

# LAKE COUNTY EDUCATION SERVICE DISTRICT

## INTEGRATED PEST MANAGEMENT PLAN



SEPTEMBER, 2016

## I. INTRODUCTION

Structural and landscape pests can pose significant problems in schools. Pests such as mice and cockroaches can trigger asthma. Mice and rats are vectors of disease. Many children are allergic to yellow jacket stings. The pesticides used to remediate these and other pests can also pose health risks to people, animals, and the environment. These same pesticides may pose special health risks to children due in large part to their still-developing organ systems. Because the health and safety of students and staff is our first priority – and a prerequisite to learning – it is the policy of Lake County ESD to approach pest management with the least possible risk to students and staff. In addition, Senate Bill 637 (incorporated into ORS Chapter 634 upon finalization in 2009) requires all school districts to implement integrated pest management in their schools. For this reason, the **Lake County ESD** board of directors, having policymaking and general oversight responsibility for an education service district adopts this integrated pest management plan for use on the campuses of our district.

## II. WHAT IS INTEGRATED PEST MANAGEMENT?

Integrated Pest Management, also known as IPM, is a process for achieving long-term, environmentally sound pest suppression through a wide variety of tactics. Control strategies in an IPM program include structural and procedural improvements to reduce the food, water, shelter, and access used by pests. Since IPM focuses on remediation of the fundamental reasons why pests are here, pesticides are rarely used and only when necessary.

### IPM Basics

Education and Communication: The foundation for an effective IPM program is education and communication. We need to know what conditions can cause pest problems, why and how to monitor for pests, proper identification, pest behavior and biology before we can begin to manage pests effectively. Communication about pest issues is essential. *A protocol for reporting pests or pest-conducive conditions and a record of what action was taken is the most important part of an effective IPM program.*

Cultural & Sanitation: Knowing how human behavior encourages pests helps you prevent them from becoming a problem. Small changes in cultural or sanitation practices can have significant effects on reducing pest populations. Cleaning under kitchen serving counters, reducing clutter in classrooms, putting dumpsters further from kitchen door/loading dock, proper irrigation scheduling, and over-seeding of turf areas are all examples of cultural and sanitation practices that can be employed to reduce pests.

Physical & Mechanical: Rodent traps, sticky monitoring traps for insects, door sweeps on external doors, sealing holes under sinks, proper drainage and mulching of landscapes, and keeping vegetation at least 24 inches from buildings are all examples of physical and mechanical control.

Pesticides: IPM focuses on remediation of the fundamental reasons why pests are here; pesticides should be rarely used and only when necessary.

# IPM Basics



### III. WHAT IS AN INTEGRATED PEST MANAGEMENT PLAN?

ORS 634.700 defines an IPM plan as a proactive strategy that:

(A) Focuses on the long-term prevention or suppression of pest problems through economically sound measures that:

- a) Protect the health and safety of students, staff and faculty;
- b) Protect the integrity of campus buildings and grounds;
- c) Maintain a productive learning environment; and
- d) Protect local ecosystem health;

(B) Focuses on the prevention of pest problems by working to reduce or eliminate conditions of property construction, operation and maintenance that promote or allow for the establishment, feeding, breeding and proliferation of pest populations or other conditions that are conducive to pests or that create harborage for pests;

(C) Incorporates the use of sanitation, structural remediation or habitat manipulation or of mechanical, biological and chemical pest control measures that present a reduced risk or have a low impact and, for the purpose of mitigating a declared pest emergency, the application of pesticides that are not low-impact pesticides;

(D) Includes regular monitoring and inspections to detect pests, pest damage and unsanctioned pesticide usage;

(E) Evaluates the need for pest control by identifying acceptable pest population density levels;

(F) Monitors and evaluates the effectiveness of pest control measures;

(G) Excludes the application of pesticides on a routine schedule for purely preventive purposes, other than applications of pesticides designed to attract or be consumed by pests;

(H) Excludes the application of pesticides for purely aesthetic purposes;

(I) Includes school staff education about sanitation, monitoring and inspection and about pest control measures;

(J) Gives preference to the use of nonchemical pest control measures;

(K) Allows the use of low-impact pesticides if nonchemical pest control measures are ineffective; and

(L) Allows the application of a pesticide that is not a low-impact pesticide only to mitigate a declared pest emergency or if the application is by, or at the direction or order of, a public health official.

The above definition is the basis for our ESD's IPM plan. This plan fleshes out the required strategy from ORS 634.700 – 634.750 for our ESD.

