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October 2, 2009

Mr. George Person
National Highway Traffic Safety Administration (NHTSA)
Office of Defects Investigation, NVS-211
1200 New Jersey Avenue S.E.
Washington, DC 20590

ELGIN
VACTOR
GUZZLER
JETSTREAM

Subject: Vactor Manufacturing Hose Fitting Recall

Dear Mr. Person,

We are submitting by electronic mail the PART 573 Defect and Noncompliance Report for the Vactor Manufacturing 2100 and Jetter Hose Fittings. Included with the 573 report are copies of our distributor notification, customer notification, and distributor repair bulletin.

If you should require any additional information regarding this submission, please feel free to contact me at 847-622-7069.

Sincerely,



William Byrnes
Vice President, Service and Parts

Enclosures

Part 573 Defect and Noncompliance Report
Distributor Notification
Customer Notification
Distributor Service Bulletin

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OFFICE OF DEFECTS
INVESTIGATION



Safety Defect and Noncompliance Report Guide for Vehicles PART 573 Defect and Noncompliance Report³

On September 25th, 2009, Vactor Manufacturing decided that a defect which relates to motor vehicles 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: September 29, 2009

Furnish the manufacturer's Identification code for this recall (if applicable):_____

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.

Vactor Manufacturing
1621 S. Illinois Street
Streator, IL, 61364

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

William Byrnes
Vice President of Service Operations

Telephone Number: 847-622-7069 Fax No.: 847-622-7077

Name and Title of Person who prepared this report:

William Byrnes
Director of Service Operations
Federal Signal, Environmental Solutions Group

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): Vactor Model Years Involved: 2004 Model (s): 2100 sewer cleaner

Production Dates: Beginning: November 2004 Ending: November 2004

VIN Range: Beginning: 04-11V-9158 Ending: 04-11V-9158

Vehicle Type: Sewer Cleaner Bodystyle: _____

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

This specific serial numbered sewer cleaner had known defective parts installed as an aftermarket part in the field. Only this serial number is affected for this model year.

Make(s): Vactor Model Years Involved: 2007 Model(s): 2100 Sewer Cleaner

Production Dates: Beginning: September 2007 Ending: September 2007

VIN Range: Beginning: 07-09V-10696 Ending: 07-09V-10696

Vehicle Type: Sewer Cleaner Bodystyle: _____

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

This specific serial numbered sewer cleaner had known defective parts installed as an aftermarket part in the field. Only this serial number is affected for this model year.

Make(s): Vactor Model Years Involved: 2009 Model(s): 2100 sewer cleaners and Jetter series trucks

Production Dates: Beginning: May 2009 Ending: September 25, 2009

VIN Range: Beginning: 09-05T-1602 Ending: 09-10V-11905

Vehicle Type: Sewer cleaners Bodystyle: _____

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

None

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 for 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.

Model	Year	Number of Vehicles Potentially Involved
Vactor 2100	2004	1
Vactor 2100	2007	1
Vactor 2100	2009	98
Vactor Jetter	2009	15

Total Number Potentially Affected by the Recall: 115 total

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:

Vactor Manufacturing was informed by Eaton Aeroquip, LLC, a wholly owned subsidiary of Eaton Corporation on August 31, 2009 of a defect in manufacturing in fittings used on complete hose assemblies, individual hose fittings, and hose menders that are used in 2100 Sewer Cleaner and Jetter truck production. Eaton Aeroquip, LLC determined the defective parts were manufactured between April 1, 2009 and July 24, 2009. There is no visible way to identify a defective part from a known good part. Because of this Vactor Manufacturing determined that all 2100 Sewer Cleaners manufactured between April 1, 2009 and September 25²⁰⁰⁹ may have been shipped with defective hose assemblies, hose fittings, or hose menders. Vactor will recall all trucks manufactured in this date range. Vactor has also distributed these same components for Eaton Aeroquip, LLC as aftermarket parts. These parts could potentially be used on other equipment not manufactured by Vactor. Vactor manufacturing will be placing advertisements in local

trade and national magazines (e.g. Cleaner Magazine, Pumper Magazine, and Municipal Sewer and Water) to make every attempt to notify any and all customers that may have purchased these parts. Vactor will also notify all distributors with a Service Bulletin instructing them to return all inventories of any hose fitting or hose mender direct to Eaton Aeroquip, LLC. Eaton Aeroquip, LLC will provide customers with new fittings and hose menders.

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.

