecke 1983). The FMT thermodynamic database
32 contained phase 3, but not phase 5, at the time. If phase 5 had been in the database, FMT would
33 have predicted that phase 5 would be present in GWB instead of phase 3 (Section MgO-5.1).
34 The hydration reaction that produces phase 5 is:



36 It should be noted that Freyer (Freyer 2012) concluded that phase 3 is stable with respect to
37 phase 5 under the conditions expected in a German domal salt repository (see Section MgO-
38 4.1.1).

1 **MgO-4.1.1 Results since the CRA-2009**

2 Deng et al. (Deng et al. 2009) conducted long-term hydration experiments with Martin Marietta
3 MgO primarily to obtain information on the solid phases produced by the hydration of Martin
4 Marietta MagChem 10 WTS MgO. This MagChem 10 WTS MgO is apparently identical to the
5 Martin Marietta MagChem WTS-60 MgO, used by Deng, Xiong and Nemer (Deng, Xiong and
6 Nemer 2007, Section 5) in their accelerated hydration experiments (see Appendix MgO-2009,
7 Section MgO-4.1.2) (U.S. DOE 2009), because the particle-size distributions reported by Deng,
8 Xiong, and Nemer (Deng, Xiong, and Nemer 2007, Section 5) and Deng et al. (Deng et al. 2009)
9 are identical. Deng et al. (Deng et al. 2009) used MgO with three particle sizes (as-received, <
10 75 μm , and 1.0-2.0 mm), three brines (GWB, “simplified GWB” (1 M MgCl_2 + 3.6 M NaCl),
11 and ERDA-6), and two MgO/brine ratios (0.0403 and 0.273 grams per milliliter (g/mL)). They
12 hydrated the MgO in 30 mL high-density polyethylene (HDPE) centrifuge tubes or 125 mL
13 HDPE serum bottles at 28 °C for periods of up to about 16 months. Deng et al. (Deng et al.
14 2009) used a fractional factorial matrix similar to that used by Deng, Xiong and Nemer (Deng,
15 Xiong and Nemer 2007, Section 5) in their accelerated hydration experiments (see above). Deng
16 et al. (Deng et al. 2009) performed XRD and scanning electron microscopy analyses that
17 confirmed that brucite and phase 5 (but not phase 3) form in GWB and simplified GWB, but that
18 only brucite forms in ERDA-6 brine.

19 Because the results of numerous laboratory studies of MgO hydration showed that phase 5 forms
20 in GWB instead of phase 3 (Wang and Bryan 2000; Wang, Bryan, and Wall 2001; Snider and
21 Xiong 2002a and Snider and Xiong 2002b; Snider, Xiong, and Wall 2004; Deng et al. 2009),
22 Xiong et al. (Xiong et al. 2009 and Xiong et al. 2010) determined the solubility of phase 5 and
23 added its solubility product to the DATA.FM1 database that was qualified for An-solubility
24 calculations along with the EQ3/6 geochemical software package (Wolery 2008; Wolery et al.
25 2010; Xiong 2011a and Xiong 2011b). Therefore, EQ3/6 now predicts that the hydration of
26 MgO in GWB will produce brucite and phase 5 instead of brucite and phase 3, and that hydration
27 of MgO in ERDA-6 brine will produce only brucite. Therefore, both experimental and modeling
28 studies now agree that phase 5 is stable with respect to phase 3 under conditions expected in
29 WIPP disposal rooms.

30 Freyer (Freyer 2012), however, concluded that phase 3 is stable with respect to phase 5 under the
31 conditions expected in a German domal salt repository. It is possible that phase 5 is stable under
32 expected WIPP conditions but that phase 3 is stable in German domal salt repositories because
33 the conditions expected in the WIPP differ from those in German repositories (e.g., different
34 brine compositions, elevated temperatures in German repositories but not in the WIPP, etc.).
35 Brush, Xiong, and Long (Brush, Xiong, and Long 2009) demonstrated that whether phase 3 or
36 phase 5 is stable in GWB has very little effect on the predicted composition of this brine,
37 including An solubilities. (Neither phase 3 nor phase 5 ever forms in ERDA-6 brine, so which of
38 these phases is stable is irrelevant in the case of PA calculations using An solubilities predicted
39 for this brine.)

