

San Angelo Independent School District Integrated Pest Management Policy

This plan supersedes all previous Integrated Pest Management Plans

Integrated Pest Management (IPM) is a multi-tactical approach to preventing pest problems. As of September 1, 1995, it was required of every school district in Texas to have an official policy stating a commitment to IPM principals for pest control problems. This policy will be maintained in the office of the district superintendent, as well as the recognized IPM Coordinator's office. An IPM Plan is contained in this document that establishes more specific guidelines on how to implement this policy.

Policy Statement

"The San Angelo ISD is committed to using the established IPM procedures contained in this plan to eliminate problems that can be posed by structural and landscape pests, inside and outside of all district property. The S.A.I.S.D. has developed procedures in accordance with the Texas Structural Pest Control Board to monitor and make applications in the safest method possible. Strategies are utilized that identify when pests are present or when pest problems are severe enough to justify corrective action. Non-chemical management strategies are preferred, but if necessary a method of least-toxic chemical control will be utilized."

Regulatory Agencies

The purchase, transportation, storage, and application of pesticides and herbicides will be conducted in accordance with the following agencies:

- Federal Insecticide, Fungicide, and Rodenticide (FIFR) Act (7 United States Code 136 et seq.)
- Environmental Protection Agency (EPA), regulations contained in 40 CFR
- Occupational Safety and Health Administration (OSHA) Regulations
- Texas Administrative Code, Title 4, Part 1, Chapter 7, Sub-Chapter H, Division 3, Rule § 7.150
- San Angelo ISD policies, procedures
- City of San Angelo codes and regulations

Copies of the referenced regulations can be found in the appendices.

Compliance

Regulations require us to make appropriate notifications to students, staff, and parents about pesticide applications being made. Interior applications require 48 hour notification prior to any treatment being made, and for exterior treatment the 48 hour notification plus signage must be posted at all possible entry points. Application records will be maintained in the IPM Coordinator's office, along with copies of labels from chemicals being utilized, and Material Safety Data Sheets from the utilized chemicals. We will abide by the maximum mandated waiting period either from the manufacturer or the state, whichever is longest. Our strategies will include using the least hazardous pesticide as stipulated by the regulatory agencies. Our applicators will be licensed according to their fields of endeavor. The coordinator, all applicators, and district staff will receive periodic education on updates on usage, storage, and changes to any laws as they relate to school district usage.

Objectives of IPM

Pest management objectives will differ from site to site within the boundaries of the district. The IPM process is established to manage pest infestations by tracking reports of problems, monitoring the access and egress points, repairing entry points, and taking environmentally sound approaches to resolving the problem that may occur on district property, and to prevent interference with the learning or work environment. The focus of the IPM process is to eliminate potential safety and health risks that develop to students, staff, or other building occupants; managing pests that are recognized at district facilities to prevent the spread of disease through consumption of contaminated food products; to attempt to preserve the integrity of our facilities and property; to provide safe playgrounds and athletic facilities.

IPM 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, its environment, and the best available pest control methods. Applying IPM principals prevents unacceptable levels of pest activity and damage by the most economical means and with the least possible hazard to people, property, and environment.

The choice of using a pesticide will be based on a review of all other available options and a determination that these options are not acceptable or feasible. Cost or staffing considerations will not be adequate justification for the use of chemical control agents. Selected non-chemical pest management methods will be implemented whenever possible to provide the desired control. It is the policy of SAISD to utilize IPM principals to manage pest populations adequately. The full range of alternatives, including no action, will be considered.

When it is determined that a pesticide must be used in order to meet important pest management goals, the least hazardous material will be chosen. The application of pesticides within SAISD facilities is subject to The Department of Agriculture and EPA guidelines and regulations.

