

1 for independent LLW disposal facilities, which has been the standard practice for the LLBGs at Hanford
2 where the annual precipitation is low. To ensure that analyses are conservative when evaluating the
3 potential releases from LLW disposal, even in lined facilities, no credit is taken for the liner. Due to long
4 time period of analysis and the relative short expected life of liners (30-100 years) it was conservative to
5 model transport to ground water as if the liner did not exist. Liners effectively minimize transport of
6 contaminants from the disposal facility during operations. However, there is no scientific consensus
7 regarding the lifetime of liners.

8
9 The mixed waste trenches, ERDF, and all of the lined disposal facilities evaluated in the HSW EIS
10 alternatives are designed with liners that meet applicable technical standards. The liners are a
11 combination of clay, drainable layers, and thick polymeric liners, as discussed in Section 2.2.3.5.

12
13 Some disposal facilities use only a clay liner with its natural ability to retard water flows. Smectite or
14 bentonite-type clays are suitable for this function because they have very low permeability to water and
15 are less subject to geologic modification with time than polymeric liners. However, they can be subject to
16 shrinkage and cracking as the water environment changes.

17
18 Another option for minimizing contaminant migration could be the use of a permeable reactive
19 barrier in-lieu of the traditional double-lined system. Disposal facility trench design could optimize the
20 physical and chemical characteristics in a trench bottom in order to maximize artificially created
21 attenuation of radionuclides and hazardous waste components. Disposal site design could optimize the
22 soil adsorption capacity by artificially creating a permeable reactive barrier in the trench bottom by
23 adding such materials as flyash, zeolite clays, various oxides, zero valence metals (e.g., metallic iron),
24 granulated activated carbon, phosphates, lime, and peat. Manipulating trench-bottom material pH could
25 also assist in enhancing specific contaminants' retardation. The type and amount of additives, method of
26 additive installation (e.g., layered adsorbents vs. a homogenous blend of adsorbents), and physical/
27 chemical manipulations deployed to create an artificial reactive barrier would depend primarily on such
28 factors as waste composition (types and volumes) and climate. Field and laboratory tests have
29 demonstrated that flyash and zeolite clays alone greatly improve the retention of most radionuclides
30 (except the actinides) and hazardous contaminants. Installing such a reactive permeable liner system
31 under a mixed waste trench could provide a long-term solution to waste isolation as opposed to the
32 uncertainty associated with long-term performance of landfill barriers, performance monitoring, and
33 landfill liner systems. A permeable reactive barrier could be substantially lower in cost than a traditional
34 double-lined system due to such factors as lower construction costs and elimination of the need to collect
35 and treat leachate during the operating life cycle of the facility and would provide, with a high level of
36 certainty, the ability to isolate waste for thousands of years.

37 38 **D.5 Barrier Options**

39
40 The modified RCRA Subtitle C Barrier was selected for use in this EIS as the reference design barrier
41 for LLW and MLLW disposal facilities and is discussed in Section 2.2.3.6. A focused feasibility study
42 (DOE 1996) was performed to examine engineered barrier options that have broad application and are
43 considered viable from the standpoint of effectiveness, implementability, and cost. The feasibility study
44 evaluated a total of four conceptual barrier designs for different types of waste sites. The Hanford

1 Barrier, the modified RCRA Subtitle C Barrier, and the modified RCRA Subtitle D Barrier were
2 considered as the baseline designs for the purpose of the evaluation. A fourth barrier design, the standard
3 RCRA Subtitle C Barrier, was also evaluated; it is commonly applied at other waste sites across the
4 country. These four designs provide a range of barrier options to minimize health and environmental
5 risks associated with a site and specific waste categories for design life periods of 1000, 500, 100, or
6 30 years, respectively. Design criteria for the 500- and 1000-year design life barriers include
7 performance to extend beyond active institutional control and monitoring periods. An alternative
8 approach, which is being considered for commercial radioactive waste disposal, is also discussed below.
9

