

From: [INFOCNTR \(PHMSA\)](#)
To: [Baker, Yul \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Interpretation of NA3082 international use
Date: Thursday, October 30, 2025 13:23:36
Attachments: [image001.png](#)

Hi Yul,

Please see the below interpretation request.

Let us know if you need anything,

-Breanna

From: Pablo Calabrese <pablo.calabrese@basf.com>
Sent: Wednesday, October 29, 2025 4:07 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Cc: Cecilia Cortese <cecilia.cortese@basf.com>
Subject: Interpretation of NA3082 international use

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Dear Team,

We would like to request your interpretation on the following scenario:

If we have a material that meets the requirements to be considered a hazardous substance under **49 CFR 171.8 “Hazardous substance”**, it would qualify for classification as **NA3082, Other regulated substances, liquid, n.o.s.** for transportation within U.S. territory.
When this material is shipped from the U.S. to a neighboring country, considering that **49 CFR 172.101(b) (3)** states that the letter “D” identifies proper shipping names for domestic transportation and that an alternate proper shipping name **may** be selected when either domestic or international transportation is involved, is there any technical or regulatory reason that would prohibit the use of the **NA3082** designation solely because the shipment is international?
Therefore, is it correct to require the use of **UN3082** as the proper shipping name for this shipment?

Please note that in the destination country, the material is not classified as dangerous goods, and the shipping papers correctly reflects **NA3082** for USDOT and “non-regulated” under the destination country’s regulations.

Thank you for your guidance on this matter.

Best Regards, Mit freundlichen Grüßen, Saludos Cordiales
Pablo Calabrese
Dangerous Goods & Transport Safety, EHS (GBI/US-T/SSR)

Email: pablo.calabrese@basf.com

Postal Address: BASF Services Americas S.R.L., Dr Luis Bonavita 1266, 11300 Montevideo, Uruguay



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