Exhibit B. EUR Opinion

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

In accordance with RCSA section 22a-133k-2(b)(2)(B) PCBs polluted soil at a release area that is less than fifteen feet below the ground surface may be remediated so that the concentration of PCBs in such soil is equal to or less than the industrial/commercial direct exposure criteria as defined in RCSA section 22a-133k-1(a)(41) for PCBs, provided an ELUR is in effect for the Subject Area and Parcel.

|  |
| --- |
| **Restrictions and Obligations Applicable to the Subject Area** |
| In accordance with RCSA section 22a-133k-2(b)(2)(B)(iv), the Grantor shall ensure that use, occupancy, and activity of and at Subject Area(s) ***Subject Area*** as depicted on Exhibit C of this ELUR are restricted and obligations complied with as follows:   * Residential activity as defined in RCSA section 22a-133k-1(a)(76) is prohibited; * The parcel shall only be used in accordance with title 40 CFR Part 761, including but not limited to, those provisions of 40 CFR Part 761 regarding the requirement for high-occupancy areas; and * The parcel shall only be used as “outdoor electrical substation,” as defined in 40 CFR 761.123 or an “other restricted access non-substation location,” as defined in 40 CFR 761.123.   The Subject Area ***Subject Area*** is the entire parcel as depicted on Exhibit C,. ELUR Survey, and further described in Exhibit A. Property Description (Metes and Bounds). |
| **Type of Substances at the Subject Area** |
| PCBs |
| **How Compliance with the Restrictions and Obligations Will Ensure Future Compliance with the RSRs at the Subject Area** |
| Compliance with the restrictions and obligations are necessary to adequately protect human health and the environment.  Provided the Subject Area is not used for residential activities as required by the ELUR, the PCBs present in soil do not pose an unacceptable risk to human health.  Provided activities at the parcel are consistent with the requirements of Title 40 CFR Part 761, including but not limited to, those provisions of Title 40 CFR Part 761 regarding the requirement for high-occupancy areas, as required by the ELUR, the PCBs present in soil do not pose an unacceptable risk to human health.  Provided the parcel is an “outdoor electrical substation,” as defined in Title 40 CFR 761.123 or an “other restricted access non-substation location,” as defined in Title 40 CFR 761.123, as required by the ELUR, the PCBs present in soil do not pose an unacceptable risk to human health. |
| **Reasons Why the Restrictions and Obligations Chosen are Appropriate for the Conditions Present at the Subject Area** |
| The restriction or limitation and obligations are consistent with the RSRs because:   * The current condition of the Subject Area is in compliance with the restrictions and obligations of this ELUR, which prohibits residential activity; * Soil at Subject Area polluted with PCBs is remediated to concentrations at which the Industrial/Commercial Direct Exposure Criteria for PCBs in soil is met; * Activities at the parcel are consistent with the requirements of title 40 CFR Part 761, including but not limited to, those provisions of 40 CFR Part 761 regarding the requirement for high-occupancy areas; and * The parcel is an “outdoor electrical substation,” as defined in 40 CFR 761.123 or an “other restricted access non-substation location,” as defined in 40 CFR 761.123. |