1 **MgO-4.2 Carbonation of MgO**

2 The CRA-2009, Appendix MgO-2009, Section 4.2 (U.S. DOE 2009) discussed the carbonation
3 of MgO, the formation of hydromagnesite and (perhaps) magnesite in the WIPP, and the possible
4 passivation of MgO.

5 **MgO-4.2.1 Results since the CRA-2009**

6 Since the CRA-2009, Xiong determined the solubility constant of hydromagnesite (5424)
7 ($\text{Mg}_5(\text{CO}_3)_4(\text{OH})_2 \cdot 4\text{H}_2\text{O}$) in NaCl solutions up to 4.4 M (Xiong 2011c).

1 **MgO-5.0 Effects of MgO on the WIPP Disposal System**

2 This section reviews the effects of MgO on (1) brine composition, f_{CO_2} , pH, and An solubilities,
3 including changes since the CRA-2009 (Section MgO-5.1); (2) colloidal An concentrations
4 (Section MgO-5.2); (3) other near-field processes and conditions, including repository H₂O
5 content, gas generation, and room closure (Section MgO-5.3); and (4) far-field An transport
6 (Section MgO-5.4).

7 **MgO-5.1 Effects of MgO on Brine Composition, f_{CO_2} , pH, and An Solubilities**

8 The DOE is emplacing MgO in the WIPP to decrease the solubilities of the An elements in TRU
9 waste by consuming all the CO₂ that would be produced by microbial activity should all the CPR
10 materials in the repository be consumed. Consumption of CO₂ will decrease An solubilities by
11 (1) buffering f_{CO_2} at a low value or within a low range of values, (2) maintaining a mildly basic
12 pH, and (3) preventing the production of significant carbonate ion (CO₃²⁻) quantities.

13 The effects of MgO carbonation have been included in WIPP PA by removing CO₂ from the
14 gaseous phase in BRAGFLO calculations, and using the values of f_{CO_2} and pH predicted for
15 reactions among MgO, brine, and aqueous or gaseous CO₂ to calculate An solubilities.

16 Table MgO-1 provides the initial compositions of GWB and ERDA-6 brine and their
17 compositions predicted by EQ3/6 for the An-solubility calculations for the CRA-2014 PA (Brush
18 and Domski 2013b) after equilibration with (1) the MgO hydration and carbonation products
19 brucite (Mg(OH)₂) and hydromagnesite (5424), respectively; (2) halite (NaCl) and anhydrite
20 (CaSO₄), two of the most abundant minerals in the Salado; and (3) the An-bearing solids
21 Am(OH)₃; hydrous, amorphous ThO₂; and KNpO₂CO₃. In addition to these solids, which are
22 specified in the input files, EQ3/6 predicted that (1) the solids phase 5 and whewellite (Ca
23 oxalate hydrate, or CaC₂O₄·H₂O) would precipitate from GWB; and (2) glauberite
24 (Na₂Ca(SO₄)₂) and whewellite would precipitate from ERDA-6 brine if these brines equilibrate
25 with brucite, hydromagnesite (5424), halite, and anhydrite. Note that the prediction that phase 5
26 would precipitate from GWB but not ERDA-6 brine is consistent with previous laboratory and
27 modeling studies of the hydration of MgO carried out for the WIPP (see Sections MgO-4.1 and
28 MgO-4.1.1). Note also that because oxalate (and other organic ligands) was included in these
29 brines for the CRA-2014 PA calculations, Brush and Domski (Brush and Domski 2013b)
30 predicted that whewellite would precipitate.

31 EQ3/6 predicts that equilibration of these brines with the solids listed above will (1) establish a
32 total inorganic carbon (TIC) concentration of 3.79×10^{-4} M in GWB, and decrease the TIC
33 concentration from 1.6×10^{-2} M to 4.55×10^{-4} M in ERDA-6 brine; (2) buffer f_{CO_2} at 3.14×10^{-6}
34 atmospheres (atm) in both brines; and (3) establish a pH of 8.82 in GWB and increase the pH
35 from 6.17 to 8.99 in ERDA-6 brine.

36 Equilibration of GWB and ERDA-6 brine with these solids will also change the concentrations
37 of the major and other minor elements in these brines. In particular, the concentration of Mg in
38 GWB will decrease from 1.02 to 0.330 M, but will increase from 0.019 to 0.136 M in ERDA-6
39 brine (Table MgO-1).

