

IPM Policy 2/12/15

10/20/2022

Integrated Pest Management Policy and Plan

Structural and landscape pests can pose significant problems in the urban environment. The pesticides used to remediate such pests can also pose health risks to people, non-target organisms, and the environment. Because the health and safety of students and staff are our first priorities and are prerequisites to learning, it is the policy of Promontory School to use Integrated Pest Management (IPM) procedures for the control of structural and landscape pests as outlined in Health Department Code R392-200-7(12). Through the use of IPM, this facility will minimize pesticide use and maximize pest control, thereby reducing the exposure to staff, students, and the community.

To accomplish this goal, the IPM Coordinator and staff will utilize physical, mechanical, cultural, biological, and educational tactics as primary controls. The IPM coordinator, the director, and the facilities coordinator have the responsibility and authority to request changes in the school facilities and in staff behaviors to ensure that the IPM policy is followed.

Reduced-risk chemical controls will be used when necessary. Pests will be controlled to maintain the integrity of school buildings and grounds, to protect the health and safety of children and staff, and to maintain a productive learning environment. Pesticides will not be used to control pests for aesthetic reasons alone. Contractors working in the building and grounds are required to adhere to all provisions of the school's IPM policy.

Pests

Pests are populations of living organisms (animals, plants, or microorganisms) that interfere with use of the facility by students and staff. Strategies for managing pest populations will be influenced by the pest species and by whether that species poses a threat to people, property, or the environment.

IPM Coordinator

The school director shall appoint an IPM coordinator who shall have primary responsibility for ensuring that the IPM policy is implemented. The IPM coordinator will work with the director, as well as custodial, building, grounds, and maintenance staff to ensure implementation of pest prevention measures. The IPM Coordinator will:

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- *manage pest control contractors and staff engaged in monitoring and controlling pest problems*
- *coordinate with the school's director to carry out posting and notification*
- *provide record keeping and education as outlined in this policy*
- *provide IPM information to the school community (including parents) and answer questions on IPM topics*
- *present an annual report to the school director evaluating the progress of the IPM program.*

Education

Staff, students, administrative personnel, custodial staff, pest managers, and parents will be educated about potential school pest problems and the IPM policies and procedures to be used to achieve the desired pest management objectives. Staff will receive information and/or training on their role in pest management. Specifically, teachers and students will be educated about appropriate storage and disposal of food and other waste. Proper storage and disposal techniques will significantly reduce pest problems in lockers, classrooms, the teachers' lounge, the lunchroom, and outside areas.

Record Keeping

Records will be kept on the number of pests or other indicators of pest populations both before and after any treatments. Monitoring of pests must be current and accurate if IPM is to work. Records of pesticide use shall be maintained on site to meet the requirements of the state regulatory agency and school board, and records will also document any non-toxic treatment methods being used. The school will also keep a list of pesticides used, pesticide Material Safety Data Sheets (MSDSs), and pesticide product labels. The objective is to create records from which programs and practices can be evaluated in order to improve the system and to eliminate ineffective and unnecessary treatments.

Notification

The IPM coordinator takes the responsibility to notify students' parents or guardians and school staff of upcoming pesticide treatments. Notices will be posted in designated areas at school, and emails will be sent to students' homes. Antimicrobial agents, such as sanitizers and insecticides, and rodenticide baits, are exempt from notification requirements. Exemptions from prior notification shall also include emergency situations and applications of bait pesticides and/or container-delivery systems.

Pesticide Storage and Purchase

Pesticide purchases will be limited to the amount authorized for use during the year by the school director and the IPM coordinator. Pesticides will be stored and disposed of in accordance with the EPA-registered label directions and state

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regulations. Pesticides must be stored in an appropriate, secure site not accessible to students or unauthorized personnel. A cabinet in a non-student area with a locked and labeled door is advised. The door label should include skull and crossbones, Mr. Ugh, or other visual signals for non-English reading adults or children.