Roles and Responsibilities in the IPM Process

IPM Coordinator

In accordance with the § 7.150, the district must appoint an IPM Coordinator, who will assist with coordinating pest management procedures and personnel. As outlined in the Texas Administrative Code, the coordinator will within 6 months of his/her appointment successfully complete at least 6 hours of training as it pertains to the Texas Administrative Code, and receive annual updates and education credits as mandated by regulations. The coordinator will ensure that all district applicators have appropriate personnel protective equipment. The coordinator will confirm that all school applicators are licensed, have acquired proper training and continuing education, receive necessary supervision, and are following the intent of this plan.

Non-Commercial Applicator

Is an employee of the district who has received adequate training, an appropriate license, and receives yearly educational credits. The applicator will perform structural pest control methods as outlined by the Texas Administrative Code. As an employee of the district and a licensed non-commercial applicator, he/she may not engage in similar business activities outside the scope of employment, unless he/she is also certified as a commercial applicator. The applicator is responsible for the daily pest control needs of the district. He is also responsible for maintaining application records and consulting with the coordinator concerning the use of pesticides.

Contract Applicators

Should the district find itself in need of going outside of the district for some of its application needs, it is the IPM Coordinator's responsibility to work with bid specifications, and oversee the application procedures of the awarded contractor. The awarded contractor will abide by all mandated regulations, as well as following all district IPM policies. A sample of a Contract Bid Specification is located in the appendices.

Licensing

All Structural Pest Control Licenses must be displayed in a conspicuous place at the business of the license holder. They will be presented for visual inspection when requested by an inspecting authority. A licensed individual must also carry a licensed card while engaged in pest control work.

Education

The IPM Coordinator will receive mandated training within one 6 months of employment. The non-commercial applicators will be certified prior to any application of chemical on district property. Both the coordinator and the applicator will receive continuing education credits annually, as mandated by the Texas Administrative Code.

Staff and Students

Staff and students, as building occupants are concerned about the safety and effectiveness of the pest control methods used. The most important responsibilities they have are towards building sanitation. Much of the prevention and reduction of pest infestation at the school site depends on a clean environment. This requires the removing and cleaning of food remains, removing gum from the underside of desks, and the proper maintenance of clutter. Prompt notification and identification of pests, or the evidence of pests will aid in a successful IPM program. Site Administrators can determine if the IPM process and objectives are being met by observing the area of complaint and working directly with the applicator and the building occupants. A complete understanding of IPM principals and procedures by everyone is needed in order for the program to be successful.

IPM Cycle

Inspection, Identification, Monitoring, and Treatment

An IPM program consists of a cycle of inspecting, identifying, monitoring, evaluating and choosing the appropriate product method of control. Routine inspections and accurate identification of pests are vital components in IPM. Once the pests have been identified and the source located, then an attempt to modify habitation, primary exclusion, repair entry points, and sanitation efforts may greatly reduce the prevalence of pests. The information gained through the monitoring can be evaluated to determine whether the action threshold has been exceeded and what can be done to eliminate the pest.

Action Thresholds

As a district, we have established action thresholds, which is a level of infestation that determines action that should be taken. The response action is determined by deciding how many pests can be tolerated in a particular area based on the type of pest, the area concerned, area occupants and possible risks to the occupants, as well as history of previous action. **The presence of pests does not always require the application of pesticides.**

Samples of the Action Threshold can be seen in the appendices.

District IPM Strategies

Proven pest prevention measures will be utilized by the district to reduce the possibilities of infestation and resulting pesticide application. These measures include but are not limited to sanitation, structural repairs, and using physical and mechanical barriers such as screens and traps. The following are more specific strategies that should be implemented.

