

# Integrated Pest Management Plan for Umatilla-Morrow Head Start, Inc. Classroom Version

**Resource:**

Tim Stock  
OSU School IPM Program Coordinator  
Integrated Plant Protection Center, Oregon State University

**Notes:**

Contributions by: Office of Environmental Public Health, Oregon Health Authority; Vonnie Good, Salem-Keizer School District; Patrick Wolfe, Portland Public School District; Doug Lemley, Eugene School District; Rick Stucky, Oregon School Boards Association; Paul Jepson, Oregon State University; Jeff Jenkins, Oregon State University; Jennifer Snyder, Oregon State University.

# Contents

<b>I. INTRODUCTION</b>	<b>3</b>
<b>II. WHAT IS INTEGRATED PEST MANAGEMENT?</b>	<b>3</b>
<b>III. WHAT IS AN INTEGRATED PEST MANAGEMENT PLAN?</b>	<b>4</b>
<b>IV. SCHOOL DISTRICT IPM PLAN COORDINATOR</b>	<b>5</b>
<b>V. RESPONSIBILITIES/TRAINING/EDUCATION of UMCHS EMPLOYEES</b>	<b>6</b>
A. IPM Plan Coordinator	6
B. Kitchen/Staff / Custodial Staff	6
C. Maintenance Staff	7
D. Grounds Department	8
E. Kitchen Staff	8
F. Operations Director	9
<b>VI. IPM PROCESS</b>	<b>10</b>
A. Monitoring – Reporting – Action Protocol	10
1. Monitoring & Reporting – All Staff	10
2. Monitoring & Reporting – Coordinator and Custodial/Maintenance Staff	10
3. Monitoring & Reporting – Grounds Staff	11
4. Sticky Monitoring traps for insects	11
5. Monitoring for Mice	11
6. Reporting “Pests of Concern”	11
7. Action!	12
8. Acceptable Thresholds (pest population density levels)	12
B. Inspections	12
C. Pest Emergencies	13
E. Annual IPM Report (completed by Health & Safety Coordinator)	13
<b>VII. PESTICIDE APPLICATIONS: REQUIRED NOTIFICATION, POSTING, RECORD KEEPING, AND REPORTING</b>	<b>13</b>
A. Notification and Posting for Non-emergencies	13
B. Notification and Posting for Emergencies	14
C. Record Keeping of Pesticide Applications	15
D. Annual Report of Pesticide Applications	15
<b>VII. APPROVED LIST OF LOW-IMPACT PESTICIDES</b>	<b>16</b>
<b>LIST OF APPENDICES</b>	<b>17</b>

## 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 UMCHS, Inc. 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 **UMCHS Board of Directors** adopts this integrated pest management plan for use on the campuses of our agency.

## 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.

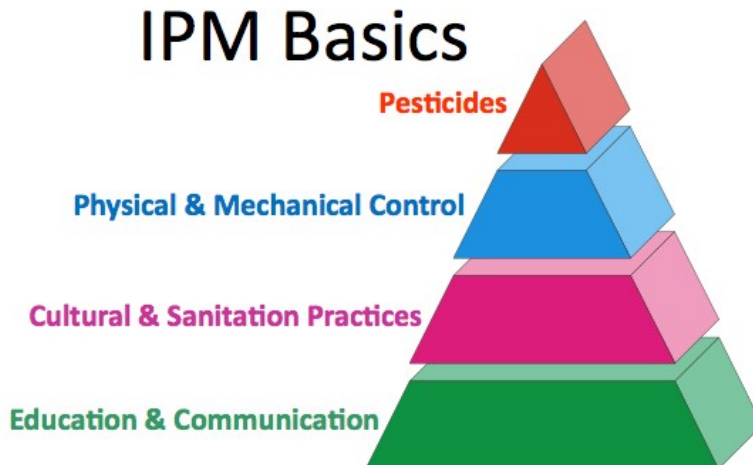
### IPM Basics

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.



### 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 the UMCHS, Inc. IPM plan. This plan fleshes out the required strategy from ORS 634.700 – 634.750 for our agency.

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.

Note: See Appendix 1a for more information on small ant management.

#### **IV. AGENCY IPM PLAN COORDINATOR**

The ***UMCHS Board of Directors*** designates the Health & Safety Coordinator as the IPM Plan Coordinator. The Coordinator is key to successful IPM implementation in our agency, 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 shall include at least 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.

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

The Health & Safety Coordinator (or designee) will provide training as outlined in Section VII below.

**C. Overseeing pest prevention efforts;** The Coordinator will work with custodians, teachers, and maintenance 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 V) 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 VI 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. 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 UMCHS, Inc. EMPLOYEES**

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

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

### ***B. Kitchen Staff / Custodial Staff Responsibilities***

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

The Health & Safety Coordinator with the USDA Program Manager will train Kitchen/custodial staff at least annually on sanitation, monitoring, inspection, and reporting, and their responsibilities as outlined below.

