

Willard, Richard (NHTSA)

From: david.stanley@daimler.com
Sent: Friday, January 27, 2012 2:08 PM
To: Willard, Richard (NHTSA)
Subject: RE: Proposed CNG owner letter
Attachments: CNG Owner Letter.doc; Inspection Instructions (customer) - HDX CNG Tank Clearance.pdf

We are in the process of sending the attached letter out. This notice will include a slightly modified version of the inspection procedures - as attached.

Dave Stanley
Product Compliance and Regulatory Affairs Defect Investigations & Government Reporting
Daimler Trucks North America LLC
(503) 745-7926
david.stanley@daimler.com

(See attached file: CNG Owner Letter.doc)(See attached file: Inspection Instructions (customer) - HDX CNG Tank Clearance.pdf)

Richard.Willard@dot.gov

01/18/2012 07:53 AM

david.stanley@daimler.com

Bruce.York@dot.gov

To
cc
Subject
RE: Proposed CNG owner letter

Dave - it would be great if the letter referenced or included the September tank clearance inspection procedure. Other than that we are okay with it as written.

I'm attaching a copy of the inspection for reference.

Ric Willard
Safety Defects Engineer
Office of Defects Investigation
Medium & Heavy Duty Vehicle Division
NHTSA-DOT
1200 New Jersey Avenue, SE
Washington, DC 20590
202-366-6544
202-713-7888 BB

From: david.stanley@daimler.com [<mailto:david.stanley@daimler.com>]
Sent: Tuesday, January 17, 2012 10:42 AM
To: Willard, Richard (NHTSA)
Subject: Proposed CNG owner letter

Ric,

Here is TBB's proposed owner letter for the CNG tank clearance issue. If it doesn't meet your expectations, please mark it up with your suggestions, and I'll work with TBB to get it revised. Hopefully we can get this finished by the end of the week.

Thanks

Dave Stanley
Product Compliance and Regulatory Affairs Defect Investigations & Government Reporting
Daimler Trucks North America LLC
(503) 745-7926
david.stanley@daimler.com

If you are not the intended addressee, please inform us immediately that you have received this e-mail in error, and delete it. We thank you for your cooperation. [attachment "Inspection Instructions - HDX CNG Tank Clearance.pdf" deleted by David Stanley/164/INT/EEC] [attachment "CNG Owner Letter.doc" deleted by David Stanley/164/INT/EEC] If you are not the intended addressee, please inform us immediately that you have received this e-mail in error, and delete it. We thank you for your cooperation.

To our valued Customers:

A core value of Thomas Built Buses and Daimler Trucks North America is to manufacture safe products for our valued Customers. As a valued customer of our CNG (compressed natural gas) products, we want to remind you that maintaining a safe product includes routine and periodic inspections.

We want to take this opportunity to remind you of specific inspections unique to CNG vehicles operating in your fleet. All CNG vehicle fuel containers must meet the federal government's Federal Motor Vehicle Safety Standard (FMVSS) 304 (49 CFR 571.304), Compressed Natural Gas Fuel Container Integrity.

In addition to meeting the federal government's standard, periodic in-service Inspection requirements are required. Containers are to be visually inspected every 36 months, or at the time of any re-installation, for external damage and deterioration and free from contact with other chassis structures (i.e. tank cages and frame rails). We have enclosed a Thomas Built Bus visual inspection guide to help you. The visual inspection of tanks is to be performed with tanks full. The Compressed Gas Association (CGA) and tank manufacturer offer inspection guidelines to help you in completing the periodic inspection.

Thomas Built Buses wants to remind you that periodic inspections of CNG containers in accordance to the manufacturer's recommendations are fundamental to operating a safe vehicle. We have included an industry resource guide below that will help you find details regarding inspection of CNG containers.