Indoor Strategies

Entryways (doorways, windows, plumbing and mechanical penetrations)

1. Keep doors closed when not in use
2. Place and maintain weather stripping on doors and windows
3. Caulk and seal openings and cracks in walls
4. Install or repair screens on appropriate windows

5. Install or replace damaged entry thresholds

Classrooms and offices (classrooms, science laboratories, administrative offices, auditoriums, gymnasiums, hallways)

1. Allow food and beverage consumption in specific areas only
2. Keep indoor plants healthy, do not over water
3. Store classroom pet food in air tight containers
4. Keep desks, backpacks, and storage areas free of food and beverages
5. Frequently vacuum carpeted areas
6. Students with head lice should be referred to the school nurse
7. Remove all clutter, cardboard boxes, used paper, cloth furniture, and excess materials
8. Trash receptacles should be washed out and sanitized weekly

Kitchens and serving areas (cafeterias, kitchens, home economics labs, snack areas, and vending machine areas)

1. Store food in containers that are not accessible to pests. Containers should have air tight lids, and be made of plastic, glass, or metal
2. Waste should be removed from each noted area daily (unless problems are noted, then twice daily is recommended)
3. Maintain screens on vents, windows, and floor drains to alleviate entry points
4. All cardboard shipping and storage containers, intended for dry room storage, should be removed and discarded as they arrive
5. Eliminate food and water sources that attract pests by removing food debris, repairing dripping faucets, and drying wet surfaces
6. Improve cleaning practices by promptly cleaning food preparation equipment and removing grease accumulation from vents, ovens, stoves, and other surfaces

Rooms and areas with extensive plumbing (bathrooms, sink areas, home economics labs, science labs, shower areas)

1. Promptly repair any detected leaks
2. Dry spills immediately to prevent standing water
3. Seal all penetrations through walls and floors
4. Do not store paper products near wet areas

Maintenance areas (boiler rooms, mechanical rooms, custodial closets)

1. No eating is allowed in these areas
2. After use, thoroughly clean mops and buckets and allow them to air dry
3. Use plastic liners in all trash receptacles and replace daily

Outdoor Strategies

Playgrounds, parking lots, athletic fields, loading docks, and dumpster areas

1. Secure lids on trash containers and empty them frequently
2. Provide adequate drainage from areas
3. Keep weeds and plant growth controlled
4. Keep trash picked up and not accumulating
5. Keep dumpsters at least fifty (30) feet from the building
6. Do not place trash outside of container
7. Keep shrubs and trees trimmed away from buildings and awnings

Turf areas (lawns, athletic fields, and playgrounds)

1. Select turf types that are best suited for area and soil types
2. Raise mowing heights for turf to enhance weed elimination
3. Sharpen mower blades and vary mowing patterns to reduce soil compaction
4. Water turf during early morning hours to allow drying before nightfall
5. Provide good drainage and check frequently for pests or diseases

6. Allow grass clipping to remain in turf as mulch where conditions permit
7. Fertilize appropriately for turf and soil conditions

ornamental shrubs and trees

1. Apply fertilizer appropriately
2. Prune branches to improve plant growth and structure
3. Use native plants that are disease and pest resistant
4. Correctly identify pests and use the appropriate treatment

Product Specifics

Purchasing

Regularly purchased pesticide and herbicide products will be from the EPA's recognized "**Green List**," and will be used on a daily basis for routine pest management and control whenever feasible. If a situation arises where "**Yellow List**" products are required to be utilized, approval from the Certified Applicator will be required prior to any application. "**Red List**" products will only be purchased and applied with the approval of the IPM Coordinator, in extreme situations. A partial list of the "Green", "Yellow", and "Red" list products can be found in the appendices.

Products

All products used will be categorized as explained:

Green List Products: Are inorganic pesticides (i.e., boric acid, disodium octoborate tetra hydrate, silica gels, diatomaceous earth); insect growth regulators; insect and rodent baits in tamper-resistant containers or for crack and crevice placement only; microbe-based insecticides; botanical insecticides (not including synthetic pyrethroids) containing not more than 5.0% synergists; biological (living) control agents, pesticidal soap and natural and synthetic horticultural oils. ***Green list products may be used at the discretion of the licensee.***

Yellow List Products: All EPA III and IV pesticides (i.e., products carrying a CAUTION signal word or no signal word as exempted by the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Sec. 25 (b) not included as a Green List product, with the exception of restricted-use or state-limited-use pesticides as defined under the Federal Insecticide, Fungicide, and Rodenticide Act and/or the Texas Agriculture Code. ***Use of Yellow list products requires written approval from the certified applicator.*** A copy of the approval must be sent to the IPM Coordinator. Yellow list product approval shall have duration of no longer than six (6) months or six (6) applications per site, whichever comes first.