Table MgO-1. Compositions of GWB and ERDA-6 Brine Predicted by EQ3/6 for the An-Solubility Calculations for the CRA-2014 PA (Brush and Domski 2013b) (M, Unless Otherwise Noted) before and after Equilibration with Brucite, Hydromagnesite, Halite, Anhydrite, Other Solids and Organics

Dissolved Element or Property	GWB before Reaction with Solids ^a	GWB after Reaction with Solids ^b	ERDA-6 Brine before Reaction with Solids ^c	ERDA-6 Brine after Reaction with Solids ^d
B(III)	0.158	0.186	0.063	0.0623
Na(I)	3.53	4.77	4.87	5.30
Mg(II)	1.02	0.330	0.019	0.136
K(I)	0.467	0.550	0.097	0.0960
Ca(II)	0.014	0.0111	0.012	0.0116
S(VI)	0.177	0.216	0.170	0.182
Cl(-I)	5.86	5.36	4.8	5.24
Br(-I)	0.0266	0.0313	0.011	0.0109
f _{CO₂} (atm)	-	3.14 × 10 ⁻⁶	-	3.14 × 10 ⁻⁶
Ionic strength	-	6.44	-	5.99
pH ^e (std. units)	-	8.82	6.17	8.99
pcH	-	9.54	-	9.69
RH (%) ^f	-	73.5	-	74.7
TIC	-	3.79 × 10 ⁻⁴	16	4.55 × 10 ⁻⁴

^a From Krumhansl et al. (1991) and Snider (2003b).
^b From Brush and Domski (2013b, Table 5, 1 × Minimum).
^c From Popielak et al. (1983).
^d From Brush and Domski (2013b, Table 6, 1 × Minimum).
^e The Pitzer scale is an unofficial pH scale consistent with pH values calculated using single-ion activity coefficients based on the Pitzer activity-coefficient model for brines and evaporite minerals of Harvie (Harvie et al. 1984), extended to include Nd(III), Am(III), and Cm(III); Th(IV); and Np(V). T. J. Wolery of Lawrence Livermore National Laboratory proposed the term "Pitzer scale" unofficially.
^f Relative humidity.

MgO-5.2 Effects of MgO on Colloidal An Concentrations

The CRA-2009, Appendix MgO-2009, Section 5.2, and U.S. DOE 2004, Appendix BARRIERS, Section BARRIERS-2.3.3 (U.S. DOE 2009) described the effects of MgO on colloidal An concentrations. There has been no change to the conceptual colloid model since the CRA-2009; however, a number of parameters have been updated for the CRA-2014 (Appendix SOTERM-2014, Section 3.8). Refer to the CCA, Appendix SOTERM (U.S. DOE 1996), for information on the colloid conceptual model.

MgO-5.2.1 Changes since the CRA-2009

In its Technical Support Document related to CRA-2009, Appendix MgO, the EPA (U.S. EPA 2010b) stated that "although the mineral-fragment colloids reported in the recent literature are not expected to be stable in WIPP brines, examination of the data used to develop the colloidal actinide source term model has shown that possible formation of mineral fragment colloids by

1 MgO and its hydration and carbonation products under WIPP-relevant conditions has not been
2 evaluated” (U.S. EPA 2010). This statement is partially in response to a study by Altmaier
3 (Altmaier et al. 2004) that discussed the formation of colloids of magnesium chloride hydroxide
4 hydrate, $Mg_2Cl(OH)_3 \cdot 4H_2O$, which is termed as phase 3 in cement literature, in their
5 experiments in 4.5 M $MgCl_2$. The Altmaier (Altmaier et al. 2004) study raised the possibility
6 that Mg-Cl-OH colloids could form in brines in the presence of MgO and that these colloids
7 could sorb radionuclides and transport them. Therefore, the investigation into the presence or
8 absence of Mg-Cl-OH colloids under the WIPP relevant conditions was necessary, as the
9 presence of such colloids could have an effect on the actinide source term.

