

June 2, 2026

VIA EMAIL

Kevin Nestingen  
Kwik Trip, Incorporated  
1626 Oak St  
La Crosse, WI 54603

RE: No Association Determination  
Kwik Trip 1794, 1000 & 1050 West 94th Street, Bloomington  
MPCA Site ID: BF0003267  
Billing ID: 266490  
PIN: 0902724440056 and 0902724440057

Dear Kevin Nestingen:

This letter is in response to the request from Nicholas Stingl of Braun Intertec for a determination under Minn. Stat. section 115B.178 that certain actions proposed to be taken by Kwik Trip Incorporated at the Kwik Trip 1794 site, located at the address referenced above (the Site), will not constitute conduct associating Kwik Trip Incorporated with the release or threatened release of hazardous substances, pollutants, or contaminants at the Site for the purpose of Minn. Stat. section 115B.03, subd. 3(a)(4).

The Minnesota Pollution Control Agency (MPCA) staff in the Voluntary Investigation and Cleanup (VIC) Program has reviewed the documents submitted for the Site. The Site consists of two contiguous parcels totaling approximately 1.6 acres. Prior to late 1960s, the Site was used as agricultural land. In 1969, the east Site building was constructed, and the west portion of the Site was developed with a parking lot. In 1984, the parking lot was replaced with the current west Site building. Historically, the east building has been used by various commercial tenants including an automotive repair and dealership (mid-1990s to mid-2010s), a charter bus company (mid-2010s to 2023), and most recently, a landscaping company. The west Site building was initially used as a retail store until 1994 when the use transitioned to offices and warehouse storage. The Site is located within the Lyndale Avenue Corridor Superfund Site (SR0001402), which is known for tetrachloroethene (PCE) and trichloroethene (TCE) in groundwater and soil vapor. Kwik Trip Incorporated intends demolish the current Site buildings and redevelop the Site with a gas station and convenience store. No vehicle maintenance is planned at the Site.

The Phase I Environmental Site Assessment noted that tires and chemicals associated with vehicle repair and maintenance were on-site at the time of the site reconnaissance. These materials should be properly recycled or disposed of prior to purchase of the Site.

A limited environmental investigation was completed at the Site in October 2024. Seven soil samples were collected from seven soil borings and analyzed for volatile organic compounds (VOCs). No VOCs were detected in the soil samples. Two additional push-probe borings were advanced directly to groundwater, which was encountered at depths of approximately 39 feet below ground surface (bgs). A temporary well was installed in each boring, and groundwater samples were collected for VOC analysis.

Trichloroethene was detected in both groundwater samples, with a maximum concentration of 4.2 micrograms per liter ( $\mu\text{g/L}$ ), which is greater than the Health Risk Limit (HRL) established by the Minnesota Department of Health (MDH) for drinking water purposes. Cis-1,2-dichloroethene (cis-1,2-DCE), 1,1-dichloroethane (1,1-DCA), and 1,1,1-trichloroethane (1,1,1-TCA), were detected in groundwater at concentrations less than their respective HRLs.

Five soil vapor samples were collected at the Site within the footprint of the proposed building in October 2024 (non-heating season) and November 2025 (heating season). Tetrachloroethene, TCE, and 1,1,1-TCA were detected in soil vapor at concentrations less than the MPCA vapor mitigation action level of thirty-three times (33X) their respective commercial intrusion screening values (ISV). Low concentrations of cis-1,2-DCE and 1,1-DCA were detected in isolated soil vapor samples; these VOCs do not have an established ISV. Only 1,3-butadiene was detected in soil vapor at a concentration greater than the MPCA action level of 33X its commercial ISV. 1,3-Butadiene is commonly found in soil vapor in urban environments due to its association with petroleum products, vehicle exhaust, and asphalt. It is unlikely that the 1,3-butadiene stems from a release of hazardous substances at the Site. Based on the two seasonal sampling events, a vapor mitigation system is not required for the proposed Site building.

For the purpose of this letter, the identified release consists of PCE, TCE, cis-1,2-DCE, 1,1-DCA, and 1,1,1-TCA in groundwater and soil vapor (Identified Release). This letter does not address petroleum-related contaminants. Technical assistance for petroleum-related compounds may be obtained through the MPCA's Petroleum Brownfield Program.

