

**Summary: Nomination for Critical Use Exemptions for Methyl Bromide Submitted by the
United States of America on January 31, 2012
[Requests 442,337 kg for 2014 calendar year]**

Nominating Party: United States of America		
1	Descriptive Title of Nomination:	Methyl Bromide Critical Use Nomination for Post Harvest Use for Commodities
	Crop Name or Post-Harvest Use	Walnuts, dried fruit (prunes, raisins, figs), and dates produced in California
	Quantity of MeBr requested in 2014	740 kg
	Reasons alternatives not technically and economically feasible	<p>Phosphine, alone and in combination:</p> <ul style="list-style-type: none"> -- Suitable for fumigating commodities in storage, where fumigation time is not a factor, but generally too slow for treating large commodity volumes that need to be processed rapidly -- Switching to this slower product would require substantial operational changes that are economically infeasible <p>Sulfuryl Fluoride:</p> <ul style="list-style-type: none"> -- Early studies have shown that, under vacuum or atmospheric conditions, sulfuryl fluoride is effective against adult, pupal, and larval stages of insects infesting walnuts, but less effective against the egg stage <p>Propylene Oxide:</p> <ul style="list-style-type: none"> -- U.S. EPA has established tolerances for propylene oxide on prunes, figs, and raisins, but no comparative efficacy data for commodity fumigation seems to be currently available <p>Sulfuryl Fluoride + Propylene Oxide:</p> <ul style="list-style-type: none"> -- Research is ongoing to determine if this combination is more cost effective than methyl bromide, especially regarding the egg stage of several economically important insects that infest tree nuts and dried fruit
2	Descriptive Title of Nomination:	Methyl Bromide Critical Use Nomination for Post-Harvest Use in Food Processing Plants
	Crop Name or Post-Harvest Use	Rice mills, flour mills, and pet food manufacturing facilities.
	Quantity of MeBr requested in 2014	22,800 kg
	Reasons alternatives not technically - and economically feasible	<p>Phosphine, alone and in combination:</p> <ul style="list-style-type: none"> -- Limited because of corrosion to electrical equipment -- Takes longer, thereby delaying plant operations -- Temperature sensitive -- Some reports of resistance in stored product pests <p>Heat:</p> <ul style="list-style-type: none"> -- Takes longer, thereby delaying plant operations -- Constraints depending on building materials -- Cost typically very high <p>Sulfuryl Fluoride:</p> <ul style="list-style-type: none"> -- Efficacy is temperature dependent -- Requires applicator training -- Industry is incorporating into their IPM/best management practices -- Costs often higher than methyl bromide -- Transition rates of 15-23% depending on industry -- EPA has published a proposed order to revoke tolerances

3	Descriptive Title of Nomination:	Methyl Bromide Critical Use Nomination For Post Harvest Use on Dry Cured Pork Products
	Crop Name or Post-Harvest Use	Cured meat products, such as country hams
	Quantity of MeBr requested in 2014	3,730 kg
	Reasons alternatives not technically and economically feasible	Phosphine: -- Not registered in all states -- Not efficacious against mites Heat: -- Would affect the final product (rancidity, cooking) Sulfuryl Fluoride: -- Not tested in commercial setting -- Tested for efficacy against mites, but not effective against ham mites
4	Descriptive Title of Nomination:	Methyl Bromide Critical Use Nomination for Preplant Soil Use for Strawberries Grown for Fruit in Open Fields
	Crop Name or Post-Harvest Use	Strawberry production in California
	Quantity of MeBr requested in 2014	415,067 kg
	Reasons alternatives not technically and economically feasible	-- In California, township caps currently restrict the use of the most thoroughly studied alternative, 1,3-D. Restrictions could affect approximately 40-62% of total strawberry land. -- Iodomethane has not been tested extensively on large-scale production land at the low rates specified on the California label. Furthermore, California requires much larger buffer zones (5 to 10 times those on the federal label). Research using higher rates (comparable to those on the federal label) generally indicates good efficacy. The new fumigant should be available in several formulations with chloropicrin, but impacts of buffer restrictions and use rate efficacy in California will be unclear until experience with the formulations and its activity against various pests is known.