



Gresham-Barlow School District Healthy and Safe Schools Plan

December 28, 2016



Gresham-Barlow School District Safe and Healthy Schools Plan

Introduction

In August, 2016 Oregon Department of Education released rules regarding “Healthy and Safe Schools”. Specifically, OAR 581-0022-2223 requires school districts, on or before October 1, 2016 to report to the local school board and the Department of Education a draft “Healthy and Safe Schools Plan” that contains the following:

1. Position responsible for maintaining and implementing the Healthy and Safe Schools Plan.
2. A list of all facilities included in the plan.
3. A plan to test for elevated levels of radon as required under ORS 332.167.
4. A plan to test for and reduce exposure to lead in water used for drinking or food preparation.
5. A plan to reduce exposure to lead paint that includes compliance with the United States Environmental Protection Agency’s Renovation, Repair and Painting Program Rule.
6. A plan to implement integrated pest management practices under ORS 634.700 through 634.750.
7. A plan to communicate results for all test required under the Healthy and Safe Schools Plan.
8. Annual statement regarding the Healthy and Safe Schools Plan to the following:
 - a. Local board of education.
 - b. All building occupants or for occupants under the age of 18, their parents or legal guardians.
 - c. The community (website and information at district office).
9. The annual statement must include the following:
 - a. Position responsible for maintaining and implementing the plan.
 - b. How to obtain a copy of the plan.
 - c. How to access results for tests conducted as required by the plan.
 - d. A summary of major mitigation efforts in the last year as a result of the plan.

1. Responsible Person:

The person responsible for maintaining and implementing the Healthy and Safe Schools Plan is:

Name: Terry Taylor
Position: Director of Facilities
Contact Information: taylor6@gresham.k12.or.us
503-258-4700

2. List of Buildings:

This plan covers the following buildings:

Elementary Schools

Site	Address
Deep Creek – Damascus K-8	14265 SE 242 nd Ave, Damascus, OR 97089
East Gresham ES	900 SE 5 th , Gresham, OR 97080
East Orient ES	7431 SE 302 nd Ave, Gresham, OR 07080
Hall ES	2505 SE 23 rd Ave, Gresham, OR 97030
Highland ES	295 NE 24 th , Gresham, OR 97030
Hogan Cedars ES	1770 SE Fleming Ave, Gresham, OR 97080
Hollydale ES	505 SW Birdsdales, Gresham, OR 97080
Kelly Creek ES	2400 SE Baker Way, Gresham, OR 97080
North Gresham ES	1001 SE 217 th , Gresham, OR 97030
Powell Valley ES	4825 E Powell Blvd, Gresham, OR 97080
West Gresham ES	330 W Powell Blvd, Gresham OR 97030

Middle Schools

Clear Creek MS	219 NE 219 th Ave, Gresham, OR 97030
Dexter McCarty MS	1400 SE 5 th Ave, Gresham, OR 97080
Gordon Russell MS	3625 Powell Blvd, Gresham, OR 97080
West Orient MS	29805 SE Orient Drive, Gresham, OR 97080

High Schools

Gresham HS	1200 N Main Street, Gresham, OR 97030
Sam Barlow HS	5105 SE 302 nd Ave, Gresham, OR 97080
Springwater Trail HS	1440 SE Fleming Ave, Gresham, OR 97080

Other Sites

Center for Advanced Learning	1484 NW Civic Drive, Gresham, OR 97030
Deep Creek Campus	15600 SE 232 nd Drive, Damascus, OR 97089
District Office / Nutrition Services	1331 NW Eastman Parkway, Gresham, OR 97030
Facilities Office	2020 SE Fleming Ave, Gresham, OR 97080
Metro East Web Academy	1394 NW Civic Drive, Gresham, OR 97030
Student Support Services	1550 NW Eastman Pwy; STE 175, Gresham, OR 97030
Technology Office (Portables at DMMS)	1400 SE 5 th Ave, Gresham, OR 97080

3. Required Testing:

Radon – As required under ORS 332.167 the district has completed a radon-testing plan (see Attachment A - Radon Testing and Reporting Plan). Testing will occur annually at selected schools. Testing will be complete at all schools prior to January 1, 2021.

Lead in water (drinking and food prep) – Initial testing for lead levels in water used for drinking and food preparation were completed in the Summer of 2016 including remediation and retesting of all fixtures with a reading of 20 ppb or higher (see district website). Subsequent testing, on all fixtures used for drinking or food preparation, will be performed annually, bi-annually, and every five years based on priority order (see Attachment B – Drinking Water Testing Plan).

Lead paint – To reduce the risk of lead-based paint exposure to adults and children the Environmental Protection Agency (EPA) issued the Renovation, Repair and Painting Rule (RRP Rule) that became effective on April 22, 2010. The district is following the EPA plan in managing lead based paint in our in our schools. We manage our exterior and interior paint conditions through our work order system. Currently, we work to the rule, referenced above, to limit exposure of K-2 grade students to renovation, repairs and/or other lead based paint concerns. In 2016, the district will move to test all schools, grades K-12. The district is able to test painted surfaces, which allows us to know if the paint does contain lead prior to any renovation and/or repair. Once we have a known area of lead paint that is in need of repair we follow the EPA procedure in addressing the paint condition (see Attachment C – Lead Paint Testing Plan)

Integrated pest management – As required under ORS 634.700 through 634.750, the district implemented the Integrated Pest Management Plan on March 3, 2014 (see Attachment D – Integrated Pest Management Plan). The plan outlines the following:

1. What is Pest Management?
2. What is an Integrated Pest Management Plan?
3. School District IPM Plan Coordinator
4. IPM Decision-Making Process
5. Required Training/Education
6. Pesticide Applications: Required Notification, Posting, Record Keeping and Reporting.
7. Approved List of Low-Impact Pesticides

Asbestos Management Plan- Asbestos Hazard Emergency Response Act ([AHERA](#)) mandated that EPA develop regulations to respond to asbestos in schools. To implement this mandate, EPA enacted the Asbestos-Containing Materials in Schools Rule. GBSD follow this rule that requires all private and public nonprofit elementary and secondary schools to:

1. Perform an original inspection and re-inspection every three years of asbestos-containing material;
2. Develop, maintain, and update an asbestos management plan and keep a copy at the school;
3. Provide yearly notification to parent, teacher, and employee organizations regarding the availability of the school's asbestos management plan and any asbestos abatement actions taken or planned in the school;
4. Designate a contact person to ensure the responsibilities of the local education agency are properly implemented;
5. Perform periodic surveillance of known or suspected asbestos-containing building material;
6. Ensure that properly accredited professionals perform inspections and response actions and prepare management plans; and
7. Provide custodial staff with asbestos awareness training.