#### **2. Responsibilities**

- 1) Attending annual IPM training provided by the Health & Safety Coordinator or USDA Program Manager.
- 2) Placing and checking sticky insect monitoring traps in break rooms, eating areas, and kitchen as per the Health & Safety Coordinator's instructions.

- 3) Assuring floor under serving counters is kept free of food and drink debris.
- 4) Promptly emptying and removing corrugated cardboard materials daily. Avoiding long-term storage or use of cardboard boxes.
- 5) Keeping exterior kitchen doors closed.
- 6) Reporting pest conducive conditions that require maintenance (e.g., leaky faucets, dumpster too near building, build-up of floor grease requiring spray-washing, etc.) to proper staff either orally or using pest logs.
- 7) Continually monitoring for pest-conducive conditions during daily work, and sealing up small cracks or holes when reported by teachers or noticed by self when this can be done in a short time (e.g. less than 15 minutes).
- 7) Recording his/her pest management actions in the pest logs.
- 8) Reporting pest problems that he/she cannot resolve in less than 15 minutes to the Site Supervisor or Team Leader.
- 9) Checking sticky trap monitors once per month for cockroaches or drain flies. Immediately reporting these pests and any sightings of rodents or rodent droppings to Site Supervisor or Team Leader and marking them in pest log.

### **C. Maintenance Staff Responsibilities**

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

The Health & Safety 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) Continually monitoring for pest conducive conditions during daily work, and sealing small holes and cracks when noticed.
- 2) Working with the Operations Director and Coordinator to develop a protocol and priority list with deadlines for sealing holes, installing external door sweeps, and other pest exclusion needs which cannot be done in a short period of time (e.g. 15 minutes).
- 3) Assisting Health & Safety Coordinator with resolving issues found in annual inspection report.

- 4) Confiscating any unapproved pesticides (such as aerosol spray cans) discovered during inspections or regular duties and delivering them to the IPM Plan Coordinator.
- 5) Proper mulching in landscaped areas to reduce weeds.
- 6) Working with the Health & Safety Coordinator to reduce conditions conducive to weeds, gophers, moles, yellow jackets, and other outdoor pests.

#### ***D. Grounds Department Responsibilities***

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

The head of grounds staff (or designee) will train grounds staff at least once per year. Each year before the training, the head of grounds staff will meet with the Health & Safety Coordinator to review the annual report of pesticide applications and plan training for all grounds staff. The annual training will review this IPM Plan (especially grounds department responsibilities outlined below) and data from the annual report related to pesticide applications by grounds crew. It will also review the OSU turf management publications EC 1521, EC 1278, EC 1550, EC 1638-E, and PNW 299 (available free online at <http://extension.oregonstate.edu/catalog/>), and the matrices in Appendix 1-i.

##### **2. Responsibilities**

- 1) Attending annual IPM training provided by the Health & Safety Coordinator (or designee).
- 2) Working with the Health & Safety Coordinator to reduce conditions conducive to weeds, gophers, moles, and other outdoor pests.
- 3) Keeping vegetation (including tree branches and bushes) at least 24 inches from building surfaces.
- 4) Proper fertilization, over-seeding, mowing height, edging, drainage, aeration, and irrigation scheduling in turf areas to reduce weeds (see OSU turf management publications **EC 1521, EC 1278, EC 1550, EC 1638-E, and PNW 299** - available free online at <http://extension.oregonstate.edu/catalog/>).
- 5) When the decision is made to apply a pesticide, following notification, posting, record-keeping and reporting protocols in Section VI.

#### ***E. Agency Staff Responsibilities***

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

The Health & Safety Coordinator (or a designee of the Coordinator) will train site staff and Site Supervisors/Team Leaders at least once per year on the basic principles of IPM and their responsibilities as outlined below. These short (15 – 20 minute)



trainings are arranged by the Coordinator with individual Site Supervisors/Team Leaders when openings in their Team Meeting schedules permit. During the training, the Coordinator will review the following with staff:

- 1) What pest-conducive conditions are (clutter, food debris, moisture, cracks, holes, etc.), and the importance of reporting these in a timely manner.
- 2) The importance of keeping their classrooms and work areas free of clutter.
- 3) The importance of having students clean up after themselves when food or drink is consumed in the classroom.