Note: As mentioned above, ORS 634.700 allows for the routine application of pesticides designed to be consumed by pests. To avoid a proliferation of pests and/or unnecessary applications of pesticides, we will not set out any ant or cockroach baits until first:

- 1) Informing staff in the area where the pests are that sanitation and exclusion are the primary means to control the pest.
- 2) Establishing an acceptable pest population density
- 3) Cleaning up any food debris in the area.
- 4) Sealing up any cracks or crevices where we know the pests are coming from.
- 5) Setting out sticky insect monitoring traps in the area using the sticky insect monitoring trap protocol.

#### **IV. DISTRICT IPM PLAN COORDINATOR**

The **Lake County ESD Board of Directors** designates Mary Woodworth as the IPM Plan Coordinator. The Coordinator is key to successful IPM implementation in our district, and is given the authority for overall implementation and evaluation of this plan. The Coordinator is responsible for:

##### **A. Attending not less than six hours of IPM training each year**

The training will include a general review of IPM principles and the requirements of ORS 634.700 – 634.750. It will also include hands-on training on updated exclusion practices, monitoring & inspection techniques, and management strategies for common pests.

**Note:** ORS 634.720 requires IPM plan coordinators to complete six hours of training each year. Contact your property and liability insurance provider, your Education Service District, or the OSU School IPM Program for information on IPM coordinator training courses that cover the above.

##### **B. Conducting outreach to the school community (custodians, maintenance, and staff) about the school's IPM plan;**

The IPM Coordinator (or designee) will provide training as outlined in Section V below.

##### **C. Overseeing pest prevention efforts;**

The Coordinator will work with administration, custodian/maintenance, teachers and staff to reduce clutter and food in the classrooms, and seal up pest entry points.

##### **D. Assuring that the decision-making process for implementing IPM in the district (section VI) is followed;**

The Coordinator will continually assess and improve the pest monitoring/reporting/action protocol.

##### **E. Assuring that all notification, posting, and record-keeping requirements in section VII are met when the decision to make a pesticide application is made;**

##### **F. Maintaining the approved pesticides list as per section VIII;**

##### **G. Responding to inquiries and complaints about noncompliance with the plan;**

Responses to inquiries and complaints will be in writing and kept on record with the Coordinator.

**H. Keeping records of pest complaints using pest logs located in the Lake County ESD office.**

**I. Developing protocols and provisions for pest avoidance and prevention during construction and renovation projects.** The Coordinator will be involved in drafting any bids, and will have the authority to halt construction projects if protocols and provisions for pest avoidance and prevention are not being met.

## **V. RESPONSIBILITIES + TRAINING/EDUCATION of SCHOOL EMPLOYEES**

**Note:** ORS 634.700 (3) (i) requires staff education “about sanitation, monitoring and inspection and about pest control measures”. All staff should have at least a general review of IPM principles and strategy as outlined in Sections II and III.

### **A. IPM Plan Coordinator**

- 1. Training (see section IV above)**
- 2. Responsibilities (see section IV above)**

### **B. Staff**

#### **1. Training/Education**

**Custodial** - The IPM Plan Coordinator (or a designee of the Coordinator) will train custodial staff at least annually on sanitation, monitoring, inspection, and reporting, and their responsibilities as outlined below.

**Maintenance** - The IPM Plan Coordinator (or a designee of the Coordinator) will train maintenance staff at least annually on identifying pest-conducive conditions and mechanical control methods (such as door sweeps on external doors and sealing holes under sinks), and their responsibilities as outlined below.

#### **2. Responsibilities**

- 1) Attending annual IPM training provided by the IPM Coordinator (or designee).
- 2) Continually monitoring for pest-conducive conditions during daily work, and sealing small holes and cracks when noticed (if this can be done in a short amount of time)
- 3) Reporting pest problems and pest-conducive conditions that he/she cannot resolve in a short amount of time to the IPM Coordinator.
- 4) Reporting any unapproved pesticides (such as aerosol spray cans) discovered in their regular duties or during an inspection and reporting them to the IPM Coordinator.
- 5) Assisting IPM Coordinator with resolving issues found in annual inspection report.
- 6) Keeping work area free of clutter, food debris, and other conditions that lead to pests.

## **VI. IPM PROCESS**

### **A. Monitoring – Reporting – Action Protocol**

Monitoring is the most important requirement of ORS 634.700 – 634.750. It is the backbone of our ESD’s IPM Program. It provides recent and accurate information to make intelligent and effective pest management decisions. It can be defined as the regular and ongoing inspection of areas where pest problems do or might occur. Information gathered from these inspections is always written down.

