

March 17, 2026

JAKE RIED
TIMBERLINE ESTATES LLC
6205 MILLS CIVIC PKWY STE 200
WEST DES MOINES IA 50266

BRENT GREGUREK
THE NEW PIONEER GUN CLUB
31454 312TH PL
WAUKEE IA 50263

Re: The New Pioneer Gun Club (31454 312th Pl, Waukee, IA 50263)
Iowa DNR Contaminated Sites Database ID No. [2864](#)
Addendum to Site Assessment Report ([Doc 43349](#))

Dear Mr. Ried and Mr. Gregurek

The Iowa Department of Natural Resources, Solid Waste and Contaminated Sites Section (DNR) received an Addendum to the Site Assessment Report for The New Pioneer Gun Club (NPGC) property in Waukee, Iowa on March 11, 2026. The report was completed and submitted on your behalf by EcoSource LLC.

The present report is acceptable, and DNR has the following comments regarding this submission, as well as planned remedial work at the site:

- An environmental covenant (EC) will be required to sever the soil and groundwater risk pathways on each parcel at NPGC. This EC will carry forward from the present (two) parcels to the eventual subdivided (homeowner) parcels. This EC can also be applied to associated Timberline Estates LLC properties and/or Hubbell Realty properties if necessary.
- Work at the site will require a robust soil and groundwater management plan during the remedial and construction phases to ensure that contaminated soil and groundwater are dealt with safely and legally. This plan must be submitted to DNR, and approved before site remediation can commence. This plan will also be required to be part of the EC if contamination is left in place.
- It is imperative that your consultant understands when a RCRA-regulated waste has been generated, as well as what waste may be considered hazardous according to EPA standards (potentially different than state standards). Disposal options for generated wastes vary, and it may not be possible to replace or reuse certain soils on the property. Please contact EPA Region 7 RCRA staff (contact information below) to discuss waste as related to lead shot on closed shooting ranges and what federal requirements might exist.
- The site will need a pre-existing plan or understanding with a local landfill to ensure compliance with the landfill's regulatory needs for testing before disposal or transportation (TCLP).

- Test methods for ensuring residential compliance (EPA 6020B) are not the same as test methods for landfilling or hazardous waste determination. Use of the Toxic Characteristic Leaching Procedure (TCLP) is required when informing landfills and making RCRA waste determinations.
- As noted in the Conclusions and Recommendations Section, stormwater management and fugitive dust control are required, and documentation of these measures is also required during remediation and before site closure.
- Appendix A, Exhibit G shows a “heat” map for lead concentration in soil, as requested in previous DNR communications. Areas on the map such as south of the present club house, where no sampling data exist, are colored in the heat map. While it is understood that this is an artifact of the manner in which the maps are generated, it is important to note that map-based interpolation or inference regarding areas where no sample data have been collected will not be allowed in the final product.
- No plan is presented in the current submission for the pond, or what the final disposition of the feature will be. Please communicate this information in the next submittal.
- The open, row-crop field north, of the waterway has not been sampled, and is part of (current) parcel 1605200041. The northern-most samples (in the waterway) exceed the acceptable residential lead level. Delineation of gun-range impact across the entire parcel is required.

Please submit a workplan detailing remedial activities and contingencies for handling lead-contaminated soil and groundwater at the site within 60 days. Development and execution of an EC can be done at any time during the life of the project. When drafting an EC, please ensure that DNR reviews a draft copy in advance of any signatures or filings. If desired, a meeting to discuss plans and requirements can be scheduled.

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](tel:5152501923).

Sincerely,

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

cc: Michael Sullivan
Iowa DNR
6200 Park Ave Suite 200
Des Moines, IA 50321

Iowa DNR Field Office 5, Des Moines

Caleb Lewis
EcoSource LLC
1001 Raccoon St
West Des Moines, IA 50266

Kevin Snowden
EPA Region 7, Compliance Officer
Enforcement & Compliance Assurance Division
11201 Renner Blvd.
Lenexa, Kansas 66219
snowden.kevin@epa.gov