## **2. Responsibilities**

- 1) Attending annual basic IPM training provided by the Health & Safety Coordinator (or designee).
- 2) Keeping their classrooms and work areas free of clutter.
- 3) Making sure students and staff clean up after themselves when food or drink is consumed in the classroom or break rooms.
- 4) Reporting pests and pest conducive conditions to the Health & Safety Coordinator, via Site Supervisor/Team Leader; in-person, by e-mail, or by phone.
- 5) Following first steps of protocol for ant management before notifying the custodian (clean up any food the ants are eating, kill visible ants, wipe down area where ants were with soapy water, notify Health & Safety Coordinator only if ants continue to [be found](#) after following these steps).
- 6) Site Supervisors/Team Leaders will participate in any inspections conducted by Health & Safety Coordinator or Operations Director.
- 7) Site Supervisors/Team Leaders will keep records of pest complaints using pest logs placed in the staff break room, kitchen, or other designated area.
- 8) Site Supervisors/Team Leaders will assuring that teachers keep their rooms clean and free of clutter in accordance with the Health & Safety Coordinator's instructions.

## **F. Operations Director Responsibilities**

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

- 1) Ensuring time for teachers to receive annual training provided by the IPM Plan Coordinator (or designee).

## 2. Responsibilities

- 1) Attending annual IPM training for agency staff.
- 2) Assuring that all administrators, staff, adult students and parents receive the annual notice (provided by the Health & Safety Coordinator) of potential pesticide products that could be used on school property as per Section VI.
- 3) Working with the Health & Safety Coordinator to make sure all notifications of pesticide applications reach all administrators, staff, adult students and parents (via the method most likely to reach the intended recipients).
- 4) Assuring that all staff fulfill their role as outlined in the district's IPM plan (reducing pest conducive conditions, participation in monitoring and pest log recording, attendance at IPM training(s), cooperation with the district's Health & Safety Coordinator).

## VI. IPM PROCESS

### B. Monitoring – Reporting – Action Protocol

Monitoring is the most important requirement of ORS 634.700 – 634.750. It is the backbone of our agency'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 agency 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 Health & Safety 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, by e-mail, using Pest Logs, by work order to the Site Supervisor /Team Leader and then to the Health & Safety Coordinator.

#### 2. Monitoring & Reporting – Coordinator and Custodial/Maintenance Staff

During the normal course of their daily work, the Health & Safety Coordinator and custodial/maintenance staff will monitor structures and building perimeters for:

- 1) Pest-conducive conditions inside and outside the building (structural deterioration, holes that allow pests to enter, conditions that provide pest harborage).
- 2) The level of sanitation inside and out (waste disposal procedures, level of cleanliness inside and out, conditions that supply food and water to pests)

- 3) The amount of pest damage and the number and location of pest signs (rodent droppings, termite shelter tubes, cockroaches caught in sticky traps, etc.)
- 4) Human behaviors that affect the pests (food preparation procedures, storage procedures, classroom food, etc.)
- 5) Their own management activities (caulking/sealing, cleaning, setting out traps, treating pests, etc.) and their effects on the pest population.
- 6) Any pests or pest-conducive conditions will be reported to the Health & Safety Coordinator either orally, or by e-mail, using Pest Logs, or work order to the Coordinator.

### **3. Monitoring & Reporting – Grounds Staff**

During normal daily activities, grounds staff will monitor for invasive weeds, gophers, moles, and other outdoor pests. These will be reported to the Health & Safety Coordinator orally, or by e-mail, using Pest Logs, or work order to the Coordinator.

### **4. Sticky monitoring traps for insects**

Sticky traps are neither a substitute for pesticides nor an alternative for reducing pest populations, but rather a diagnostic tool to aid in identifying a pest's presence, [their reproductive stage](#), the likely direction pests are coming from, and the number of pests.

All staff will be made aware of the traps and their purpose so they don't disturb them. Kitchen Staff will be responsible for setting them out and checking them once per month (approximately 10 minutes), and replacing them once every four months (approximately 30 minutes). Kitchen staff also will be responsible for checking those in the kitchen primarily for cockroaches and drain flies once per month (approximately 4 minutes).

After receiving training in the use of pest monitoring sticky traps by the Health & Safety Coordinator (or designee), Kitchen Staff will be responsible for checking traps placed in pre-determined "pest-vulnerable areas" in the staff room, kitchen, classrooms, and storage closets on a monthly basis, and replacing them every four months. If Kitchen Staff cannot interpret what they find in the monitors they will contact the Health & Safety Coordinator for assistance.

### **5. Monitoring for Mice**

In addition to monitoring for signs of mice (droppings, gnawing, hair, etc.), snap traps will be placed in the kitchen (and any other area the Health & Safety Coordinator deems necessary), and checked monthly by the Coordinator (see appendix 1g for more information on monitoring for mice) if deemed necessary.