10 **D.5.1 Hanford Barrier**

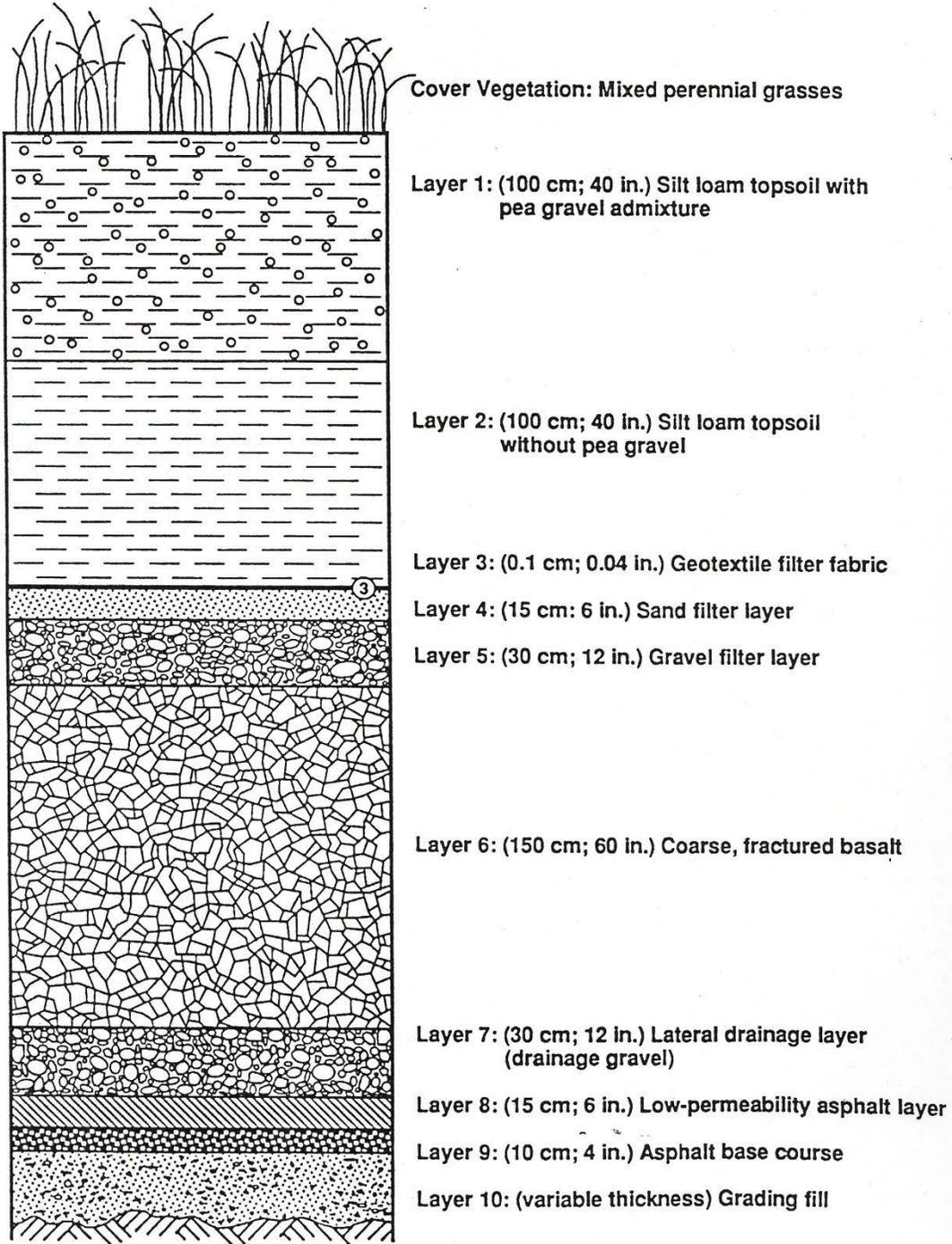
11
12 The Hanford Barrier was designed for disposal facilities with Greater than Category C (GTCC) LLW,
13 GTCC MLLW, and/or wastes with significant inventories of TRU constituents. This barrier is designed
14 to remain functional for a performance period of 1000 years and to provide the maximum practicable
15 degree of containment and hydrologic protection of the evaluated designs. The Hanford Barrier is
16 composed of nine layers of durable material (excluding the grading fill layer) with a combined thickness
17 of 4.5 m (14.7 ft) (see Figure D.12). The barrier layers are designed to maximize evapotranspiration, and
18 to minimize moisture infiltration and bio-intrusion, considering long-term variations in Hanford Site
19 climate.
20

