

# DEFENSE DEPOT OGDEN, UTAH

## A MODEL OF INNOVATION & PARTNERING

Secretary of Defense Environmental Restoration Nominee for 2002  
Installation Category



## Secretary of Defense Environmental Award for 2002

Category: Environmental Restoration – Installation  
Submission: Former Defense Depot Ogden Utah

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Hard work and dedicated and consistent installation staff at the Defense Distribution Depot Ogden, Utah, (DDOU), coupled with a strong commitment on the part of state and federal regulators led to many firsts in the federal remediation world. United States Environmental Protection Agency Region 8 provided the Ogden Depot with the first Regional Federal Facility Agreement, the first Resource Conservation Recovery Act (RCRA) Part B Closure in the nation, and the first Regional certificate of Operating Properly and Successfully (OPS). In addition, in October 2002, the Depot officially became the first Defense Logistics Agency (DLA) installation to close-down and transfer the property to the local community. Working as one team, with goals to complete cleanup efficiently while focusing on protection of human health and the environment, and to transfer the site to the community as early as possible, the Ogden DLA staff together with its regulatory partners surpassed all expectations.

## **INTRODUCTION**

The Defense Logistics Agency (DLA) is proud to nominate the Defense Distribution Depot Ogden, Utah, (DDOU) for the 2002 Secretary of Defense Environmental Restoration Installation Award.

Originally established in 1941 as the Utah General Depot, the installation's mission was to support the Quartermaster Corps Chemical Warfare Service, Medical Corps, Corps of Engineers, and the Signal Corps. In 1964, the facility was renamed the Defense Depot Ogden, Utah, (DDOU) for operation by the DLA as a distribution depot, to store, maintain, and ship supplies including petroleum and industrial chemicals for the Department of Defense (DoD) and other agencies. For more than half a century, DDOU served as a community mainstay, providing employment for 6,000 residents of rural Ogden and neighboring Salt Lake City. Located in northern Utah approximately 30 miles north of Salt Lake City, the Depot occupied 1,128 acres and included over 155 buildings used for supply storage, administration, vehicle maintenance, and family housing.

In 1995, amidst much local opposition, DDOU was identified for closure by the Defense Base Closure and Realignment Commission (BRAC) and was formally closed on September 30, 1997. The Ogden community, state political leaders, state and Federal regulators, and with DLA staff leading the way, immediately rallied together to achieve one final goal – promote the best possible reuse of the installation while cleaning up the site to ensure the community would be safe from any potential environmental hazards. At the time of closure, approximately 250 people remained employed through final transfer of the property to the Ogden Redevelopment Authority in October 2002.

## **BACKGROUND**

Liquids and solid waste materials were generated and disposed of at DDOU over many years. Oily liquids and combustible solvents and fuels were burned in pits, and solid wastes were also burned and buried. Early site assessments and investigations during the 1980s identified and preliminarily characterized waste disposal areas and the environmental conditions of the Depot. As a result of these investigations, the Depot was placed on the National Priorities List (NPL) in 1987 as a Federal facility requiring investigation. A Depot-wide Phase I

remedial investigation was conducted in 1988, and based on these findings a Federal Facility Agreement (FFA) was signed on November 30, 1989 in accordance with Comprehensive Environmental Response, Compensation, and Liability Act. The FFA divided the waste disposal sites into four operable units.

**Challenges.** Upon closure in 1997, environmental assessments were conducted that identified 107 sites which required investigation and / or remediation before they could be

declared environmentally safe to transfer to the Ogden Local Redevelopment Authority. The dedicated environmental staff of seven individuals, with support from the Army Corps of Engineers and environmental contractors then began the challenge to efficiently and effectively remediate the many remaining contaminants in the soil and groundwater that included solvents, paint and residues, insecticides, chemical warfare agents, Polychlorinated Biphenyls (PCBs), degreasers and perchlorates.