GBSD manages a Master AHERA management plan in the Facilities Office 2020 SE Fleming Ave, Gresham OR 97080 as well GBSD has site specific AHERA Management Plans at the following schools where we have know asbestos containing materials.

Site	Address
Deep Creek – Damascus K-8	14265 SE 242 nd Ave, Damascus, OR 97089
East Gresham ES	900 SE 5 th , Gresham, OR 97080
East Orient ES	7431 SE 302 nd Ave, Gresham, OR 07080
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Hollydale ES	505 SW Birdsdales, Gresham, OR 97080
North Gresham ES	1001 SE 217 th , Gresham, OR 97030
Powell Valley ES	4825 E Powell Blvd, Gresham, OR 97080
West Gresham ES	330 W Powell Blvd, Gresham OR 97030
Dexter McCarty MS	1400 SE 5 th Ave, Gresham, OR 97080
Gordon Russell MS	3625 Powell Blvd, Gresham, OR 97080
West Orient MS	29805 SE Orient Drive, Gresham, OR 97080
Gresham HS	1200 N Main Street, Gresham, OR 97030
Sam Barlow HS	5105 SE 302 nd Ave, Gresham, OR 97080
Deep Creek Campus	15600 SE 232 nd Drive, Damascus, OR 97089

4. Communication:

All test results – Test results will be available to the public within 5 days of receiving the results. An explanation of the test results will be included when reported. Summary results will be available on the District website. Notification of results will be sent using email and/or direct mail as appropriate. Additional information will be communicated using email and/or direct mail as appropriate.

5. Annual Communication:

School Board – In the Fall of each year, the Director of Facilities will provide updates regarding the Safe and Healthy Schools Plan including the responsible position for maintaining and implementing the plan, certification the plan is up to date and required testing has been completed, how to access test results and a high level summary of major activities and mitigation efforts pursuant to the plan.

Facility occupants – In the Fall of each year, updates regarding the Safe and Healthy Schools Plan will be provided to staff and parents or legal guardians including the responsible position for maintaining and implementing the plan, certification the plan is up to date and required testing has been completed, how to access test results and a high level summary of major activities and mitigation efforts pursuant to the plan.

Community – In the Fall of each year, updates regarding the Safe and Healthy Schools Plan will be posted to the district website and copies made available at the district office including the responsible position for maintaining and implementing the plan, certification the plan is up to date and required testing has been completed, how to access test results and a high level summary of major activities and mitigation efforts pursuant to the plan.



Engineering +
Environmental

ATTACHMENT A

Radon Testing and Reporting Plan

Gresham-Barlow School District

Gresham, Oregon

Prepared for:



Gresham-Barlow School District
1331 NW Eastman Parkway
Gresham, Oregon 97030

September 1, 2016
23797.005 Phase 0001

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Radon Testing and Reporting Plan

For

GRESHAM-BARLOW SCHOOL DISTRICT

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Prepared by

PBS Engineering and Environmental Inc.
4412 SW Corbett Avenue
Portland, Oregon 97239

Introduction:

In 2015, the Oregon Legislature passed Oregon Revised Statute (ORS) 332.166-167 which, in part, requires school districts to develop a plan for testing district-owned buildings for radon, test for radon, and report test results to parents, school boards, district staff, and the Oregon Health Authority (OHA). This Radon Testing and Reporting Plan is designed to meet statute requirements for developing a radon testing plan for submittal to OHA by the deadline of September 1, 2016.

Gresham-Barlow School District is committed to providing a safe environment for students and staff. As radon is the number one cause of lung cancer deaths in the United States among non-smokers, and schools are the second most commonly occupied buildings for children, testing for radon in schools is a priority for Gresham-Barlow School District.

This Radon Testing and Reporting Plan meets the guidelines outlined in OHA's *Testing for Elevated Radon in Oregon Schools: A Protocol and Plan Version 1.0 – 2016*. The plan will be initiated after September 1, 2016, with initial testing completed before the OHA deadline of January 1, 2021.

Any questions about this document or results of radon testing should be directed to Terry Taylor, Director of Facilities for Gresham-Barlow School District, at (503) 785-7897.

Terry Taylor, Director of Facilities

Gresham Barlow School District

Signature

Date

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- | | |
|--------------------------------|---------------------------------|
| District Office | Hall Elementary School |
| Facilities | Highland Elementary School |
| Center for Advanced Learning | Hogan Cedars Elementary School |
| Clear Creek Middle School | Hollydale Elementary School |
| Deep Creek Damascus K8 | Kelly Creek Elementary School |
| Deep Creek Campus | North Gresham Elementary School |
| Dexter McCarty Middle School | Powell Valley Elementary School |
| East Gresham Elementary School | Sam Barlow High School |
| East Orient Elementary School | Springwater Trail High School |
| Gordon Russell Middle School | West Gresham Elementary School |
| Gresham High School | West Orient Middle School |

ATTACHMENTS

Testing for Elevated Radon in Oregon Schools A Protocol and Plan (Version 1.0). Oregon Health Authority Public Health Division (2016)

1. PLAN SUMMARY

1.1 Background

Gresham-Barlow School District (District) is located in Gresham, Oregon and is comprised of 20 separate school campuses. Along with administrative, maintenance, technology, and special program sites, the district maintains approximately 70 buildings (including portables, or modular classrooms) that are regularly occupied by students or staff. Gresham-Barlow School District is committed to completing initial radon testing, in accordance with ORS 332.166-167, in district-owned schools and sites prior to January 1, 2021. It is estimated that approximately 1,000 rooms will need to be tested for radon, based on the guidance outlined in the OHA *Testing for Elevated Radon in Oregon Schools: A Protocol and Plan Version 1.0 – 2016 (Plan)*.