A complete hose assembly contains two individual hose fittings. Hose menders are used to join to lengths of hose together. Hose menders are not installed in production. They are only installed in the field to repair sewer cleaner hose. Both of these components could crack and fail upon installation on to a hose or while in use by the operator of the equipment.

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

The hose assemblies, hose fittings and hose menders are manufactured by Eaton Aeroquip, LLC. The raw material used to manufacture these components requires annealing. The annealing process softens the metal to a state of hardness that is appropriate for use in sewer cleaning applications. Eaton Aeroquip, LLC identified that the annealing process was not used on the raw material between April 1, 2009 and July 24, 2009. Because the annealing process was not performed, the metal material is in a harder and more brittle state. This causes the final components to be more susceptible to cracking upon installation or during use.

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

Failure of a hose fitting or hose mender during operation of Sewer Cleaner or Jetter could cause the component to separate from the sewer cleaner hose. If the operator is using the 2100 Sewer Cleaner or Jetter truck in a high operating range and is near a hose fitting or mender during a failure, there is the possibility for injury or property damage.

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

Daily maintenance inspection of sewer cleaner hose, hose ends, and hose fittings may reveal cracks. Visible cracks in the components could be evident before the failure.

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

Eaton Corporation – Hydraulics Business

14615 Lone Oak Road

Eden Prairie, MN 55344

952-937-7168

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

Brian Wadnal

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.

Eaton Aeroquip, LLP notified Vactor Manufacturing of defective hose fittings and hose menders on August 31, 2009. Upon notification Vactor Manufacturing checked warranty data and customer contact records to verify if any failures have occurred in the field. Vactor also verified if any of the suspect components were used on production trucks.

There have been two known documented failures of hose fittings. On August 3rd, Vactor dealer CN Wood filed a warranty claim for a hose fitting that separated from a hose while in a sewer line on serial number 09-05T-1606. On August 11th, Vactor dealer CN Wood filed a separate warranty claim for a hose fitting that was used on serial number 04-11V-9158. The hose fitting blew off the hose while in a sewer line. No injury or property damage has occurred as a result of the defective parts.

Upon receipt of Aeroquip's bulletin, Vactor requested Eaton Aeroquip, LLC conducted additional testing and provide the root cause analysis of the failure mode. Eaton Aeroquip, LLC determined the root cause of the failure to be the lack of annealing to the raw material used to manufacture the components. The lack of annealing leaves the metal in a harder and more brittle state. This makes the material more susceptible to cracking. Upon determination of the root cause, Vactor manufacturing determined a safety recall was necessary.

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.

N/A

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.

Eaton Aeroquip, LLC has quarantined all known defective parts in their manufacturing facility. Eaton Aeroquip, LLC has made changes to their manufacturing process that no longer requires raw material that requires annealing. Eaton Aeroquip, LLC will be ensuring consistency of material used. To remedy the units affected in the field, Vactor and Eaton Aeroquip, LLC will replace all suspect defective parts with known good parts that are manufactured to the correct specification. Vactor will issue Service Bulletin "SB-238" detailing the remedy for production units. Two hose fittings on each hose assembly that was shipped with a production Sewer Cleaner or Jetter truck will be replaced by the Vactor distributor with new hose fittings from Eaton Aeroquip, LLC. Vactor Service Bulletin "SB-238" also informs Vactor distributors to contact customers who have purchased these components as service parts. Vactor distributors will return their entire inventory of hose fittings and hose menders in their inventory to Eaton Aeroquip, LLC and replaced with new parts from Eaton Aeroquip, LLC. Vactor distributors will be provided a form to send to customers instructing them to return all hose fittings and hose menders purchased between April 1, 2009 and September 25, 2009. Any labor incurred by the customer will be covered by Vactor manufacturing and Aeroquip.

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

There are no distinguishing characteristics between suspect defective parts and the remedy. The manufacturing process of the components does not lend itself to marking the parts to provide identification. Therefore, the entire production range of trucks where suspect parts were used is being recalled, and the entire dealer inventory of parts returned to Aeroquip.

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.

The production remedy is identical to the recall remedy. Production stock at Vactor manufacturing and parts distribution has been quarantined and returned to Eaton Aeroquip, LLC and replaced with known good parts. Production was corrected with serial number SB-238.

VI. Identify the Recall Schedule

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.

Initial mailing to Vactor Manufacturing Dealers: October 12, 2009

Notification to customers: October 14 – 16, 2009

VII. Furnish Recall Communications

9. 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) for review prior to mailing.*

Note that these documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.