**Management and Community Involvement.** The management of the project commencing in 1995 was under the direction of engineer Del Fredde and community relations specialist Ron Smith, both longtime DDOU employees. Their efforts began with the staff spending countless days walking through the surrounding neighborhoods of the Depot interviewing neighbors, inquiring of their concerns, and asking individuals how they wanted to be involved in cleanup and reuse decisions. As neighbors expressed fears that their drinking wells were contaminated, the Depot offered to pay for testing. When neighbors suggested that the best means for many of them to understand the Depot's activities was through a newsletter, a quarterly environment newsletter was established. To ensure timely information, an environmental information hotline was established for a specialist to be available by phone or for neighbors to let the Depot know about new concerns. All of these early-on activities contributed to a great amount of trust by the local community that the DLA staff not only had the communities interest at heart, but that the Depot was receiving the support it needed from

Headquarters DLA to ensure that the community was involved in decision-making.

Beginning in January 1996, the central focus of community involvement for the Depot centered on the formal establishment of a Restoration Advisory Board (RAB). The RAB consisted of 20 representatives including DLA, USEPA, Utah Department of Environmental Quality, Local Redevelopment Authority, State Congressmen, Weber County Commissioners, Weber County Health District, Ogden Nature Center, and community citizens. The RAB met quarterly for 7 years and were involved in every major cleanup decision made from 1996-2002. Once all remediation decisions and systems were in place, the RAB decided unanimously in July 2002, that their work was complete and officially disbanded.

Due to the strong commitment of the RAB members as well as sincere respect for each other, the RAB worked as a team to assist the Depot reach their cleanup and transfer goals. Three themes that the RAB operated under were: open communication, mutual respect and understanding, and the use of innovative tools.

"Ogden's reuse and economic growth has been very successful for the Community," said Colonel David Dinning, United States Air Force, Defense Distribution Depot Hill, Utah (DDHU) Commander. "However, it wouldn't have happened without the teamwork and cooperation from the Ogden RAB, under DLA's leadership. Meeting quarterly for the past 7 years shows commitment and respect for each other. Everyone worked together to

achieve one final goal -- which was to promote reuse while ensuring our community was safe from any potential environmental hazards. That goal was met," according to Colonel Dinning.

"During the restoration process, decisions are made between the installation and the regulators based on compliance with environmental laws, regulations and guidance," said Michael Dobbs, DLA Environmental Program Manager. "It is essential that the communities impacted by these decisions have a clear understanding as to how and why these decisions are made. The Ogden RAB was a great example of the community and the government working well and closely together. This was a huge success for everyone," according to Mr. Dobbs.

According to RAB members, two lessons learned from their experiences that should be transferred to other RABs are: a team approach of shared goals is the most effective means to accelerate cleanup; and supporting creativity on the part of the installation will save time and money in the cleanup and transfer.

**Cleanup Initiatives.** In 1995, the installation established a BRAC Cleanup Team (BCT) to provide oversight to the cleanup program. The BCT included staff from EPA Region 8, Utah Department of Environmental Quality, and DLA staff. From 1996 through 2002, highlights of the remediation activities that occurred at the Depot included:

1997 – Once the land reuse plan was updated, a Phase I RCRA Facility Investigation (RFI) was completed approving six sites for No Further

Action (NFA) and six large sites for cleanup.

1998 – Completed Phase II of the RFI for above and underground storage tank investigations and gasoline releases. The team also completed cleanup of PCBs at 135 transformer sites.

1999 – Completed Phase III of the RFI and the remediation of 11 Solid Waste Management Units. The team also completed remediation of a former skeet range and the range was granted NFA status by the state and EPA. Two Community Assurance Plans were also implemented and the first of four Finding of Suitability to Transfer (FOST's) were approved.

2000 – Version 4 of the BRAC cleanup plan was completed as well as removal of all contaminated soil from a Solid Waste Management Unit (SWMU), a pistol range, and the western boundary area of the Depot. The second FOST was also approved allowing transfer of nearly 50 percent of the land.