Regards,

Thomas Built Buses

Industry Resource Guide	
Thomas Built Buses, Inc.	www.thomasbus.com/dealers/ (to locate a Thomas Dealer)
Natural Gas Vehicle Coalition	www.ngvc.org
Clean Vehicle Education Foundation	www.cleanvehicle.org/technology/cylinder.shtml
Clean Vehicle Education Foundation – CNG Vehicle Fuel Container Standards	http://www.cleanvehicle.org/technology/cylinder2.shtml
Dynetek Insustries LTD	www.dynetek.com



Because every mile matters.SM



INSPECTION INSTRUCTIONS

Subject: Saf-T-Liner HDX CNG Tank Clearance Inspection

Date: 1/19/2012

Page: 1 of 3

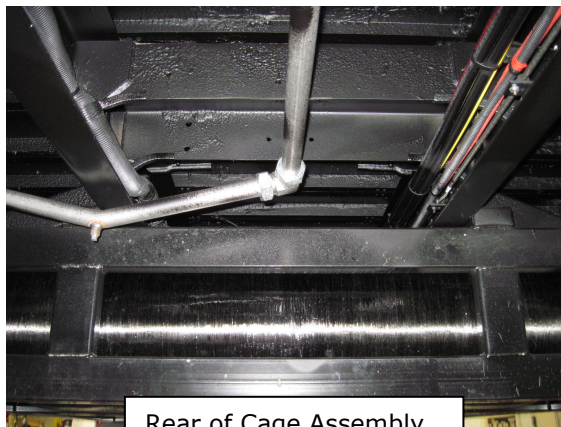
This document is intended to provide general guidance for inspecting the clearance above the Saf-T-Liner HDX CNG tanks. The tanks are located under the bus, mounted in cages that are suspended from the chassis frame rails. Varying by sales option, a Thomas Built bus can have two (2) to eight (8) CNG tanks suspended from the frame rails. The inspection is to check that there is no contact between the CNG tanks and the tank cage or bus frame rails above them.

Note: CNG Tanks must be filled to operating capacity for the clearance inspection.

1. Make sure the ignition is in the "Off" position. Chock the tires.
2. The following inspection was made from the front and/or rear of the CNG tank cage assemblies beneath the bus. The inspector was positioned between the frame rails.



Front of Cage Assembly



Rear of Cage Assembly

Note: The no-contact test gauge shown in the following steps was made from 1/32" thick banding material and painted red for visibility in pictures.

INSPECTION INSTRUCTIONS

4. From between the chassis frame rails, sweep the test gauge over each CNG tank and under the frame rail / tank cage. The gauge should move between the frame rail / tank cage and the CNG tank easily.

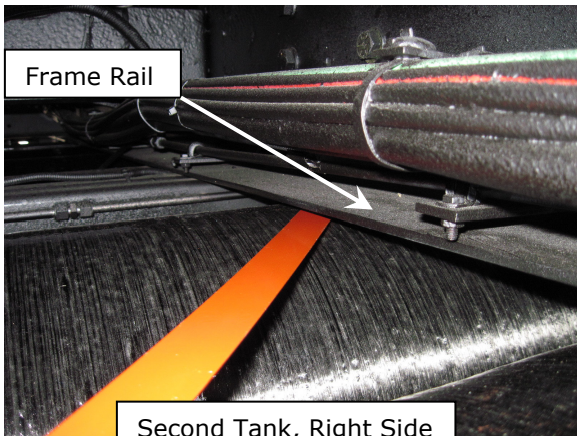


First Tank, Left Side
(Inside Frame Rails)

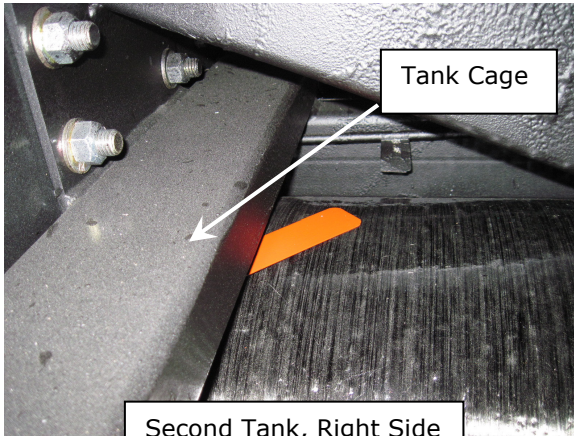


Second Tank, Left Side
(Inside Frame Rails)

5. While performing each sweep of the gauge, be sure the test gauge is extended past the CNG tank cage on the outside of the frame rail. This allows one sweep per tank end to confirm clearance of both frame rail and tank cage.

