

February 3, 2026

Mr. Christopher Allan
Professional Environmental Engineer
New York State Department of Environmental Conservation
Division of Environmental Remediation
47-40 21st Street
Long Island City, New York 11101-5407

Re: Interim Remedial Measure Work Plan and Scope of Work for the Remediation of Remedial Zone PCB-11 (Loop Track 2) in Operable Unit 4
Sunnyside Yard, Queens, New York
OOC Index #W2-0081-08-10

Dear Mr. Allan:

Roux Environmental Engineering and Geology, D.P.C. (Roux) has prepared this Interim Remedial Measure (IRM) Work Plan and Scope of Work for Remedial Zone PCB-11 (Loop Track 2) in Operable Unit 4 on behalf of National Railroad Passenger Corporation (Amtrak) to detail the proposed environmental delineation work at Sunnyside Yard, Queens, New York (Yard), located at 39-29 Honeywell Street, Queens, New York (Site). As discussed with the NYSDEC on January 14, 2026, the remedial activities outlined in this IRM Work Plan are intended to further delineate polychlorinated biphenyls (PCBs) concentrations in Remedial Zone PCB-11 in Operable Unit (OU) 4 in the Yard. Operable Unit 4 is defined as soil above the water table (unsaturated) throughout the Yard, excluding OU-1, OU-2, and OU-3.

It is anticipated that Loop Track 2 will be out of service for a weekend outage of approximately 55 hours in the 2nd Quarter of 2026, providing an opportunity to perform the remedial excavation of ballast/soil as approved in the OU-4 Remedial Action Work Plan (RAWP), dated September 24, 2009. Further delineation of Remedial Zone PCB-11 has been proposed to ensure this Remedial Zone can be addressed during this planned track outage.

A discussion of the proposed delineation work associated with Remedial Zone PCB-11 is provided below.

Site Background and Previous Soil Investigations

In accordance with the Order on Consent (OOC), Index #W2-0081-87-06, between the New York State Department of Environmental Conservation (NYSDEC), Amtrak and the New Jersey Transit Corporation (NJTC), Roux conducted extensive remedial investigation (RI) activities in OU-4. The results of RI activities were documented in the Operable Unit 4 RI Report, prepared by Roux, and submitted to the NYSDEC and New York State Department of Health (NYSDOH) on October 2, 2008, and defined compounds of concern (COCs) within the Yard to be PCBs, lead and semivolatile organic compounds (SVOCs).

Taking into account the RI results and a Feasibility Study (FS) report for OU-4 dated January 30, 2009, NYSDEC issued a Record of Decision (ROD) for OU-4 selecting excavation of the identified soil exceedances, or remedial zones, as the permanent remedy for OU-4. The September 24, 2009, RAWP provided a description of this excavation remedy for thirteen remedial zones in OU-4: PCB-1 through PCB-12 and LEAD-20. The Scope of Work (SOW) presented herein is focused on soil remediation at

Remedial Zone PCB-11 that is currently scheduled to become accessible when Loop Track 2 will be out of service in the 2nd Quarter of 2026.

Remedial Zone PCB-11 is located within Loop Track 2 on the eastern side of the Yard, approximately 80 feet south of Remedial Zone Lead-20 and east of the Static Frequency Converter Station, see Figure 1. During the August 2001 Limited Phase II Environmental Site Assessment for the Leveraged Lease Area, soil sample LLS-11A was collected between 1 and 2 feet below land surface (bls) and the laboratory results indicated that it contained a PCB concentration of 92.2 milligrams per kilogram (mg/kg), exceeding the Yard-specific soil cleanup level of 25 mg/kg. Delineation samples were collected around LLS-11A in May 2007. One sample was collected 10 feet north of (LLS-11N) and one sample was collected 10 feet south (LLS-11S), both at a depth of 2 feet bls. These samples indicated that PCB concentrations were under the Yard-specific soil cleanup level. Bounded by the width of Loop Track 2 and the two delineation samples, the rectangular area that defines Remedial Zone PCB-11 contains approximately 15 cubic yards of PCB impacted soil. Details regarding the horizontal and vertical delineation of Remedial Zone PCB-11 are further discussed in the OU-4 RAWP.

