5741 Cornelison Road
6400 Building A
Chattanooga, TN 37411-5661

January 8, 2009

Via FedEx Priority Overnight

09V-029
(8 pages)

Associate Administrator for Enforcement
Attention: Kelly Shuler
National Highway Traffic Safety Administration
400 7th Street, SW
Washington, DC 20590

Re: Heil Petro Intra-Lite Frame Failures
Manufacturer's Recall ID Code: EWR282

To Whom It May Concern:

Please be advised that Heil Trailer International has determined there is an inadequacy in the suspension hanger bracing of the petro intra-lite frame, which could potentially result in cracking at the rear of the suspension frame. Such a crack, if left unattended, could progress to an abrupt failure of the hanger, potentially causing property damage and injury.

To date, Heil is aware of only 7 intra-lite frame failures. However, there have been no injuries or property damage experienced. In an effort to provide excellent service to our customers and to comply with Federal regulations, Heil decided that a voluntary safety recall is in order to ensure the upgrade of the suspension hanger bracing of the petro trailers with intra-lite frames. As a result, all affected customers will be notified of this recall and the need to have their units upgraded. The upgrade may be performed at no charge to the owner of the unit(s), at any Heil-approved repair shop.

There are a total of 294 units that will be affected by this field campaign.

If you have any further questions regarding this matter, I would appreciate your call.

Respectfully submitted,

Lynn Moses
Director of Customer Service

cc: Jim Sanko
Robert Lane
Bill Nehrkorn

Safety Defect and Noncompliance Report Guide for Vehicles

PART 573 Defect and Noncompliance Responsibility and Reports[1]

On January 8 , 2009, Heil Trailer International [MFR] decided that a defect which relates to motor vehicle safety 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 Responsibility and Reports.

Date this report was prepared: January 8, 2009

Furnish the manufacturer's identification code for this recall (if applicable): EWR282

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.

Heil Trailer International

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

Leslie Greene Customer Service Administrative Assistant

Lynn Moses Director of Customer Service

Telephone Number: 423-400-6913 ext 596 **Fax No.:** 423-744-8070

Name and Title of Person who prepared this report.

Leslie Greene

Customer Service Administrative Assistant

Signed:

[1] Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Responsibility and Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. George Person at (202) 366-5210, by FAX at (202) 366-7882, or by E-Mail to RMD.ODI@dot.gov.

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): Heil **Model Years Involved**: 2005-2008 **Model(s)**: Heil petro

Production Dates: **Beginning**: 2005 **Ending**: 2008

VIN Range: **Beginning**: _____ **Ending**: _____

Vehicle Type: Petro **Bodystyle**: Aluminum Tanker

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:
Recalled vehicles will have both intra-lite frame and model AANT suspension with single-bolt cross bracing.

_____

_____

Make(s): _____ **Model Years Involved**: _____ **Model(s)**: _____

Production Dates: **Beginning**: _____ **Ending**: _____

VIN Range: **Beginning**: _____ **Ending**: _____

Vehicle Type: _____ **Bodystyle**: _____

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

_____

_____

Make(s): _____ **Model Years Involved**: _____ **Model(s)**: _____

Production Dates: **Beginning**: _____ **Ending**: _____

VIN Range: **Beginning**: _____ **Ending**: _____

Vehicle Type: _____ **Bodystyle**: _____

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

_____

_____

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 Vehicles equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Vehicles of all Vehicles 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.

Model	Year	Number of Vehicles Potentially Involved
Heil Petro	2005-2008	294

Total Number Potentially Affected by the Recall: 294

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:

From Heil Trailer International engineering records. The frame in question was released in 2005 using a suspension that required a welded cross channel. There are no failures with this design combination and none are anticipated since the welded channel provides sufficient bracing to withstand the side loading experienced in the field. The failures were isolated to the frame using a suspension bracing consisting of a formed angle attached with one bolt to each hanger. The beginning date was determined using information from the suspension vendor specifying the release date of the design change specific to this failure. The end date was determined by the Engineering Change Order released by HTI engineering documenting the new design.

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.
Cracking around hanger on suspension frame

Describe the cause(s) of the defect or noncompliance condition.
Side movement caused by lateral loading. Bolted angle ILO welded channel not providing structural support to resist movement. Attaching air tank bracket to frame rail flange which provides a load point in weak area of frame. Customers not maintaining and inspecting units as needed. Proper maintenance and inspection of equipment can prevent failures by revealing the beginning of the cracking.

Describe the consequence(s) of the defect or noncompliance condition.
Cracking of frame rails around the hanger attachment area.

Identify any warning which can (a) precede or (b) occur.
Visual observation for cracks of frame rails around the front hanger attachment area.

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

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

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.

On Feb.21, 2008 first warranty request for frame crack, serial #71633 pictures were included. Between Feb.21, 2008 and Nov.21, 2008 trips made to inspect units. A field fix was generated for the warranty request. Six more units would be determined to need field fix for frame crack, but all units were being operated in the northeastern part of the country. Nov.21, 2008 Serial #73368 request warranty for frame crack. Issues are no longer confined to northeast. Nov.30, 2008 Engineering begins investigation into frame cracks. Determine potential number of units involved. Dec.30, 2008 Meetings with engineering, to discuss failure and proper repair procedures for the field as well as in production. Jan.6, 2009 Final repair drawings, letters and trailer information completed and discussed with group. Jan.8, 2009 Contacted NHTSA recall representative Kelly Shuler regarding potential consumer safety recall.

V. Identify the Remedy

8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

The old cross bracing had one formed angle cross brace attached by one bolt to each suspension hanger. The remedy will have an updated tower cross bracing that will include two diagonal cross braces attached by one bolt each to the top of the suspension hanger and attached to a formed channel cross brace that is attached by one bolt to each suspension hanger. In addition we moved the air tank attachment off the lower flange of the frame.

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

For the recall component/assembly, the current brace between suspension towers will be replaced with Hendrickson "K" bracing. Air tank will be attached to outside web of frame rail.

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

New bracing will include two diagonal cross-braces attached by one bolt each to the top of the suspension hanger and a formed channel cross brace that is attached by one bolt to each suspension hanger. The existing design only includes a formed angle cross brace attached by one bolt to each suspension hanger. Additionally, in the remedy the front air tank bracket is attached to the long side of the frame rail while it is attached to the small flange in the recalled design.

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.

For the remedy component/assembly, the current brace between suspension towers will be replaced with Hendrickson "K" bracing. Air tank will be attached to outside web of frame rail. Welding procedures will be revised to eliminate welding across lower flange. Increase in thickness of hat brace crossmember, and matching of drill mount holes for hanger casting.

VI. Identify the Recall Schedule

10. Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

The 577 letter is anticipated to be mailed to each of the noncompliant customers within 5 days of receiving a formal recall number from ODI. The only foreseeable problem with implementing recall is that we cannot force these customers to ground their units long enough to make the repair.

VII. Furnish Recall Communications

11. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. ***A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) or by E-Mail to RMD.ODI@dot.gov for review prior to mailing.***

Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.