10 Since the CRA-2009, a series of experiments has been developed to investigate the potential
11 formation of Mg-Cl-OH colloids under WIPP-relevant conditions and, if formed, the capacity of
12 such colloids to sorb Th(IV) as mineral-fragment colloids in the WIPP source term (Xiong and
13 Kim 2011). For GWB in the presence of MgO, the thermodynamically favored Mg-Cl-OH phase
14 is $Mg_3Cl(OH)_5 \cdot 4H_2O$, termed as phase 5 in cement literature; no Mg-Cl-OH phase is
15 thermodynamically favored in ERDA-6 in the presence of MgO (Xiong and Lord 2008). These
16 experiments are in progress and results will be reported as they are available. As part of this
17 effort, the study of Altmaier (Altmaier et al. 2004) was critically evaluated. Based on the results
18 of this analysis it can be concluded that the formation of Mg-Cl-OH mineral fragment colloids in
19 the Altmaier (Altmaier et al. 2004) study was an artifact of the experimental setup. The colloids
20 formed due to the drastic pH shift when two disequilibrium solutions (concentrated $MgCl_2$ brine
21 containing dissolved Th-nitrate and NaOH solution) were mixed. This “rapid precipitation”
22 process that lead to the formation of colloids would not be expected to form within an actual
23 system. These conclusions were substantiated in personal communication with Dr. Marcus
24 Altmaier (Sassani 2013).

25 **MgO-5.3 Effects of MgO on Other Near-Field Processes and Conditions**

26 Section MgO-5.3.1, Section MgO-5.3.2, and Section MgO-5.3.3 are based on the text in the
27 CRA-2004, Appendix BARRIERS, Section BARRIERS-2.3.4.1, Section BARRIERS-2.3.4.2,
28 and Section BARRIERS-2.3.4.3.

29 **MgO-5.3.1 Effects of MgO on Repository H₂O Content**

30 The hydration of periclase could consume significant quantities of H₂O in the WIPP (Reaction
31 [MgO.1]). The carbonation of brucite to form hydromagnesite (5424) or, less likely,
32 hydromagnesite (4323), will not release this H₂O unless hydromagnesite (5424) or (4323) goes
33 on to form magnesite. Furthermore, even if large quantities of magnesite form during the
34 10,000-year regulatory period, there will still be large quantities of periclase available for
35 hydration because the DOE is emplacing more MgO than necessary to consume all the CO₂ that
36 would be produced by microbial activity should all the CPR materials in TRU waste and waste
37 containers be consumed.

38 **MgO-5.3.1.1 Changes since the CRA-2009**

39 During its completeness review of the CRA-2009, the EPA identified implementation of a more
40 comprehensive H₂O budget for WIPP disposal rooms as a possible improvement in the WIPP PA

1 (U.S. EPA 2010). Previous PAs (e.g., the 1997 PAVT, and the CRA-2004 PABC) included the
2 effects of H₂O consumption and hydrogen (H₂) production by anoxic corrosion of steels and
3 other iron-base (Fe-base) alloys in steel waste containers and in steels and other alloys in the
4 waste. These PAs also included production of various gases by microbial consumption of CPR
5 materials; and implicitly included hydrogen sulfide (H₂S) and CO₂ consumption by sulfidation of
6 steels and other Fe-base alloys and carbonation of MgO, respectively. However, it was assumed
7 that microbial consumption of CPR materials, sulfidation of steels and other Fe-base alloys, and
8 MgO carbonation neither consumed nor produced H₂O (Camphouse 2013).

9 The CRA-2014 PA included: (1) hydration of periclase (MgO) to form brucite, which consumes
10 H₂O; (2) carbonation of brucite to form hydromagnesite, which neither consumes nor produces
11 H₂O; and (3) the reaction of hydromagnesite to form magnesite (MgCO₃) and brucite, which
12 releases H₂O (Camphouse 2013). The reaction of hydromagnesite to magnesite was included
13 because hydromagnesite is thermodynamically unstable with respect to magnesite and thus might
14 proceed to a significant extent during the 10,000-year WIPP regulatory period. Another possible
15 hydromagnesite-magnesite reaction, which consumes CO₂ and releases H₂O but does not
16 produce brucite (Appendix MgO-2009, Equation MgO.9 (U.S. DOE 2009)), was not included in
17 the CRA-2014 PA. Appendix PA-2014 provides additional details regarding the inclusion of
18 MgO hydration and carbonation in the near-field H₂O budget and the results of this change.

