Exhibit B. EUR Opinion

## Environmentally Isolated Soil Restriction and Obligation

In accordance with RCSA section 22a-133k-2(c)(5)(A) environmentally isolated soil, as defined in RCSA section 22a-133k-1(a)(20), at a release area above the seasonal high water table is not required to be remediated to the pollutant mobility criteriaprovided an that an EUR is in effect for the Subject Area. This restriction is in the form of a NAUL.

In accordance with CGS section 22a-133o, a NAUL may be used for this purpose provided (i) the pollutant concentrations in the environmentally isolated soil do not exceed ten times the applicable direct exposure criteria and the applicable pollutant mobility criteria, or (ii) the total volume of soil that is environmentally isolated that exceeds ten times the applicable direct exposure criteria and the applicable pollutant mobility criteria is less than or equal to ten cubic yards.

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| **Pursuant to RCSA Section 22a-133k-1(a)(20):**  The environmentally isolated soil is polluted soil beneath a building.  or  NA |
| **Restrictions and Obligations Applicable to the Subject Area** |
| In accordance with RCSA section 22a-133k-2(c)(5)(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:  The environmentally isolated soil shall not be exposed to infiltration of liquid;  The environmentally isolated soil shall not be a continuing source of pollution;  If the environmentally isolated soil contains volatile organic substances in excess of GA area pollutant mobility criteria, the concentrations of such substances have been reduced or immobilized to the maximum extent prudent; and  The building shall not be removed and shall consist of a roof and structural walls that prevent infiltration of liquid into the soil into the building footprint. |

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| **Pursuant to RCSA Section 22a-133k-1(a)(20):**  The environmentally isolated soil is polluted soil which is beneath a permanent structure.  Description of permanent structure:*Enter Description*  Date of commissioner approval: *Approval Date*  or  NA |
| **Restrictions and Obligations Applicable to the Subject Area** |
| In accordance with RCSA section 22a-133k-2(c)(5)(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:  The environmentally isolated soil shall not be exposed to infiltration of liquid;  The environmentally isolated soil shall not be a continuing source of pollution;  If the environmentally isolated soil contains volatile organic substances in excess of GA area pollutant mobility criteria, the concentrations of such substances have been reduced or immobilized to the maximum extent prudent;  The permanent structure shall not be removed; and  The permanent structure shall prevent infiltration of liquid into the soil beneath the structure’s footprint. |

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| **Activities Permitted and Activities and Uses Inconsistent with Maintaining Compliance with the NAUL** |
| **Activities Permitted**  Activities and uses which do not allow for the infiltration of liquid into environmentally isolated soil; and  Maintenance of the building (consisting of a roof and structural walls) and/ or the permanent structure that renders soil environmentally isolated.  **Activities and Uses Inconsistent with Maintaining Compliance with the NAUL**  Activities and uses which allow for the infiltration of liquid into environmentally isolated soil; and result in the removal of the building or permanent that renders soil environmentally isolated consisting of a roof and structural walls that prevent infiltration of liquid into the soil beneath the building footprint or permanent structure. |

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| **Type of Substances at the Subject Area** |
| *Enter Substances 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 and obligations are necessary to adequately protect human health and the environment.  Provided the building or permanent structure is not removed and polluted soil: 1) is not exposed to infiltration of liquid; 2) is not a continuing source of pollution; and 3) that contains volatile organic substances in excess of GA area pollutant mobility criteria, the concentrations of such substances have been reduced or immobilized to the maximum extent prudent, as required by the EUR, then such polluted soil does not pose an unacceptable risk to groundwater quality.  The NAUL is consistent with CGS section 22a-133o because (i) the pollutant concentrations in the environmentally isolated soil do not exceed ten times the applicable direct exposure criteria and the applicable pollutant mobility criteria, or (ii) the total volume of soil that is environmentally isolated that exceeds ten times the applicable direct exposure criteria and the applicable pollutant mobility criteria is less than or equal to ten cubic yards. |
| **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 EUR;  The soil which exceeds the pollutant mobility criteria is rendered environmentally isolated below a building or permanent structure;  The environmentally isolated soil is not a continuing source of pollution;  Volatile organic substances present in environmentally isolated soil have been reduced or immobilized to the maximum extent prudent; and  If applicable, documentation that demonstrates that for volatile organic substances located beneath the building or permanent structure, the concentrations of such substances have been reduced or immobilized to the maximum extent prudent has been submitted to the Connecticut Department of Energy and Environmental Protection.  Title and Date: *Enter Title* *Choose Date* |