

**SERVICE INFORMATION****Bulletin No.:** SI-002**Date:** February 20, 2015**Subject:** Cylinder Inspection Intervals**Models:** All Quantum 3,600 psi Type 4 CNG Cylinders**Background:**

Federal Motor Vehicle Safety Standard ("FMVSS") 304 **requires** specific information to be displayed on every certified CNG cylinder including the following statement:

"This container **should** be visually inspected after a motor vehicle accident or fire and at least every 36 months or 36,000 miles, whichever comes first, for damage and deterioration."

**Note:** Notwithstanding anything contained in this Service Information, the labels affixed to your CNG cylinders CANNOT be removed or altered under any circumstances.

For years, CNG cylinder manufacturers and CNG system suppliers have interpreted NHTSA's cylinder inspection recommendation in FMVSS 304 as a mandate rather than a recommendation. With the recent growth of the CNG industry into the commercial truck market where the vehicles experience faster mileage accumulation, NHTSA's recommended inspection is onerous and not practicable. As a result, NHTSA's recommended inspection interval has been largely ignored in commercial trucking applications.

The Federal Motor Carrier Safety Administration ("FMCSA"), the agency within the Department of Transportation that is responsible for, among other things, establishing safety related regulations for large trucks, has not yet adopted out of service inspection criteria specifically for CNG systems, but has begun a process that could lead to such regulations being issued in the future. In March 2013, the FMCSA received a comprehensive report titled "Natural Gas Systems: Suggested Changes to Truck and Motorcoach Regulations and Inspection Procedures" in which the author recommended that the FMCSA adopt a regulation that required the entire CNG fuel system (not just the cylinders) be visually inspected at least every 36 months. The author's recommendation of a visual inspection at least every 36 months was based on the author's review of existing codes, standards, best practices, and direct input from 21 market participants.

The 36 month recommendation contained the above referenced report is consistent with the standards adopted by the American National Standards Institute ("ANSI")/Canadian Standards Association ("CSA") NGV2 which state:

"Each container shall be visually inspected at least every 36 months, or at the time of any re-installation, for external damage and deterioration."

**Note:** Some states have adopted their own rules and regulations related to CNG fuel cylinder inspections which could be more stringent than the inspection interval recommended in FMVSS 304 and this Service Information. The owner/operator is responsible for ensuring compliance with each state's rules and regulations where the vehicle will be operated.

**SERVICE INFORMATION****Recommended Inspection Interval for Quantum Type 4 CNG Cylinders:****Light Duty Trucks and Passenger Vehicles**

Quantum Technologies maintains that the FMVSS recommended inspection interval of 3 years or 36,000 miles, which ever occurs first, is appropriate for passenger vehicle applications.

**Commercial Trucks**

We recommend a detailed visual inspection interval of at least 1 years or 100,000 miles, whichever occurs first. This inspection should be performed by a qualified container inspector in accordance with the procedures provided in Compressed Gas Association (CGA) pamphlet C-6.4. Where vehicles are operated in environments that may expose the cylinder to unusual hazards, the fleet operator must evaluate the inspection interval and use an interval that is appropriate to ensure safe continued use of the product.

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