



**U**  
**OF**  
**L**

Superfund  
Research  
Center

Community Engagement Core

# THE UNTOLD HISTORY OF THE VALLEY OF THE DRUMS, EPA SUPERFUND SITE



**Presenter: Sam Satterly, MS**  
**Community Knowledge Exchange Session**  
**April 5, 2024**



UNIVERSITY OF  
**LOUISVILLE**

**WELCOME!**

Introductions

# THE VALLEY OF THE DRUMS

## EPA SUPERFUND

- A. L. Taylor Superfund Site
- Used as an uncontrolled and unregulated chemical waste site
- Activities at the site predate the formation of the EPA
- 17,051 drums were found on the SURFACE
- 142 different chemical compounds



*EPA Press Release, September 1981*



*EPA 1979 Site Inspection Report*



## **THE VALLEY OF THE DRUMS**

- **Location of EPA led Superfund cleanup**
- **Served as part of the impetus for establishing the Superfund program**

Fire lasting over a week occurred at the Site	November 1967
KDEP responded to reports of fire and identified the Site as a waste disposal site for the first time	December 1967
KDEP first documented release of hazardous substances	1975
EPA responded to releases of oil and hazardous substances at the Site and began emergency response actions	January 1979
Potentially Responsible Parties (PRPs) performed voluntary cleanup actions	1980
EPA conducted site investigation and began another emergency removal actions	1981
EPA completed all emergency response and removal actions	1981
EPA began the Site's remedial investigation/feasibility study (RI/FS).	September 30, 1981
EPA proposed the Site for listing on the National Priorities List (NPL)	December 30, 1982
EPA finalized the Site on the NPL	September 8, 1983
EPA began the Site's remedial design	May 30, 1986
EPA completed the Site's Remedial Investigation /FS EPA signed the Site's Record of Decision (ROD)	June 18, 1986
EPA began remedial action	April 20, 1987
EPA completed remedial design	September 30, 1987
EPA and KDEP signed a Superfund State Contract for O&M activities	July 19, 1989
Site achieved EPA Construction Complete designation EPA issued the Site's Close-Out Report	August 10, 1990
EPA and PRPs signed Consent Decree (CD)	October 30, 1991
EPA signed first FYR	July 16, 1992
EPA issued notice of intent to delete the Site from the NPL	March 8, 1996
EPA deleted the Site from the NPL	May 17, 1996
EPA signed second FYR	March 6, 1998
EPA signed third FYR	March 28, 2003
EPA discovered hardened paint sludge and drum carcasses in Wilson Creek	December 2007
EPA signed fourth FYR	June 26, 2008
EPA approved KDEP's use of O&M funds for further investigations of Wilson Creek	July 2009
KDEP began investigations of Wilson Creek	2010
EPA signed fifth FYR	September 26, 2013
KDEP completed investigations of Wilson Creek and cleaned up paint waste and drum carcasses	March 2017
EPA signed fifth FYR	September 26, 2018
Site Title Search	May 2018

# EPA Site Chronology

- **Public Health representatives visited the site on December 8, 1967**

*“Industrial waste was laying over a large area and not covered. The waste was from more than one day of operation.” – Holland, 1967*