19 **MgO-5.3.2 Effects of MgO on Gas Generation**

20 The two gas-producing processes included in WIPP PA are anoxic corrosion of steels and other
21 Fe-base alloys, which will produce H₂, and microbial consumption of CPR materials, which will
22 produce mainly CO₂, hydrogen sulfide (H₂S), and methane (CH₄).

23 **MgO-5.3.2.1 Gas Generation from Anoxic Corrosion**

24 Appendix MgO-2009, Section 5.3.2.1 (U.S. DOE 2009) provided a description of the effects of
25 MgO on gas generation from anoxic corrosion of steels and other Fe-base alloys. Since the
26 CRA-2009, a new series of steel and lead corrosion experiments has been conducted (Roselle
27 2009, Roselle 2010, Roselle 2011a, Roselle 2011b, and Roselle 2013). The object of these
28 experiments has been to determine steel and lead corrosion rates under more WIPP-relevant
29 conditions. In these experiments, steel and lead coupons were immersed in brines under WIPP-
30 relevant conditions using a continuous gas flow-through system. The experimental apparatus
31 maintained the following conditions: pO₂ less than 5 parts per million (ppm); temperature of 26
32 °C; relative humidity at 78% ± 10%; and a range of CO₂ concentrations (0, 350, 1500 and 3500
33 ppm, balance N₂). Four high-ionic-strength brines were used: GWB, ERDA-6 brine, GWB with
34 organic ligands (EDTA, acetate, citrate, and oxalate), and ERDA-6 brine with the same ligands.
35 The composition of the experimental brines used was that calculated by Brush (Brush 2005) for
36 brines equilibrated with MgO, halite and anhydrite. Therefore, the anoxic corrosion experiments
37 of Roselle (Roselle 2009, Roselle 2010, Roselle 2011a, and Roselle 2011b) incorporated the
38 effects of MgO on brine chemistry.

1 **MgO-5.3.2.2 Microbial Gas Generation**

2 Experiments by Leonard (Leonard et al 1999) on the potential toxicity of MgO to WIPP-relevant
3 microorganisms suggested that MgO inhibited growth at concentrations above 0.5 grams per liter
4 (g/L), but only in the absence of a pH buffer. The effects of MgO on microbial gas generation in
5 this study were inconclusive. Appendix MgO-2009, Section MgO-5.3.2.2 (U.S. DOE 2009)
6 reviewed studies of the potential toxicity of MgO to non-WIPP microorganisms.

7 No additional studies of the effects of MgO on microbial gas generation by WIPP-relevant
8 microorganisms under expected WIPP conditions have been carried out since Leonard (Leonard
9 et al 1999). However, WIPP-specific data obtained by Swanson (Swanson et al 2012)
10 demonstrate that many WIPP-relevant microbes, especially haloarchaea, grow well at high
11 MgCl₂ concentrations (~1.0 M) and can tolerate pH up to 9.5.

12 **MgO-5.3.3 Effects of MgO on Room Closure**

13 Appendix MgO-2009, Section 5.3.3 (U.S. DOE 2009) described the effects of MgO on room
14 closure. There is no new information since the CRA-2009 on the effects of MgO on this process.

15 **MgO-5.4 Effects of MgO on Far-Field An Transport**

16 The CRA-2009, Appendix MgO-2009, Section 5.4 (U.S. DOE 2009) discussed the effects of
17 MgO on far-field An transport. In particular, this discussion focused on the effects of MgO on
18 the matrix distribution coefficients (K_{ds}) for dissolved thorium (Th), uranium (U), Pu, and
19 americium (Am) in the Culebra member of the Rustler Formation. Since the CRA-2009, there
20 have been changes in these K_{ds} ; however, there have been no changes in the effects of MgO on
21 these K_{ds} .

1 **MgO-6.0 The MgO Excess Factor**

2 The CRA-2009, Appendix MgO-2009, Section MgO-6.0 (U.S. DOE 2009) provided a detailed
3 description of the MgO excess factor and its use in the WIPP. The MgO excess factor is defined
4 as the ratio of the total amount of MgO to be emplaced in the WIPP divided by the total amount
5 required to consume all of the CO₂ produced by microbial activity should all of the CPR
6 materials in the repository be consumed. There have been no changes in the MgO excess factor
7 since the CRA-2009.

1 **MgO-7.0 References**

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