1.2 Regulatory Requirements

In 2015, the Oregon Legislature passed House Bill (HB) 2931 to bring awareness to elevated radon levels in Oregon schools. HB 2931 later became Oregon Revised Statute (ORS) 332.166-167.

This Radon Testing and Reporting Plan is designed to help school districts fulfill the requirements of (ORS) 332.166-167 of submitting a plan to the Oregon Health Authority (OHA) by September 1, 2016.

Per ORS 332.166-167, actual testing of each school for radon will be completed before January 1, 2021, and testing results will be sent to OHA and posted on the school's or school district's website.

1.3 About Radon

Radon is a naturally occurring radioactive gas. Radon is colorless, odorless, and tasteless. Radon comes from natural deposits of uranium in the soil and is found everywhere in the world. These deposits of uranium naturally decay into radium, which further breaks down into radon gas. Because radon is a gas, it can move up through the soil and enter buildings that are in contact with the soil. Radon is typically at its highest concentration in the lower portion of a building. Once radon enters a building, it is easily dispersed through the air. It then begins a radioactive decay process that leads to the creation of radon decay products. If inhaled, these radioactive particles (decay products) can be trapped in the lungs. As these particles decay further, they release small bursts of radiation, which can damage lung tissue and lead to lung cancer over the course of a lifetime.

According to EPA estimates, radon is the number one cause of lung cancer among non-smokers. No amount of radon is safe, but steps can be taken to reduce its potential for harm.

For most schoolchildren and school staff, the second largest contributor to radon exposure, next to their home is their school. As a result, both USEPA and the Oregon Health Authority (OHA) recommend that school buildings and homes be tested for radon. For schools in Oregon, this recommendation became law in the 2015 Legislature (ORS 332.166-167).

1.4 Action Level

In the US, radioactivity is measured in curies. A curie is approximately the amount of radioactivity produced by one gram of radium. A picocurie is one trillionth, of a curie. Radiation from radon is expressed in picocuries per liters of air (pCi/L).

US EPA has set the action level for radon at 4.0 pCi/L and recommends reducing the concentration of radon in indoor environments to below this action level.

2. TESTING PLAN

2.1 Testing Locations

The District will develop a detailed list of rooms for each site to be tested for radon in accordance with recommendations in the OHA Plan. The District will utilize each facility's floor plan to determine testing locations in frequently occupied rooms that are in contact with the ground or located above a crawlspace or basement, as required per ORS 332.166-167. Locations to be tested will be identified on drawings to be included in final reports and future radon testing plans.

Once testing locations are identified for each site, the District will calculate the number of test kits needed for each site. One test kit or device will be used per room for rooms that are less than 2,000 square feet in size. For rooms greater than 2,000 square feet, one kit or detector will be placed for every 2,000 square feet.

For quality assurance purposes, the District will also calculate the number of kits or devices needed to allow for blanks, duplicates, and spikes. Blanks will be deployed in five percent of the rooms to be tested at each site. Duplicates will be deployed in ten percent of rooms to be tested at each site. Blanks and duplicates will be deployed following the same methodology as the actual test kits. Spike samples are used for laboratory quality control and are not deployed on site. Test kits from the same batch as the kits used for on-site testing are sent to a third-party laboratory and “spiked” with a known concentration of radon. These test kits are then returned to the user and submitted to the testing laboratory along with the test kits from each school. Spikes will be submitted at a rate of three percent of the rooms to be tested at each site. Delivery of spike samples will coincide with the collection of test kits, duplicates, and blanks. A minimum of one blank, one duplicate, and one spike will be deployed per site.

For specific details and guidance, see sections “What rooms should be tested?” “Quality Assurance Procedures for a School Radon Measurement Program,” and “APPENDIX D: STEP-BY-STEP GUIDE FOR PLANNING RADON TESTING” in the attached OHA Plan.

Initial Short-Term Testing:

All locations identified will be tested using short-term activated charcoal adsorption test kits. Test kit, duplicate, and blank locations will be plotted on a building floor plan and tracked in a placement log or electronic database. Ideally, initial short-term testing will occur in October to allow time for follow-up long term testing beginning in November, if needed. Testing will occur during normal school days or days when the HVAC system is functioning in the same manner as normal school days.

Specific details and guidance outlining best practices for placing test kits and when to deploy test kits is not included in the scope of this plan. See “APPENDIX A: RADON TEST PLACEMENT PROTOCOL CHECKLIST” in the attached OHA Plan for details and guidance.

Results of the initial short-term tests that are ≥ 4.0 pCi/L will be evaluated using the quality assurance calculations listed in the “INTERPRETATION OF RESULTS” section of the attached OHA Plan.

The Gresham-Barlow School District will schedule a second short-term test, or long-term follow-up test based on the initial short-term test results as indicated below:

- If the result is less than 2.0 pCi/L, the District will test again every 10 years (as required by Oregon Revised Statute 332.166-167).
- If the result is between 2.0 pCi/L and 4.0 pCi/L, the District will investigate options for fixing (lowering) the radon in that room (e.g., adjustments to HVAC, sealing entry routes, etc.).
- If the result is between 4.0 pCi/L to 8.0 pCi/L, the District will perform a follow-up measurement of that room using a long-term test. This will be conducted over as much of a nine-month school year as possible, when rooms are likely to be occupied. If that result is equal to or greater than 4.0 pCi/L, the District will investigate options for lowering the radon in that room (e.g., adjustments to HVAC, soil depressurization, sealing entry routes, building pressurization, zone-specific ventilation, etc.).
- If the initial test result is equal to or greater than 8.0 pCi/L, the District will conduct a second short-term test within one month. The follow up result is then averaged with the result of the initial short-term test (see follow-up testing below).
- If the average result of the two short-term tests is equal to or greater than 4.0 pCi/L, the District will investigate options for lowering the radon in that room (e.g., adjustments to HVAC, soil depressurization, sealing entry routes, building pressurization, zone-specific ventilation, etc.).