# VALLEY OF THE DRUMS // GULLY OF THE DRUMS

A. L. Taylor aka Valley of the Drums property line



George & Vera Stober property line



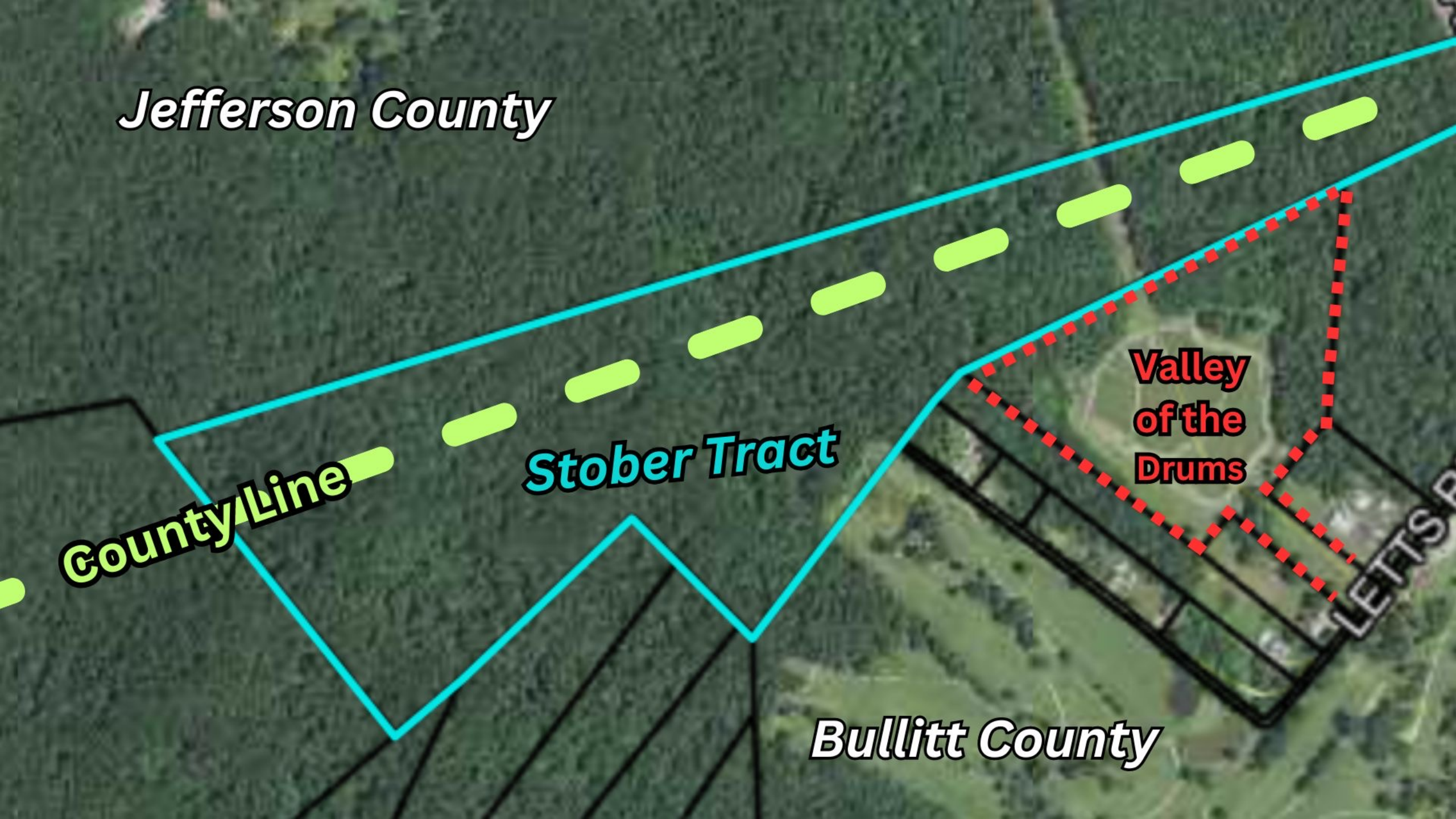
*Jefferson County*

**County Line**

**Stober Tract**

**Valley of the Drums**

*Bullitt County*





February 8, 1966

Mr. Charlie Vettiner  
Superintendent  
Jefferson County Playground &  
Recreation Board  
P. O. Box 36  
Jeffersontown, Kentucky

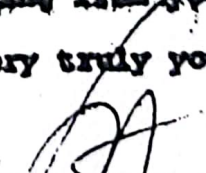
Re: Proposed Landfill-Jefferson County Forest  
at South Park Road

Dear Charlie:

You will recall our recent conversation regarding the request of a Mr. Taylor regarding the lease of a portion of the Jefferson County Forest at South Park Road for a possible landfill site.

As I indicated at that time it seemed to me that the basic question is whether you would want this land to remain in its present state so that it would be used for passive type recreation or whether you would desire it cleared and leveled so that it might be used for some active type of recreation. After this question has been answered then it would appear that Mr. Taylor's request for lease of this property could be considered. As I also indicated to you I have been studying the possibility of some type of waste disposal program to be entered into by Jefferson County which could possibly make available some additional park land. After you have had an opportunity to study this matter, I would appreciate hearing from you.

