



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

June 4, 2026

Mr. Pablo Calabrese
BASF Services Americas S.R.L.
Dr. Luis Bonavita 1266
11300 Montevideo, Uruguay

Reference No. 25-0140

Dear Mr. Calabrese:

This is in response to your October 29, 2025 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the use of proper shipping names intended for domestic use. Specifically, you ask whether there is a prohibition under the HMR or international standards on the use of the proper shipping name “NA3082, Other regulated substances, liquid, n.o.s.” when a shipment originates from the United States and is intended for international transport. In addition, you state that the material is not regulated for transportation by the destination country.

When offered for transportation under the HMR, the answer is no, there is no prohibition against the use of an NA description for an international shipment. In accordance with § 172.101(e), identification numbers prefixed with “NA” are domestic descriptions not recognized in international standards, such as the International Maritime Organization (IMO)’s International Maritime Dangerous Goods (IMDG) Code or International Civil Aviation Organization (ICAO) Technical Instructions. Therefore, carriers accepting shipments transported under those international standards may require the use of the “UN3082” entry. As you stated in your letter, § 172.101 Hazardous Materials Table (HMT) entries with the letter “D” in Column (1) may be inappropriate for international transportation under the provisions of international regulations (e.g., IMO, ICAO). Section 172.101(b)(3) authorizes an alternate proper shipping name when either domestic or international transportation is involved.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Arthur Pollack".

Arthur Pollack
Acting Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

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

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

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

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



We create chemistry

Todas las informaciones contenidas en este e-mail, confidenciales o no, tienen finalidad específica y su propiedad es protegida por ley. Si usted no es el destinatario pretendido de este mensaje, solicitamos que informe inmediatamente a su remitente y luego borre este e-mail. Cualquier divulgación, copia, distribución, almacenamiento y/o alguna otra acción tomada con base en esas informaciones están estrictamente prohibidas. Agradecemos su cooperación.

All information contained in this e-mail, confidential or not, has specific purposes and its property is protected by law. If you are not this message's intended recipient, we ask you to promptly inform the sender, deleting this message immediately. Any disclosure, copying, distribution, storage and/or any other action taken in connection to such information is strictly prohibited. Thank you for your cooperation.