

**Methyl Bromide Critical Use Exemption Process**  
**2007 Methyl Bromine Usage Numerical Index (BUNI)**

Date: **1/28/2005**  
 Sector: **FOREST SEEDLINGS**

Average Hectares in the US:  
 % of Average Hectares Requested:

**51,506**  
**2%**

2007 Amount of Request				2001 & 2002 Average Use*			Quarantine and Pre-Ship <sup>1</sup>	Regional Hectares**		Research Amount (kgs)
REGION	Kilograms (kgs)	Hectares (ha)	Use Rate (kg/ha)	Kilograms (kgs)	Hectares (ha)	Use Rate (kg/ha)		2001 & 2002 Average	% of Request	
Southern Forest Nursery Mgmt Coop.	246,032	656	375	246,032	656	375	50%	Not Available	0	
International Paper	26,380	127	208	36,759	108	341	16%			
Illinois Department of Natural Resources	4,264	16	263	3,822	15	263	50%			
Weyerhaeuser (SE)	17,962	53	336	22,970	63	367	38%			
Weyerhaeuser (NW)	16,935	76	224	15,886	67	236	39%			
NE Forest & Conservation Nursery Assoc.	31,922	93	343	26,558	76	349	50%			
Michigan Seedling Association	6,908	26	267	9,417	35	269	0%			
Michigan Herbaceous Perennials	4,763	12	392	50,723	129	392	0%			
<b>TOTAL OR AVERAGE</b>	<b>355,166</b>	<b>1,059</b>	<b>335</b>	<b>412,167</b>	<b>1,148</b>	<b>359</b>	<b>30%</b>			

2007 Nomination Options	Subtractions from Requested Amounts (kgs)					Combined Impacts Adjustment (kgs)		MOST LIKELY IMPACT VALUE		
	2007 Request	(-) Double Counting	(-) Growth	(-) Use Rate Adjustment	(-) QPS	HIGH	LOW	Kilograms (kgs)	Hectares (ha)	Use Rate (kg/ha)
Southern Forest Nursery Mgmt Coop.	246,032	67,693	-	12,052	83,143	83,143	83,143	83,143	238	350
International Paper	26,380	-	-	-	4,101	22,279	22,279	22,279	107	208
Illinois Department of Natural Resources	4,264	-	442	-	1,911	1,911	1,911	1,911	7	263
Weyerhaeuser (SE)	17,962	-	-	-	6,736	11,226	11,226	11,226	33	336
Weyerhaeuser (NW)	16,935	-	1,049	-	6,250	9,637	9,637	9,637	43	224
NE Forest & Conservation Nursery Assoc.	31,922	-	5,363	-	13,279	13,279	13,279	13,279	39	343
Michigan Seedling Association	6,908	-	-	-	-	6,908	6,908	6,908	26	267
Michigan Herbaceous Perennials	4,763	-	-	517	-	4,246	4,246	4,246	12	350
<b>Nomination Amount</b>	<b>355,166</b>	<b>287,473</b>	<b>280,618</b>	<b>268,049</b>	<b>152,629</b>	<b>152,629</b>	<b>152,629</b>	<b>152,629</b>	<b>506</b>	<b>302</b>
<b>% Reduction from Initial Request</b>	<b>0%</b>	<b>19%</b>	<b>21%</b>	<b>25%</b>	<b>57%</b>	<b>57%</b>	<b>57%</b>	<b>57%</b>	<b>52%</b>	<b>10%</b>