Very truly yours,

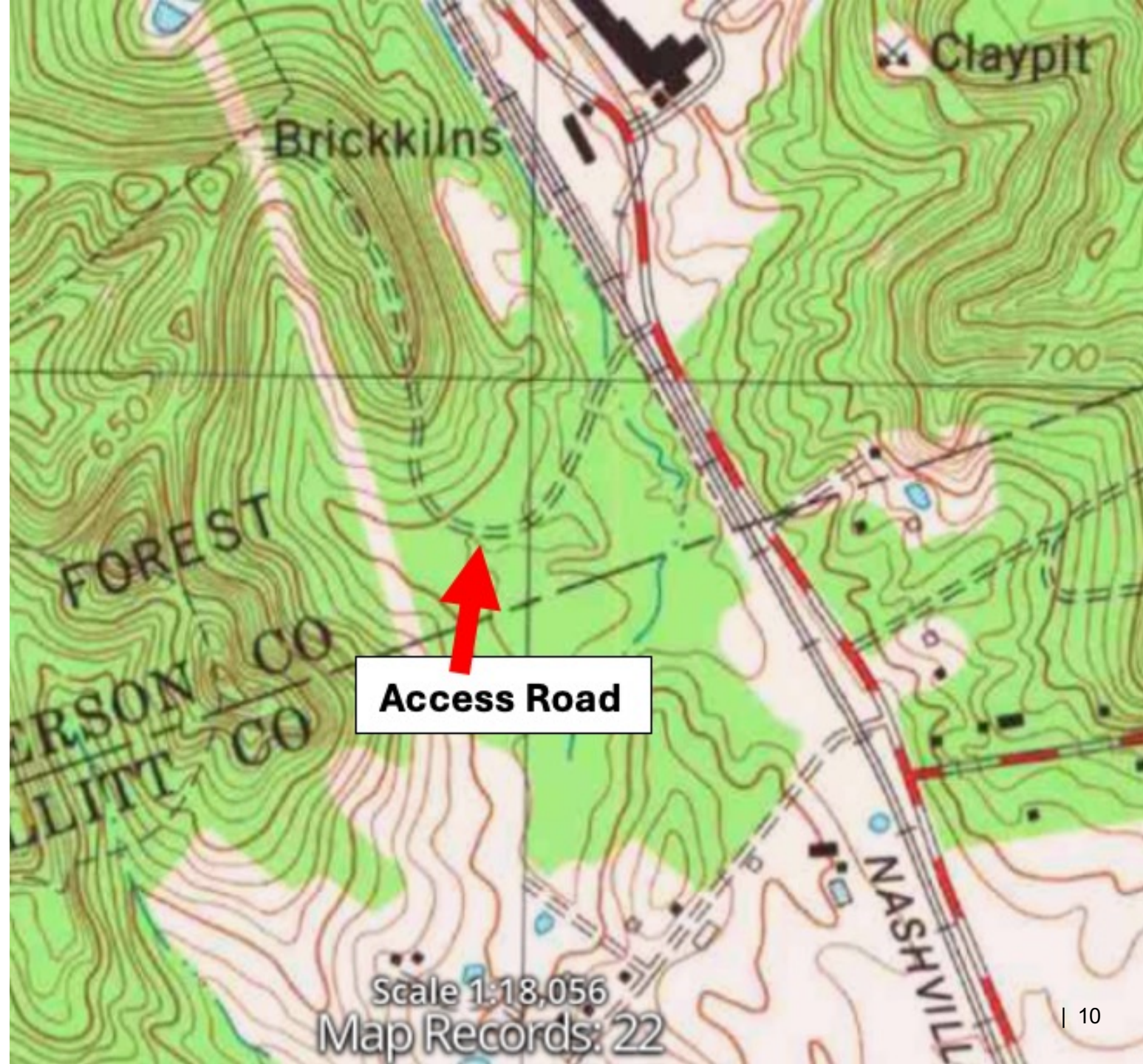
  
Sammie F. Lee  
Director of Works

BFL:ps

In early 1966,  
Jefferson County  
was in negotiations  
with Mr. Taylor to  
lease a portion of  
Jefferson (County)  
Memorial Forest to  
be used as a  
municipal landfill.

***“We will agree to build an access road to the property and we will build it at our expense. We will further agree that Jefferson County may dump land fill there at no expense.”***