Pesticide Applicators

Pesticide applicators must be educated and trained in the principles and practices of IPM and the use of pesticides approved by Promontory School of Expeditionary Learning. Applicators must follow regulations and label precautions and should be certified and comply with the school's IPM policy. Applications shall not be made while school or school activities are in progress.

Integrated Pest Management Procedures

IPM procedures will determine when to control pests and whether to use mechanical, physical, chemical, cultural, or biological means. IPM practitioners depend on current, comprehensive information on the pest and its environment and the best available pest control methods. Applying IPM principles prevents unacceptable levels of pest activity and damage with the least possible hazard to people, property, and the environment.

When it is determined that a pesticide must be used in order to meet important management goals, the least hazardous material will be chosen. The application of pesticides is subject to the Federal Insecticide, Fungicide, and Rodenticide Act (7 United States Code 136 et seq.), Environmental Protection Agency regulations in 40 Code of Federal Regulations, Occupational Safety and Health Administration regulations, and state and local regulations, Utah code 4-14-101

1. Integrated Pest Management programs are designed to prevent pest problems whenever possible. This is done through monitoring, regular inspections, high standards of sanitation and pest-proofing measures, or modification of environmental conditions leading to pest problems.
2. The IPM coordinator will establish pest tolerance thresholds for common pests. These thresholds will serve as an indicator for pest population levels and the point at which control measures will be undertaken. Control measures will not be undertaken if pest damage or populations are below threshold levels. In such cases, managers will use preventive measures such as improved sanitation, clutter reduction, and exclusion of pests. When determining threshold values, keep in mind that they will vary for each organism (e.g., the threshold may be higher for crickets than for venomous insects). Thresholds will not be set based on aesthetic criteria alone.
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4. When pests do exceed tolerance thresholds, non-chemical pest control measures (e.g., sanitation, screening, physical barriers, vacuuming, mulching, irrigation, fertilization, manual weeding, insect nest removal, and pest-resistant plant selection) will be practiced.
5. Pesticides will be used when appropriate, along with other management practices or when other pest prevention and non-chemical control measures have failed to reduce pests below tolerance thresholds. Cost or staffing considerations alone will not be adequate justification for the use of chemical control agents. When a pesticide must be used, the smallest amount of the reduced-risk product that will meet pest management goals will be used.
6. No routinely scheduled (e.g., seasonal, monthly or weekly) pesticide applications will be made. Insecticides will be used only in containerized baits, or for spot treatments targeted to insect infestations or problem areas where a minimal amount of material is used. Rodent baits shall not be used unless in childproof bait boxes. Bait boxes shall be inaccessible to children and tethered when appropriate.
7. Pesticide Use and Selection. To ensure the safety of students and staff, the management will use the following criteria to ensure that the least hazardous pesticide and/or the least hazardous method of control be utilized:
 - a. No use of any pesticide classified as highly acutely toxic by the U.S. EPA. This includes Hazard Category I and II products and/or products with the signal words DANGER and/or WARNING.
 - b. The school shall not use any pesticide unless all ingredients in the product have been evaluated by the U.S. EPA and found to include no possible, probable, known, or likely human carcinogens; no reproductive toxicants; no known, probable or suspected endocrine disruptors; and no nervous system toxicants (either cholinesterase inhibitors or listed as neurotoxins by the Toxics Release Inventory.) A pesticide will not be used if the facility does not have information on its ingredients, including inert ingredients.
 - c. All ingredients in pesticides used by the facility shall have a soil half-life of 30 days or less.
 - d. Properly applied gel bait or tamper-resistant containerized bait can be exempted from 6a, 6b, and 6c if it represents the least hazardous treatment option.
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8. *The IPM coordinator must approve pesticide applications, antimicrobial agents, and insecticide and rodenticide baits in advance. Pesticides will be applied by certified pesticide applicators only when no one is present in the building or the grounds of the school to be treated. The application of such pesticides is subject to the Federal Insecticide, Fungicide, and Rodenticide Act (7 USC 136 et seq.), US EPA regulations, Occupational Safety and Health Administration regulations, and state and local regulations.*