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September 24, 2012

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE
Washington DC, 20590

**Subject: Safety Defect Information Report
2011-2012 MV-1 Compressed Natural Gas Vehicle Pressure Relief Device**

As directed by CFR Title 49 Part 573 "Defect and Noncompliance Responsibility and Report," The Vehicle Production Group LLC is informing NHTSA of a voluntary safety recall to Compressed Natural Gas (CNG) versions of the 2011 and 2012 MV-1. The campaign is related to a quality defect in the pressure relief device (PRD) causing unintended venting of the CNG tanks.

Following rigorous data collection and technical examination through our Field Issue Investigation Process, the Executive Field Action Committee (EFAC) made the final determination to declare a safety recall on September 17, 2012.

Please address any questions or inquiries to Gerald Brohl on 248-910-2469 or gbrohl@vpgautos.com.

Regards,

By: 

Name: Mathew A. DeMars
Title: President & COO

DEFECT INFORMATION REPORT

1. Manufacturer's Name and Address

The Vehicle Production Group LLC
333 Republic Drive
Suite D
Allen Park, MI 48101

2. Equipment involved in this defect notification:

All 2011 and 2012 model year MV-1 CNG vehicles.

3. Total number of vehicles or items of equipment:

435 vehicles (CNG only)

4. Percentage of vehicles estimated to actually contain the defect:

The valve manufacturer, GFI, has indicated that the suspect population is all 1705X2 valves assembled to the #1 CNG tank manufactured prior to August of 2011, and all 1705X14 valves (2 per vehicle assembled to the #2 and #3 tanks) manufactured in that same time period. All suspect date codes (stamped on the valves) are known. The valve assemblies for tanks #2 and #3 are the same, and unique from the #1 tank valve. There is no record of specific valves installed on individual tanks or vehicles, therefore suspect valves may be installed on all 435 vehicles in the field.

5. Description of the defect:

A Pressure Relief Device (PRD) is installed in every CNG tank valve assembly for the purpose of discharging fuel in case of a fire. The valve is made using a eutectic plug located inside an orifice which melts when the tank reaches a critical temperature. The melting material opens a valve and causes the natural gas to be discharged through the vent orifice.

Due to improper manufacturing of the valve body, a "burr" or "step" in the orifice can cause the plug to be misassembled. Over time the plug can settle or shift into a position which causes an inadvertent discharge of the CNG tanks. Seven incidents of inadvertent venting have been identified and confirmed, four at the assembly plant and three at customer sites.

6. **Chronological summary of events leading to this determination:**
 - 5/30/2012 – The first incident of inadvertent venting is reported at the Mishawaka Assembly Plant. Team investigations of root cause and scope are kicked off.
 - 7/01/2012 – First field incident reported and confirmed of inadvertent venting.
 - 8/02/2012 – The team determines the root cause and suspect population of valves.
 - 8/24/2012 – The field remedy is determined and passes FMVSS 304 testing.
 - 9/17/2012 – The Executive Field Action Committee (EFAC) reviews the facts and decides a safety campaign is appropriate.

7. **Description of proposed remedy:**

The remedy is to install a secondary (auxiliary) PRD valve kit to each vehicle on each tank in the field. This will prevent inadvertent venting in the event the primary, and suspect PRD, within the main valve body vents. The remedy was tested and passed FMVSS 304 standards.

8. **Program for remedy campaign:**

It is VPG's intention to notify all CNG vehicle dealers and customers within the identified suspect vehicle population to install secondary PRD kits (supplied by VPG or its designated parts supplier) to each tank on each vehicle in the field. This will be at no expense to the customer. The attachment is a draft of the information that will go out to customers.