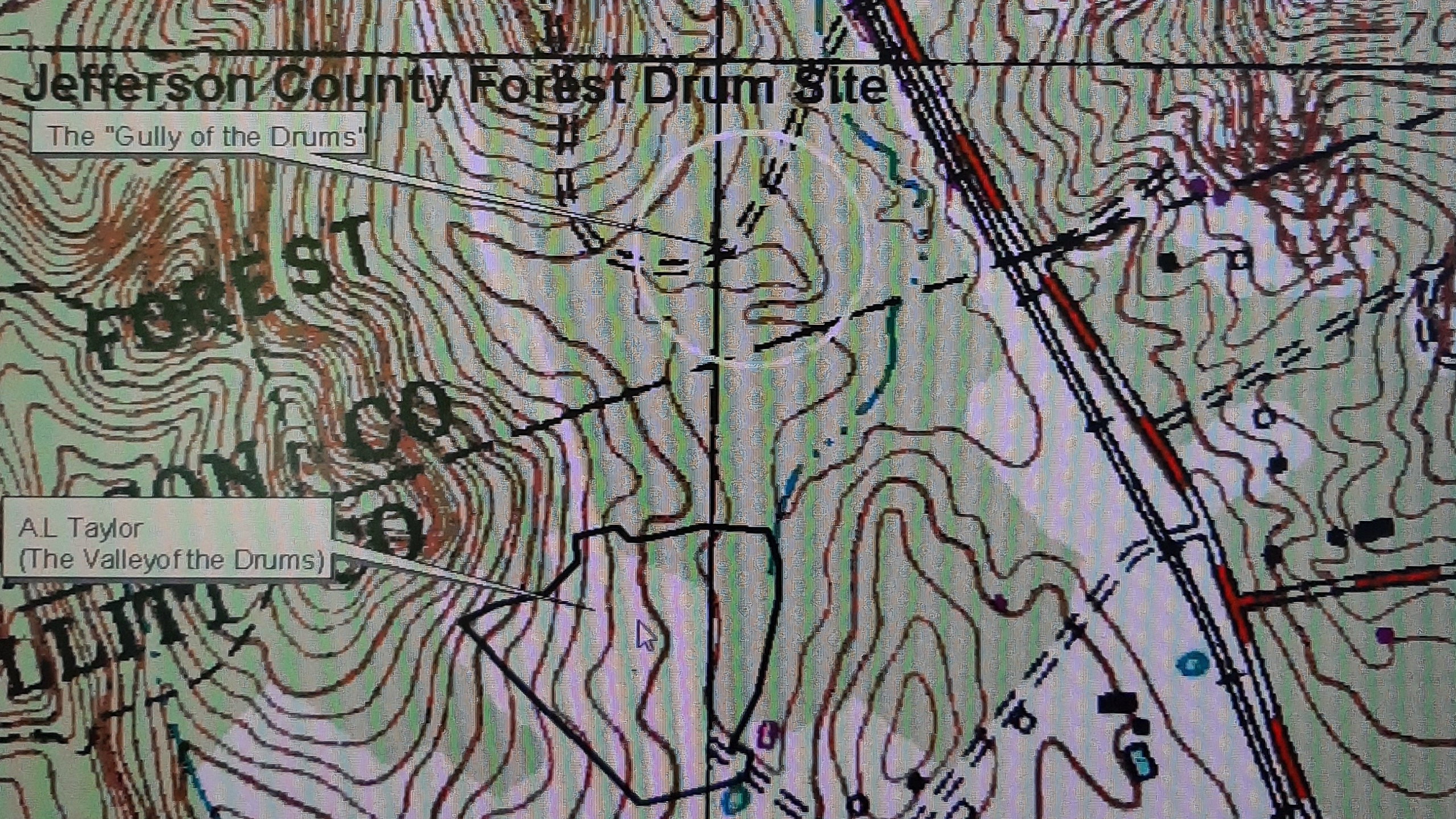
**--Mr. Taylor’s lease offer**



# Jefferson County Forest Drum Site

The "Gully of the Drums"

A.L. Taylor  
(The Valley of the Drums)