21 The primary structural differences between the Hanford Barrier and other barriers discussed in this
22 report are increased thicknesses of the individual layers within the barrier and the inclusion of a coarse-
23 fractured basalt layer to control bio-intrusion and to limit inadvertent human intrusion.
24

25 **D.5.2 Standard RCRA Subtitle C Barrier**

26
27 This barrier design can be used at disposal facilities containing hazardous constituents. This barrier is
28 designed to provide containment and hydrologic protection for a period of 30 years, to include institu-
29 tional control consisting of monitoring and necessary maintenance. The Standard RCRA Subtitle C
30 Barrier is composed of five primary layers (not counting the grading fill layer) with a combined minimum
31 thickness of 1.65 m (65 in.) (see Figure D.13). The barrier layers are designed to shed surface waters, and
32 only minimally account for moisture retention and evapotranspiration capabilities. Bio-intrusion is
33 mitigated primarily by institutional control, monitoring, and maintenance. However, EPA guidelines
34 suggest using optional surface layer treatments for bio-intrusion considerations.
35

36 The Standard RCRA Subtitle C Barrier technology meets EPA's minimum technology guidance
37 (EPA 1989). The Standard RCRA Subtitle C Barrier has limited applications and use at the Hanford Site.
38 Limitations include a design life that may be inadequate for the radioactive waste categories; an
39 anticipated high surveillance and maintenance and operations cost caused by implementation of the low
40 permeability layer design features in an arid climate condition; and maintenance and operations cost
41 caused by surface water runoff and runoff control, collection, and discharge facilities.