### **6. Reporting "Pests of Concern"**

"A pest of concern" is a pest determined to be a public health risk or a significant nuisance pest. These include cockroaches (disease vectors, asthma triggers), mice & rats (disease

vectors, asthma triggers), yellow jackets (sting can cause anaphylactic shock), cornered nutria, raccoons, cats, dogs, opossums, skunks (they can bite), and bed bugs (significant nuisance pest).

When pests of concern (or their droppings, nests, etc.) are observed, staff should immediately tell the site Team Leader or Site Supervisor. The Team Leader or Site Supervisor must contact the Health & Safety Coordinator immediately.

## **7. Action!**

### **a) Structural**

Any items (such as sealing up holes) that kitchen or custodial staff observe (or see on Pest Logs) that they can be resolved in less than 15 minutes should be taken care of and [this follow up action should be](#) noted in the Pest Log.

Site supervisors/Team Leaders will review Pest Logs once per week. Any items he/she cannot resolve in less than 15 minutes should be marked in order of priority.

Pest Logs will be faxed or emailed to the Health & Safety Coordinator once per month with Month End paperwork. The Coordinator will determine further actions to be taken and when.

If the actions needed are not something the Coordinator can accomplish alone or with minimal assistance, the Coordinator will meet with Operations Director, Maintenance Staff and/or Pest Management Professional (PMP) to develop a protocol and priority list with deadlines for sealing holes, installing external door sweeps, and other pest exclusion or pest management needs. The Coordinator will then generate a work order with a proposed deadline for completion based on the severity of the risk or nuisance.

The Coordinator will monitor the completion of the work order. If the work is not completed by the proposed deadline, the Coordinator will write a follow-up e-mail to the Operations Director, Maintenance Staff and/or the Pest Management Professional (PMP). Upon completion of the work, the Coordinator and the Site Supervisor/Team Leader will be notified.

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

### **b) Grounds**

When pests on grounds reach a threshold established by Operations Director and the Health & Safety Coordinator, action will be taken as per the matrices in Appendix 1-i. The Grounds Crew or Coordinator will keep records of actions, time, and money spent to manage pests on grounds.

## **9. Acceptable Thresholds (pest population density levels)**

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 Health & Safety Coordinator and the Operations Director.

### **B. Inspections**

The Health & Safety Coordinator will conduct an annual inspection using the annual IPM inspection form (Appendix 2). 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 Health & Safety Coordinator, after consultation with the Operations Director, 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.

### **E. Annual IPM Report (completed by Health & Safety Coordinator)**

In January of each year, the Health & Safety Coordinator will provide UMCHS Board of Directors and the OSU School IPM Program Coordinator an annual IPM report. The report will include a summary of data gathered from Pest Logs, 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. See Appendix 9 for a template for the annual IPM report.

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. At the beginning of each school year, all staff, administrators, volunteers and parents will be given a list of potential pesticide products that could be used in the event that other pest management measures are ineffective. They will also be informed of the procedures for notification and posting of individual applications, including those for pest emergencies. This information will be provided to all the above via e-mail as well as hard copy to volunteers and parents.

### **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 Health & Safety Coordinator.*

No non-emergency pesticide applications may occur in or around a school until after 3:30 PM on a Thursday while school is in session, unless the Health & Safety 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 Health & Safety 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 Health & Safety 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 Health & Safety 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 Health & Safety Coordinator).

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

Important Notes:

- 1) *The Health & Safety Coordinator may not declare the existence of a pest emergency until after consultation with the Operations Director and the Executive Director.*
- 2) *If a pesticide is applied at a site due to a pest emergency, the Plan 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 UMCHS Board of Directors.*
- 3) *The UMCHS 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 Health & Safety Coordinator shall send the notice no later than 24 hours after the application occurs.

The Health & Safety 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 Health & Safety Coordinator or designee shall keep a copy of the following pesticide product information on file at the office of the Team Leader/Site Supervisor at the site where the application occurred, and at the office of the Health & Safety 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 Health & Safety Coordinator gave the notices

The above records must be kept on file at the Team Leader/Site Supervisors office at the school where the application occurred, and at the office of the Health & Safety Coordinator, for at least four years following the application date.

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

In January of each year, the Health & Safety Coordinator will provide UMCHS 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

## VII. 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 at [www.umchs.org](http://www.umchs.org) or is included in Appendix 13 to this IPM Plan.



## **LIST OF APPENDICES**

### Appendix 1 Pest Management for Specific Pests

a-Ants (Small Ants)

b-Ants (Carpenter Ants)

c-Bed Bugs

d-Mosquitoes

e-Oregon Spiders

f-Cockroaches

g-Mice (House Mouse)

h-Yellow Jackets, Paper Wasps and Honey Bees

i-Grounds Pests

### Appendix 3 Pest Logs

### Appendix 12 References and Source Materials

### Appendix 13 Low-Impact Pesticide List