- If the follow-up test is long-term, and the result is 4.0 pCi/L or above, the District will investigate options for lowering the radon in that room (e.g., adjustments to HVAC, soil depressurization, sealing entry routes, building pressurization, zone-specific ventilation etc.).

Results of any follow-up tests that are ≥ 4.0 pCi/L will be evaluated using the same quality assurance calculations as the initial short-term tests listed in the "INTERPRETATION OF RESULTS" section of the attached OHA "Testing for Elevated Radon in Oregon Schools: A Protocol and Plan."

CRM Use

The District may use continuous radon monitors (CRM) for follow-up long term and short term testing. The use of CRMs can help determine radon levels in a room during times it is actually occupied, which may in turn determine if adjustments to the HVAC system are adequate for reducing radon levels.

Mitigation

Mitigation measures are not specifically addressed in this plan but the District is committed to doing everything it can to reduce radon levels and provide a safe environment in every district building.

The EPA, OHA Oregon Radon Awareness Program, and numerous non-governmental groups, recommend that school districts take action to reduce the radon level in those rooms where the average of the initial and follow-up short-term kit results OR the result of the long-term kit used in follow-up is 4.0 pCi/L or more.

Although not required of school districts under ORS 332.166-167, it is recommended that school administration direct appropriate staff members to adjust building HVAC systems and retest. If this doesn't reduce the radon below 4.0 pCi/L, school districts have the option of hiring a radon mitigation professional to reduce elevated radon levels identified through testing.

Periodic Retesting

Following initial short-term radon testing, District sites will be retested every 10 years as required by ORS 332.166-167. Additional testing may be undertaken by the District, in addition to the 10 year retest cycle, should any of the conditions noted in the "When Should Periodic Retesting be Done?" section of the attached OHA Plan apply.

2.2 Reporting

All radon testing results will be made available to the District's school board, the Oregon Health Authority, and readily available to parents, guardians, students, school employees, school volunteers, administrators, and community representatives at the school office, district office, or on a website for the school or school district as required by ORS 332.166-167. Follow-up testing results, 10-year retest results, and mitigation implementation will also be made available.

3. REFERENCES

3.1 References

Oregon Health Authority Public Health Division (2016) *Testing for Elevated Radon in Oregon Schools A Protocol and Plan* (Version 1.0).

USEPA (United States Environmental Protection Agency). (July 1993). *Radon Measurement In Schools Revised Edition*, USEPA Air and Radiation (6609J), (EPA 402-R-92-014).

Minnesota Department of Health. (March 2013). *Best Practices for Radon Measurement in Minnesota Schools and Commercial Buildings* (Version 3).

Ohio Department of Health, Bureau of Environmental Health and Radiation Protection, Radon Licensing Program. (2015). *School Radon Testing Checklist*.

ATTACHMENT B

GBSD Drinking Water Testing plan: updated 12/29/2016 Terry Taylor, Director of Facilities

Following EPA's 3t's in Reducing Lead in Drinking water:

https://www.epa.gov/sites/production/files/2015-09/documents/toolkit_leadschools_guide_3ts_leadschools.pdf

Currently GBSD has followed the EPA plan in reducing lead in drinking water in our school. We have tested all known drinking water sources and are working to reduce all drinking water lead sources to below EPA Limits of 20/ppb. Only one drinking fountain is currently off due to this standard.

Next steps GBSD is now testing water sources in ice machines as well as on all outdoor water spigots as both sources of water do make it into the drinking water source for our students and staff. We will continue to follow the EPA 3t's for Reducing Lead in Drinking Water in Schools. Upon findings from those samples GBSD will address appropriately. At this time water sources that have not been tested to be below EPA levels for schools are not being used for Drinking water Sources.

GBSD will continue to monitor lead levels in drinking water sources and will continue to use the EPA 3t's for remediation of lead in drinking water sources.

GBSD has organize schools in age of construction and specific plumbing material groups to allow specific testing frequencies to address in priority order the schools and or office that require more frequent testing/management.

Group A-Annual Testing Winter/Spring Repairs Summer Reporting Fall

East Gresham ES-900 SE 5th, Gresham OR 97080

East Orient ES-7431 SE 302nd Ave, Gresham OR 07080

North Gresham ES-1001 SE 217th, Gresham OR 97030

Powell Valley ES-4825 E Powell Blvd, Gresham OR 97080

West Gresham ES-330 W Powell Blvd, Gresham OR 97030

Deep Creek Damascus K8-14265 SE 242nd Ave, Boring OR 97009

Dexter McCarty MS-1400 SE 5th Ave, Gresham OR 97080

Gordon Russell MS-3625 Powell Blvd, Gresham OR 97080

West Orient MS-29805 SE Orient Drive, Gresham OR 97080

Gresham HS-12 N Main Street, Gresham OR 97030

Sam Barlow HS-5105 SE 302nd Ave, Gresham OR 97080

Group B-Biennial testing Testing Winter/Spring Repairs Summer Reporting Fall

Deep Creek Campus-15600 SE 232nd Ave, Boring OR 97009

Hall ES-2505 SE 23rd Ave, Gresham OR 97030

Highland ES-295 NE 24th, Gresham OR 97030

Hollydale ES-505 SW Birdsdale, Gresham OR 97080

Group C-5 year testing Testing Winter/Spring Repairs Summer Reporting Fall

Hogan Cedars ES-1770 SE Fleming Ave, Gresham OR 97080

Kelly Creek ES-2400 SE Baker Way, Gresham OR 97080

Clear Creek MS-219 NE 219th Ave, Gresham OR 97030

Springwater Trail HS-1440 SE Fleming Ave, Gresham OR 97080

District Office-1331 NW Eastman Parkway, Gresham OR 97030

Facilities Office-2020 SE Fleming Ave, Gresham OR 97080

Nutrition Services-Included in District Office plan

Student Support Services-Leased Facility-1550 NW Eastman Parkway, Suite 175

GBSD School and Office Locations:

Deep Creek Campus-15600 SE 232nd Ave, Boring OR 97009

Lewis and Clark Montessori Charter School

East Gresham ES-900 SE 5th, Gresham OR 97080

East Orient ES-7431 SE 302nd Ave, Gresham OR 07080

Hall ES-2505 SE 23rd Ave, Gresham OR 97030

Highland ES-295 NE 24th, Gresham OR 97030

Hogan Cedars ES-1770 SE Fleming Ave, Gresham OR 97080

Hollydale ES-505 SW Birdsdale, Gresham OR 97080

Kelly Creek ES-2400 SE Baker Way, Gresham OR 97080

North Gresham ES-1001 SE 217th, Gresham OR 97030

Powell Valley ES-4825 E Powell Blvd, Gresham OR 97080

West Gresham ES-330 W Powell Blvd, Gresham OR 97030

Deep Creek Damascus K8-14265 SE 242nd Ave, Boring OR 97009

Clear Creek MS-219 NE 219th Ave, Gresham OR 97030

Dexter McCarty MS-1400 SE 5th Ave, Gresham OR 97080

Gordon Russell MS-3625 Powell Blvd, Gresham OR 97080

West Orient MS-29805 SE Orient Drive, Gresham OR 97080

Gresham HS-12 N Main Street, Gresham OR 97030

Sam Barlow HS-5105 SE 302nd Ave, Gresham OR 97080

Springwater Trail HS-1440 SE Fleming Ave, Gresham OR 97080

District Office-1331 NW Eastman Parkway, Gresham OR 97030

Facilities Office-2020 SE Fleming Ave, Gresham OR 97080

Nutrition Services-Included in District Office plan

Student Support Services-Leased Facility-1550 NW Eastman Parkway, Suite 175

Technology-Included in Dexter McCarty MS plan

ATTACHMENT C

GBSD Lead Paint Testing plan: updated 12/29/2016 Terry Taylor, Director of Facilities

Following EPA's Environmental Protection Agency (EPA) issued the Renovation, Repair and Painting Rule (RRP Rule) that became effective on April 22, 2010.

<https://public.health.oregon.gov/HealthyEnvironments/HealthyNeighborhoods/LeadPoisoning/Pages/rrp.aspx>

Currently, GBSD is following the EPA Plan in managing lead base paint in our in our schools. We manage our exterior and interior paint conditions through our work order system. Currently we work to the referenced rule above to limit exposure to K-2 grade students renovation, repairs and or other lead-based paint concerns. We are able to test painted surfaces that allow us to know if the paint does contain lead prior to any renovation and or repair. Once we have a known area of lead paint that is in need of repair we follow the EPA procedure in addressing the paint condition.

GBSD has now moved to test all schools grades K-12 using the same process in identifying Lead Based Paint in need of repair and/or renovation.

Next steps, GBSD will train custodial staff and Administrators on the process, as well as the inspection procedures in evaluating their schools. We will continue to follow EPA's Environmental Protection Agency (EPA) issued the Renovation, Repair and Painting Rule (RRP Rule) that became effective on April 22, 2010.

Group A-Annual Testing Winter/Spring Repairs Summer Reporting Fall

East Gresham ES-900 SE 5th, Gresham OR 97080

East Orient ES-7431 SE 302nd Ave, Gresham OR 07080

North Gresham ES-1001 SE 217th, Gresham OR 97030

Powell Valley ES-4825 E Powell Blvd, Gresham OR 97080

West Gresham ES-330 W Powell Blvd, Gresham OR 97030

Deep Creek Damascus K8-14265 SE 242nd Ave, Boring OR 97009

Dexter McCarty MS-1400 SE 5th Ave, Gresham OR 97080

Gordon Russell MS-3625 Powell Blvd, Gresham OR 97080

West Orient MS-29805 SE Orient Drive, Gresham OR 97080

Gresham HS-12 N Main Street, Gresham OR 97030

Sam Barlow HS-5105 SE 302nd Ave, Gresham OR 97080

Group B-Biennial Testing Testing Winter/Spring Repairs Summer Reporting Fall

Deep Creek Campus-15600 SE 232nd Ave, Boring OR 97009

Hall ES-2505 SE 23rd Ave, Gresham OR 97030

Highland ES-295 NE 24th, Gresham OR 97030

Hollydale ES-505 SW Birdsdale, Gresham OR 97080

Group C-5 year testing Testing Winter/Spring Repairs Summer Reporting Fall

Hogan Cedars ES-1770 SE Fleming Ave, Gresham OR 97080

Kelly Creek ES-2400 SE Baker Way, Gresham OR 97080

Clear Creek MS-219 NE 219th Ave, Gresham OR 97030

Springwater Trail HS-1440 SE Fleming Ave, Gresham OR 97080

District Office-1331 NW Eastman Parkway, Gresham OR 97030

Facilities Office-2020 SE Fleming Ave, Gresham OR 97080

Nutrition Services-Included in District Office plan

Student Support Services-Leased Facility-1550 NW Eastman Parkway, Suite 175

GBSD School and Office Locations:

