

1 **Title:**

2 An anomalous metal-rich phosphogypsum: characterization and classification according to
3 international regulations

4 **Authors:**

5 Francisco Macías^{a*}, Carlos R. Cánovas^a, Pablo Cruz–Hernández^a, Sergio Carrero^a, Maria P. Asta^b,
6 José Miguel Nieto^a, Rafael Pérez–López^a

7 ^a *Earth Science Department, University of Huelva, Campus “El Carmen”, E-21071 Huelva,*
8 *Spain.*

9 ^b *Environmental Microbiology Laboratory, École Polytechnique Fédérale de Lausanne, EPFL*
10 *ENAC IIE EML, CE 1 543 (Centre Est), Station 6, CH-1015 Lausanne, Switzerland.*

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12 *Corresponding author:

13 francisco.macias@dgeo.uhu.es

14 Tel.: +34-95-921-9834; fax: +34-95-921-9810

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36 **Abstract**

37 Phosphogypsum is the main waste generated by the phosphate fertilizer industry. Despite the high
38 level of pollutants found in phosphogypsum and the proximity of stacks to cities, there are no
39 specific regulations for the management of this waste. This study addresses this issue by applying
40 to phosphogypsum, from a fertilizer plant in Huelva (SW Spain), the leaching tests proposed by
41 the current European and US environmental regulations for wastes management and
42 classification. Two main conclusions were obtained: 1) the anomalous metal and metalloid
43 concentrations (e.g. As, Fe, Pb, Sb, Mn, V and Cu) and higher mobility observed in the Huelva
44 phosphogypsum compared to other stacks worldwide, and 2) the discrepancies observed between
45 EU and US regulations dealing with hazardousness classification of these materials. This latter
46 finding suggests the need to use complementary assessment protocols to obtain a better
47 characterization and classification of these wastes. An evaluation of the potential risk to the
48 aquatic life according to the US EPA regulation is proposed in this study. The results warn about
49 the acute and chronic effects on the aquatic life of this waste and suggest the adoption of more
50 strict measures for a safe disposal of phosphogypsum stacks.

51 **Keywords:**

52 leaching tests; hazardousness classification; aquatic life risk; arsenic anomaly.

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73 1. Introduction

74 Phosphate fertilizer industry plays a key role to maintain the levels of farming production
75 worldwide. This industry needs phosphoric acid for the fertilizer production, which is mainly
76 obtained from the manufacturing process of phosphate rock by the “wet acid method” [1]. In this
77 method, the previously washed phosphate rock is concentrated by flotation and digested with
78 sulfuric acid to obtain phosphoric acid and an unwanted by-product known as phosphogypsum.
79 For every ton of phosphoric acid manufactured, 5 tons of phosphogypsum are generated.
80 Considering that the world phosphate rock production is increasing as well as the P_2O_5
81 consumption from fertilizers, then, the world phosphogypsum production is expected to reach
82 values around 100-280 Mt per year [2].

83 The geochemical characteristics of phosphogypsum are strongly influenced by the ore phosphate
84 rock composition and by the chemical behavior of impurities released during manufacturing
85 process [3]. Thus, although phosphogypsum is mainly composed by gypsum ($CaSO_4 \cdot 2H_2O$), this
86 waste also contains some impurities such as phosphate, sulfate and fluoride, mainly in form of
87 residual acids, toxic trace elements (e.g. As, Cd, Cr, Cu or Zn) and radionuclides from uranium
88 decay series. Then, the management, environmental policy and potential recycling of these wastes
89 depend on the type and amount of impurities. From all the phosphogypsum generated in the world,
90 only the 15% is recycled, mainly as building materials [1]. The remaining 85% is disposed of in
91 large stacks, commonly in coastal areas, without any treatment and exposed to weathering
92 processes. During operation, phosphogypsum is commonly stockpiled near the fertilizer plant
93 over a composite liner to avoid infiltration. Upon closure, the stack is often capped with an
94 impermeable layer to avoid leaching of contaminants.

95
96 Despite the high content of contaminants found in phosphogypsum and the proximity of stacks to
97 cities, it is especially surprising that there are no specific regulations for the management of this
98 waste. Furthermore, the phosphogypsum leaching capacity and the compliance of leachates to
99 current regulations have not been properly addressed. There are several works dealing with the
100 environmental impact of radionuclides contained in phosphogypsum, which suggest managing
101 this by-product in radioactive waste landfills [e.g. 1, 4]. However, only few researches have been
102 focused on the trace metals leachability during weathering processes or on the behavior of
103 phosphogypsum stacks, based on leaching protocols, for management strategies according to
104 international rules [5, 6]. In this sense, the high variability in phosphogypsum chemical
105 composition associated to the different nature of phosphate rock, type of wet acid process
106 performed and the release of contaminants during acid phosphoric manufacturing may cause
107 significant differences on the leaching behavior among piles. Owing to this variability, the
108 research on metal release from stacks worldwide under different weathering scenarios is of crucial
109 importance.

110 Therefore, the present study addresses this issue by applying to phosphogypsum, from a fertilizer
111 plant in Huelva (SW Spain), the leaching tests proposed by the current European and US
112 environmental regulations for wastes management and classification (EN 12457-2 [7] and TCLP
113 [8], respectively). In addition, owing to the intense interaction of Huelva phosphogypsum with
114 seawater, leaching tests with this weathering agent have been also performed. The results of these
115 tests have been compared with, to our knowledge, the only case reported worldwide applying
116 these leaching protocols; the Mulberry stacks (Florida, US) [5]. Additionally, the potential risk to
117 the aquatic life under different weathering scenarios has been studied by comparing the leachates
118 composition to the so-called criterion continuous concentration and criterion maximum
119 concentration from the National Recommended Water Quality Criteria of the US EPA [9]. The
120 results obtained in this study will fill a gap in the knowledge of the potential pollutant release of
121 these wastes under different weathering agents and help decision makers to determine the best
122 cost-effective and environmentally safe disposal practices for these wastes.

123 **2. Huelva phosphogypsum stack**

124 The phosphoric acid production in the city of Huelva since 1967 to 2010 has caused the dumping
125 of around 100Mt of phosphogypsum directly on 12 km² of salt-marshes of the Tinto River estuary,
126 less than 100 m from the urban core (Fig. 1). The Huelva phosphogypsum is divided into four
127 different zones within the stack (Fig. 1); zones 1 and 4 account for 65 Mt of phosphogypsum
128 deposited over 680 ha, with heights ranging from 2 to 10 m. Both zones have been restored by
129 conventional dry-covers to prevent weathering. Despite to this fact, highly-polluted acid leachates
130 are directly discharged into the estuary [10]. Zones 2 and 3 are unrestored areas, accounting up to
131 40 Mt of phosphogypsum deposited over 440 ha, with average heights of 30 and 8 m, respectively.
132 In both zones, the number and pollution grade of the acid discharges are far greater than those
133 from the already-restored zones 1 and 4 [10].