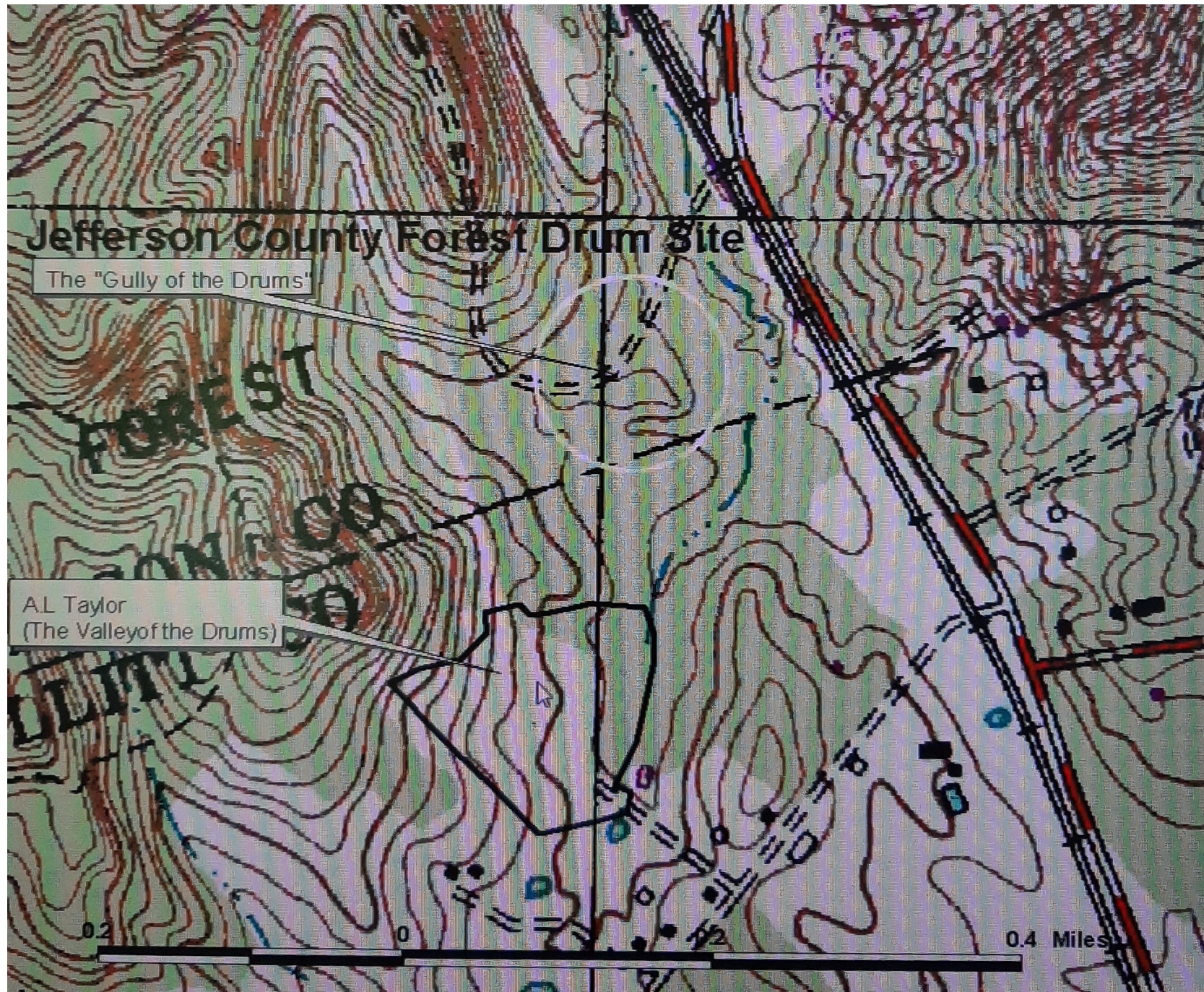




INQUIRY #: 2692359.2  
YEAR: 1971  
= 500'  
N  
↑

## ACCESS ROAD & MUNICIPAL DUMP SITE

*Shield Environmental Associates,  
Inc. (2011 October). Site  
Investigation Report: Jefferson  
Memorial Forest Drum Site.*



**In late 1966, Jefferson County mistakenly asserted ownership over the Stober property, stating that by using the access road the Stober's had been trespassing.**

*Preliminary Assessment: Jefferson Forest Drum Site.*  
B&V Waste Science and Technology Corp., 1994

# JANUARY 1967

## GEORGE P. STOBER AND VERA Z. STOBER

-VS-

## JEFFERSON COUNTY

- **Second Count III:** *“Defendants w/out authority, permission, or consent placed or caused to be placed upon the said property large amounts of trash, debris, dead animals, crushed rock, gravel and other similar materials, the exact amount of which material is unknown.”*
- **Second Count IV:** *“Prior to placing of such materials... premises was composed of fertile soil of good quality...but that since placing of said materials upon said premises...its value for any purpose has been greatly impaired and reduced.”*

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Site Title Search	May 2018

# EPA Site Chronology

- **Public Health representatives visited the site on December 8, 1967**

***“A revisit to the site is needed to help plan operation at his new site.”***

**– Holland, 1967**

**OCTOBER 1968**

**GEORGE P. STOBER AND VERA Z. STOBER**

**-VS-**

**JEFFERSON COUNTY SETTLED**

- **3.** *“Jefferson County agree to remove, dispose, or by other appropriate means, clean the debris from the George P. Stober tract and return the tract to as natural condition as possible.”*
- **4.:** *“It is further agreed by Jefferson County that this work shall be...completed within six months from the date of this agreement...”*





47-6/14/70

L. J. HOLLENDACH, III  
COUNTY JUDGE

JEFFERSON COUNTY  
DEPARTMENT OF PUBLIC WORKS

FRIEND H. LODGE, P.E.  
DIRECTOR OF WORKS

401 FISCAL COURT BUILDING  
LOUISVILLE, KENTUCKY 40202  
June 12, 1970

Mr. Lodge is  
holding this up -

## June 1970

The Stober attorney sent a letter to the Jefferson County Fiscal Court stating that the county had failed to clean the waste debris from the Stober tract, and that Jefferson County had once again illegally entered onto the Stober property for the purpose of building a rifle and gunnery range.

Fiscal Court  
Jefferson County  
Court House  
Louisville, Kentucky 40202

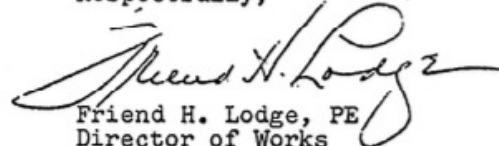
RE: County Police Pistol Range  
South Park Rd. and Jefferson  
County Forest

I am hereby requesting approval of the Court to rent one self-loading caterpillar pan, and one sheepsfoot roller with tractor to cut approximately 16,000 yards of dirt from the high portion of the range and to make the fill on the lower part of the range. The total cost of the rental of this equipment is not to exceed \$4000.00.

By renting the subject equipment, this work can be completed in approximately two weeks time. With our own equipment it will require approximately two months time. By the same token, this same equipment is critically needed on other projects scheduled for this summer.

Your favorable action in this matter will be appreciated.

Respectfully,



Friend H. Lodge, PE  
Director of Works

FHL/gS

- cc: Mr. Jim Lynch, County Auditor
- Mr. J. Bruce Miller, County Attorney
- Colonel Thomas Holsclaw, Chief-Jefferson Co. Police
- Mr. Walter Swyers, Administrative Assistant
- Mrs. Augusta Scott, Deputy Clerk-Fiscal Court Office



DEPARTMENT OF PUBLIC WORKS

**JEFFERSON COUNTY**

FISCAL COURT BLDG.