Deep Creek Campus-15600 SE 232nd Ave, Boring OR 97009

Lewis and Clark Montessori Charter School

East Gresham ES-900 SE 5th, Gresham OR 97080

East Orient ES-7431 SE 302nd Ave, Gresham OR 07080

Hall ES-2505 SE 23rd Ave, Gresham OR 97030

Highland ES-295 NE 24th, Gresham OR 97030

Hogan Cedars ES-1770 SE Fleming Ave, Gresham OR 97080

Hollydale ES-505 SW Birdsdale, Gresham OR 97080

Kelly Creek ES-2400 SE Baker Way, Gresham OR 97080

North Gresham ES-1001 SE 217th, Gresham OR 97030

Powell Valley ES-4825 E Powell Blvd, Gresham OR 97080

West Gresham ES-330 W Powell Blvd, Gresham OR 97030

Deep Creek Damascus K8-14265 SE 242nd Ave, Boring OR 97009

Clear Creek MS-219 NE 219th Ave, Gresham OR 97030

Dexter McCarty MS-1400 SE 5th Ave, Gresham OR 97080

Gordon Russell MS-3625 Powell Blvd, Gresham OR 97080

West Orient MS-29805 SE Orient Drive, Gresham OR 97080

Gresham HS-12 N Main Street, Gresham OR 97030

Sam Barlow HS-5105 SE 302nd Ave, Gresham OR 97080

Springwater Trail HS-1440 SE Fleming Ave, Gresham OR 97080

District Office-1331 NW Eastman Parkway, Gresham OR 97030

Facilities Office-2020 SE Fleming Ave, Gresham OR 97080

Nutrition Services-Included in District Office plan

Student Support Services-Leased Facility-1550 NW Eastman Parkway, Suite 175

Technology-Included in Dexter McCarty MS plan



Gresham Barlow School District Integrated Pest Management Plan 3/3/2014

Terry Taylor
GBSD School IPM Program Coordinator
Facilities Department, Gresham, Oregon 97080

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. GBSD Facilities Grounds Staff, Jered Black, Mark Hopkins, Randy Wicht, Max Seifert and Office Staff, Denise Blaylock and Tana Stewart

Periodic updates will be posted at www.ipmnet.org/tim as experience gained through implementation is used to improve this plan.

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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 Gresham-Barlow School District 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 **Gresham-Barlow School 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

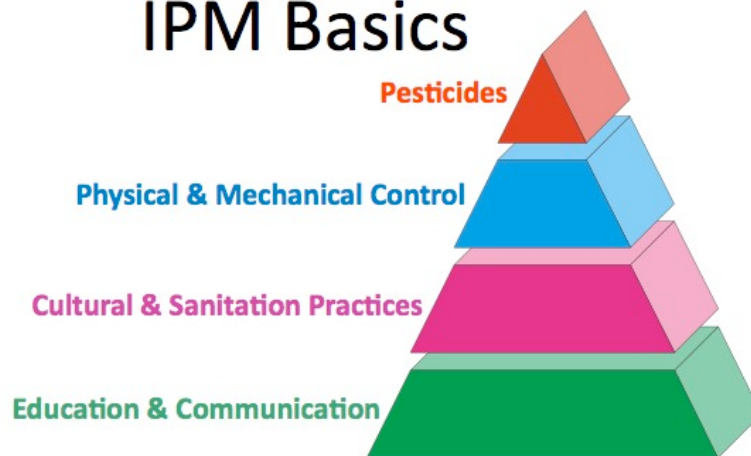
Education and Communication: The foundation for an effective IPM program is education and communication. We need to know what conditions can cause pest problems, why and how to monitor for pests, proper identification, pest behavior and biology before we can begin to manage pests effectively. Communication 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 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 non-chemical pest control measures;
- K. Allows the use of low-impact pesticides if non-chemical 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 Gresham-Barlow School District's IPM plan. This plan fleshes out the required strategy from ORS 634.700 – 634.750 for Gresham-Barlow School District.

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, several steps must be taken before **any** "routine" applications are allowed:

1. Staff must be educated on sanitation, monitoring, and exclusion as the primary means to control the pest.
2. An acceptable pest population density level must be established.
3. The use of sanitation, structural remediation or habitat manipulation, or of mechanical or biological control methods must be incorporated into the management strategy of the pest.
4. Documentation that the above steps were ineffective.
5. The pesticide label must be read thoroughly to make sure the pesticide will be used in strict compliance with all label instructions.

IV. SCHOOL DISTRICT IPM PLAN COORDINATOR

Note: ORS 634.720 states that the Coordinator "must be an employee of the governed district, unit, school or entity, unless the governing body delegates pest management duties to an independent contractor."

The Gresham-Barlow School District designates **Terry Taylor**, as the IPM Plan Coordinator. The Coordinator is key to successful IPM implementation in the Gresham-Barlow School 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 shall include at least a general review of IPM principles and the requirements of ORS 634.700 – 634.750.
- B. **Conducting outreach to the school community (custodians, maintenance, construction, grounds, faculty, and kitchen staff) about the school’s IPM plan** - The IPM Plan 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; and**
- 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.

V. IPM DECISION-MAKING PROCESS

A. Responsibilities – Gresham-Barlow School District Employees

1. *IPM Plan Coordinator Responsibilities*

See Section IV, above

2. *Custodial Services Responsibilities*

Custodial Services staffs are responsible for the following:

- a. Attending annual IPM training provided by the IPM Plan Coordinator (or designee).
- b. Placing and checking sticky insect monitoring traps in staff lounge, cafeteria, and kitchen as per the IPM Plan Coordinator’s instructions.
- c. Keeping records of pest complaints using pest logs placed in the staff lounge, cafeteria, and kitchen.
- d. Assuring floor under serving counters is kept free of food and drink debris.

- e. Sealing up small cracks or holes when reported by teachers or noticed by custodian when this can be done in a short time (e.g. less than 15 minutes).
- f. Recording his/her pest management actions in the pest logs.
- g. Reporting pest problems that he/she cannot resolve in less than 15 minutes to the IPM Plan Coordinator.
- h. Reporting teachers to the IPM Plan Coordinator who repeatedly refuse to reduce clutter and other pest-conducive conditions in their classrooms.
- i. Reporting pest-conducive conditions to the IPM Plan Coordinator if the custodian cannot fix them in less than 15 minutes.
- j. Confiscating any unapproved pesticides (such as aerosol spray cans) discovered during inspections or regular duties and delivering them to the IPM Plan Coordinator.
- k. Following up on issues found in annual inspection report as instructed by the IPM Plan Coordinator (IPM Plan Coordinator will determine which schools receive annual inspections based on pest and pesticide use history).