134 The singularity of the Huelva phosphogypsum stack relies on two outstanding circumstances: a)
135 the waste was deposited over the marshland without any type of isolation, and b) the piles are
136 located within the tidal prism of the estuary. As a consequence, the Huelva phosphogypsum is
137 subject to three different weathering scenarios. Firstly, the wastes are subject to weathering by
138 rainwater (at least zones 2 and 3), where in semiarid climates rainfall events are scarce but intense.
139 Secondly, due to its location within the estuarine system, the stack is also affected by the
140 weathering of seawater during tidal cycles. Finally, owing to the absence of composite liners in
141 the bottom of the stack, the residue is in direct contact with the organic matter-rich marshland;
142 for this reason, the upward flow of seawater and the downward flow of rainwater may interact
143 with the stack, causing the weathering of the phosphogypsum under reducing conditions [6].
144 Detailed information about environmental setting of the Huelva stack and its pollution capacity
145 can be found elsewhere [6, 10].

146 **3. Materials and methods**

147 **3.1 Sampling and analysis of total composition of Huelva phosphogypsum**

148 Phosphogypsum solid samples were collected in the zone 3 of the stack (Fig. 1) in November
149 2015, from a bore-hole at different depths (0.5, 1.6, 2.9, 3.5, 4.1, 5.6, 7 and 8.1 m). The two
150 shallowest samples correspond to unsaturated zone (0.5 and 1.6 m samples), whereas the
151 remaining samples correspond to saturated zone (from 2 to 8.1 m). The deepest sample represents
152 the stack basement directly in contact with the estuarine marsh soils. Additionally, 6 surface
153 phosphogypsum samples (Z3-1 to Z3-6) were collected in different locations of the zone 3 for
154 seawater leaching experiments (Fig.1). After collection, samples were immediately frozen and
155 lyophilized to preserve their characteristics.

156 The chemical composition of the samples was obtained by analyses after aqua-regia pseudo-total
157 digestion. These data were compared to those obtained from different leaching protocols with the
158 purpose of quantifying the proportion of pollutants released by each weathering process
159 simulated. This chemical extraction has been traditionally used to determine the pseudo-total
160 metal content in environmental samples, with good recovery percentages regarding the total
161 content. Thus, 10 mL of aqua-regia (12 mol L⁻¹ HCl and 15.8 mol L⁻¹ HNO₃ in the ratio 3:1) were
162 added to 1 g of phosphogypsum in Teflon reactors and reacted for 20 h in a fume cupboard, and
163 then, simmered on a hot plate for 1 h at 100 °C. The digestates were diluted with deionized water
164 and stored refrigerated at 4°C until analysis.

165 **3.2 Leaching protocols for management and hazardousness assessment**

166 Three different leaching tests were performed to assess the waste management and disposal
167 according to its hazardousness. On the one hand, the phosphogypsum was subject to leaching
168 protocols established by current regulations on waste disposal using both EU standard EN 12457-

169 2 [7] and US standard TCLP [8] leaching tests. On the other hand, the release of pollutants under
170 seawater interaction was studied by leaching with seawater. All these leaching tests simulate the
171 potential weathering agents that may currently release pollutants from the stacks, which will be
172 briefly described below.

173 The EN 12457-2 leaching test is applied to assess the acceptance for disposal of a waste in
174 European landfill sites, and has been widely used in mineral-processing wastes [e.g. 11-12]. The
175 experimental concentrations obtained in the test must be normalized to the sample weight in order
176 to be compared with the limit threshold values issued by the European Council Decision [13] as
177 criterion for the acceptance of wastes in three types of landfill sites: landfills for inert wastes, non-
178 hazardous wastes and hazardous wastes. The test was conducted by mixing phosphogypsum
179 samples with deionized water at a liquid to solid ratio of 10:1, followed by stirring for 24 h,
180 centrifugation and filtration of the supernatant and determination of dissolved elements. In
181 addition, the use of deionized water in this test allows us to estimate the potential leaching of
182 pollutants by phosphogypsum through contact with rainwater.

183 The TCLP leaching test [8] was originally designed to simulate co-disposal with municipal
184 wastes, although its applicability has been extended for the hazardousness classification of
185 mineral-processing wastes [14] regarding to the regulated limits of certain inorganic pollutants
186 [e.g. 11, 15-16]. Additionally, metal concentrations in TCLP leachates can be also employed as
187 limits to determine if a specific waste needs to be submitted to an universal treatment standard
188 (UTS) to accomplish with Land Disposal Restrictions (LDR, EPA 530-R-01-007) [17]. The test
189 was performed according to the method 1311 of the US EPA [8]. The samples were extracted for
190 18 h by stirring on a shaker with a liquid to solid ratio of 20:1. The extractant must be chosen as
191 function of waste pH. For samples with $\text{pH} < 5$, such as the Huelva phosphogypsum, an acetic
192 acid solution buffered to $\text{pH} 4.9$ was used as extractant. Following the extraction, samples were
193 centrifuged, the supernatant filtered, acidified with HNO_3 and stored refrigerated at 4°C until
194 analysis. In this case, leaching of phosphogypsum with organic acids would simulate the leaching
195 processes when the upward flow from the basement and/or the downward flow by meteoric water
196 from the surface interacts with organic matter-rich environments from the salt-marshes.

197 Finally, the simulation of weathering by seawater was performed in 6 samples by mixing with
198 seawater at a liquid to solid ratio of 10:1, followed by stirring for 24 h. Afterwards, filtration of
199 the supernatant and determination of dissolved elements or pollutants were performed. Seawater
200 used during this leaching test was obtained in the coast of Atlantic Ocean near to the city of
201 Huelva.

202 **3.3 Analytical methodology**

203 Major element (Al, Fe, Mn and S) concentrations were obtained using Inductively Coupled
204 Plasma-Atomic Emission Spectroscopy (ICP-AES; Jobin Yvon Ultima 2) and trace element (As,
205 Ba, Be, Cd, Co, Cr, Cu, Mo, Ni, Pb, Sb, Se, Sn, Tl, V and Zn) contents by Inductively Coupled
206 Plasma-Mass Spectroscopy (ICP-MS; Agilent 7700). Detection limits were: 0.2 mg/L for S; 0.05
207 mg/L for Al and Fe; 0.02 mg/L for Mn; and 0.2 $\mu\text{g/L}$ for trace elements. All analyses were
208 performed in the laboratories of the University of Huelva. Three laboratory standards, prepared
209 with concentrations within the range of the samples, were analyzed every 10 samples to check for
210 accuracy. Furthermore, dilutions were performed to ensure that the concentration of the samples
211 was within the concentration range of the standards. Blank solutions with the same matrix as the
212 samples were also analyzed. The average measurement error was $<5\%$.

213 **3.4. Comparison with other phosphogypsum stacks worldwide**

214 With the aim of checking remarkable differences of the waste by-products in various phosphoric
215 industries, the total chemical composition of Huelva phosphogypsum has been compared with

216 that reported for other phosphogypsum stacks around the world. Data were obtained from stacks
217 located at Florida, Idaho and Louisiana reported by Mostary (2011) [5], Luther et al. (1993) [18]
218 and Carbonell-Barrachina et al. (2002) [19], respectively; from Brazilian phosphogypsums
219 published by Oliveira et al. (2012) [20], da Conceicao et al. (2006) [21] and Silva et al. (1999)
220 [22]; from Canadian phosphogypsum reported by Rutherford et al. (1995) [23]; and from Tunisian
221 and Jordanian stacks described by Choura et al. (2015) [24] and Abed et al. (2008) [25],
222 respectively.

