

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#)
Cc: [Hazmat Interps](#); [Baker, Yul \(PHMSA\)](#)
Subject: FW: **Internal** Request for formal letter of interpretation
Date: Friday, April 25, 2025 15:40:01

Hi Alice,

Please see the below interpretation request.

Let me know if you need anything.

-Breanna

From: Cecilia Cortese <cecilia.cortese@basf.com>
Sent: Friday, April 25, 2025 2:40 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: **Internal** Request for formal letter of interpretation

No suele recibir correo electrónico de cecilia.cortese@basf.com. [Por qué es esto importante](#)

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I am submitting this letter to request a formal interpretation of Packaging instruction; **§ 173.243 - Bulk packaging for certain high hazard liquids and dual hazard materials which pose a moderate hazard.**

Specifically regarding 49 CFR 173.243(a) where it claims, "Except as otherwise provided in this section, DOT Specification 111 tank cars and DOT Specification 111 tank cars built to the CPC-1232 industry standard are no longer authorized to transport Class 3 (flammable liquids) in Packing Group I".

Does this statement apply to materials with a subsidiary class 3, in a PGI? Or is it exclusive to Primary hazard class 3?

For example:

Proper Shipping Name (PSN)

Amine, liquid, corrosive, flammable, n.o.s. or Polyamines, liquid, corrosive, flammable, n.o.s.

Hazard Class

8

UN/NA Number

UN2734

Packing Group

I

Label Codes

8, 3

Additionally, will the same approach be adopted for the May 2029 phaseout including Flammable liquids in Packaging Group II and III?

Best Regards, Mit freundlichen Grüß, Saludos y gracias.

Cecilia Cortese

Dangerous Goods & Transport Safety Specialist – Product Safety GBI/US-T Montevideo Hub

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