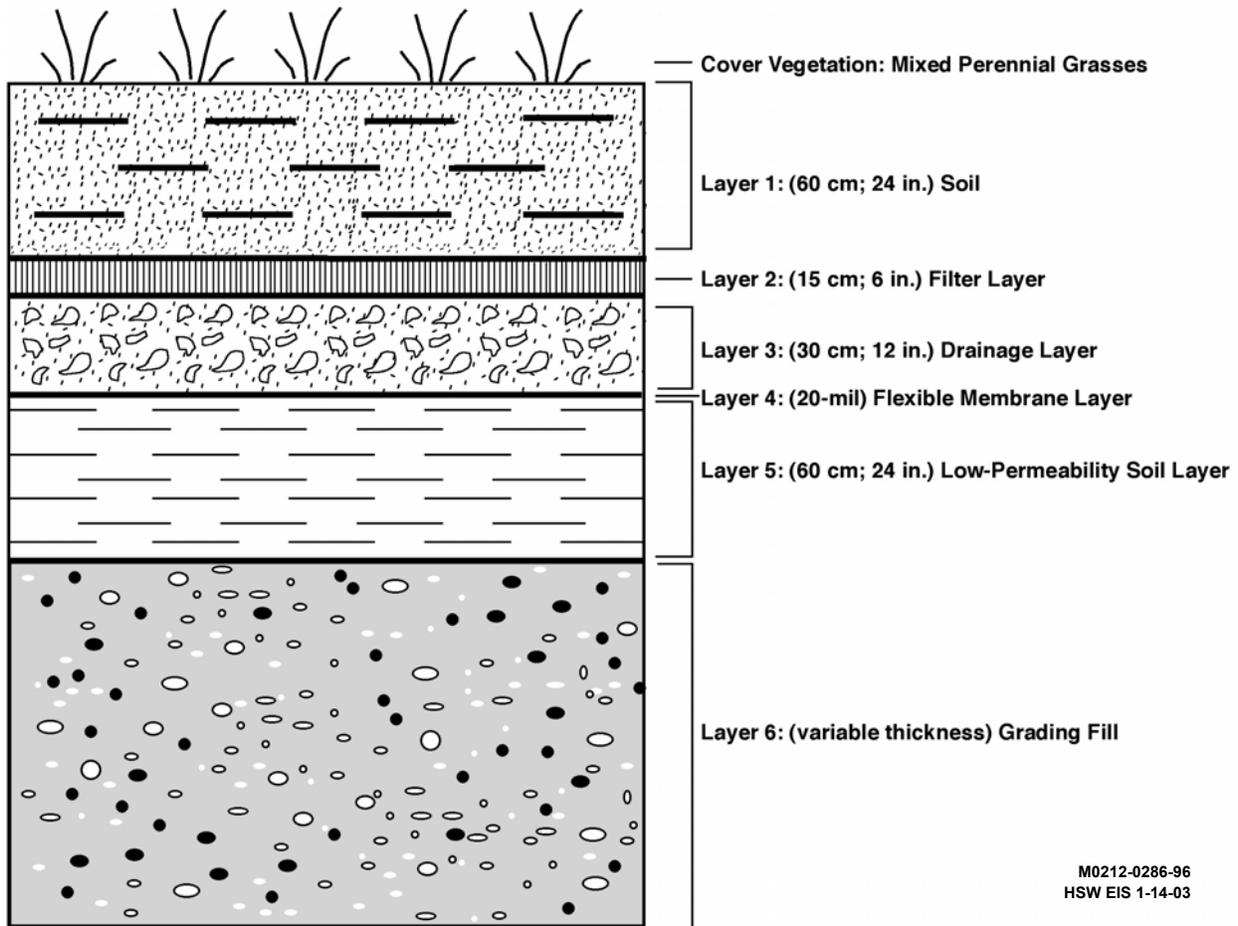


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Figure D.12. Hanford Barrier

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Standard RCRA Subtitle C Barrier



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Figure D.13. Standard RCRA Subtitle C Barrier

D.5.3 Modified RCRA Subtitle D Barrier

This barrier is designed for non-radiological and non-hazardous solid waste disposal facilities, as well as Category 1 LLW sites where hazardous constituents are not present. The modified RCRA Subtitle D Barrier as shown in Figure D.14 is composed of four layers of durable material with a combined minimum thickness of 0.90 m (2.9 ft) excluding the grading fill layer. It is designed to provide limited bio-intrusion and limited hydrologic protection (relative to the Hanford and Modified RCRA Subtitle C barrier designs) for a performance period of 100 years. The performance period is consistent with the radionuclide concentrations and activity limits specified for Cat 1 LLW. The 100-year design life is also consistent with the minimum expected duration of active institutional control.

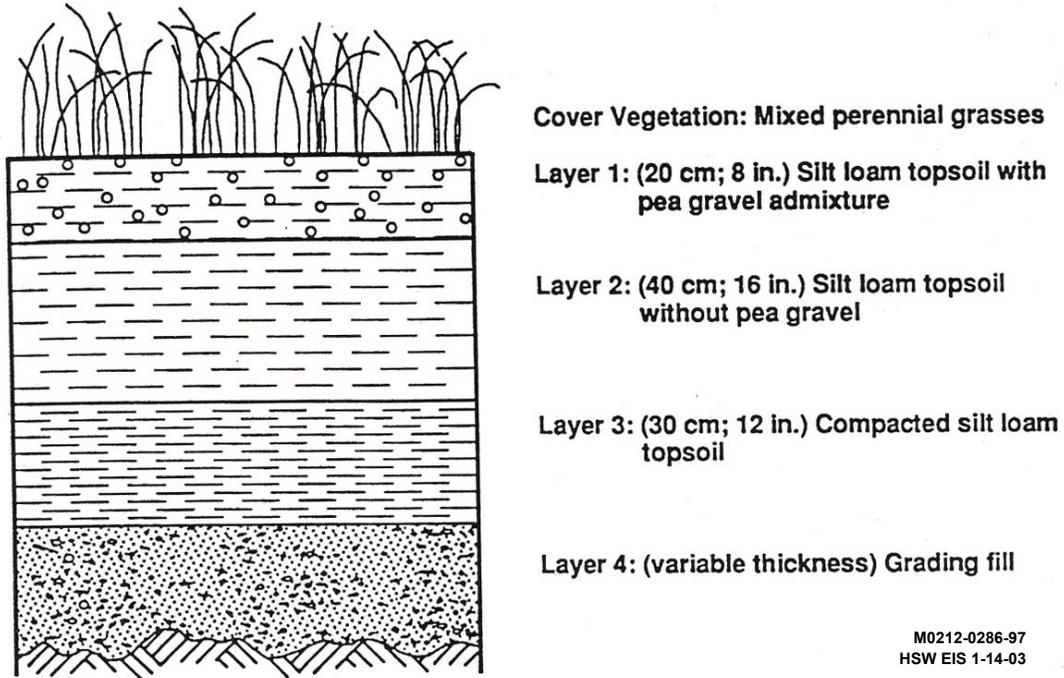


Figure D.14. Modified RCRA Subtitle D Barrier with Bentonite Mix

D.5.4 Conceptual Cover Barrier with Bentonite Mix

This barrier has been evaluated by WDOH (WDOH 1999) for use at the leased commercial disposal facility adjacent to the 200 Areas (the US Ecology Site). The conceptual cover barrier is shown in Figure D.15. Some of the key characteristics of the barrier design are a 4-inch surface layer with 50 percent gravel, 36-inch silt loam layer, and a 12-inch bentonite clay (12 percent) low-permeability barrier.