LOUISVILLE, KENTUCKY

589-3060

October 19, 1972

L. J. HOLLENBACH, III  
COUNTY JUDGE

COUNTY COMMISSIONERS  
TOM HELM  
BOB KIRCHDORFER  
GLENN McDONALD

SCOTT S. GREGORY, PE  
DIRECTOR OF WORKS  
AND  
COUNTY ENGINEER

## August 1972

The Stober attorney sent a second letter to the Jefferson County Fiscal Court stating that the county had *still* not upheld the agreed settlement and that as such, the county must reimburse the Stober's for having the work completed themselves .

Fiscal Court  
Jefferson County  
Court House  
Louisville, Ky. 40202

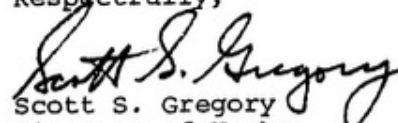
Re: Jefferson Circuit Court Action No. 106150  
George Stober, et al, versus Jefferson County, etc.

Gentlemen:

The subject lawsuit was settled in September 1968 in favor of the plaintiff. The Court ordered Jefferson County to return Mr. Stober's land, either to the condition it was in prior to illegal entry upon that land or for Mr. Stober to have this work done and the County to pay for it. **Since that time no action has been taken by either the County or the plaintiff.** The attached correspondence between Mr. Stober's attorney and the Fiscal Court now demands an answer.

It is my recommendation that the \$6,000.00 estimate be paid by Jefferson County, since it would be very difficult at this time for my forces to do the work. **I also recommend that you grant permission to this contractor to enter onto Jefferson County land, to reclaim the dirt which is moved from Mr. Stober's land, in order that they can restore this land to its natural condition and that you also grant permission to bury any debris on Jefferson County land which is necessary to clear up this situation.**

Respectfully,

  
Scott S. Gregory  
Director of Works

***Gaps in administrative records make it impossible to say with certainty whether any portion of the settlement against Jefferson County was upheld, though the physical evidence that remains on the former Stober tract would suggest not.***



## 1975

- State first documented release of hazardous substances

## 1977

- Mr. George Stober passed away

## 1978

- Mr. Arthur Taylor passed away

## 1979

- EPA responded to releases of oil and hazardous substances at the site



*Courier Journal*

**1988**

- Jefferson County acquired the Stober tract for expansion of Jefferson Memorial Forest



*wildernesslouisville.org*

# 1992

- State representatives visit the Valley of the Drums
- Discovery of the “Gully of the Drums”
  - 40+ drums located in the forest, less than 1,000 feet from the Superfund site boundary



1994 EPA Preliminary Assessment

An internal memorandum from the Federal Superfund Section asserted that it would be “*easier to get things done*” if the forest site was referred to as “*something other than A. L. Taylor*”.

SITE NAME: A.L. Taylor Site RENAMED Jefferson Forest Drum Site  
LOCATION: Brooks, Kentucky  
ID NO. (CERCLIS, ERNS, etc.) KYD 98050096

Comments: Politically may be hot. Assign ESC and send TAT to  
evaluate condition of visible drums and sample surrounding  
soils.  
Charlie Stevens is doing site investigation

## 1993

**Emergency Response & Removal Branch determined that the site qualified for low priority removal action, but the chief of the EPA ERRB determined that *"the site would be better addressed under the authority of the Commonwealth of Kentucky rather than EPA's."***

## 1994

**The EPA completed a Preliminary Assessment for the Jefferson Memorial Forest Drum site, and it was subsequently designated as No Further Remediation Action Planned (NFRAP).**





***“Archival evidence indicates that the site is related to the A. L. Taylor site.”***

**-- S. Mallette**

**2006**

- State conducted a number of inspections at the forest site
- Alerted the EPA that the site had not been remediated, even though it was on the NFRAP list
- Requested EPA to clean up the site

***“As the current property owners, they (Louisville Metro Government) could be a PRP themselves,”***

**-- S. Mallette**



*2006 KYNREPC Site Investigation Report*

***“Inspectors for the EPA have found about four dozen rusted metal drums on land just outside the part of the dump including a portion of Jefferson Memorial Forest...spokesman for Louisville Metro Parks, which manages the Jefferson Memorial Forest, said his office...has been aware of old drums on its property near the Superfund site since the late 1990s.”***

**-- J. Bruggers, Courier Journal, 2008**

***"Based on the elevated levels of lead and hexavalent chromium in some of the existing waste, and its location in a public forest, Shield anticipates the most protective eventual remedial alternative for this site to be excavation and disposal of the impacted material in an appropriately permitted sanitary landfill."***  
**-- Shield Environmental Associates, 2011**

## **2010-2011**

- State-led investigation of the Gully occurred
- Shield Environmental was contracted to complete the investigation
- Preliminary cost estimate was submitted

## 2012

- State contacted Dow Corning Corporation, naming them as the primary waste generator for the Jefferson Memorial Forest site
- Representatives from Dow Corning visited the site on at least two occasions and submitted a proposal for response actions.

