

Methyl Bromide Critical Use Exemption Process

Date: **1/28/2005**

Average Volume in the US:

Not Available

2007 Methyl Bromide Usage Numerical Index (BUNI)

Sector: **STRUCTURES - FOOD FACILITIES**

% of Average Volume Requested:

2007 Amount of Request			2001 & 2002 Average Use			Quarantine and Pre-Shipment	Regional Volume		Research Amount (kgs)
FOOD FACILITY TYPE	Kilograms (kgs)	Volume (1000m ³)	Use Rate (kg/1000m ³)	Kilograms (kgs)	Volume (1000m ³)		Use Rate (kg/1000m ³)	2001 & 2002 Average	
RICE MILLER'S ASSOCIATION	200,488	6,116	33	146,283	4,630	32	20%	Not Available	0
BAKERIES	23,814	1,206	20	28,354	1,515	19	0%		
PET FOOD INSTITUTE	44,906	2,294	20	39,275	1,803	22	0%		
NORTH AMERICAN MILLER'S ASSOCIATION	317,514	16,424	19	396,893	19,397	20	0%		
TOTAL OR AVERAGE	586,721	26,040	23	610,805	27,345	22			

2007 Nomination Options	Subtractions from Requested Amounts (kgs)					Combined Impacts Adjustment (kgs)		Adoption / Transition Adjustment (kgs)		MOST LIKELY IMPACT VALUE		
	2007 Request	(-) Double Counting	(-) Growth	(-) Use Rate Adjustment	(-) QPS	HIGH	LOW	HIGH	LOW	Amount (kgs)	Volume (1000m ³)	Use Rate (kg/1000m ³)
RICE MILLER'S ASSOCIATION	200,488	-	54,204	53,581	18,541	74,162	74,162	64,150	64,150	64,150	3,204	20
BAKERIES	23,814	-	-	-	-	23,814	23,814	23,814	23,814	23,814	1,272	19
PET FOOD INSTITUTE	44,906	-	5,630	-	-	39,275	39,275	39,275	39,275	39,275	2,006	20
NORTH AMERICAN MILLER'S ASSOCIATION	317,514	-	-	-	-	317,514	317,514	274,650	274,650	274,650	14,207	19
Nomination Amount	586,721	586,721	526,887	473,306	454,766	454,766	454,766	401,889	401,889	401,889	20,689	19
% Reduction from Initial Request	0%	0%	10%	19%	22%	22%	22%	32%	32%	32%	21%	14%

Adjustments to Requested Amounts	Use Rate (kg/1000m ³)		Key Pest Distribution (%)		Combined Impacts (%)		Adopt New Fumigants (%)		Time, Quality, or Product Loss	Marginal Strategy
	Low	EPA	High	Low	HIGH	LOW	% adopt	%per year		
RICE MILLER'S ASSOCIATION	32	20	100%	100%	100%	100%	54%	14%	0 days	Sulfuryl Fluoride*
BAKERIES	19	19	100%	100%	100%	100%	0%	0%	9 days	heat
PET FOOD INSTITUTE	20	20	100%	100%	100%	100%	0%	0%	8 days	heat
NORTH AMERICAN MILLER'S ASSOCIATION	19	19	100%	100%	100%	100%	54%	14%	9 days	Sulfuryl Fluoride*

Other Considerations	Dichotomous Variables (Y/N)			Other Issues			Economic Analysis			
	Currently Use Alternatives?	Research / Transition Plans	Pest-free Market Requirement	Change from Prior CUE Request (+/-)	Verified Historic MeBr Use / State	Frequency of Treatment /Yr	Loss per 1000 m ³ (US\$/1000m)	Loss per Kg of MeBr (US\$/kg)	Loss as a % of Gross Revenue	Loss as a % of Net Revenue
RICE MILLER'S ASSOCIATION	Y	Y	Y	0	N	5x/1year	\$ 843	\$ 8	3%	57%
BAKERIES	Y	Y	Y	+	N	2x/1year	\$ 8,604	\$ 181	3%	67%
PET FOOD INSTITUTE	Y	Y	Y	0	N	1x/ year	\$ 5,153	\$ 258	3%	59%
NORTH AMERICAN MILLER'S ASSOCIATION	Y	Y	Y	-	N	2.5x/1year	\$ 442	\$ 9	0%	2%

Adopt new fumigants - Sulfuryl fluoride

Percent of Market adoption depends on Registration Date, Cost, % of Structures that are suitable,

SF not registered in CA or NY or AK

SF might also require registration on all the additives typically found in a mill or food processing plant

EPA estimates are for an eventual 20 to 40% market share after complete registration.

Conversion Units: 1 Pound = 0.453592 Kilograms 1,000 cu ft = 0.028316847 1,000 cu m Most Likely Impact Value: High 24% Low 76%