Red List Products: All category I and II pesticides (i.e., products carrying a WARNING or DANGER signal word), not included as a Green List product or restricted use pesticides, or state-limited-use pesticides as defined under the FIFRA Act, and/or the Texas Agriculture Code. ***Use of a Red List product requires prior written permission from the certified applicator and IPM Coordinator.*** A copy of the approval must be kept in a separate file in the pest control use records for the school and clearly marked as Red List Approvals. Red List product approvals shall have duration of no longer than three (3) months or three (3) applications per site, whichever is first.

Approval Forms

Forms utilized for Yellow and Red list products must contain required information as noted from the Department of Agriculture. The approval must include a description of the problem and justification for use of these products. All approvals will be kept on file with the IPM Coordinator for a minimum of two (2) years. Samples of the approved forms are in the appendices.

Storage

An excessive amount of pesticide and herbicide inventory will not be purchased by the district. Only a reasonably anticipated amount will be purchased and stored at any given time. Pesticides will not be stored in areas where food is present, near cafeterias, or classrooms. Chemicals will not be stored in or near open flames or electrical appliances which could cause safety hazards to others in the area. Pesticides must be stored on pallets or solid surfaces which are under covered areas. If stored in confined shelving or cabinets, guaranteed ventilation will be established. Access to any stored pesticides will be restricted to trained personnel only.

Labeling

All pesticides used for district purposes will bear the appropriate label. If worn or defaced, the label will be replaced immediately. The information contained on the labels is invaluable to the applicators and the district in regards to purchasing, mixing, applying, storing, and disposing of the product.

Application

Pesticide applications will not be made within a school building if any such application will expose students to unacceptable levels of pesticides, as stated by manufacturer or the Texas Department of Agriculture. Insect and rodent baits that are in tamper-resistant containers, bait stations, non-containerized baits or gels, or botanical insecticides which are all on the Green List may be applied at any time if students are not present in the room at the time of treatment. All other Yellow or Red products may be applied only if students are not expected to be present in the area for the specified time of re-entry on the label, or by the Texas Department of Agriculture, whichever is longer.

Pesticide applications shall not be made to outdoor school grounds if such an application will expose students to physical drift of pesticide spray particles or unacceptable levels of pesticide. **Green List** products may be applied if students are not expected to be within ten (10) feet of the application site at the time of the application. **Yellow List** products may be applied if students are not expected to be within ten (10) feet of the application site for the next twelve (12) hours, and if the treated area is clearly marked to discourage entry, or secured by means of a fence or similar barrier. **Red List** products may be applied if students are not expected to be within fifty (50) feet of the application site for the next twelve (12) hours, and the treated area is clearly marked to discourage entry, or secured by means of a fence, or other similar barrier. Red List products may not be applied if there are wind conditions that would disperse the chemical beyond the marked or secured area.

Incidental Usage

Incidental use is not intended to be for long term or extensive pest control measures, rather emergency situations where the health and safety of students or staff is at risk and there is insufficient time to contact the districts applicator. Incidental use is defined as site specific, and incidental to the employee's primary duties. Examples of incidental use situations are: treating fire ants in transformer boxes, or valve boxes; controlling bees or wasps in bleachers or entryways. Any of these situations would be determined by the locations, time of day, and situations involving the area. In any case, the employee performing the incidental use should use the least hazardous method and chemical available. **Incidental Use Fact Sheets** should be distributed to each employee who performs incidental applications of Green List products, or Yellow List products when dealing specifically with wasps or bees. At the time of application an **Incidental Use Form** should be filled out and delivered to the IPM Coordinator as soon as possible for record retention. Records of incidental use applications and annual trainings will be maintained for a two (2) year period. A sample of the Incidental Use Form can be seen in the appendices.

