

From: [Special Permits \(PHMSA\)](#)
To: [Gary Howard](#); [Special Permits \(PHMSA\)](#)
Cc: [Madeline Zollo](#)
Subject: RE: Special Permit – Name/Entity Conversion Question
Date: Wednesday, January 28, 2026 3:07:50 PM
Attachments: [image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

Good afternoon Mr. Howard,

PHMSA has received your email. It will be processed as an interpretation request and there may be a delay in response for agency review.

Best regards,

Casey Chambers

Transportation Specialist, Special Permits Program
Office of Hazardous Materials Safety
US Department of Transportation

Pipeline and Hazardous Materials Safety Administration

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From: Gary Howard <ghoward@complianceservices.com>
Sent: Tuesday, January 27, 2026 9:58 AM
To: Special Permits (PHMSA) <specialpermits@dot.gov>
Cc: Madeline Zollo <mzollo@complianceservices.com>
Subject: Special Permit – Name/Entity Conversion Question

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Good morning,

I am requesting general guidance on DOT Hazardous Materials Special Permits.

Can you please confirm that when a permit holder undergoes a statutory conversion from a corporation to an LLC under state law, with no change to the legal entity or EIN, PHMSA treats this as a name/entity update that can be handled through a permit modification under 49 CFR § 107.121, rather than requiring a new Special Permit application?

This question is general in nature and not tied to any specific permit.

Thank you for your assistance.

Thank you,

Gary

Gary Howard
Program Manager, Transportation Services

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“There is no such thing as a free lunch.” - Annie Leonard

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