

EXHIBIT 18



John Haggard

Manager, Hudson River Program

GE
319 Great Oaks Blvd
Albany, NY 12203

T 518 862 2739
F 518 862 2731
John.Haggard@ge.com

Via Federal Express

April 20, 2006

Doug Garbarini
Team Leader, Hudson River Team
Emergency and Remedial Response Division
United States Environmental Protection Agency, Region 2
290 Broadway, 19th Floor
New York, New York 10007-1866

Re Phase 1 Final Design, Hudson River PCBs Superfund Site, Habitat Replacement and Reconstruction Design

Dear Doug:

In furtherance of our February 24, 2006 meeting in which habitat design and the use of backfill material for the replacement of submerged aquatic vegetation (SAV) beds within Phase 1 areas of the Hudson River PCBs Superfund Site project, were discussed, I wanted to bring to your attention Table 2-12 (Basis of Design for Backfilling/Capping and Habitat Replacement/Reconstruction) and Appendix 4 (Phase 1 Project Specifications and Contract Drawings for Contract 4 - Dredging Operations, Drawing Series B, Backfill) in the March 21, 2006 Phase 1 Final Design Report (Phase 1 FDR) that address several issues discussed during that meeting. As explained below, the estimated additional backfill material volume of up to 22,748 cubic yards (yd³) provided in the Phase 1 FDR for potential use in replacing SAV is more than adequate to return existing SAV-containing areas to the photic zone.

The estimated total volume of backfill/cap material potentially utilized for Phase 1 is provided in Table 2-12 in the Phase 1 FDR. It is specified in the second row of that table that the estimated total volume of backfill or cap material for Phase 1 is potentially up to 175,000 cubic yards (yd³). As noted in Section 2.3.7.1, Backfilling, of the Phase 1 FDR, the precise amount of backfill or cap material required will not be known until after both inventory and residuals dredging have been completed and post-dredging sediment samples are collected. Also as noted, for logistics planning only, it was assumed that half of the dredged areas would receive backfill and half would receive a cap. The backfill/cap material volume estimate of 175,000 yd³ assumes a 1 foot (ft) layer of material over the 94-acre Phase 1 dredge area (e.g., [(94 acres x 1 ft deep x 43,560 ft²)/acre + 27ft³]/yd³ = 151,653 yd³) and accounts for up to an additional 15% of the total backfill volume to be used for habitat reconstruction (e.g., 151,653 yd³ x 0.15 = 22,748 yd³). As indicated in Section 2.3.7.3, Habitat Replacement and Reconstruction, of the Phase 1 FDR, this approach implements the provision described in Attachment A (Critical Phase 1 Design Elements) of Appendix B of the Consent Decree for Hudson River Remedial Action, that additional backfill, up to 15% of the total estimated during design to be placed as part of the entire project (1 foot over dredge areas), will be allocated for the creation of SAV beds in dredged areas where additional backfill is needed to support SAV.

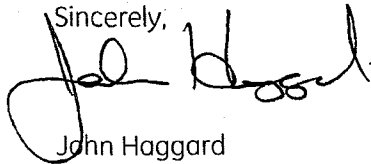
April 20, 2006

Page 2

As indicated in Section 2.3.7.3, Habitat Replacement and Reconstruction, of the Phase 1 FDR, an element of the habitat design process for Phase 1 areas included identifying locations to be dredged where SAV beds exist in areas currently less than 8 feet water depth or less (defined as the photic zone; i.e., the depth of water that is exposed to sufficient sunlight to support SAV, for purposes of the Phase 1 habitat replacement design) but will be greater than 8 feet deep following dredging and placement of 1 foot of material following dredging. You will recall from the response to Comment 131 of the Phase 1 Intermediate Design Report that the majority of SAV in the Upper Hudson River occurs at a depth of between 2 to 8 feet. At these locations, additional backfill material may be used to return areas to the photic zone to facilitate recolonization or planting of SAV. Such areas are indicated on Contract 4 B-series drawings as areas to "raise into photic zone (additional backfill)" and are demarcated by a thick dashed line on the drawings. The volume of additional backfill material required to return the areas that currently contain SAV that would drop below the photic zone following dredging to the photic zone (post dredging and placement of 1 foot of backfill) was derived by multiplying the areal extent of those areas by the depth needed to reach a water depth of 8 feet. The total estimated volume of material to return those areas to the photic zone following dredging and backfilling as currently planned in the Phase 1 FDR is approximately 6,263 yd³. To return those areas to their current existing grade following dredging and placement of 1 foot of material is approximately 13,096 yd³.

We trust that this letter sufficiently clarifies the provision for additional backfill allotted for creation of SAV beds in Phase 1 dredge areas. Please contact me or Adam Ayers if you have any questions or require additional information regarding this issue.

Sincerely,



John Haggard

JGH/bg
Enclosure

cc: Adam Ayers, GE
Michael Elder, GE
Sheri Moreno, GE