223 Also for comparison purposes, data after applying the TCLP and EN standardized leaching tests
224 in phosphogypsum from a giant stack located at Mulberry (Florida, US) [5] were used. Phosphate
225 mining in Florida is one of the state's largest industries, and produces approximately 40 Mt of
226 phosphogypsum per year [5], accounting between 14-40% of worldwide phosphogypsum
227 production. In this US state, more than one billion tons of phosphogypsum are permanently stored
228 in over 25 giant stacks, some of them with up to 60 m in height and 2 km² in extension [26]. For
229 this reason, it seems reasonable to consider Mulberry phosphogypsum as a representative stack
230 worldwide. These authors collected samples from four locations on the stack walls at different
231 depths along the first 0.6 m. Then, samples collected from different depths for each location were
232 thoroughly mixed to get a homogenous sample, obtaining finally a total of 8 samples. To our
233 knowledge, this is the only case worldwide applying the EU standard EN 12457-2 and US
234 standard TCLP leaching tests to phosphogypsum.

235 **4. Results and Discussion**

236 **4.1 Chemical composition of Huelva phosphogypsum and comparison with other** 237 **phosphogypsum stacks**

238 The Huelva stack acts as an anthropogenic aquifer system, with clearly differentiated unsaturated
239 (0-2 m) and saturated zones (from 2m depth to the bare marsh). This latter zone is subject to a
240 strongly reducing environment, especially the phosphogypsum located at the bottom of the stack.
241 This feature promotes chemical gradients along the profile, and therefore different responses to
242 weathering may be expected.

243 As can be observed in Figure 2, most elements analyzed reached the highest concentrations in the
244 bottom of the profile (with the exception of Se). This fact is due to sulfate-reducing processes
245 occurring in the contact of phosphogypsum with bare marshland soils [27, 28] that promote
246 precipitation and trapping of metals of the pore-waters into metallic sulfides. However, a slight
247 enrichment is observed for Fe and other trace metals (i.e. Sn, Ba, Cr, Pb, Se and Mo) in the
248 unsaturated zone (0-2 m) compared to the saturated zone (except to the bottom, in contact with
249 the marshland; Fig. 2).

250 The chemical composition of the three zones identified in the Huelva stack, i.e. unsaturated,
251 saturated and marshland contact zones, has been compared with that reported in others stacks
252 around the world (Fig. 3). As can be observed, Huelva phosphogypsum exhibits the same range
253 of concentrations for most elements as those reported worldwide, with the exception of the bottom
254 material where enrichments in Fe, Pb, Sb, Mn, V, Cu, Co Ni and Cr are observed in relation to
255 the rest of stacks (Fig. 3). However, the most striking feature is the anomalously high
256 concentration of As observed along the whole profile, i.e. between 1 and 2 orders of magnitude
257 higher than that found in the rest of reported stacks worldwide. The most probable origin of this
258 anomalously high concentration of As in the Huelva phosphogypsum could be related with the
259 quality of the sulfuric acid used during the industrial process. The sulfuric acid used during
260 phosphoric acid manufacturing in Huelva was mainly obtained by pyrite roasting and SO₂
261 recovery [29]. The pyrite used came from the Tharsis Mines which contained up to 0.4% of As

262 [30], thus, the high level of As in the sulfuric acid may have been transferred to the
263 phosphogypsum.

264 These results highlight the singularity of Huelva stack as an anomalous As and metal-rich
265 phosphogypsum among the cases reported worldwide, especially in the bottom of the stack where
266 Fe, Pb, Sb, Mn, V, Cu, Co, Ni and Cr are trapped as a consequence of the interaction between the
267 phosphogypsum and the organic matter-rich marshland soils. As a difference of most
268 phosphogypsum deposits worldwide, Huelva was not stockpiled over an impermeable liner but
269 on bare marshland soils [10]. If these metal and metalloids, anomalously enriched in Huelva, were
270 easily mobilized by weathering agents, the current state of the Huelva stack may pose a serious
271 threat to the environment.

272 **4.2 Management assessment and hazardousness classification based on international** 273 **regulations**

274 Owing to the anomalously high As concentration along the profile and high metal concentrations
275 observed in the deepest zone of the Huelva stack, its hazardousness and the suitability for landfill
276 disposal must be addressed. Table 1 shows the regulatory limits for waste acceptance at landfills
277 in EU [13], and the results of the EN 12457-2 leaching test applied to the Huelva depth profile.
278 For comparative purposes, the results reported in Mulberry [5] with the same test are also
279 included.

280 According to these results, the unsaturated zone of the Huelva stack could be considered as a non-
281 hazardous waste because sulfate and Cd exceed the limit of 6000 mg/kg and 0.04 mg/kg
282 respectively, established for inert wastes landfills. On the other hand, the saturated zone may be
283 considered as a hazardous material due to the high concentrations of As leached and, therefore, it
284 must be deposited in landfills for this type of wastes. As well as the saturated zone, the
285 phosphogypsum deposited in the bottom of the stack in contact with the marshland soils also
286 exceeds the values of non-hazardous wastes for As and Cd. Thus, this zone of the stack must be
287 also deposited in a hazardous waste landfill. The trend on metal and metalloids release in depth
288 by EN 12457-2 leaching test is in agreement with the trend observed for total chemical
289 composition (Fig. 2). In summary, the mobility of As and Cd confers the Huelva stacked material
290 the classification of hazardous waste according to EU regulations. On the other hand, the
291 Mulberry phosphogypsum should be considered as a non-hazardous waste according to the EU
292 regulation by the release of Cu, Mo, Ni and Zn; only these metals exceed the threshold limits for
293 inert waste landfills (Table 1). Unlike Huelva, As and Cd were below the detection limit for
294 Mulberry (Table 1), elements which confer the hazardousness to the Huelva pile.

295 According to US EPA regulation [8, 14], the Huelva and Mulberry phosphogypsums can be
296 considered as non-hazardous wastes due to the fact that the TCLP limits are not exceeded in any
297 case (Table 2). The Mulberry phosphogypsum neither exceeds the UTS limits nor must therefore
298 be treated before disposal to accomplish with Land Disposal Restrictions [17]. However, the
299 waste stored in the bottom of the Huelva stack releases Cd at concentrations that exceed the UTS
300 limit, so this zone of the stack must be treated before disposal. Most elements considered in the
301 TCLP (mainly highly toxic, e.g. As, Cd, Pb, V) were below the detection limit in the extractants
302 from Mulberry, unlike in the Huelva phosphogypsum where remarkable concentrations were
303 reached. This pattern is in line with that of chemical composition and of deionized water leaching
304 results obtained in Huelva and Mulberry, highlighting the anomalous metal and metalloid
305 concentrations and higher mobility observed in the Huelva phosphogypsum.

306 The discrepancies between EU and US regulations dealing with hazardousness classifications of
307 mineral processing wastes have been previously reported [11], which suggests the need to use
308 complementary assessment protocols to obtain a better characterization and classification of these

309 wastes. In case of discrepancies, a detailed investigation of the potential effects on the aquatic life
310 should be performed in order to assure a safe waste disposal and a risk minimization to the
311 environment.

