#### Exhibit B. EUR Opinion

# [Residential Activity Restriction and Obligation - Soil](#_Residential_Activity_Restriction) (Non-PCBs)

In accordance with RCSA section 22a-133k-2(b)(2)(A) polluted soil at a release area that is less than fifteen feet below the ground surface may be remediated so that the concentrations of substances in such soil other than PCBs are equal to or less than the industrial/commercial direct exposure criteria as defined in RCSA section 22a-133k-1(a)(41) provided an EUR is in effect for the Subject Area (the entire parcel). This EUR is in the form of a NAUL.

In accordance with CGS section 22a-133o, a NAUL may be used for this purpose if the parcel is zoned for industrial or commercial use and no holder of an interest in such property, other than such owner, has a right of residential use, as defined in RCSA section 22a-133k-1(a)(76) unless such holder of an interest in the property agrees, by signing such notice, to subject such interest to the conditions or purposes described in such notice.

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| **Restrictions and Obligations Applicable to the Subject Area** |
| In accordance with RCSA section 22a-133k-2(b)(2)(A)(iii), the owner shall ensure that use, occupancy, and activity of and at Subject Area(s) ***Subject Area*** as depicted on Exhibit C of this EUR are restricted and obligations complied with as follows:* Residential activity as defined in RCSA section 22a-133k-1(a)(76) is prohibited; and
* Access to the parcel is limited to individuals working at or temporarily visiting the subject parcel for industrial/commercial activity as defined in RCSA section 22a-133k-1(a)(40).

The Subject Area ***Subject Area*** is the entire parcel as depicted on Exhibit C. EUR Survey, and further described in Exhibit A. Parcel Description (Metes and Bounds). |
| **Activities Permitted and Activities and Uses Inconsistent with Maintaining Compliance with the NAUL** |
| **Activities Permitted*** Industrial/commercial activities are permitted at the Subject Area.

**Activities and Uses Inconsistent with Maintaining Compliance with the NAUL** * Residential activities at the Subject Area; and
* Access to the Subject Area by individuals not working at or temporarily visiting the parcel for industrial/commercial activity.
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| **Type of Substances at the Subject Area** |
| *Enter substance by type or category for Subject Area* |
| **How Compliance with the Restrictions and Obligations Will Ensure Future Compliance with the RSRs at the Subject Area** |
| Compliance with the restrictions are necessary to adequately protect human health and the environment. If the Subject Area is used for residential activities the substance(s) present in the soil at the Subject Area may pose an unacceptable risk to human health. If access to the Subject Area is not limited to individuals working at or temporarily visiting the subject parcel for industrial/commercial activity, the substance(s) present in the soil at the Subject Area may pose an unacceptable risk to human health.Provided the Subject Area is not used for residential activities in accordance with RCSA section 22a-133k-2(b)(2)(A) and access to the parcel is limited to individuals working at or temporarily visiting the parcel for industrial/commercial activity, as required by the EUR, the substance(s) present in soil at the Subject Area do not pose an unacceptable risk to human health.The NAUL is consistent with CGS section 22a-133o because the parcel is zoned for industrial or commercial use. |
| **Reasons Why the Restrictions and Obligations Chosen are Appropriate for the Conditions Present at the Subject Area** |
| The restriction or limitation is consistent with the RSRs because:* The current condition of the Subject Area and parcel is in compliance with the restrictions and obligations of this EUR, which prohibits residential activity;
* Access to the parcel containing such release area is limited to individuals working at or temporarily visiting the parcel for industrial/commercial activity activities; and
* Polluted soil is remediated at the Subject Area to a concentration at which the Industrial/Commercial Direct Exposure Criteria for soil for each substance (except for PCBs) is met.
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