2001 – Remediation of chemical warfare material was remediated from the Ogden Nature Center site. The state approved site closure for four above and underground storage sites and approved the Depot's 5-year review.

2002 – Received acceptance of monitored natural attenuation and NFA for a former parade ground area, and NFA for a groundwater treatment facility. The Depot also received OPS designation for two other groundwater treatment facilities and the final FOST, allowing complete and final transfer of the property.

Throughout the course of the cleanup, much of the remediation was conducted by a small and disadvantaged, local Utah firm.

## **PROGRAM SUMMARY**

Prior to the closure of the Depot in 1997, restoration projects were underway to identify, characterize, and remediate the environmental contamination. The focus at that time was to protect public health and the environment while considering the ongoing use of the installation. With the closure announcement, the focus shifted from supporting an active military installation to responding to property transfer and reuse considerations. The Depot strategy was then modified to restoring as efficiently as possible the 107 sites that were identified in the FFA as necessary for property transfer. By October 2002, all 107 sites were officially remediated, with two remaining groundwater pump and treatments systems left in place that were determined by USEPA to be operating properly and successfully (OPS). With long-term monitoring at the two sites and land use controls in place, the former DDOU transferred the final property consisting of approximately 240 acres over to the Ogden Local Redevelopment Authority in October 2002.

During 2001 and 2002, the Depot completed the remediation of all soil required under the original 1989 FFA. In addition, the Depot obtained regulatory closures for 4 underground storage tanks, shut 68 groundwater monitoring wells that were no longer

necessary, and obtained state review and approval of the installation's 5-Year Record of Decision. The State also approved monitored natural attenuation at one site replacing an existing groundwater extraction system and certifying NFA for that unit.

**Remedial Process Optimization.** DLA also requested that the Air Force Center of Environmental Excellence (AFCEE) conduct a Remedial Process Optimization (RPO) at the Depot. During 2001 and 2002, RPOs evaluated two groundwater treatment and extraction systems and concluded that most of the existing extraction wells were not effective in removing dissolved contaminants, and that most of the extracted water treated by the systems met cleanup requirements prior to treatment. The optimization recommendations included the Depot substantially reducing the number of operating groundwater extraction and injection wells, bypassing the extraction trench treatment system when contaminant concentrations met cleanup requirements, and evaluating use of natural attenuation as a cleanup alternative. The RPO analysis recommended process changes resulting in cost savings of approximately \$4.7 million for 2001, and additional lifetime savings in reduced long term monitoring costs.

All objectives of the environmental restoration program were met ahead of schedule and below the original estimated costs to complete the cleanup. This was all done without ever receiving a Notice of Violation (NOV), and with the understanding of the staff that as soon as transfer was possible, they would be unemployed. In other words,

the staff understood that the more efficient they were at doing their jobs, the faster they would lose their jobs. In the end total cleanup costs for the installation amounted to approximately \$60 million dollars with an additional \$10 million dollars estimated to maintain the groundwater monitoring at 2 wells for the next 13 years.

certificate of OPS. They were also the first DLA facility nationwide to receive OPS and they received it less than 9 months from commencement. The Depot received certificates of OPS for continued use of two groundwater extraction systems.



Environmental Protection Agency (EPA) recognizes former DDOU Cleanup Efforts - Pictured are from left to right: Del Fredde (DLA), Max Dodson (EPA), Ron Smith (DLA), and Paul Feldman (Army Corps of Engineers)

## **ACCOMPLISHMENTS**

In 2001 and 2002, DDOU made incredible progress in optimizing and completing remediation goals and obtaining site closure agreements. Some of these accomplishments include:

- Ogden was the first federal facility in Region 8 to receive a
- Ogden was the first DLA facility to officially conclude and disband the business of the Restoration Advisory Board once the Board had agreed that their mission was complete.
- Ogden was the first Federal facility in the nation to receive a RCRA Part B closeout permit for

a groundwater treatment system. This paved the way for other sites and encouraged the State of Utah and EPA to finalize their guidance on how to close out a RCRA permit.