Adjustments to Requested Amounts	Use Rate (kg/ha)		KARST Topography (%)		100 ft Buffer Zones (%)		Key Pest Distribution (%)		Regulatory Issues (%)		Unsuitable Terrain (%)		Cold Soil Temp (%)		Combined Impacts (%)	
	Low	EPA	High	Low	High	Low	High	Low	High	Low	High	Low	High	Low	HIGH	LOW
Southern Forest Nursery Mgmt Coop.	375	350	0	0	0	0	100	100	0	0	0	0	0	0	100%	100%
International Paper	208	208	0	0	0	0	100	100	0	0	0	0	0	0	100%	100%
Illinois Department of Natural Resources	263	263	0	0	0	0	100	100	0	0	0	0	0	0	100%	100%
Weyerhaeuser (SE)	336	336	0	0	0	0	100	100	0	0	0	0	0	0	100%	100%
Weyerhaeuser (NW)	224	224	0	0	0	0	100	100	0	0	0	0	0	0	100%	100%
NE Forest & Conservation Nursery Assoc.	343	343	0	0	0	0	100	100	0	0	0	0	0	0	100%	100%
Michigan Seedling Association	267	267	0	0	0	0	100	100	0	0	0	0	0	0	100%	100%
Michigan Herbaceous Perennials	392	350	0	0	0	0	100	100	0	0	0	0	0	0	100%	100%

Other Considerations	Dichotomous Variables (Y/N)						Other Issues			Economic Analysis				Quality/ Time/ Market Window/ Yield Loss (%)	Marginal Strategy
	Srip Bed Treatment	Currently Use Alternatives?	Research / Transition Plans	Tarps / Deep Injection Used	Pest-free Cert. Requirement	Change from Prior CUE Request (+/-)	Verified Historic MB Use / State	Frequency of Treatment (# of Times per Year)	Loss per Hectare (US\$/ha)	Loss per Kilogram of MB (US\$/kg)	Loss as a % of Gross Revenue	Loss as a % of Net Revenue			
Southern Forest Nursery Mgmt Coop.	No	Yes	Yes	Tarp	Yes	0	No	1x/4years	\$ 3,449	\$ 37	10%	22%	0	metam/Pic or 1,3-D/Pic	
International Paper	No	Yes	Yes	Tarp	Yes	-	No	1x/4years	\$ 3,536	\$ 68	11%	25%	3% Yield Loss	1,3-D/Pic	
Illinois Department of Natural Resources	No	Yes	Yes	Tarp	Yes	0	No	1x/1year	\$ 7,776	\$ 30	4%	6%	3% Yield Loss	metam/Pic or 1,3-D/Pic	
Weyerhaeuser (SE)	No	Yes	Yes	Tarp	Yes	0	No	1x/4years	\$ 1,578	\$ 19	6%	16%	3% Yield Loss	metam/Pic or 1,3-D/Pic	
Weyerhaeuser (NW)	No	Yes	Yes	Tarp	Yes	-	No	1x/3years	\$ 2,124	\$ 24	11%	25%	3% Yield Loss	metam/Pic or 1,3-D/Pic	
NE Forest & Conservation Nursery Assoc.	No	Yes	Yes	Tarp	Yes	-	No	1x/1-3years	\$ 6,738	\$ 39	14%	42%	3% Yield Loss	metam/Pic or 1,3-D/Pic	
Michigan Seedling Association	No	Yes	Yes	Tarp	Yes	-	No	1x/3-4years	\$ 5,365	\$ 60	4%	11%	3% Yield Loss	metam/Pic	
Michigan Herbaceous Perennials	No	Yes	Yes	Tarp	0	0	No	1x/2-3years	\$ 28,151	\$ 144	21%	37%	5% Yield Loss	1,3-D/Pic	

Notes: \* International Paper and Weyerhaeuser (SE) were included in the Southern Forest Nursery Management Cooperative, therefore they were removed from the Southern Forest Cooperative application as double counting.

<sup>1</sup> EPA believes that Michigan Seedling Association and Michigan Herbaceous Perennials have already subtracted their QPS amounts from their application and their application reflects methyl bromide critical use for crops that do not fall under QPS requirements. All other applications are adjusted for EPA QPS estimates.

Conversion Units: 1 Pound = 0.453592 Kilograms 1 Acre = 0.404686 Hectare Most Likely Impact Value: High 24% Low 77%