

From: [Special Permits \(PHMSA\)](#)
To: [Nti, Jephthah \(PHMSA\)](#)
Cc: [Special Permits \(PHMSA\)](#)
Subject: FW: Question regarding SP11911
Date: Thursday, November 13, 2025 2:03:32 PM
Attachments: [image002.png](#)
[image003.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image011.png](#)

Good afternoon Jeph,

Can you please log this email chain as a GC – interpretation?

V/r,

Casey Chambers

Transportation Specialist, General Approvals and Permits Branch
Office of Hazardous Materials Safety
US Department of Transportation

Pipeline and Hazardous Materials Safety Administration

1200 New Jersey Ave., Washington D.C., 20590
Mobile: 202-941-8195

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From: Nicks, Michael (PHMSA) <michael.nicks@dot.gov>
Sent: Thursday, November 13, 2025 11:36 AM
To: Special Permits (PHMSA) <specialpermits@dot.gov>
Subject: FW: Question regarding SP11911

To be on the safe side, please log this email chain in as an interpretation request. Thank you.

Michael Nicks

Transportation Specialist, Office of Hazardous Materials Safety

US Department of Transportation

Pipeline and Hazardous Materials Safety Administration

1200 New Jersey Ave., SE, Washington D.C. 20590
Telephone Number: 304-989-6507

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From: Michael Larocco <MLarocco@transferflow.com>

Sent: Thursday, November 13, 2025 11:34 AM

To: Nicks, Michael (PHMSA) <michael.nicks@dot.gov>

Cc: Ben Winter <BWinter@transferflow.com>; Teri Barry <tbarry@transferflow.com>; Chase Yamate <cyamate@transferflow.com>

Subject: RE: Question regarding SP11911

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Hey Michael,

Glad you're back in the office. Hope that the shutdown didn't negatively impact you too much. I assume it can be rough being out for that long.

Regarding the capacity question, when it refers to tank size, is it referring to the liquid capacity or the total tank volume? If this needs to be clarified through interpretation, then I would like to initiate that process. Please let me know if there is anything I need to do to get started.

Michael Larocco

Director of Engineering

P: 530-893-5209 x 250 | Fax: 530-893-0204



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From: Nicks, Michael (PHMSA) <michael.nicks@dot.gov>

Sent: Thursday, November 13, 2025 6:59 AM

To: Michael Larocco <MLarocco@transferflow.com>

Subject: RE: Question regarding SP11911

Hi Michael,

I apologize for the belated response. Paragraph 7.a.(1) states: “The size of the tank must not exceed 119 gallons”. The tank size may not exceed 119 gallons. If you need more clarity, we can process your email as an interpretation. Please let me know if you would like me to forward your email as an interpretation request.

Regards,

Michael Nicks

Transportation Specialist, Office of Hazardous Materials Safety

US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Ave., SE, Washington D.C. 20590
Telephone Number: 304-989-6507

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From: Michael Larocco <MLarocco@transferflow.com>
Sent: Thursday, October 9, 2025 3:12 PM
To: Nicks, Michael (PHMSA) <michael.nicks@dot.gov>
Subject: Question regarding SP11911

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Michael,

I have a question regarding the 119 Gallon package size limit and what that means. Our special permit states the authorized package must be less than 119 Gallons is that referring to total container volume or just liquid volume? All of our tanks have either 5 or 10% vapor space in the tank to allow for fuel expansion and contraction due to temperature changes. Do we need to include the vapor space capacity in our 119-gallon limit?

Thank you

Michael Larocco

Director of Engineering
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