Scope of Work

With such a short outage window, minimizing the extent of remedial excavation required is critical in ensuring that the work can be completed in the allotted timeframe, and does not cause any disruptions to rail service within the Yard and the larger Amtrak, NJT, and LIRR network. Amtrak has determined that it is necessary to keep the existing rails in place during the excavation of Remedial Zone PCB-11 to reduce the potential of a derailment by introducing a joint in the curved area on this segment of track. Excavating only what is necessary is vital to the safe operation of Loop Track 2. It should also be noted that Loop Track 1, which is just east of Loop Track 2, must remain in service during all activities to maintain passenger service needs. All delineation activities will be performed in accordance with the NYSDEC-approved OU-4 RAWP dated September 24, 2009, and Excavation Work Plan (EWP) for OU-3/OU-4 dated January 10, 2022.

To further refine the delineation of PCB impacts in the Remedial Zone PCB-11 and reduce the square footage and volume of excavation necessary to remove impacted material identified in sample LLS-11A, up to 16 additional shallow soil borings are proposed. Soil borings will be located in one-foot step outs relative to LLS-11A location. To the north of LLS-11A, the first sampling location will be one foot away from the LLS-11A location (identified as LLS-11A_N1), the second will be two feet to the north (identified as LLS-11A_N2), and so on up to 5 feet to the north. The same sampling plan will be conducted in the southerly direction (LLS-11A_S1, LLS-11A_S2, etc.). To the east and west, three sampling locations will be established one foot away from LLS-11A to the east: LLS-11A_E1 and to the west: LLS-11A_W1, respectively. Remedial Zone PCB-11 is bounded by Loop Track 1 to the east that must remain in service. The proposed sampling locations are provided on Figure 1. Not all samples may be collected due to Track access limitations. Sampling will begin with locations closest to LLS-11A and will subsequently step out to locations increasingly farther away.

Each soil boring location will be advanced to a depth of two feet below land surface using soft dig techniques (e.g., vacuum excavation, hand tools, etc.). Soil from each soil boring will be inspected for evidence of impacts (visual and olfactory) and field screened for organic vapors using a photoionization detector (PID). Soil lithology will be recorded according to the Unified Soils Classification System. Soil samples from all proposed soil borings will be collected from the 1- to 2-foot depth interval. All soil samples will be sent to a NYSDOH Environmental Laboratory Approval Program (ELAP) -certified laboratory, under chain-of-custody procedures. Initially, only samples from the one-foot step out in each direction will be analyzed for PCBs using USEPA Method 8082. The remaining samples from subsequent step out locations will be held at the laboratory until the initial laboratory data for the one-foot step outs are received. If a sample from the one-foot step out has PCBs detected above 25 mg/kg, the subsequent step out sample in that direction will be analyzed by the laboratory. This process will continue in each direction until PCBs are detected below the Yard-specific soil cleanup level of 25 mg/kg, at which point no additional samples in that direction will be analyzed.

All ballast/soil disturbed during sampling activities will be reused on-Site in same locations or properly disposed of off-Site if grossly impacted. These grossly impacted materials will be containerized in 55-gallon drums and stored onsite pending offsite disposal at an approved, permitted facility.

All soil boring / ground intrusive activities will be completed under the oversight of Roux and community air monitoring will be implemented during all intrusive activities, in accordance with the Community Air Monitoring Plan (CAMP) provided in the EWP. Daily activity reports, including daily CAMP data, will be provided to the NYSDEC and New York State Department of Health (NYSDOH). All deviations from the EWP will be promptly reported to NYSDEC. Activities completed as part of this IRM will be summarized in an IRM Construction Completion Report (CCR) and submitted for the NYSDEC's approval.

Following delineation of the new Remedial Zone PCB-11 extents, Amtrak will engage a remediation contractor to excavate and properly dispose of PCB-contaminated material from this area. As Remedial Zone PCB-11 will be completely delineated, following remedial excavation of the delineated area, Amtrak's track reconstruction will begin without the need to collect post-excavation confirmation samples following the documented removal of impacted material.

Schedule

Amtrak plans to start the above-mentioned activities as soon as weather and Amtrak support allows. A separate notification will be provided at least 15 days in advance of the remedial construction work. Roux will promptly notify the NYSDEC if there are any changes to the schedule.