Other significant accomplishments included pilot-testing the use of vegetable oil injection to assess the cost-effectiveness of solvent bioremediation of groundwater; completion of a soil removal action at a chemical warfare materiel site at the Nature Center; and receiving the final FOST to transfer the remaining parcels of land to the Local Redevelopment Authority (LRA).

In addition, the Depot received many state, Federal, and local awards during the entire cleanup process. On September 18, 2002, Mr. Max Dodson, Assistant Regional Administrator for EPA Region VIII presented Certificates of Appreciation to DLA representatives Del Freddo and Ron Smith; and Corps of Engineers representative, Paul Feldman for their outstanding performance in remediating the former DDOU property to a level that makes it transferable to the Ogden Reuse Authority. Mr. Dodson stated that the three key elements that led to Ogden's success and should be used as a benchmark for other DoD sites where: true partnership between all stakeholders, commonsense approach to site restoration, and an innovative approach to phased FOST.

**Innovation.** The innovative approach to FOST focused on separating the parcels and transferring property in four packages. Beginning with the first deed transfer in May 1999, this allowed the LRA to begin immediate reuse of the site and culminated with the last transfer

of land in October 2002. Additionally, two of the signed FOSTS included two different types of Land Use Controls approved by USEPA and the State of Utah. This was a new approach for both USEPA and the state.

Other innovative approaches included the use of new and unproven technologies. For example, the staff demonstrated a permeable reactive barrier wall made out of 15,000 gallons of soybean oil at no cost to the site to assess the cost-effectiveness of solvent bioremediation of groundwater. That technique proved to be very successful. The site was also the first in Utah to use bioventing for underground storage tanks, which was also a success. The use of both treatment systems received much support from the RAB and the Base Closure Team (BCT).

**Successful Reuse.** The streamlining of military base operations to enhance base closure activities and the dedicated staff that remained made redevelopment one of the most successful and fastest in the country. Together with the LRA Director, Depot environmental staff identified mutually beneficial goals for the community and the Defense Department. From the beginning, the two organizations worked closely to prioritize site cleanups based on redevelopment priorities. The environmental staff modified cleanup schedules to accommodate lessees when needed. For example, to accommodate a new tenant that purchased two buildings, DDOU accelerated excavation of a hot spot between two buildings, allowing the new tenant to take occupancy sooner than would have been possible under the original cleanup schedule.



Prior to defense realignment, the military installation was not part of Ogden City's Master Plan. Although, recognized as an anchor to some industries, the City was not leveraging base assets and other resources to make them economic generators for the community. With the Base closure in 1995 this changed. Two years of negotiations between the Federal Government and Ogden City resulted in obtaining a Lease in Furtherance of Conveyance, allowing for use of the 1,128 acres and 6 million square feet of buildings, which existed at the installation.

The redevelopment of DDOU was very successful in part due to the efforts of the environmental staff's understanding of the importance of cleaning up to residential standards at most sites. The infrastructure improvements at the installation are 8 years ahead of schedule and have already defined Business Depot Ogden, as it is currently known, as the premier business and industrial park in Utah. Also, 1,258 jobs have been retained or created after only 3 years into redevelopment. This is a rate of job creation 100 times faster than job creation for the rest of Weber County. In addition, about 30 long-term subleases have been signed for manufacturing space, and for the construction of additional manufacturing space.

final free title to the installation in 2002 through land transfer of the fourth separate FOST parcel. Due to the DLA staff success, the Depot has now been transformed from a closed military distribution depot to the genesis of a world-class industrial / business park in just a few short years. These outstanding achievements truly qualify for the Department of Defense Environmental Award for Installation Remediation for 2002.

## **CONCLUSION**

Dedication, hard work, and innovation by the DLA Ogden staff allowed the Depot to accomplish far more than expected in significantly less time. Ogden City, acting as the LRA, received