312 **4.3 Environmental impact on aquatic life under different weathering scenarios**

313 The impact of this anomalously metal-rich phosphogypsum on the aquatic life has been studied
314 under different weathering scenarios: (1) weathering by rainwater (simulated by EN 12457-2
315 leaching test), which may occur in the unrestored zones of Huelva stack during rainfall events;
316 (2) weathering under reducing conditions (simulated by TCLP leaching test), which may occur in
317 the lower part of saturated zones and in the bottom of Huelva pile; and (3) weathering by seawater,
318 which may occur during tidal cycles. The impact of these weathering scenarios on the aquatic life
319 has been assessed by comparison with the criteria established by the US EPA. In this sense, the
320 Criterion Continuous Concentration is the threshold value above which a certain element poses a
321 significant risk to the majority of species in waters if chronic exposure is maintained. On the other
322 hand, the Criterion Maximum Concentration represents the acute exposure to a metal, that is, the
323 highest one-hour average concentration that should not result in unacceptable effects on aquatic
324 organisms.

325 Tables 3 and 4 show the Criterion Continuous Concentration and Criterion Maximum
326 Concentration limits, and the metal and metalloid release after EN 12457-2 and TCLP tests in the
327 Huelva and Mulberry phosphogypsum stacks, respectively. As can be observed, only Al and, at a
328 lesser extent, Zn exceed the limits in Mulberry, which pose a risk for aquatic life by both elements
329 upon acute and chronic exposure. The metal exposure for aquatic life under rainfall weathering
330 and reducing conditions of Huelva phosphogypsum is even more severe; Cd exceeds both limits
331 along the whole profile while other pollutants (Al, As, Pb, Ni, Se and Zn) show exceedance of
332 one of the two limits at different depths. Only Fe, Cu and Cr values remained below the threshold
333 limits of the aquatic life criteria established by the US EPA along the whole profile. In addition
334 to As and Cd, the release of other toxic metals (e.g. Pb, Se or Zn) under rainfall weathering and
335 reducing conditions poses a risk to the aquatic life. The comparison with Mulberry highlights,
336 once again, the hazardous nature of the Huelva stack and warns about the acute and chronic effects
337 on the aquatic life during rainfall events and reducing conditions.

338 The interaction of seawater with Huelva stack also causes a significant release of toxic metals.
339 Both limits for Cd were exceeded in all samples and for As in two cases (Table 5). The rest of the
340 elements exceeded Criterion Continuous Concentration and/or Criterion Maximum
341 Concentration limits in one or several samples (with the exception of Cu). Once more, both Cd
342 and As appear to be the most mobile and harmful elements in Huelva phosphogypsum, which
343 agree well with the anomalous total chemical composition and the release observed for these
344 elements under previous weathering scenarios. Unfortunately, to our knowledge there is no data
345 available to compare with these findings. There is only one work focused on the interaction
346 between phosphogypsum and seawater [31], which only deals with the U release under this
347 weathering agent. This is probably due to the lower values of metals contained in phosphogypsum
348 worldwide compared to the anomalously high metal concentrations observed in Huelva. Thus,
349 little attention has been paid to this issue up to now.

350 **4.4. Potential release of metal and metalloids from different weathering agents; implication 351 for remediation strategies.**

352 As indicated in the previous section, the Criterion Continuous Concentration and Criterion
353 Maximum Concentration limits are exceeded with different elements, then, a relative
354 hazardousness order for weathering agents in Huelva stack could be established as: seawater >
355 rainwater > reducing conditions. However, the potential release of metal and metalloids from each

356 weathering agent interacting with the stack must be quantified as well as the factors controlling
357 these processes. Table 6 shows the percentage of each pollutant released with respect to the total
358 chemical composition for the phosphogypsum samples and for the weathering agents used. As it
359 is shown, the rainwater weathering and the leaching under reducing conditions cause the release
360 of high percentages of As, Cd, Cu, Ni and Zn in the saturated and bottom zones of the profile.
361 Except for Cd, the remaining pollutants are leached in higher percentages in saturated zone than
362 in the contact zone of phosphogypsum with marshland soils. These findings are supported by
363 other studies [27, 28] which evidence the key role played by sulfate-reducing processes on the
364 contaminant attenuation in phosphogypsum stacks.

365 On the other hand, the percentages released by seawater are exceptionally high for two of the six
366 samples (Z3-2 and Z3-5). In these samples, the percentages of As, Cd, Cr, Cu, Ni, and Zn released
367 under seawater leaching were twice or three times higher than those obtained with rainwater and
368 reducing conditions, which is consistent with the hazardousness order established for the
369 weathering agents from the US EPA water quality criteria limits. However, the metal and
370 metalloid release potential in the remaining four samples with seawater was low, only Cd and Ni
371 were released at significant rates in these samples (Table 6). The different release rates observed
372 in samples subject to tidal influence within the stack may be related to chemical changes produced
373 during the exposure to weathering agents. Phosphogypsum samples exposed to leaching by
374 meteoric or estuarine waters may have lost most of residual acids and soluble trace elements
375 originally present in comparison to other samples with a lesser contact with these agents. As can
376 be seen in Table 6, the samples with lower potential to release metals and metalloids correspond
377 to those with pH values close to neutrality. The alkalinity contained in seawater is high enough
378 to neutralize the residual acid still contained in these samples, causing metal and metalloid
379 depletion in the leaching solution; only the most mobile metals, such as, Cd and Zn remain in
380 solution. This pH dependence of metal and metalloid release from the phosphogypsum samples
381 has been previously pointed out by Pérez-López et al. (2010) [32], who reported a good
382 correlation ($R^2= 0.79$) between pH and P, which is indicative of H_3PO_4 residual content.

383 These results have serious implications for restoration strategies and the environmental impact on
384 the surrounding environment. Despite the high potential to release metals and metalloids shown
385 by rainwater, the settlement of impermeable barriers, i.e. clay covers, to avoid water infiltration
386 would mitigate the impact of this weathering agent on the metals and metalloids release to the
387 environment. However, the absence of any isolation barrier in the base of the stack may cause the
388 interaction of estuarine waters with phosphogypsum. Marshland soils act as a nearly impermeable
389 barrier that withholds groundwater in depth and forces the water to flow laterally. When the
390 groundwater reaches the edge of the stack, polluted water emerges forming superficial drainages,
391 known as edge outflows, which release a high load of contaminants into the estuary [10].
392 According to this latter work, both As and Cd are the main contaminants reaching the estuary
393 through edge outflow waters in highly remarkable percentages in relation to other pollution
394 sources. These findings are in agreement with the results of the leaching tests performed in this
395 study (Table 6) and may pose a great environmental concern. Both toxic pollutants, especially
396 Cd, behave conservatively in estuarine waters [33], which not only poses a significant risk to the
397 majority of species by chronic exposure but may also result in unacceptable effects on these
398 organisms under acute exposure.