3. *Maintenance/Construction Responsibilities*

Staff involved in facilities maintenance and construction is responsible for working with the IPM Plan Coordinator to ensure their daily tasks, projects and operations enhance effective pest management. This includes:

- a. Receiving training from the IPM Plan Coordinator (or designee of the Coordinator) on the basic principles of IPM, sealing pest entry points, and sanitation during construction projects.
- b. Continually monitoring for pest conducive conditions during daily work, and sealing small holes and cracks when noticed (if they can be sealed in a short period of time – e.g. 15 minutes).
- c. Working with the 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).
- d. Developing protocols and provisions for pest avoidance and prevention during construction and renovation projects. The IPM Plan Coordinator has the authority to halt construction projects if these protocols and provisions are not being met.

4. *Grounds Department Responsibilities*

Grounds crews are responsible for:

- a. Attending annual IPM training provided by the IPM Plan Coordinator (or designee).
- b. Keeping vegetation (including tree branches and bushes) at least three feet from building surfaces.
- c. Proper mulching in landscaped areas to reduce weeds.
- d. 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/>).

- e. When the decision is made to apply a pesticide, following notification, posting, record-keeping and reporting protocols in Section VI.

5. Kitchen Staff Responsibilities

Kitchen staffs are responsible for:

- a. Attending annual IPM training provided by the IPM Plan Coordinator (or designee).
- b. Assuring floor under serving counters is kept free of food and drink debris.
- c. Promptly emptying and removing corrugated cardboard materials.
- d. Keeping exterior kitchen doors closed
- e. Reporting pest conducive conditions to proper staff, either orally or by using pest logs, conditions that require maintenance (e.g., leaky faucets, dumpster to near building, build-up of grease on floor, requiring spray-washing, etc..).
- f. Participating in any inspections conducted by custodian or IPM Plan Coordinator.
- g. 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 custodian and marking them in pest log.

6. School Faculty Responsibilities

School faculty are responsible for:

- a. Attending annual basic IPM training provided by the IPM Plan Coordinator (or designee).
- b. Keeping their classrooms and work areas free of clutter.
- c. Making sure students clean up after themselves when food or drink is consumed in the classroom.
- d. Reporting pests and pest conducive conditions to the custodian, either orally or via the pest logs.
- e. 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 and notify custodian only if ants continue to be found after following these steps).

7. School Principal Responsibilities

The School Principal is responsible for:

- a. Scheduling time for teachers to receive annual training provided by the IPM Plan Coordinator (or designee).
- b. Attending annual IPM training for teachers.
- c. Assuring that teachers keep their rooms clean and free of clutter in

- accordance with the IPM Plan Coordinator's instructions.
- d. Assuring that all faculty, administrators, staff, adult students and parents receive the annual notice (provided by the IPM Plan Coordinator) of potential pesticide products that could be used on school property as per Section VI.
 - e. Working with the IPM Plan Coordinator to make sure all notifications of pesticide applications reach all faculty, administrators, staff, adult students and parents.
 - f. 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 IPM Plan Coordinator).

B. Monitoring – Reporting – Action Protocol

Monitoring is the most important requirement of ORS 634.700 – 634.750. It is the backbone of the Gresham-Barlow School District'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. *Three levels of monitoring*

There are three levels of monitoring:

1. Casual observing/looking with no record keeping is not helpful
2. Casual observing/looking with written observations can be useful
3. Careful inspections with written observations is always useful

Level 2 monitoring (All Staff)

All staff will be trained to improve their "casual observing/looking" to level 2 and to report any pests and pest-conducive conditions they observe. Level 2 monitoring, is conducted by faculty, administration, maintenance/construction, kitchen staff, school nurses, etc.

After a brief (15 – 20 minute) training by the IPM Plan 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 by jotting observations down in a Pest Log (placed in staff lounge or other) or reporting them to the custodian for him/her to write them down. Custodial, maintenance, and kitchen staff are expected to set and/or check sticky monitoring traps as per the district's IPM plan.

Level 3 monitoring (Coordinator and Custodial staff)

The IPM Plan Coordinator (or designee) and Custodians will periodically conduct monitoring at Level 3. Coordinator and Custodial staff will monitor structures:

- Pest conducive conditions inside and outside the building (structural deterioration, holes that allow pests to enter, conditions that provide pest harborage)
- The level of sanitation inside and out (waste disposal procedures, level of cleanliness inside and out, conditions that supply food and water to pests)
- The amount of pest damage and the number and location of pest signs (rodent droppings, termite shelter tubes, cockroaches caught in sticky traps, etc.)
- Human behaviors that affect the pests (working conditions that make it impossible to close doors or screens, food preparation procedures that provide food for pests, etc.)
- Their own management activities (caulking/sealing, cleaning, setting out traps, treating pests, etc.) and their effects on the pest population.

Level 3 monitoring (Grounds staff)

Grounds staff will monitor Turf and Landscape:

- The condition of the plants (vigor and appearance)
- The amount of plant damage
- pH, phosphorus, and potassium levels of turf (soil test every 3-4 years in Selected locations including Sport Field locations)
- Kind and abundance of pests (weeds, insects, mites, moles, etc.) as well as natural enemies (ladybugs, spiders, lacewing larvae, syrphid fly larvae, etc.)
- Weather conditions (record any unusually dry, hot, wet, or cold weather in the past few weeks)
- Proper drainage
- Human behaviors that affect the plants or pests (foot traffic that compacts the soil, physical damage to plants caused by people, insistence on having certain plants grow in inappropriate situations, etc.)
- Management activities (pruning, fertilizing, mulching, aeration, treating pests, etc.) and their effects on the plants and the pest population.

2. 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. Custodians 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 will be responsible for checking those in the kitchen primarily for cockroaches and drain flies once per week (approximately 4 minutes).

After receiving training in the use of pest monitoring sticky traps by the IPM Plan Coordinator (or designee), custodial staff will be responsible for checking traps placed in pre-determined "pest-vulnerable areas" in the staff room, kitchen, and cafeteria (other areas that are often pest-vulnerable are: special education or kindergarten classrooms, home economics/life skills classrooms, concession stands, classrooms with animals/plants, custodial closets/storage) on a monthly basis, and replacing them every four months. If custodial staff cannot interpret what they find in the monitors they will contact the IPM Plan Coordinator for assistance (E-mailing a close-up digital photo of the unfolded sticky trap would help!).

