

October 21, 2025

HENRY WESTEMEYER
SNYDER AND ASSOCIATES
2727 W SNYDER BLVD
ANKENY IA 50023

**Re: Background Sampling Plan for Soil
ICON Water Trails Scott Ave Uplands Project
Des Moines, Iowa**

Dear Mr. Westemeyer:

The Iowa Department of Natural Resources (DNR) received a background soil sampling plan (via email) for the ICON Water Trails Scott Ave Uplands Project on October 16, 2025. The plan was submitted on behalf of ICON by Snyder & Associates, with portions of the plan completed by Eocene Environmental Group. The plan is intended to lay out a framework for background sampling (arsenic) in soil, and calculation of a site-specific background standard for use in separating soil that can be re-used, from soil that must be disposed of at a landfill.

DNR Contaminates Sites Staff have reviewed both written and emailed responses from Snyder & Associates in regards an email from DNR Environmental Specialist Senior Shelly Nellesen to Snyder & Associates on or about September 16, 2025 concerning best practices for determining a site-specific background standard for arsenic.

Based on the submitted responses to DNR comments, maps, and arsenic background testing workplan included in the Eocene Environmental Review document, DNR approves the site to proceed as proposed with sampling and calculation of an arsenic background standard. Please use information contained in [IAC 567-137](#) when obtaining and calculating the arsenic background standard.

A brief report of activities, locations, and results used in obtaining the site-specific background standard should be submitted to DNR Contaminated Sites prior to re-use of site soil in an off-site location. In addition, as previously communicated, re-use of site soil in an offsite location necessitates testing the offsite location for arsenic to ensure that site soil will not create a new condition elsewhere.

If you have any questions, or if we may be of further assistance, please contact me at matthew.graesch@dnr.iowa.gov or by phone at (515) 250-1923

Sincerely,

Matthew Graesch, P.G.
Environmental Specialist Senior
Land Quality Bureau

cc: Michael Sullivan
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