399 Therefore, despite the absence of specific regulations on the management and disposal of these
400 by-products, the hazardousness evidenced by the present study justifies the exploration of
401 alternative restoration measures to avoid the transference of pollutants from these wastes to the
402 environment. Some discrepancies were observed according to the leaching protocols performed
403 based on international regulations (i.e. EU and US). In this sense, these wastes must be deposited
404 in properly conditioned landfills for hazardous wastes according to the EU regulations and in non-

405 hazardous waste landfills after treatment (for Cd removal) according to the US regulation.
406 However, other more cost-effective and environmentally-friendly such as reutilization of this
407 waste or recycling of compounds contained should be also addressed. This later issue has been
408 recently evaluated for Huelva phosphogypsum, suggesting that this waste is a potential source of
409 critical raw materials [34] or Ca for mineral carbon sequestration [35].

410

411 **5. Conclusions**

412 Despite the high content of contaminants found in phosphogypsum and the proximity of stacks to
413 cities, it is surprising the absence of specific regulations for the management of this waste and the
414 lack of information of metal and metalloid release under different weathering scenarios. This
415 study tries to fill this gap by applying different leaching protocols to the phosphogypsum
416 generated in the Huelva fertilizer plant (SW Spain), assessing the compliance of leachates to
417 current international regulations.

418 Compared to other stacks around the world, enrichment in Fe, Pb, Sb, Mn, V, Cu, Co Ni and Cr
419 is observed in the Huelva phosphogypsum. However, the most remarkable finding is the
420 anomalously high concentration of As observed along the whole profile, i.e. between 1 and 2
421 orders of magnitude higher than those observed in the rest of reported stacks worldwide. This is
422 attributed to the quality of the sulfuric acid used in the manufacturing process (i.e. from As-rich
423 pyrite roasting). The mobility of metals and metalloids under different weathering agents (i.e.
424 rainfall, reducing conditions and seawater) acting simultaneously in Huelva stack was assessed
425 and compared to that reported by, to our knowledge, the only case worldwide applying some of
426 these protocols to phosphogypsum; the giant stack of Mulberry (Florida, US).

427 The mobility of As and Cd confers the Huelva stacked material the classification of hazardous
428 waste according to EU regulations, while the Mulberry should be considered as a non-hazardous
429 waste by the release of Cu, Mo, Ni and Zn. However, according to US EPA regulation both the
430 Huelva and Mulberry can be considered as non-hazardous wastes due to TCLP limits were not
431 exceeded in any case, although in the case of Huelva, the phosphogypsum must be treated before
432 disposal because exceed the Cd UTS limit for the bottom zone. Two main conclusions can be
433 raised from this comparison: 1) the anomalous metal and metalloid concentrations and higher
434 mobility observed in Huelva compared to Mulberry and 2) the discrepancies observed between
435 EU and US regulations dealing with hazardousness classification of these materials. This latter
436 finding suggests the need to use complementary assessment protocols to obtain a better
437 characterization and classification of these wastes. For this reason, the assessment of the potential
438 effects on the aquatic life under different scenarios has been performed.

439 The exceedance of limits for Al and, at a lesser extent, Zn in Mulberry phosphogypsum may pose
440 a risk for aquatic life upon acute and chronic exposure. The metal exposure for aquatic life under
441 rainfall weathering and reducing conditions of Huelva is even more severe; Cd exceeds the US
442 EPA water quality criteria limits along the whole profile while other pollutants (Al, As, Pb, Ni,
443 Se and Zn) shows exceedance of these limits at different depths. Only Fe, Cu and Cr values
444 remained below the threshold limits of the aquatic life criteria established by the US EPA along
445 the whole profile. This highlights the higher environmental risk caused by the stockpiling of these
446 wastes in comparison to that of Mulberry and justifies the disposal of these wastes in landfills for
447 hazardous wastes.

448 The results of this study must be taken into account in the already-started restoration plan of the
449 Huelva phosphogypsum, which only contemplates the use of conventional dry-covers; this
450 situation will mitigate the weathering by rainwater, however, the stack would be subject to
451 seawater weathering. The impact of this weathering agent strongly depends on the acidity balance

452 between the estuarine waters and the acidic phosphogypsum pore-waters. The existence of acid
453 and metal rich outflows from restored zones by dry-covers implies the need of alternative
454 restoration measures to explore new routes for recycling and reuse of these by-products or, at
455 least, to mitigate the metal and metalloid pollution by disposal in landfills for hazardous wastes.

456 **Acknowledgements**

457 This work was supported by the Government of Andalusia through the research project
458 ‘Phosphogypsum: from the environmental assessment as a waste to its revaluation as a resource
459 (P12-RNM-2260)’. Authors also want to especially thank the funding support for the Committee
460 of Experts on “The environmental diagnosis and the proposal of measures of restoration of the
461 phosphogypsum stacks of Huelva”, appointed by the City Hall of Huelva. C.R Cánovas was
462 funded by the European Union’s Seventh Framework Program, Marie Skłodowska-Curie actions
463 (COFUND-Grant Agreement 291780) and the Ministry of Economy, Innovation, Science and
464 Employment of the Junta de Andalucía. S. Carrero was supported by a research pre-doctoral
465 fellowship AP2010-2117 (Spanish Ministry of Education, Spain). M.P. Asta has received
466 economical support from the Spanish Ministry of Science and Innovation through a Research
467 Contract from the “Juan de la Cierva Subprogram”. We would also like to thank Dr. Diana S. Aga
468 (Editor) and two anonymous reviewers for the support and comments that improved the quality
469 of the original paper.