As much as possible, monitoring should be incorporated into the daily activities of school staff. Staff training on monitoring should include what to look for and how to record and report the information.

### **1. Monitoring & Reporting – All Staff**

After a brief (15 – 20 minute) training by the IPM Coordinator (or designee) on pests and pest-conducive conditions, staff will be expected to report pests or pest-conducive conditions they observe during the normal course of their daily work. Reporting will be done verbally or by e-mail.

### **2. Action**

#### **a) Structural**

Any items (such as sealing up holes) that custodial/maintenance staff observe that they can resolve should be taken care of and reported to IPM Coordinator. The Coordinator will keep records of these actions using Pest Logs.

The Coordinator will inform the superintendent of actions being taken/work performed, and monitor the completion of all work. The Coordinator will keep records of actions taken/work performed using Pest Logs or.

The Coordinator will keep records of time and money spent to manage pests.

#### **b) Grounds**

When pests on grounds reach a threshold established by the IPM Coordinator, action will be taken as per guidelines developed by the Coordinator. The Coordinator will keep records of actions, time, and money spent to manage pests on grounds.

### **3. Acceptable Thresholds**

A threshold is the number of pests that can be tolerated before taking action. The acceptable threshold for cockroaches, mice, rats, raccoons, cats, dogs, opossums, skunks, and nutria is 0.

Acceptable thresholds for other pests will be determined by the IPM Coordinator and the superintendent.

## **B. Inspections**

The IPM Plan Coordinator will conduct an annual inspection using the annual IPM inspection form. During the inspection he or she will also inspect or review:

1) Human behaviors that affect the pests (working conditions that encourage or support pests, food preparation procedures that provide food for pests, etc.)

2) Management activities (caulking/sealing, cleaning, setting out traps, treating pests, etc.) and their effects on the pest population.

## **C. Pest Emergencies (see also Section VII. B. below)**

IMPORTANT: If a pest emergency is declared, the area must be evacuated and cordoned off before taking any other steps. When the IPM Plan Coordinator, after consultation with school faculty and administration, determines that the presence of a pest or pests immediately threatens the health or safety of students, staff, faculty members or members of the public using the campus, or the structural integrity of campus facilities, he or she may declare a pest emergency. Examples include (but are not limited to) yellow jackets swarming in areas frequented by children, a nutria in an area frequented by children, a half a dozen mice or rats running through occupied areas of a school building. The Coordinator will keep records of actions taken using Pest Logs.



#### **D. Annual IPM Report (completed by IPM Plan Coordinator)**

In January of each year, the IPM Plan Coordinator will provide the governing body and the OSU School IPM Program Coordinator an annual IPM report. The report will include a summary of data gathered from Pest Logs, e-mails, and/or Coordinator notes, as well as costs for PMPs and pesticides (including turf and landscape pesticides). Costs for items such as sealants, fixing screens, door sweeps and other items that would not normally be considered part of pest control will not be recorded.

Prevention and management steps taken that proved to be ineffective and led to the decision to make a pesticide application will be copied and pasted or incorporated into the annual report of pesticide applications (see section VII. D)

#### **VII. PESTICIDE APPLICATIONS: REQUIRED NOTIFICATION, POSTING, RECORD KEEPING AND REPORTING**

Any pesticide application (this includes weed control products, ant baits, and all professional and over-the-counter products) on school property must be made by a licensed commercial or public pesticide applicator. Staff will be informed of the procedures for notification and posting of individual applications, including those for pest emergencies.

##### **A. Notification and Posting for Non-emergencies**

When prevention or management of pests through other measures proves to be ineffective, the use of a low-risk pesticide is permissible. *Documentation of these measures is a pre-requisite to the approval of any application of a low-risk pesticide. This documentation will remain on file with the IPM Plan Coordinator.*

Non-emergency pesticide applications may occur in or around buildings at, during, or before time while school is in session, unless the IPM Plan Coordinator authorizes an exception. If the labeling of a pesticide product specifies a reentry time, a pesticide may not be applied to an area of campus where the school expects students to be present before expiration of that reentry time. If the labeling does not specify a reentry time, a pesticide may not be applied to an area of a campus where the school expects students to be present before expiration of a reentry time that the IPM Plan Coordinator determines to be appropriate based on the times at which students would normally be expected to be in the area, area ventilation and whether the area will be cleaned before students are present.

The IPM Plan Coordinator (or a designee of the Coordinator) will give written notice of a proposed pesticide application (via the method most likely to reach the intended recipients) at least 24 hours before the application occurs.

