Exhibit B. EUR Opinion

## Residential Activity Restriction and Obligation - Groundwater

**For Industrial/Commercial Volatilization Criteria (Groundwater):** In accordance with RCSA section 22a-133k-3(c)(1)(B) groundwater polluted with volatile organic substances that is thirty feet or less from the ground surface and the lowest portion of a building or volatile petroleum substances ten feet or less from the ground surface and the lowest portion of a building shall be remediated so that the concentrations of each substance in such groundwater are equal to or less than Industrial/Commercial Volatilization Criteria for groundwater as defined in RCSA section 22a-133k-1(a)(96) provided that an EUR is in effect for the Subject Area or the entire parcel.

**For Soil Vapor Below a Building:** In accordance with RCSA section 22a-133k-3(c)(2)(A), remediation to the applicable volatilization criteria may not be required if the concentration of such substances in soil vapor are equal to or less than Industrial/Commercial Volatilization Criteria for soil vapor as defined in RCSA section 22a-133k-1(a)(97) provided that an EUR is in effect for the Subject Area or the entire parcel.

**For Concentrations at the Water Table:** In accordance with RCSA Section 22a-133k-3(c)(2)(B), remediation to the applicable volatilization criteria may not be required if the substances in groundwater exceeding volatilization criteria are not at the water table and all the analytical results from sampling the concentration of such substances at the water table, as seasonally demonstrated by groundwater monitoring representative of the uppermost portion of the water column are equal to or less than the industrial/commercial volatilization criteria for groundwater as defined in RCSA section 22a-133k-1(a)(96) provided an EUR is in effect for the Subject Area or the entire parcel.

This EUR is in the form of a NAUL.

In accordance with CGS section 22a-133o, a Notice of Activity and Use Limitation (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 regulations adopted pursuant to section 22a-133k 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 22a-133k-3(c)(1)(B) 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 Subject Area is limited to individuals working at or temporarily visiting the Subject Area for industrial/commercial activity.  The Subject Area Subject Area is the entire property as depicted on Exhibit C, EUR Survey, and further described in Exhibit A. Property Description (Metes and Bounds).  or  **Subject Area *Subject Area*** is/are a portion or portions thereof the property as depicted on Exhibit C. EUR Survey, and further described as follows:  *Enter Description* |

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| **Activities Permitted and Activities and Uses Inconsistent with Maintaining Compliance with the NAUL** |
| **Activities Permitted**  Industrial/commercial activities provided that access to the Subject Area containing such release area is limited to individuals working at or temporarily visiting the subject parcel for industrial/commercial activity.  **Activities and Uses Inconsistent with Maintaining Compliance with the NAUL**  Residential activities; and  Access to Subject Area containing such release area by individuals not working at or temporarily visiting the subject parcel for industrial/commercial activity. |

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| **Type of Substances at the Subject Area** |
| **Subject Area *Subject Area*** Volatile organic substances thirty feet or less from the ground surface and the lowest portion of a building  *Enter substances by type or substance for Subject Area*  **Subject Area *Subject Area*** Volatile petroleum substances ten feet or less from the ground surface and the lowest portion of a building  *Enter substances by type or substance 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.  If the Subject Area is used for residential activities the substance(s) present in the groundwater may pose an unacceptable risk to human health.  If access to the Subject Area containing such release area is not limited to individuals working at or temporarily visiting the subject parcel for industrial/commercial activity, the substance(s) present in the groundwater may pose an unacceptable risk to human health.  Provided the Subject Area is not used for residential activities and access to the Subject Area is limited to individuals working at or temporarily visiting the subject parcel for industrial/commercial activity the substance(s) present in groundwater do not pose an unacceptable risk to human health.  The EUR prohibits the use of the Subject Area for residential activities in accordance with RCSA section RCSA 22a-133k-3(c)(1)(B) and limits access to the Subject Area to individuals working at or temporarily visiting the subject parcel for industrial/commercial activity.  The NAUL is consistent with CGS section 22a-133o because 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 regulations adopted pursuant to section 22a-133k 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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| **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 Subject Area is not currently used for any residential activity;  Access to the Subject Area is limited to individuals working at or temporarily visiting the Subject Area for industrial/commercial activity activities; and  **For Industrial/Commercial Volatilization Criteria (Groundwater):**  Groundwater at the Subject Area is remediated for each substance to a concentration that is equal to or less than the applicable Industrial/Commercial Volatilization Criteria for groundwater.    **For Soil Vapor Below a Building:**  Soil vapor polluted with volatile organic substances at the Subject Area is remediated for each substance to a concentration that is equal to or less than the applicable Industrial/Commercial Volatilization Criteria for soil vapor.  **For Concentrations at the Water Table:**  Substances in groundwater at the water table, as seasonally demonstrated by groundwater monitoring representative of the uppermost portion of the water column are at concentrations equal to or less than the Industrial/Commercial Volatilization Criteria for groundwater. |