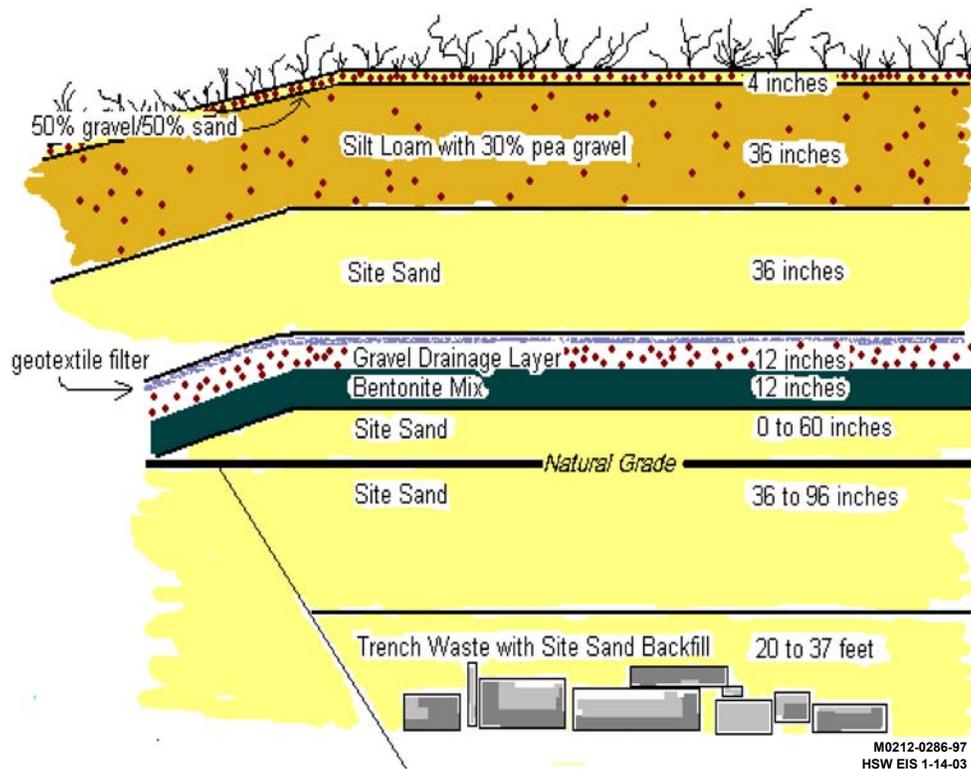


Figure D.15. US Ecology Conceptual Cover Barrier

D.6 References

40 CFR 261. "Identification and Listing of Hazardous Waste." U.S. Code of Federal Regulations. Online at: http://www.access.gpo.gov/nara/cfr/waisidx_01/40cfr261_01.html.

40 CFR 717. "Records and Reports of Allegations that Chemical Substances Cause Significant Adverse Reactions to Health or the Environment." U.S. Code of Federal Regulations.

40 CFR 761. "Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution In Commerce, and Use Prohibitions." U.S. Code of Federal Regulations. Online at: http://www.access.gpo.gov/nara/cfr/waisidx_01/40cfr761_01.html.

40 CFR 792. "Good Laboratory Practice Standards." U.S. Code of Federal Regulations. Online at: http://www.access.gpo.gov/nara/cfr/waisidx_01/40cfr792_01.html.

15 USC 2601. Toxic Substance Control Act (TSCA) of 1976. Online at: <http://www4.law.cornell.edu/uscode/15/2601.html>.

42 USC 2011 et. seq. Atomic Energy Act of 1954. Online at: <http://www4.law.cornell.edu/uscode/15/2601.html>.