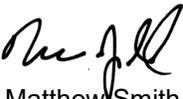
If you have any questions regarding this scope of work, please do not hesitate to contact the undersigned.

Sincerely,

ROUX ENVIRONMENTAL ENGINEERING AND GEOLOGY, D.P.C.



Jack Rusk
Project Geologist



Matthew Smith
Senior Scientist



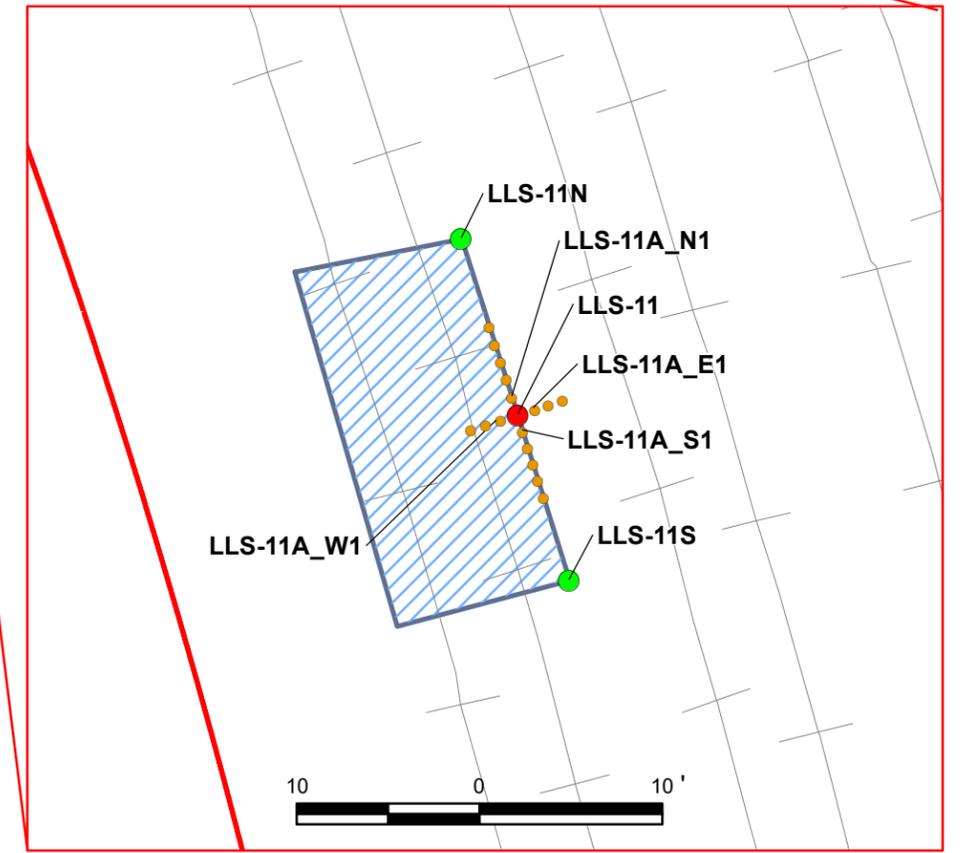
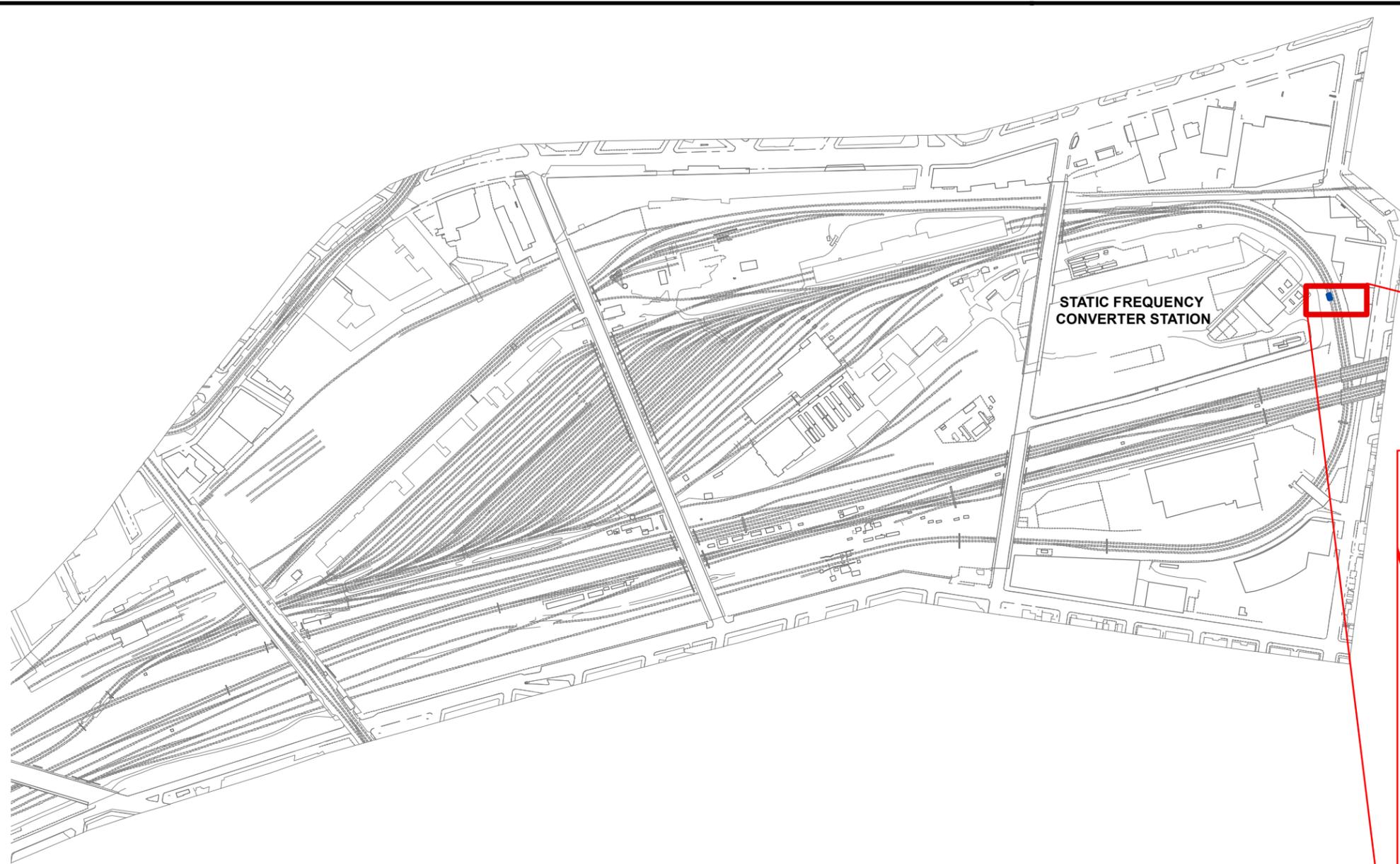
Jeff Wills, P.G.
Principal Geologist / Operations Manager

Attachments

1. Site Plan and Proposed Delineation of Remedial Zone PCB-11

cc: Jane O'Connell, NYSDEC
Cris-Sandra Maycock, NYSDEC
Josephine McCarthy, NYSDOH
Jordyn Perdon, Amtrak
Michael Panhuise, Amtrak
Charlie McGuckin, Roux

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LEGEND

- PROPOSED DELINEATION BORING AND SOIL SAMPLE
- LOCATION AND DESIGNATION OF SOIL BORING PCBs GREATER THAN 25 MG/KG
- LOCATION AND DESIGNATION OF DELINEATION BORING FOR PCBs LESS THAN 25 MG/KG
- LIMIT OF SOIL EXCAVATION TO ADDRESS PCB EXCEEDANCE OF 25 MG/KG



SITE PLAN AND PROPOSED DELINEATION OF REMEDIAL ZONES PCB-11		
SUNNYSIDE, QUEENS, NEW YORK		
Prepared for: AMTRAK		
	Compiled by: J.R.	Date: 01/23/26
	Prepared by: M.S.R.	Scale: AS SHOWN
	Project Mgr: M.S.	Project: Non-Initialized
	File: 0055.0071Y_working_OU4_Hotspots.mxd	
		FIGURE 1