Signage and Postings

All signage will be developed in accordance with mandated regulations. A pest control sign (posting) must be provided to the site administrator no less than 48 hours prior to the scheduled indoor treatment. In turn, the site administrator must inform all employees of the scheduled treatment. This would include any necessary treatments that need to be performed to immediate exterior areas as well. This posting will be placed in an area considered to be of common access by both staff and parents. The 48 hour notification will be waived if an

emergency situation arises, and the district noncommercial applicator and the site administrator both sign off a statement detailing the emergency situation. An emergency is defined as an imminent hazard to health, Safety, or property, or an infestation and emergency treatment is limited to the localized area of the emergency. If the site administrator is not available for signing, notations of the administrator's name, address, contact date will be noted on the statement.

Exterior treatments of weeds or Lawn and Ornamental will require the same 48 Hour Notification procedure with adherence to the application methods stated earlier. Exterior signs will be posted stating a "Chemical Application has been made to this area, restricted access is required as long as posting is made." These signs will be placed in as many access areas as possible.

Notifications

As a district, we will supply and receive signed affirmations of receipt of the Texas Department of Agriculture **Consumer Information Sheet** at the start of each school year, with an agreement that additional copies will be supplied on request. Notifications will be made to all parents or guardians of children attending schools or Head Start Centers at the time of registration, that the district periodically applies pesticides indoors to achieve the desired pest management objective. These notifications will be distributed in the Student and Staff Handbooks. Any additional information regarding the application or chemical usage can be obtained from the IPM Coordinator upon request.

Record Keeping

The noncommercial applicator or anyone utilizing the incidental usage procedures must keep accurate records of all applications. Included in these records should be routine operational data: name and address of location to be serviced, chemical name, percentage of mixture, amount of chemical used, application method, purpose of application, date of the application, and the person who performed the application. Purchasing and disposal information will be documented and maintained. All records will be maintained in the office of the IPM Coordinator for a minimum of two (2) years.

Inspections

As mandated by Texas Department of Agriculture Code § 7.150, each licensed pest control business shall be inspected at least one time every two years. Entities showing a lack of compliance with regulations or laws may be inspected more frequently.

IPM Safety

Many different kinds of pesticides are currently available for use against urban and structural pests. An appropriate application uses the least toxic and most effective and efficient technique and material. Due to their potentially toxic nature, these materials will be applied by qualified applicators in a manner to ensure maximum efficiency with minimal hazard. Although the EPA registers pesticides for use within the United States, the fact that a particular product is registered does not mean that it is safe under all conditions. The following general recommendations should minimize exposure to people and other non-target species when the application of pesticides is being considered:

- Read and follow all label instructions
- Choose a pesticide that is labeled for the specific site, intended for the pest you are trying to control, and as target specific as possible, rather than a broad spectrum.
- Use a spot treatment method of application when pesticide treatments are required. Treat only the obvious infested areas.
- Limit the use of sprays, foggers, or volatile formulations. Instead, use bait and crack and crevice application when possible.

- Place all rodenticides either in locations not accessible to children and non-target species or in tamper resistant bait boxes.
- Apply only when occupants are not present or in areas where they will not be exposed to the material applied.
- Notify students, staff, and interested parents of upcoming pesticide applications.

Transporting Pesticides

Careless transport of pesticide can lead to broken containers, spills, and contamination. Once pesticides are in the possession of district personnel, they are responsible for safely transporting them. Accidents can occur even over short distances. Always work to prevent transport problems, but be prepared for emergencies.