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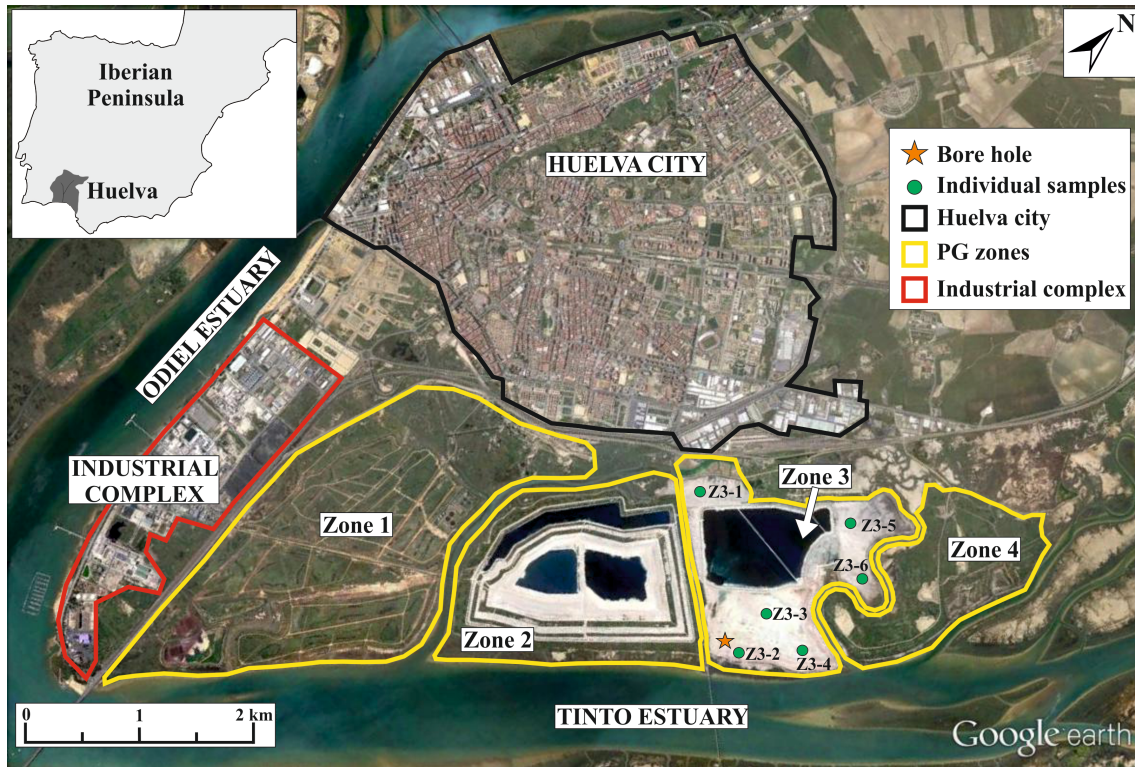
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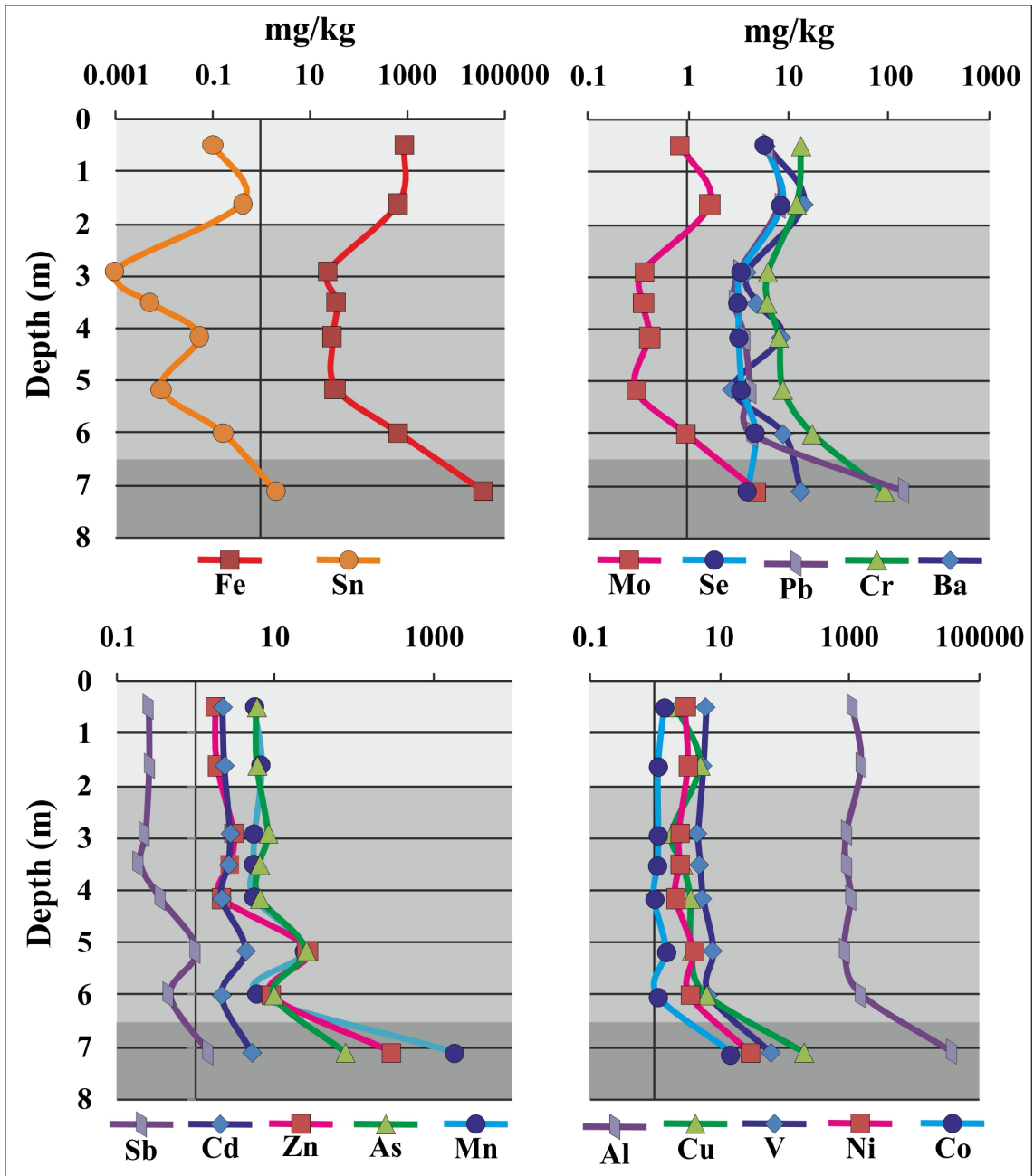
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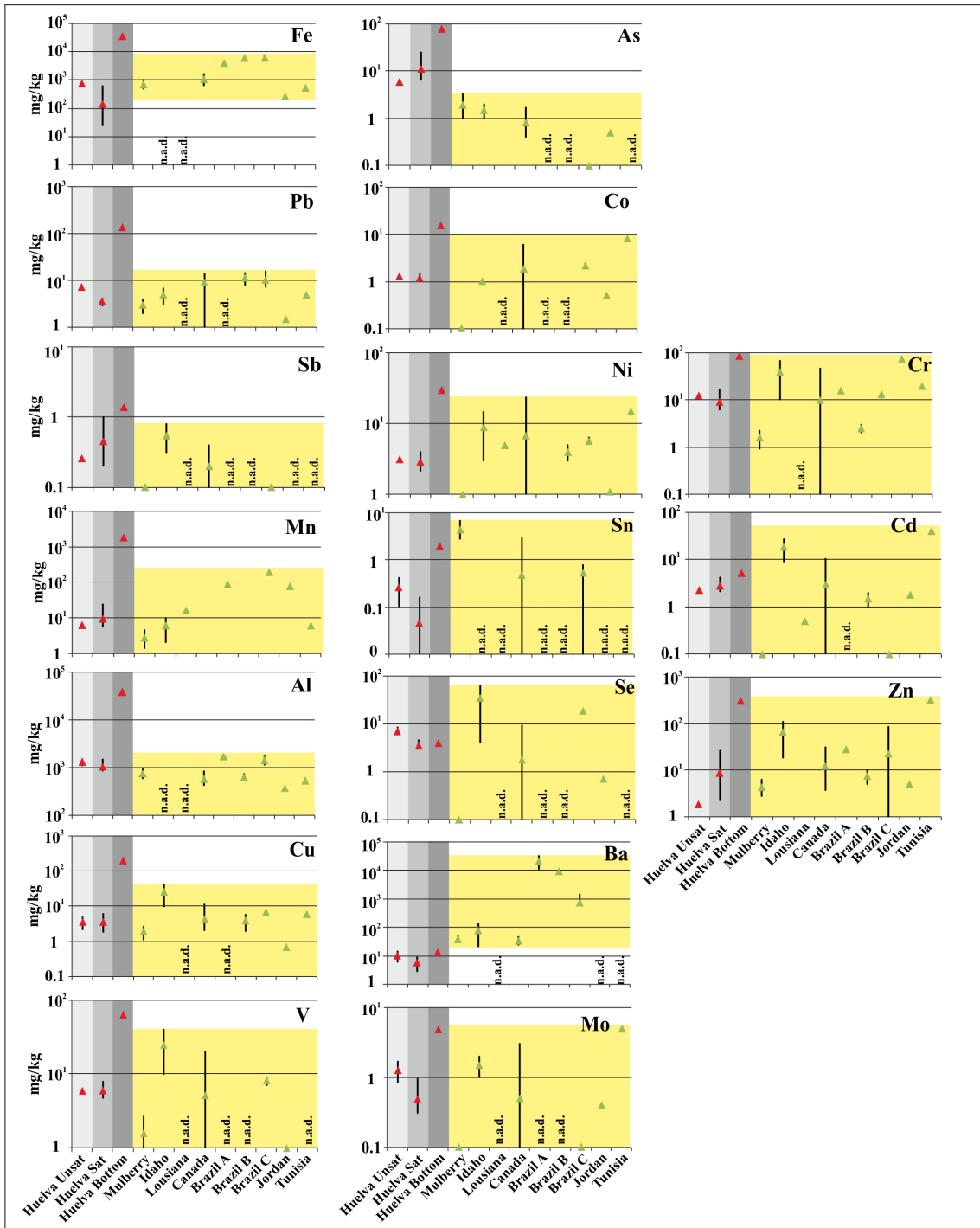
578 Figure 1. Location map of the Huelva phosphogypsum stack, with bore-hole and individual
579 sampling points indicated. Image from Google Earth[®] software.