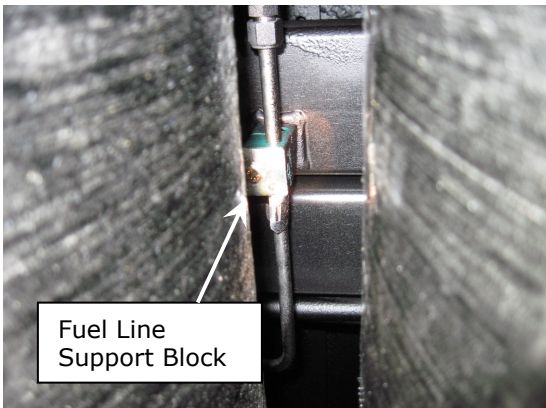


Second Tank, Right Side
(Inside Frame Rails)



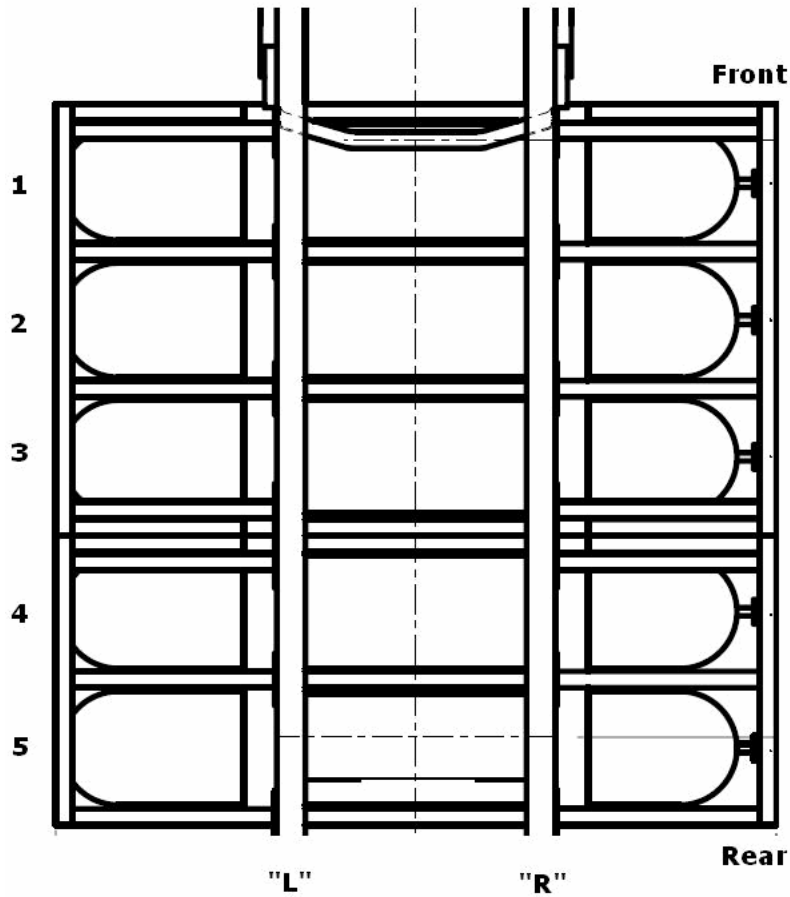
Second Tank, Right Side
(Outside Frame Rails)

Note: There are fuel line support blocks and unused fuel line support bosses on the under-side of the tank cage member shown above. If the test gauge strikes an object, confirm first that it is not a fuel line support block or unused boss in that location. These are located between CNG tanks, but may be an obstacle for the test gauge when sweeping from one tank to the next.



6. Proceed to test the clearance on each side of each CNG tank. If the test gauge fails to pass between the CNG Tank and the Frame Rail / Tank Cage (confirm gauge did not strike a surrounding object), this may be an indication of interference.

Example: 5 tank option shown.



7. When inspection is complete, remove the tire chocks.

8. Contact your local Thomas Built Buses dealer if you have questions or concerns.

INSPECTION INSTRUCTIONS