Based upon a review of the information provided to the MPCA VIC Program, and subject to the conditions set forth in this letter, a determination is hereby made pursuant to Minn. Stat. section 115B.178, subd. 1 that the proposed actions (Proposed Actions) listed below will not associate Kwik Trip Incorporated with the Identified Release for the purpose of Minn. Stat. section 115B.03, subd. 3(a)(4). This determination applies only to the following Proposed Actions:

- Purchase of the Site
- Demolition of the existing Site buildings, subject to proper abatement of hazardous building materials
- Redevelopment of the Site with gas station and convenience store and related infrastructure, in accordance with an MPCA-approved Construction Contingency Plan
- Operation of a gas station and convenience store at the Site provided that the business does not engage in the business of generating, transporting, storing, treating, or disposing of the compounds, or breakdown products of the compounds, comprising the Identified Release

This determination is made in accordance with Minn. Stat. section 115B.178, subd. 1, and is subject to the following conditions:

1. The Proposed Actions shall be carried out as described herein.
2. Kwik Trip Incorporated shall cooperate with the MPCA, its employees, contractors, and others acting at the MPCA's direction, in the event that the MPCA takes, or directs others to take, response actions at the Site to address the Identified Release or any other as yet unidentified release or threatened release of a hazardous substance, pollutant, or contaminant, including, but not limited to, granting access to the Site so that response actions can be taken.

Kevin Nestingen

Page 3

June 2, 2026

3. Kwik Trip Incorporated shall avoid actions that contribute to the Identified Release or that interfere with response actions required under any MPCA-approved response action plan to address the Identified Release.
4. In the event that any suspected hazardous substances are encountered during Site activities (i.e., demolition, grading, redevelopment, etc.), Kwik Trip Incorporated shall notify the MPCA project staff immediately in order to determine appropriate handling, sampling, analysis, and disposal of such wastes.

Pursuant to Minn. Stat. section 115B.178, subd.1, when Kwik Trip Incorporated takes the Proposed Actions in accordance with the determination in this letter, subject to the conditions stated herein, the Proposed Actions will not associate Kwik Trip Incorporated with the Identified Release for the purpose of Minn. Stat. section 115B.03, subd. 3(a)(4).

The determination made in this letter applies to Kwik Trip Incorporated's successors and assigns if the successors and assigns: 1) are not otherwise responsible for the Identified Release at the Site; 2) do not engage in activities with respect to the Identified Release which are substantially different from the activities which Kwik Trip Incorporated proposes to take, as described herein; and 3) comply with the conditions set forth in this letter.

Please be advised that the determination made in this letter is subject to the disclaimers found in Attachment A and is contingent on compliance with the terms and conditions set forth herein.

If you have any questions about the contents of this letter, please contact Youmi (Elisa) Wrobel, Project Manager, at 651-757-2597 or by email at [Youmi.Wrobel@state.mn.us](mailto:Youmi.Wrobel@state.mn.us).

Sincerely,

*Amy K. Hadjaris*

*This document has been electronically signed.*

Amy K. Hadjaris, P.G.

Supervisor

Voluntary Investigation and Cleanup Unit

Remediation Division

AKH/YW:df

Attachment

cc: Nicholas Stingl, Braun Intertec (electronic) (w/attachment)  
Christina Scipioni, City of Bloomington (electronic) (w/attachment)  
Mary Finch, Hennepin County Environment and Energy (electronic) (w/attachment)  
Josie Hartung, MPCA (electronic) (w/attachment)



**Disclaimers**  
**Kwik Trip 1794**  
**MPCA Site ID: BF0003267**

1. Reservation of authorities

The Minnesota Pollution Control Agency (MPCA) Commissioner reserves the authority to take any appropriate actions with respect to any release, threatened release, or other conditions at the Site. The MPCA Commissioner also reserves the authority to take such actions if the voluntary party does not proceed in the manner described in this letter or if actions taken or omitted by the voluntary party with respect to the Site contribute to any release or threatened release or create an imminent and substantial danger to public health and welfare.

2. No MPCA assumption of liability

The MPCA, its Commissioner, and staff do not assume any liability for any release, threatened release or other conditions at the Site or for any actions taken or omitted by the voluntary party with regard to the release, threatened release, or other conditions at the Site, whether the actions taken or omitted are in accordance with this letter or otherwise.

3. Letter based on current information

All statements, conclusions, and representations in this letter are based upon information known to the MPCA Commissioner and staff at the time this letter was issued. The MPCA Commissioner and staff reserve the authority to modify or rescind any such statement, conclusion, or representation and to take any appropriate action under the Commissioner's authority if the MPCA Commissioner or staff acquires information after issuance of this letter that provides a basis for such modification or action.

4. Disclaimer regarding use or development of the property

The MPCA, its Commissioner, and staff do not warrant that the Site is suitable or appropriate for any particular use.

5. Disclaimer regarding investigative or response action at the property

Nothing in this letter is intended to authorize any response action under Minn. Stat. section 115B.17, subd. 12.

6. This approval does not supplant any applicable state or local stormwater permits, ordinances, or other regulatory documents.