580

581 Figure 2. Metal content of the Huelva phosphogypsum at different depths (see text for
 582 explanation).

583



584

585 Figure 3. Content in metal and metalloids of Huelva phosphogypsum profile and comparison with
 586 other phosphogypsum stacks worldwide. Max, min and mean values are plotted. n.a.d. (no
 587 available data).

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593 TABLES

594

Landfills for:	As	Ba	Cd	Cr	Cu	Mo	Ni	Pb	Sb	Se	Zn	SO₄²⁻
Inert wastes	0.5	20	0.04	0.5	2	0.5	0.4	0.5	0.06	0.1	4	6000
Non-hazardous wastes	2	100	1	10	50	10	10	10	0.7	0.5	50	20000
Hazardous wastes	25	300	5	70	100	30	40	50	5	7	200	50000
Huelva PG depth profile (m):												
0.5	0.03	0.19	0.12	b.d.l	0.03	0.04	0.09	b.d.l	b.d.l	0.06	0.31	13758.63
1.6	0.09	0.2	0.11	b.d.l	0.04	0.05	0.1	0.02	b.d.l	0.07	0.32	14067.45
2.9	4.24	0.29	0.35	0.22	0.78	0.02	0.43	0.13	0.03	0.02	2.63	15045.97
3.5	3.72	0.29	0.34	0.33	0.74	0.02	0.41	0.14	0.04	0.02	2.57	14799.06
4.1	3.47	0.35	0.38	0.39	1.52	0.02	0.48	0.17	0.05	0.02	2.57	16168.68
5.1	3.22	0.28	0.35	0.34	1.26	0.03	0.38	0.11	0.06	0.03	6.73	18082.20
6	6.71	0.3	0.42	0.26	0.7	0.02	0.46	0.1	0.04	0.03	9.16	16739.63
7.1	6.76	0.23	1.78	0.03	1.78	0.18	1.06	0.01	0.05	0.1	24.71	18028.75
Mulberry PG (n=8)												
Max	b.d.l	1.20	b.d.l	b.d.l	3.40	2.00	0.80	b.d.l	b.d.l	b.d.l	5.80	n.a.d
Min	b.d.l	0.40	b.d.l	b.d.l	1.80	0.40	0.20	b.d.l	b.d.l	b.d.l	2.00	n.a.d
Mean	b.d.l	0.80	b.d.l	b.d.l	2.40	1.00	0.40	b.d.l	b.d.l	b.d.l	3.60	n.a.d

595 b.d.l (below detection limit), n.a.d (no available data).

596 Table 1. Results of the EN 12457-2 leaching test applied to the Huelva depth profile and Mulberry
 597 phosphogypsum stack, and comparison with the regulatory limits for waste acceptance at landfills
 598 in EU. Data in mg/kg.

599

Limits:	As	Ba	Cd	Cr	Ni	Pb	V	Zn	Se	Sb	Be	Tl
TCLP	5	100	1	5	n.r.l	5	n.r.l	n.r.l	1	n.r.l	n.r.l	n.r.l
UTS	5	21	0.11	0.6	11	0.75	1.6	4.3	5.7	1.15	1.22	0.2
Huelva PG depth profile (m):												
0.5	0.002	0.027	0.010	b.d.l	0.011	0.002	b.d.l	0.026	b.d.l	b.d.l	b.d.l	b.d.l
1.6	0.006	0.026	0.008	b.d.l	0.012	0.005	b.d.l	0.021	0.004	b.d.l	b.d.l	b.d.l
2.9	0.213	0.036	0.019	0.005	0.026	0.008	0.015	0.124	b.d.l	0.002	b.d.l	b.d.l
3.5	0.185	0.034	0.020	0.008	0.027	0.009	0.033	0.126	b.d.l	0.003	b.d.l	b.d.l
4.1	0.177	0.041	0.022	0.005	0.029	0.004	0.028	0.121	b.d.l	0.003	b.d.l	b.d.l
5.1	0.345	0.032	0.024	0.005	0.027	0.001	0.019	0.419	b.d.l	0.002	b.d.l	b.d.l
6	0.156	0.028	0.020	0.007	0.024	0.001	0.018	0.304	b.d.l	0.002	b.d.l	b.d.l
7.1	0.400	0.030	0.127	0.008	0.068	0.008	0.075	1.591	0.004	0.004	b.d.l	0.001
Mulberry PG (n=8)												
Max	b.d.l	0.16	b.d.l	0.04	0.07	b.d.l	b.d.l	0.29	b.d.l	b.d.l	n.a.d	n.a.d
Min	b.d.l	0.07	b.d.l	0.02	0.01	b.d.l	b.d.l	0.05	b.d.l	b.d.l	n.a.d	n.a.d
Mean	b.d.l	0.11	b.d.l	0.03	0.03	b.d.l	b.d.l	0.14	b.d.l	b.d.l	n.a.d	n.a.d

600 n.r.l (no referenced limit), b.d.l (below detection limit), n.a.d (no available data).

601 Table 2. Results of the TCLP leaching test (method 1311 of US EPA) applied to the Huelva depth
 602 profile and Mulberry phosphogypsum stack, and comparison with the regulatory limits
 603 established by the Land Disposal Restrictions (LDR, EPA 530-R-01-007). Data in mg/L.

