

Associate Administrator for Enforcement
National Highway Traffic Safety
Room 5326
400 Seventh Street S. W.
Washington, DC 20590

04V-411
(5 pages)

August 10, 2004

Subject: **PART 573--DEFECT AND NONCOMPLIANCE REPORT**
Structural Composites Industries Tank ALT823D

Orion is submitting information regarding a noncompliance of a component to FMVSS 304. The noncompliance relates to the bonfire testing of a Compressed Natural Gas (CNG) tank installed in certain Orion transit buses.

Orion has received notification from Structural Composites Industries, the supplier of the CNG tank, stating that during testing a noncompliance was discovered. There is no indication that this noncompliance is related to any field reports, accidents, injuries, or warranty claims. As a result, Orion's Part 573 Report references the Noncompliance Report submitted by Structural Composites Industries. Orion is not administrating a recall or completion reports for a recall. Structural Composites Industries are administrating all matters regarding this noncompliance.

I have enclosed our data recorded as outlined in the 49 CFR Part 573.6. Should you have any questions or wish to discuss this matter further, please do not hesitate to contact me.

Sincerely,

J. Labonte

Joe Labonte
Compliance and Safety Officer
Member of American Society of Safety Engineers
(905) 403-7832 ext. 3335

cc John Courson, Product Manager - NGV Fuel Tanks, (SCI) Structural Composites Industries

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Report

On May 19, 2004, Structural Composites Industries decided that a noncompliance with Federal Motor Vehicle Safety Standard No. 304 exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.

Date this report was prepared: August 10, 2004

Furnish the manufacturer's identification code for this recall (if applicable): N/A

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

Orion Bus Industries Inc.

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

Joe Labonte

Compliance and Safety Officer

Telephone Number: (905) 403-7832 ext. 3335 Fax No.: (905)403-8800

Name and Title of Person who prepared this report.

Joe Labonte

Compliance and Safety Officer

Signed: _____

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

Make(s): Orion Model Years Involved: 2002 - 2003 Model(s): VII CNG

Production Dates: Beginning: January 2002 Ending: June 2004

VIN Range: Beginning: TBD Ending: TBD

Vehicle Type: Bus Bodystyle: VII CNG

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Vehicle model Orion VII powered by CNG fuel.

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Widgets equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period.

100%

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

<u>Model</u>	<u>Year</u>	<u>Number of Vehicles Potentially Involved</u>
<u>VII CNG</u>	<u>2002 - 2004</u>	<u>252</u>

Total Number Potentially Affected by the Recall: 252

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 100%

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

All CNG powered vehicles manufactured having a tank with 15.3" diameter x 120" length (ALT823D).

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

The compressed natural gas fuel container's pressure relief devices fail to timely and fully activate during the FMVSS 304 bonfire test. As a result of these activation problems, the container ruptured during testing.

Describe the cause(s) of the defect or noncompliance condition.

The non-compliant condition of tank component (ALT823D) is believed to be a result of the pressure relief device location and/or the pressure relief device activation characteristics.

Describe the consequence(s) of the defect or noncompliance condition.

In the event of a vehicle fire with the fuel system roof enclosure removed or opened, the fuel container's pressure relief devices may not activate as they are designed to do and the fuel container could rupture and explode. Such an explosion, if it were to occur, could cause serious injuries or death to occupants of the bus or to persons outside the bus.

Identify any warning which can (a) precede or (b) occur.

Removal or opening of the fuel system roof enclosure can delay activation of the pressure relief devices in the event of a fire that engulfs the container.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

Structural Composites Industries

325 Enterprise Place

Pomona, CA 91768

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

John Coursen

Product Manager - NGV Fuel Tanks

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

Orion became aware of the noncompliance by way of a letter to Orion dated June 8th, 2004

See Structural Composite Industries Part 573 Noncompliance report.

V. Identify the Remedy

8. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

See Structural Composite Industries Part 573 Noncompliance report.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

See Structural Composite Industries Part 573 Noncompliance report.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

See Structural Composite Industries Part 573 Noncompliance report.