***“Based on the limited knowledge of the full extent of buried waste, and its contents, it is not possible to develop a true estimated cost for the remedial effort at this time.”***

**-- Shield  
Environmental  
Associates, 2011**

# 2016



*1992 EPA Site Inspection*

- A second letter was sent to Dow Corning, which stated that because unknown materials were leaking from the drums, Superfund personnel had determined that there was an “imminent threat to human health and the environment”.
- Dow Corning responded stating that since submitting a proposal for potential response actions in 2013, but they had received no response from the state. Dow Corning asserted that they would not assume responsibility for the site

## 2018

- EPA Region IV requested a title search for the A. L. Taylor/Valley of the Drums site

## 2020

- State abandoned the monitoring wells in Jefferson Memorial Forest

# 2023

- State published the seventh FYR for the Valley of the Drums



*1992 EPA Site Inspection*



## **Under CERCLA liability, Jefferson County is the Potentially Responsible Party (PRP) for the Gully of the Drums because they:**

- (a) arranged for the disposal of hazardous waste on site
- (b) selected the site where the hazardous waste was transported to, and
- (c) are the current owners of the site.
  - *U.S.C. 42 Chapter 103, CERCLA, § 9607: Liability*

# **AN UNKNOWN AMOUNT A WASTE REMAINS BURIED IN AND AROUND THE VALLEY OF THE DRUMS SUPERFUND SITE.**

**At the time of this publication, the drum and waste debris still remain staged in Jefferson Memorial Forest. The Jefferson Memorial Forest Master Plan makes no mention of the drum site, and there are no current active cleanup efforts underway.**

**2024**

**ACTION**

**INTEGRITY**

**TRANSPARENCY**

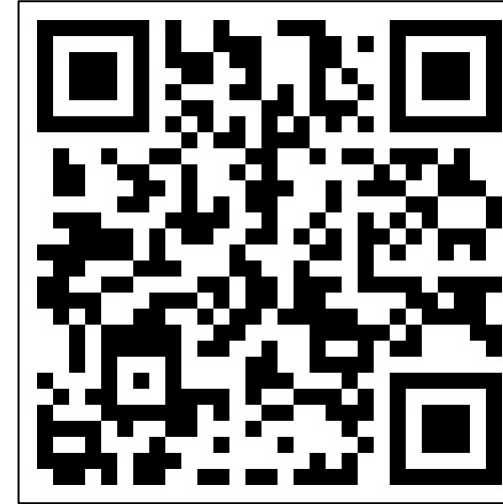


*2023, S. Satterly*

# THANK YOU!

StoryMap by Sam Satterly:

<https://storymaps.arcgis.com/stories/d914bd376b82442780ccd4064bc31078>



Inside Climate News Article:

<https://insideclimatenews.org/news/03042024/louisville-gully-of-the-drums-hazardous-waste/>



# OTHER EVENTS OF INTEREST

## Association for Advancing Participatory Science! Kentuckiana Meeting

**Who:** Researchers, governmental officials, teachers, students, and anyone who likes to participate in community-based science

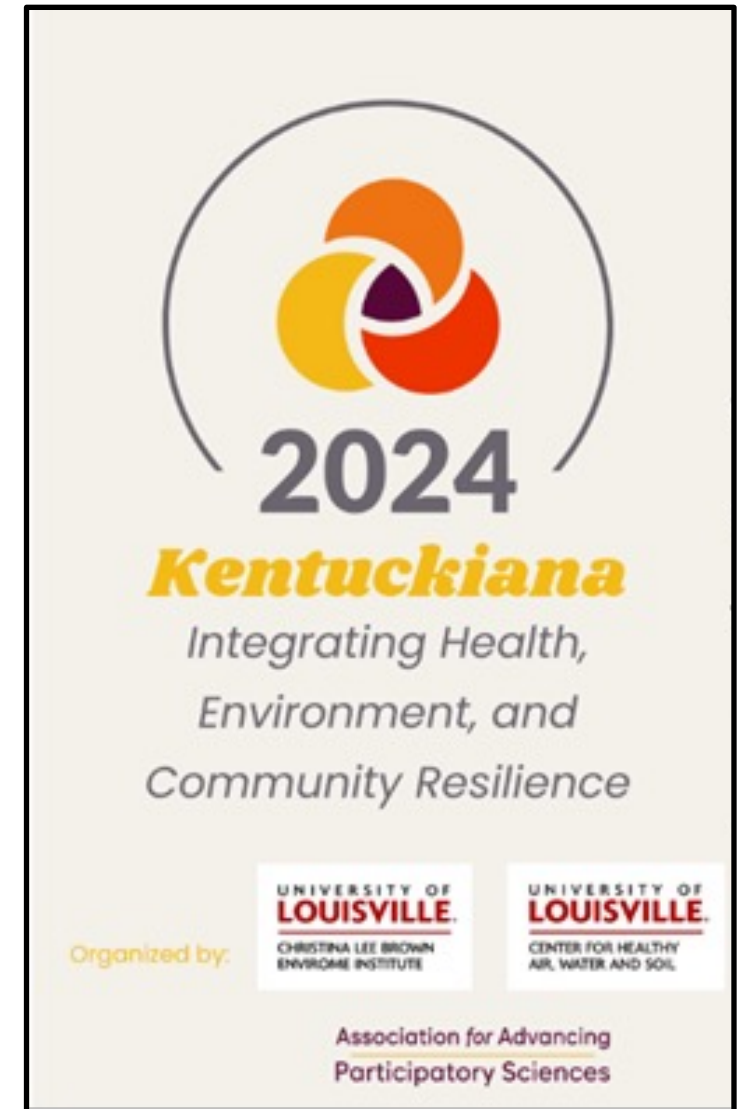
**What:** A one-day meeting with keynote speakers (Drs. Luz Huntington-Moskos from UofL's CIEHS and Chris Lorentz from Thomas More's Field Biology Station), poster session, and facilitated discussions

