FEB [illegible]

February 21, 1973

Dr. Griffith E. Quinby
P. O. Box 1313
Wenatchee, Washington 98801

Dear Dr. Quinby:

I too am puzzled regarding the origin of the statement that only one in a hundred million ballasts burn out or otherwise fail. I personally am not aware that anyone in Monsanto has made that claim. We have relied on information from the electrical industry and have used references such as the General Electric article referred to in your letter. In fact, this General Electric article was the source of our statements which we made before the Interdepartmental Task Force on PCBs in Washington on May 15, 1972. I have enclosed a copy of the full presentation for your use.

I am tempted to speculate that perhaps someone has attempted to distinguish between those capacitor failures that result in electrical malfunction and those capacitor failures which result in a rupture of the capacitor container and immediate release into the environment. This attempt at differentiating between the two types of failures could have resulted in the lower failure rate quoted. I believe representatives of the capacitor industry are in a better position to comment in this area than I am. You may wish to contact Dr. A. Pozefsky, General Electric Company, Hudson Falls, New York. Dr. Pozefsky may be able to give you more precise information relating to ballasts and thermal controls as required by the Manual of National Electrical Code 1971.

We have long recognized that disposal of failed small capacitors which are widely distributed is extremely difficult to control. With this in mind we have developed a more degradeable version of capacitor PCB fluid. You will note in the attached report that we do not propose that this fluid can be freely discharged in the environment

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but we do believe that any of this material which accidentally escapes control will eventually degrade. It is our considered opinion that, although this is not the ultimate desired solution, it represents a significant step in the proper direction.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

Enclosure

cc: Dr. R. E. Kelly

Dr. A. Pozefsky
General Electric Company
Hudson Falls, New York

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