The notice must identify the name, trademark or type of pesticide product, the EPA registration number of the product, the expected area of the application, the expected date of application and the reason for the application.

The IPM Plan Coordinator (or a designee of the Coordinator) shall place warning signs around pesticide application areas beginning no later than 24 hours before the application occurs and ending no earlier than 72 hours after the application occurs.

A warning sign must bear the words "Warning: pesticide-treated area", and give the expected or actual date and time for the application, the expected or actual reentry time, and provide the telephone number of a contact person (the person who is to make the application and/or the IPM Plan Coordinator).

##### **B. Notification and Posting for Emergencies**

Important Notes:

- 1) *The IPM Plan Coordinator may not declare the existence of a pest emergency until after consultation with staff.*

- 2) *If a pesticide is applied at a campus due to a pest emergency, the Coordinator shall review the IPM plan to determine whether modification of the plan might prevent future pest emergencies, and provide a written report of such to the Board of Directors.*
- 3) *The Board of Directors shall review and take formal action on any recommendations in the report.*

The declaration of the existence of a pest emergency is the only time a non-, low-impact pesticide may be applied.

If a pest emergency is declared, the area must be evacuated and cordoned off before taking any other steps.

If a pest emergency makes it impracticable to give a pesticide application notice no later than 24 hours before the pesticide application occurs, the IPM Plan Coordinator shall send the notice no later than 24 hours after the application occurs.

The Coordinator or designee shall place notification signs around the area as soon as practicable but no later than at the time the application occurs.

Note: ORS 634.700 also allows the application of a non-low-impact pesticide “by, or at the direction or order of, a public health official”. If this occurs, every effort must be made to comply with notification and posting requirements above.

### **C. Record Keeping of Pesticide Applications**

The IPM Plan Coordinator or designee shall keep a copy of the following pesticide product information on file at the head custodian’s office at the school where the application occurred, and at the office of the IPM Plan Coordinator:

- A copy of the label
- A copy of the MSDS
- The brand name and USEPA registration number of the product
- The approximate amount and concentration of product applied
- The location of the application
- The pest condition that prompted the application
- The type of application and whether the application proved effective
- The pesticide applicator’s license numbers and pesticide trainee or certificate numbers of the person applying the pesticide
- The name(s) of the person(s) applying the pesticide
- The dates on which notices of the application were given
- The dates and times for the placement and removal of warning signs
- Copies of all required notices given, including the dates the IPM Plan Coordinator gave the notices

The above records must be kept on file at the head custodian’s office at the school where the application occurred, and at the office of the IPM Plan Coordinator, for at least four years following the application date.

### **D. Annual Report of Pesticide Applications**

In January of each year, the IPM Plan Coordinator will provide the Board of Directors and the OSU School IPM Program Coordinator an annual report of all pesticide applications made the previous year. The report will contain the following for each application:

- The brand name and USEPA registration number of the product applied
- The approximate amount and concentration of product applied
- The location of the application
- The prevention or management steps taken that proved to be ineffective and led to the decision to



- make a pesticide application
- The type of application and whether the application proved effective

### **VIII. APPROVED LIST OF LOW IMPACT PESTICIDES**

Note: All pesticides used must be used in strict accordance with label instructions.

According to ORS 634.705 (5), the governing body of a school district shall adopt a list of low-impact pesticides for use with their integrated pest management plan. The governing body may include any product on the list except products that:

- (a) Contain a pesticide product or active ingredient that has the signal words “warning” or “danger” on the label;
- (b) Contain a pesticide product classified as a human carcinogen or probable human carcinogen under the United States Environmental Protection Agency 1986 Guidelines for Carcinogen Risk Assessment; or
- (c) Contain a pesticide product classified as carcinogenic to humans or likely to be carcinogenic to humans under the United States Environmental Protection Agency 2003 Draft Final Guidelines for Carcinogen Risk Assessment.

As a part of pesticide registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) and re-registration required by the Food Quality Protection Act (FQPA), EPA Office of Pesticide Programs (OPP) classifies pesticide active ingredients (a.i.) with regards to their potential to cause cancer in humans. Depending on when a pesticide active ingredient was last evaluated the classification system used may differ as described above.

The National Pesticide Information Center (<http://npic.orst.edu/>) can be contacted at 1.800.858.7378 or [npic@ace.orst.edu](mailto:npic@ace.orst.edu) for assistance in determining a pesticide a.i. cancer classification.

The most current list of approved low-impact pesticides is available on our website.