**When:** 9-4p on Thursday, April 18

**Where:** The Urban Design Studio in downtown Louisville

**Details:** [register here](#) (by April 7!) and [website here](#)

**Volunteers needed.** Seeking two people to assist with day of logistics on April 18! Contact Lauren Anderson: [lauren.anderson@louisville.edu](mailto:lauren.anderson@louisville.edu)



# FAMILY FUN MATH EXPLOSION JUNE 22, 2024!

NEEDS 100 volunteers.

Both participants and volunteers may register using the link below.

[https://www.eventbrite.com/e/family-fun-math-explosion-tickets-865213957237?fbclid=IwAR2-oqxTC0gfR0oN2zr4GIJq6POt4GvquaTcwjmJFsRan1O6HfqGszXsaag\\_aem\\_Aa3yqIG5fDNwBO9eZM473m6f7CZX3Pbv7abQ\\_WvRHx2f8xdRjcBLv0zzwA\\_WXL4WQcvjS\\_g9BDrk-3dpGmfv1iKq](https://www.eventbrite.com/e/family-fun-math-explosion-tickets-865213957237?fbclid=IwAR2-oqxTC0gfR0oN2zr4GIJq6POt4GvquaTcwjmJFsRan1O6HfqGszXsaag_aem_Aa3yqIG5fDNwBO9eZM473m6f7CZX3Pbv7abQ_WvRHx2f8xdRjcBLv0zzwA_WXL4WQcvjS_g9BDrk-3dpGmfv1iKq)

More info: [info@wlmsp.org](mailto:info@wlmsp.org)

**WEST LOUISVILLE  
MATH & SCIENCE PROJECT  
FAMILY FUN  
MATH EXPLOSION**

Saturday, June 22  
1 pm - 4 pm  
Southwick Community Center  
3621 Southern Ave  
Louisville, KY 40211  
**Registration Encouraged**  
Scan QR Code below

**FREE ADMISSION  
LUNCH PROVIDED**

**For ages 3 -103**  
\*Children under 11  
must be accompanied  
by an adult\*

[info@wlmsp.org](mailto:info@wlmsp.org)

**WEST LOUISVILLE  
MATH AND SCIENCE PROJECT**

**LOUISVILLE  
PARKS  
AND RECREATION**

**CAPRA**

**RECREATION**

**BRIDGE KIDS  
INTERNATIONAL**

**THE KIZAZI  
FUND**  
Investing in the Next Generation!  
BRIDGE KIDS INTERNATIONAL

# WEST JEFFERSON COUNTY COMMUNITY TASK FORCE MONTHLY MEETINGS

Meets virtually every third Tuesday of  
the month from 5:30-7pm

<https://global.gotomeeting.com/join/117194797>

Contact: Arnita Gadson (502) 645-3588  
wjcctf.lou@gmail.com



# REMINDERS FROM UL SUPERFUND RESEARCH CENTER



- We are looking for new members for our coordinating committee and community advisory board. If you or someone you know is interested email those recommendations to [lauren.heberle@louisville.edu](mailto:lauren.heberle@louisville.edu)



# REMINDERS

- Please fill out our survey regarding today's event at [https:// forms.gle/JsQ7f34gcr8EA9vs8](https://forms.gle/JsQ7f34gcr8EA9vs8)



- Meeting Documents are available here:  
<https://drive.google.com/drive/folders/17FpTkziB7nuU9FfRius1FXnCeWRF2KcT?usp=sharing>



# THANK YOU FOR JOINING US TODAY!

Contacts:

[Lauren.Heberle@louisville.edu](mailto:Lauren.Heberle@louisville.edu) and

[Khushi.Pola@louisville.edu](mailto:Khushi.Pola@louisville.edu)



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