



By Electronic Mail [RMD.OD@DOT.GOV](mailto:RMD.OD@DOT.GOV)

June 10, 2014

Nancy L. Lewis

Associate Administrator for Enforcement

National Highway Traffic Safety Administration

1200 New Jersey Avenue, SE

Attn: Recall Management Division

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

Dear Ms. Lewis:

Attached is our updated vehicle defect information report, which is being submitted by Agility Fuel Systems pursuant to 49 C.F.R. Part 573. Detailed information is provided pursuant to Subsection (3) of Part 573.6(c), which includes all known customer contact details. Additional information is provided as specified in Subsections (6) and (8).

Sincerely,

A handwritten signature in black ink, appearing to read "Yoshio Coy". The signature is fluid and cursive, written over the printed name.

Yoshio Coy

Director of Product Support

**1. The manufacturer's name:**

Agility Fuel Systems

1815 Carnegie Ave

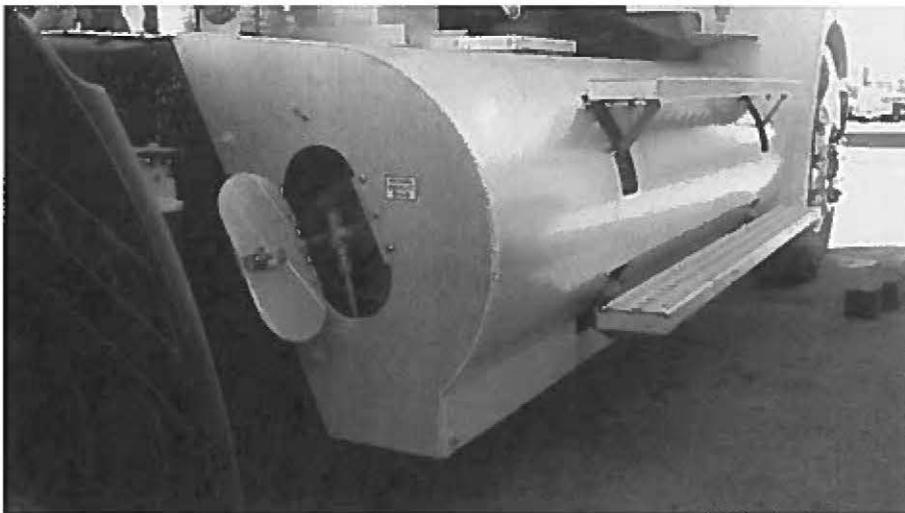
Santa Ana, CA 92673

**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*

### **3. Number of Systems potentially containing the Defect (Customer List)**

(Confidential business information is concurrently being submitted to the Chief Counsel's Office pursuant to the procedure specified by Part 512.)

#### **Summary of Estimates:**

Estimated total vehicles impacted: 566 (324 repaired)

Estimated total potential systems with mounting system defects: 1036 (596 repaired)

Estimated remaining mounting systems to repair: 440

Estimated remaining vehicles impacted: 242

### **4. Estimated Percentage of Systems Containing the Potential Defect**

All of the identified vehicles contain the suspect mounting systems

### **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 to become loose within the mounting system, thereby permitting the tank to rotate or move within the mounting system.

If the tank rotates substantially within the mounting system, the fuel lines could be compromised to the point of failure or 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.

In addition, severe displacement could cause abrasion damage to the tank if the rubber isolators, which are normally positioned between the tank and the bracket system, are displaced and the tank contacts the metal mounting brackets directly.



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



*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.

## **6. Chronology of Events Leading to Decision to Recall**

Agility became aware of a possible tank mounting issue as a result of reviewing its service and warranty data. This review, which led to its issuing Technical Service Bulletin ENP-047 dated January 2, 2013, was conducted primarily during December-2012. Agility decided to pursue the issue as a safety-related recall following discussions with NHTSA ODI personnel in early 2014.

## **8. Agility's Plan to Address Impacted Systems**

Of the above listed 1036 tanks with potential mounting system defects, 596 have been repaired in the field by Agility. Agility has developed an update kit, which improves the mounting system by use of a revised design stainless steel tank strap and mounting hardware along with a new isolator design that together provides improved durability and tolerance for tank expansion and contraction. Agility will install the update kit on each of the remaining systems in the field.

In order to repair the remaining 440 mounting systems, Agility will provide notification to all customers of the recall and will actively ensure that all end users with potential mounting system defects that have not been repaired are contacted and repairs of their systems will be made by Agility at no cost to them. Repairs will be made either at the customer's location, or at qualified Agility service provider location, or by the end user or customer, as agreed to mutually by Agility and the customer and end user.

Agility expects to have notice letters sent to substantially all owners or customers by July 1, 2014.

Agility has sufficient supply of replacement parts available to complete the remaining system repairs. All repairs will complete by approximately 12/31/14.

**11. Agility Campaign Number**

Agility will utilize NHTSA assigned identification number once assigned