



U.S. Department  
of Transportation

**National Highway  
Traffic Safety  
Administration**

# Memorandum

Subject: ACTION: PE13-019 Memo to Public File

Date: August 27, 2014

From: Kyle Bowker, Principal Investigator  
Office of Defects Investigation

In Reply Refer To: NVS-214

To: Frank Borris, Director  
Office of Defects Investigation

This memorandum serves to amend a statement made in the PE13-019 closing resume document approved on June 12, 2014 and to provide public notice of such. By e-mail message dated July 07, 2014, Agility Fuel Systems, Inc. has notified the agency that it no longer believes that fuel leak through the valve stem is a potential safety consequence of a Youngdo manual fuel container isolation valve exhibiting the defect condition described in NHTSA Safety Recall 14E-025. As the principal investigator on this matter, I concur with Agility's assessment. Accordingly, as the closing resume is already a matter of public record, this memo serves as an amendment to that document. The following statement in the PE13-019 closing resume document: "There may also be a small fuel leak through the valve stem when the valve seat becomes detached." is not accurate and should not be considered when reviewing the facts related to the investigation.

Agility's July 07, 2014 e-mail message also takes exception to the agency's position regarding the relationship between the alleged defect and the potential for fuel container over-pressurization. Agility has since conceded to the agency's point of view on this matter.

Attachments:

Copy of e-mail message dated July 07, 2014 sent by Agility Fuel Systems, Inc. to the Office of Defects Investigation Recall Management Division.

**From:** [Schuler, Kelly \(NHTSA\)](#)  
**To:** [Bowker, Kyle \(NHTSA\)](#)  
**Subject:** FW: acknowledgement letters for recall campaign 14E-025 & 14E-026  
**Date:** Thursday, July 10, 2014 9:56:39 AM  
**Attachments:** [Youngdo Failure Mode.pdf](#)  
[RCAK-14E025-4758.pdf](#)

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Hi Kyle.

Agility Fuel Systems has some concerns with our write up of the consequence in safety recall 14E-025. Josh asked that I send this to you for review. Attached is the acknowledgement letter that we sent to Agility containing the description of the consequence that has already been posted. Please look this over and let us know if we need to make adjustments to the language in the recall.

**Kelly J. Schuler**  
Safety Recall Specialist  
Recall Management Division  
Office of Defects Investigation  
Enforcement  
(W) 202-366-5227

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**From:** Yoshio Coy [mailto:YCoy@agilityfs.com]  
**Sent:** Monday, July 07, 2014 6:16 PM  
**To:** Schuler, Kelly (NHTSA)  
**Subject:** RE: acknowledgement letters for recall campaign 14E-025 & 14E-026

Dr. Kelly Schuler:

Have these notices been filed? With the holiday last week I was not able to review immediately upon your submission. I was able to take a look and have a couple comments regarding recall 14E-25. There are a few statements that appear to be incorrect in the consequence section:

“There may also be a small fuel leak through the valve stem when the valve seat becomes detached, increasing the risk of fire.”

We initially were suspicious that the failure of the valve seat to stem would potentially result in an external fuel leak (see attached Youngdo failure mode, which was submitted to NHTSA as part of PE13, but this was subsequently determined to not be the case. A failure of the seal between the stem and the seat, which occurs when the seat separates from the stem (when stuck in closed position), is of no consequence to the external sealing of the valve. External sealing remains intact.

“The affected fuel container may also become over-pressurized if the stuck valve goes undetected for a period of time, or is not repaired in a timely manner, and the ambient temperature increases significantly.:

Filling a system with a valve that is stuck in the closed position (with the valve handle in the open position) will result in the valve becoming no longer stuck in the closed position because the valve seat will become pushed off of the valve outlet and gas will flow into and out of the tank. If the system is filled with the valve stuck in the closed position (with the valve handle also in the closed position) then gas will not flow into the cylinder. Therefore, there are no realistic scenarios where the tank, even over a period of time, will become over pressurized.

If you have any questions, please let me know.

Best Regards,

Yosh Coy  
Director of Product Support  
Agility Fuel Systems  
1815 Carnegie Ave  
Santa Ana, CA 92705-5527  
(909) 349-5877 Cell  
(949) 236-5523 Office

Contact us via our new Product Support Hotline for Technical Support, Field Service, Training and Aftermarket Parts at (949) 267-7745.

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**From:** [Kelly.Schuler@dot.gov](mailto:Kelly.Schuler@dot.gov) [<mailto:Kelly.Schuler@dot.gov>]  
**Sent:** Wednesday, July 02, 2014 9:06 AM  
**To:** Yoshio Coy  
**Subject:** acknowledgement letters for recall campaign 14E-025 & 14E-026

Hello Mr. Coy.

Please review the attached acknowledgement letters for accuracy. The recalls are scheduled to be released by tomorrow am, so please let me know right away if you find any errors.

Thank you for your patience.

**Kelly J. Schuler**  
**Safety Recall Specialist**  
**Recall Management Division**  
**Office of Defects Investigation**  
**Enforcement**  
**(W) 202-366-5227**