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13E-014
(3 pages)

Emerson Process Management
Regulator Technologies, Inc
310 E. University Dr.
McKinney, Texas 75069
U.S.A.

Via e-mail and certified mail

March 12, 2013

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attn: ODI/Recall Management Div. (NVS-215)
1200 New Jersey Ave., S.E.
Washington, D.C. 20590

RE: Section 573.6(c) Information Report: Fisher H732 and H832 pressure relief valves

Dear Administrator:

Pursuant to 49 C.F.R. § 573.6(c), Emerson Process Management Regulator Technologies, Inc. submits the following information:

(1) Emerson Process Management
Regulator Technologies, Inc.
310 East University Drive
McKinney, TX 75069-1872

(2)(iii) Fisher-branded H732 and H832 pressure relief valves used in cargo tank trailers. Emerson Process Management Regulator Technologies, Inc. manufactured these units between January 2003 and January 2013. The H732 and H832 valves have a different design and construction than previous versions of Fisher-branded pressure relief valves.

(2)(v) Emerson Process Management Regulator Technologies, Inc. does not sell this equipment directly to any vehicle or original equipment manufacturers for installation in their motor vehicles or original equipment. Sales are to independent distributors for resale to their customers as original or replacement equipment, with installations performed by the customers or third parties.

(3) The total number of H732 and H832 units sold: 29,118.

(4) Estimated percentage of units potentially subject to failure: Less than 0.2%.

(5) The H732 and H832 pressure relief valves are intended to relieve pressure by venting compressed gases contained within the cargo tank into the atmosphere. The valves are designed for use in cargo tank trailers containing various gases, including, among others, liquid propane, butane, and anhydrous ammonia. There typically are two valves per tank, one in front and one in the rear.

Based on information derived from the incidents described in paragraph (6) below, the stem of the relief valve may break, resulting in the upper portion of the valve separating from the stem and being ejected from the tank. This may result in the uncontrolled release of pressurized gas into the atmosphere and also may create a road hazard (the upper portion of the valve weighs approximately one pound). Since the valves are flush-mounted atop the tank, any release of gas would occur directly upward from the tank into the air.

(6) From incident information obtained from various sources, of the more than 29,000 H732 and H832 relief valves sold, Emerson Process Management Regulator Technologies, Inc. is aware of 12 incidents in which a portion of the valve reportedly separated from the tank, as described in paragraph 5 above. Two of these incidents occurred in 2008, two in 2010, three in 2011, four in 2012, and one in 2013. These incidents appear to be sporadic and random. No injuries have resulted. In one incident, the ejected portion of a valve struck the hood of a trailing car, resulting in approximately $800 in damage.

The valves meet all applicable industry standards. Internal investigation by Emerson Process Management Regulator Technologies, Inc. has confirmed that the shortest length of time in service has been approximately five months for one valve. In all other instances, length of time in service has been 18 months or longer. Emerson Process Management Regulator Technologies, Inc. engineering analysis and testing have failed to reveal any pattern of failure based on transport size, tank or trailer manufacturer, or time of year of incident. Engineering and metallurgical analysis has also found that the failures have not been caused by material or component defects or by assembly or installation errors. In early March 2013, Emerson Process Management Regulator Technologies, Inc. received testing results from vibration studies conducted on actual routes where a H732 relief valve failed. Those test results suggest that roadway rumble strips, which have been used more extensively in certain areas, exert significantly greater forces on the valve which may cause bending stress fatigue in the valve stem over time. Although Emerson Process Management Regulator Technologies, Inc. believes that these occurrences would occur extremely rarely, the company has decided based on this recent information to replace all of the subject relief valves as a precautionary measure.

On March 8, 2013, Emerson Process Management Regulator Technologies, Inc. evaluated the most recent information and determined to take the voluntary remedial action that is the subject of this report.

(7) N/A

(8)(i) Emerson Process Management Regulator Technologies, Inc. will replace the H732 and H832 valves with a redesigned pressure relief valve. Emerson Process Management Regulator Technologies, Inc. will include provision for pre-notification reimbursement in the event the company determines that any of the affected units may have been remedied at the owner's expense, prior to the recall notification, for the issue that is the subject of this recall.

(8)(ii) Emerson Process Management Regulator Technologies, Inc. expects to begin customer notification by April 1, 2013 and expects to complete the notification by April 11, 2013. Emerson Process Management Regulator Technologies, Inc. will notify NHTSA if this schedule should be delayed by more than two weeks.

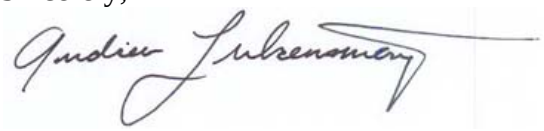
(9) N/A

(10) A representative copy of all notices, bulletins, etc. will be provided to NHTSA. Emerson Process Management Regulator Technologies, Inc. will provide a draft notification letter to NHTSA for review.

(11) Emerson Process Management Regulator Technologies, Inc. will promptly notify NHTSA if Emerson Process Management Regulator Technologies, Inc. assigns a campaign number different than the identification number assigned by NHTSA.

Emerson Process Management Regulator Technologies, Inc. appreciates your assistance in this matter.

Sincerely,



Andrew Lukensmeyer
Product Safety Officer