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By Recall Management Division at 10:50 am, May 19, 2014



By Electronic Mail RMD.OD@DOT.GOV

May 16, 2014

Nancy L. Lewis

Associate Administrator for Enforcement

National Highway Traffic Safety Administration

1200 New Jersey Avenue, SE

Attn: Recall Management Division

Subject: Agility Fuel Systems Recall – CNG Rail Mount System Mounting System Defects

Dear Ms. Lewis:

Attached is a vehicle defect initial information report, which is being submitted by Agility Fuel Systems pursuant to 49 C.F.R. Part 573.

The undersigned should be contacted for any additional information regarding this recall.

Sincerely,

A handwritten signature in blue ink, appearing to read "Yoshio Coy".

Yoshio Coy

Director of Product Support

(949) 265-6849 or ycoy@agilityfs.com

1. The manufacturer's name:

Agility Fuel Systems

1815 Carnegie Ave

Santa Ana, CA 92673

2. Identification of the Potentially Defective Agility CNG Systems

All Agility manufactured rail mount CNG fuel systems sold between September 2010 and January 2013 contain potentially defective mounting systems that may allow the tank to rotate/move within the mounting system.

Agility determined that a defect may be present by conducting inspections of vehicles in the field and by following up field reports of the condition.

Potentially defective Agility CNG fuel systems are installed on heavy-duty trucks in either refuse/vocational or over the road truck tractor applications, as shown in the picture below.



Picture 1 - Agility CNG Rail Mount System

Customer List

Agility rail mount CNG fuel systems with potentially defective mounting systems have been sold to:

Customer	Potential Mounting System Defects
Baltimore Freightliner	4
Bridgeport Mfg.	1
Canbria Truck Center	2
Casella Waste Systems	1
CIT Group, Inc.	4
Compressed Energy Systems, LLC	2
Convenience Transportation	28
Cummins Npower	1
Cummins Westport	10
Custom Vehicle Solutions	12
Daimler Trucks	40
EcoDual Group LP	2
Emission Solutions, Inc.	4
Fuel Tek Conversion Corp.	2
Fyda Freightliner	2
Haul a Way Rubbish	2
Heil	43
Houston Freightliner	12
Inland Kenworth Montebello	19
International	16
Kenworth	26
KW of Central Florida	2
Kwik Trip	4
KWSF - Ameriquest	2
Los Angeles Freightliner - Whittier	4
Los Angeles Freightliner - Fontana	2
McCoy Freightliner	2
McNeilus	2
MHC Truck - GA	14
MHC Truck - Bronx, NY	4
Newway	4
Peterbilt	4
Rainbox Disposal	2
Randy's Sanitation, Inc	4
Republic Services	54
RIHM Kenworth	12
Roberts Truck Center	1

Robinson Waste Service	2
Rush Enterprises	22
Rush Peterbilt	18
Rush Truck Center - Fontana Div	10
San Bernardino, City of	1
Scranton Manufacturing	1
Signature Equipement	2
Sioux City Truck Sales	2
Solid Waste Systems	2
Swift Transportation	2
Tampa Truck Center	82
TEC of California / La Mirada	2
Universal Waste System, Inc.	8
Volvo	14
Waste Equipment Sales Service, LLC	2
Waste Management	456
Wastequip, Inc.	4
Westfall Truck	38
Wisconsin Kenworth	4
Young Truck Sales	12
Total	1034

Note: Agility is compiling a complete customer contact list to include name, address, and phone number for all customers that have purchased CNG systems from Agility with potentially defective mounting systems and will forward to NHTSA upon completion.

Of the above listed 1034 systems with potential mounting system defects, 612 have been repaired in the field by Agility and are no longer considered defective. When the customer contact list is completed, all units that have been repaired in the field will be identified.

5. Description of the Defect and Identification of the Risk to Motor Vehicle Safety

Rail mounted CNG systems produced by Agility between September 2010 and January 2013 potentially contain a defect to the tank mounting system that may allow the tank it to become loose within the mounting system and allow the tank to rotate or move within the mounting system, which may cause damage to the fuel line tubing connected to the tank, or cause damage to the tank if the rubber isolators that are normally installed between the tank the bracket system are displaced and the tank contacts the metal mounting brackets.

If the tank rotates within the mounting system, it can rotate until the fuel lines can be either compromised to the point of failure or can be pinched to the point that fuel will not freely flow

from the tank. Compromised fuel lines may leak or fail, which would result in a gas leak of varying magnitude and interruption of fuel flow to the engine.



Picture 2 - Significant tank rotation causing fuel lines to be compromised and the flow to/from the tank restricted

If the brackets become loose, the rubber isolator may become displaced and the tank may contact the metal bracket. This contact may lead to abrasion damage of the tank.



Picture 3 - Loose mounting straps allowing rubber isolator to be displaced, possibly allowing the tank to contact the metal brackets, possibly leading to abrasion damage to the tank

A vehicle crash is a potential outcome from the described defects.

The operator of the vehicle may experience any of the following symptoms for an unknown duration in advance of a potential engine stall if the fuel lines are significantly compromised or significantly restricted from tank rotation.

1. Reduced power
2. Erratic fuel level gauge readings that correlate with engine power demand
3. Engine fault codes related to low gas delivery pressure to the engine, which will illuminate a "check engine" or "malfunction indicator" warning lamp on the dashboard of the vehicle.

If the operator does not discontinue operation of the vehicle, an engine may stall and a crash may be a potential outcome.