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FEDDERS CORPORATION

EDISON NEW JERSEY 08817

March 21, 1974

Dr. C. Hugh Thompson
Chairman, Hazardous and Toxic Substances
Regulation Task Force
Office of Water Protection Agency
Environmental Protection Agency
Washington, D. C. 30460

Subject: PROPOSED WATER EFFLUENT STANDARDS

Dear Dr. Thompson:

The Fedders Corporation is a major manufacturer of room air conditioners and residential and commercial air conditioning equipment. Our major manufacturing facility is in Edison, New Jersey with other plants located in Herrin and Effingham, Illinois; Buffalo, New York; Frederick and Elkton, Maryland. During the past calendar year we manufactured over 1,000,000 products of various types and sizes all of which used one or more impregnated capacitors. The writer is Corporate Director of Product Safety and Reliability and is a Registered Professional Engineer in the State of New York.

The Fedders Corporation would like to go on record as being strongly opposed to the inclusion of Polychlorinated Biphenyls (PCB) in the water effluent standards as proposed by the EPA and published in the December 27, 1973 Federal Register. This standard is restrictive enough to provide an effective ban on the manufacture and use of PCB which would therefore prohibit its use in impregnated capacitors.

The only presently available practible substitutes for PCB as the impregnant fluid in capacitors are mineral oil based materials and Phthalate Esters. The necessity for the substitution of either of these materials in capacitors would be of great concern to us, over and above the economic effect which would be appreciable, for the following reasons.

1. Capacitors with substitute non-PCB fluids would be physically larger than those currently in use with PCB. This fact would create a serious problem for the consumer with regard to the replacement of capacitors which failed, since it would be impossible in many instances to install a non-PCB capacitor where a PCB capacitor was used as original equipment.

   We normally maintain service parts inventory for at least two years. Our capacitor inventory could not be replaced for many years with non-PCB capacitors because of this serious interchangeability problem.

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2. Capacitors using the non-PCB fluids would be flammable. It is not certain as of this date whether such capacitors could be used in UL or AGA listed products because of this deficiency.

Furthermore, with the increasing emphasis on safety for consumer products it is doubtful that the use of capacitors with flammable impregnant fluids would be acceptable to the Consumer Product Safety Commission for air conditioners and other appliances which are used in the home. In line with the strong position the Commission is taking with the television industry in regard to the potential hazards from television fires, the use of such capacitors would certainly appear to be a step in the wrong direction from the Commission's standpoint.

Even if UL listed such capacitors and if the Commission was not opposed to their use, there would still remain considerable reluctance on our part to use capacitors in our products which had an increased fire hazard potential without many years of careful surveillance of controlled field test samples.

The Fedders Corporation feels that the minimal risk of environmental contamination due to the use of PCB in capacitors would be more than offset by the serious problems outlined above. We therefore urge you to remove PCB from the list of toxic pollutants included in the Proposed Effluent Standards.

Very truly yours,

R. H. Meyerhans
Vice President

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