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		pH	Al	As	Cd	Cr	Cu	Fe	Pb	Ni	Se	Zn
Total depth profile (mg/Kg)	Unsaturated	n.a	1301.7	5.9	2.3	12.5	3.6	791.3	7.3	3.2	7.2	1.8
	Saturated	2.12	1029.3	11.1	2.8	9.2	3.6	158.2	3.6	2.9	3.6	8.7
	Bottom	2.15	38303.7	77.7	5.2	87.9	197.8	36121.3	136.8	30.0	3.9	301.8
Rainwater (%)	Unsaturated		4.1	1.0	4.9	0.0	1.1	0.0	0.1	2.9	0.9	16.9
	Saturated		1.4	49.2	14.2	3.9	31.2	7.1	3.7	15.8	0.7	84.5
	Bottom		0.2	8.7	34.3	0.0	0.9	0.0	0.0	3.5	2.6	8.2
Reducing conditions (%)	Unsaturated		3	1.3	8.2	0.0	2.0	0.0	0.9	7.1	0.4	25.8
	Saturated		1.1	45.0	15.9	1.5	27.9	0.0	2.8	19.3	0.0	76.4
	Bottom		0.3	10.3	48.9	0.2	4.9	0.0	0.1	4.5	2.2	10.5
Total individual samples (mg/kg)	Z3-1	6.66	1923.4	b.d.1	2.1	3.6	b.d.1	300.3	4.4	1.4	b.d.1	4.2
	Z3-2	2.49	1627.4	6.4	2.8	16.7	3.3	208.6	10.8	2.7	b.d.1	13.1
	Z3-3	6.35	1314.4	b.d.1	1.6	9.9	b.d.1	299.6	3.6	0.9	b.d.1	1.9
	Z3-4	6.41	1275.8	b.d.1	1.4	20.3	b.d.1	287.0	2.8	0.9	1.2	2.3
	Z3-5	3.04	1244.4	11.6	2.3	11.2	2.2	216.6	3.2	1.9	b.d.1	9.9
	Z3-6	6.35	1001.0	b.d.1	1.4	3.6	b.d.1	120.4	2.0	1.1	b.d.1	2.4
Seawater (%)	Z3-1		0.6	0.0	8.8	0.0	0.0	0.0	0.0	5.9	0.0	0.0
	Z3-2		1.5	86.1	49.8	21.4	100.0	7.2	0.0	66.7	0.0	90.6
	Z3-3		0.9	0.0	7.5	0.0	0.0	0.0	0.0	11.4	0.0	0.0
	Z3-4		0.6	0.0	8.6	0.0	0.0	0.0	0.0	17.2	0.0	4.4
	Z3-5		1.3	71.7	38.5	2.7	100.0	1.0	9.4	45.5	0.0	63.5
	Z3-6		0.4	0.0	17.91	0.0	0.0	0.0	0.0	24.0	0.0	13.2

608

609 Table 3. Results of the leaching experiments with deionized water and comparison with the
610 Mulberry results and the Criterion Continuous Concentration and Criterion Maximum
611 Concentration limits established in the aquatic life criteria by the US EPA (see text for
612 explanation). Data in mg/L.

613

US EPA Water Quality Criteria limits:	Al	As	Cd	Cr	Cu	Fe	Pb	Ni	Se	Zn
Criterion Continuous Concentration	0.087	0.15	0.00025	0.085	1.3	1	0.0025	0.052	0.005	0.12
Criterion Maximum Concentration	0.75	0.34	0.002	0.586	n.r.l	n.r.l	0.065	0.47	n.r.l	0.12
Huelva depth profile (m):										
0.5	5.279*	0.003	0.012*	b.d.1	0.003	0.005	b.d.1	0.009	0.006**	0.032
1.6	5.450*	0.009	0.011*	b.d.1	0.004	b.d.1	0.002	0.010	0.007**	0.032
2.9	1.692*	0.428*	0.035*	0.022	0.078	0.083	0.013**	0.043	0.002	0.265*
3.5	1.590*	0.384*	0.035*	0.034	0.076	0.180	0.014**	0.042	0.002	0.265*
4.1	1.434*	0.350*	0.038*	0.039	0.153	0.470	0.017**	0.048	0.002	0.260*
5.6	1.152*	0.335**	0.036*	0.036	0.131	0.400	0.011**	0.040	0.003	0.699*
7	1.111*	0.697*	0.044*	0.027	0.073	0.801	0.011**	0.048	0.003	0.951*
8.1	6.371*	0.729*	0.192*	0.003	0.193	0.051	0.002	0.114**	0.011**	2.668*
Mulberry (n=8):										
Max	2.210*	b.d.1	b.d.1	b.d.1	0.170	b.d.1	b.d.1	0.040	b.d.1	0.290*
Min	1.200*	b.d.1	b.d.1	b.d.1	0.090	b.d.1	b.d.1	0.010	b.d.1	0.100
Mean	1.630*	b.d.1	b.d.1	b.d.1	0.120	b.d.1	b.d.1	0.020	b.d.1	0.180*

* (Both US EPA Water Quality Criteria limits has been exceeded), ** (only Criterion Continuous Concentration has been exceeded).
n.r.l (no referenced limit), b.d.1 (below detection limit).

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616 Table 4. Results of the leaching experiments with organic acid and comparison with the Mulberry
617 results and the Criterion Continuous Concentration and Criterion Maximum Concentration limits
618 established in the aquatic life criteria by the US EPA (see text for explanation). Data in mg/L.

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Table 5. Results of the leaching experiments with seawater and comparison with the Criterion Continuous Concentration and Criterion Maximum Concentration limits established in the aquatic life criteria by the US EPA (see text for explanation). Data in mg/L.

US EPA Water Quality Criteria limits:	Al	As	Cd	Cr	Cu	Fe	Pb	Ni	Se	Zn
Criterion Continuous Concentration	0.087	0.15	0.00025	0.085	1.3	1	0.0025	0.052	0.005	0.12
Criterion Maximum Concentration	0.75	0.34	0.002	0.586	n.r.l	n.r.l	0.065	0.47	n.r.l	0.12
Huelva individual samples:										
Z3-1	0.300**	b.d.l	0.018*	b.d.l	b.d.l	b.d.l	b.d.l	0.008	b.d.l	b.d.l
Z3-2	0.600**	0.550*	0.141*	0.360**	0.434	1.490*	b.d.l	0.178**	0.020**	1.190*
Z3-3	0.300**	b.d.l	0.012*	b.d.l	b.d.l	b.d.l	b.d.l	0.010	b.d.l	b.d.l
Z3-4	0.200**	b.d.l	0.012*	b.d.l	0.004	b.d.l	b.d.l	0.015	b.d.l	0.010
Z3-5	0.400**	0.830*	0.089*	0.030	0.409	0.220	0.030**	0.087**	b.d.l	0.629*
Z3-6	0.100**	0.050	0.025*	b.d.l	0.008	b.d.l	b.d.l	0.025	b.d.l	0.031

* (Both US EPA Water Quality Criteria limits has been exceeded), ** (only Criterion Continuous Concentration has been exceeded).
n.r.l (no referenced limit), b.d.l (below detection limit).

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623 Table 5. Results of the leaching experiments with seawater and comparison with the Criterion
624 Continuous Concentration and Criterion Maximum Concentration limits established in the aquatic
625 life criteria by the US EPA (see text for explanation). Data in mg/L.