The safest way to move pesticides is in the back of a truck. Flatbed trucks will have side and tail rails to prevent loss of load. Steel beds are best because they are easiest to clean in case of a spill. Secure all pesticides so they can not shift, roll, or bounce. Protect containers from water. Moisture can soak into paper and cardboard packages, rusting metal, or ruining labels. If a spill occurs, clean immediately using appropriate procedures. If a spill of more than five (5) gallons occurs, contact the appropriate regulatory agency immediately.

Never carry pesticides inside your car, van, or truck cab. Skin contact or fumes from spilled pesticides may cause injury or death to you or your passengers. Spills on seat covers are very hard to remove and may be a lasting source of exposure if not cleaned properly.

Never leave your vehicle unattended when transporting pesticides. Curious children or careless adults may come in contact with your load causing health and legal issues. Some pesticide are designated as “hazardous substances” by the Department of Transportation (DOT). Certain guidelines apply to transportation of these pesticides. For example, shipping papers must be carried in the truck cab when pesticides are moved on the highway. A sign (placard) may be required stating the truck contains hazardous substances.

Personal Protective Equipment (PPE)

Pesticides can enter your body through your skin, eyes, mouth, and lungs. Pesticide poisoning occurs most commonly through skin contact. Some pesticides can be absorbed through the skin quite easily. Concentrates are especially dangerous. Also, two areas of your body – your head and genitals – absorb pesticides very fast and need extra protection.

If a pesticide spills on you, your skin will absorb most of it within minutes. Wash off the pesticide immediately. Avoid direct contact with pesticides by wearing protective clothing. The pesticide label will tell which protective clothing has proven to be most effective. Common PPE which should be used could include the following:

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| • Gloves | • Boots | • Respirators |
| • Body covering | • Goggles or Face Shield | • Cartridge Respirators |
| • Apron | • Head or Neck Covering | • Gas Masks |

Always work in pairs when handling highly toxic chemicals. Watch your co-worker carefully for unusual behavior or actions. Remind him (and yourself) to wash his face and hands before eating, drinking, or smoking. Never use the toilet without washing your hands first. It is important to avoid getting pesticide on any part of your body. At the end of the day, remove your contaminated clothing carefully and put it into a plastic bag, well away from regular laundry. Shower well, paying particular attention to fingernails and hair.

Disposal

Try to utilize all the pesticides mixed in your tank(s). If you have some left, use it on other target locations at the recommended dosage or mixture. Upon completion of application, clean equipment thoroughly and put it away immediately to prevent contact accidents. Do not leave pesticides or pesticide containers in the field or at the application site. Be sure that every container is accounted for at the end of the project or day. Dispose of empty containers as directed on each label. Do not reuse empty containers for any purpose. Tightly seal containers with remaining pesticides, and store in predetermined areas. Keep any unqualified staff and students away from storage location.

Cleanup

Clean all mixing, loading, and application equipment as soon as you finish using them. Clean them in a special area that has a sump drain capable of handling contaminated wash water. Label specifications will give detailed instructions on how to dispose of contaminated wash water. If possible, collect the contaminated wash water and use it to dilute the pesticide or a compatible pesticide if possible. All waste from equipment will be kept out of water supplies and streams.

It is very important to clean equipment between applications. Accidental death to sensitive plants and animals could occur from applications made with slight residues from pesticides. Always clean the inside and outside of the equipment, including nozzles. Washing the outside of the equipment ensures that people touching it will not be exposed to chemicals. Cleaning the inside insures that dangerous combinations of chemical mixtures will not occur.

At the end of each day, the applicator should immediately wash his person thoroughly. Remembering to scrub fingernails, clean jewelry, and remove footwear. Always store any PPE used in secure locations so access cannot be gained by unknowing persons. Do not reuse disposable or limited use garments. Dispose of these garments in a manner recommended by federal, state and local regulations. Separately launder washable clothing. This applies to regular work clothes worn daily, or any clothing exposed to pesticide or chemical use.