3. Reporting (pests, signs of pests, and conducive conditions)

When staff observe pests or pest conducive conditions they should jot them down in a Pest Log or report them to the custodian for him/her to write them down.

4. 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 building custodian. The custodian must contact the IPM Plan Coordinator immediately.

5. Action!

a. Structural

Any items (such as sealing up holes) that maintenance/construction staff or custodial staff observe (or see on Pest Logs) that they can resolve in less than 15 minutes should be taken care of and this follow-up action should be noted in the Pest Log.

Custodial staff will review Pest Logs twice 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 to the IPM Plan Coordinator once per week. 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 maintenance/construction and/or the 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 maintenance/construction and/or the Pest Management Professional (PMP), with a Cc to the governing body. Upon completion of the work, the Coordinator and the school custodian will be notified.

The Coordinator will keep records of time and money spent to manage the pest, including copies of original receipts.

Small Ants:

When staff observe a small number of ants (e.g. under 10 ants) they must:

1. Spend two minutes trying to find out where the ants are coming from
2. Kill the ants with a paper towel or similar material
3. Remove any food or liquid the ants were eating
4. Wipe down the area with soapy water or disinfectant to remove pheromone trails
5. Note corrective action in the in the Pest Log

If the ants come back or there are more than a small number (e.g. under 10 ants) of them:

1. Spend two minutes trying to find out where the ants are coming from
2. Jot down the above in the Pest Log
3. Ask the custodian to come with vacuum and sealant as soon as he/she is able

The custodian will:

1. Spend two minutes trying to find out where the ants are coming from
2. Vacuum up the ants and any food debris nearby (vacuum up a tablespoon of cornstarch to kill most of the ants in the vacuum bag, then put the vacuum bag inside plastic garbage bag, seal it, and dispose of it properly)
3. Seal up the crack or hole where the ants were coming from (do what can be done in less than 15 minutes)
4. Wipe down the area with soapy water or disinfectant to remove pheromone trails

5. Note corrective action in the Pest Log

To avoid a proliferation of small ants and/or unnecessary applications of pesticides, the routine use of ant baits is not permitted without first:

1. Educating staff on sanitation, monitoring, and exclusion as the primary means to control the ants.
2. Establishing an acceptable pest population density (e.g. 10 ants).
3. Improving sanitation (e.g. cleaning up crumbs and other food sources) and structural remediation (sealing up cracks or holes where the ants are coming from).

For more detailed information on small ants, see Appendix 1a.

b. Grounds

When pests on grounds reach a threshold established by the Grounds Lead with assistance from the Grounds Crew and the IPM Plan Coordinator, action will be taken as per the matrices in Appendix 1-f.

6. **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 IPM Plan Coordinator and the governing body.

C. Inspections

1. Routine Inspections

The IPM Plan Coordinator will conduct routine inspections of different schools throughout the year (schedule and schools to be determined by the governing body and the Coordinator). Site custodians are required to accompany the Coordinator during the inspections. The inspections will typically last one to two hours and will focus on compliance with this plan and an inspection of the kitchen, staff room, and any other place of concern. After each routine inspection the Coordinator will write a one-page report on findings and recommendations. The report will be submitted to the school principal and custodian.

2. Annual Inspections

The IPM Plan Coordinator will conduct annual inspections at individual schools. Site custodians are required to assist the Coordinator with the annual inspection. The annual inspections will be more thorough than the routine inspections, and will use the Annual IPM Inspection Form (see Appendix 2) to guide the inspections. The specific schools to be inspected will be determined by the IPM Plan Coordinator and governing body based on a review of the annual number of pest problems and pesticide applications reported in the Annual IPM Report and Annual Report of Pesticide Applications.

D. 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.

E. 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, as well as costs for PMP's 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)

VI. REQUIRED TRAINING/EDUCATION

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 Training

ORS 634.720 (2) requires that the IPM Plan Coordinator "shall complete not less than six hours of training each year. The training shall include at least a general review of IPM principles and the requirements of ORS 634.700 to 634.750."

Content should include health and economic issues associated with pests in schools, exclusion practices, pest identification and biology for common pests, common challenges with monitoring-reporting-action protocols, proper use of sticky monitoring traps for insects, and hands-on training on proper inspection techniques.

Contact your Education Service District or the OSU School IPM Program for information on OSU-approved training courses.

B. Training for Custodial Staff

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 in Section V. A.

C. Training for Maintenance and Construction Staff

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 in Section V. A.

D. Training for Grounds Staff

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 IPM Plan 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 in Section V.A.) 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-g. Grounds staff will also be trained in basic monitoring for common pests on grounds.

E. Training for Kitchen Staff

The IPM Plan Coordinator (or a designee of the Coordinator) will train kitchen staff at least once per year on the basic principals of IPM and their responsibilities as outlined in Section V. A.

F. Training for Faculty and Principal

The IPM Plan Coordinator (or a designee of the Coordinator) will train faculty and principals at least once per year on the basic principals of IPM and their responsibilities as outlined in Section V. A. These short (15 – 20 minutes) training are arranged by the Coordinator with individual principals when openings in their school Faculty Meeting schedules permit.

G. Other Training

Basic training on the principals of IPM and the main points of this IPM Plan should also be provided to school nurses, administrative staff, superintendents, and students. Coaches who use athletic fields should be given an overview of basic monitoring and IPM practices for turf so they understand key pest problems to look out for and when to report them.

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 faculty, administrators, staff, adult students 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 adult students 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 IPM Plan Coordinator and at the office of the head custodian where the application takes place.*

No non-emergency pesticide applications may occur in or around a school until after 3:30 PM on a Friday 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 school faculty and administration.*
- 2. If a pesticide is applied at a campus 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 the governing body.*
- 3. The governing body 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 IPM Plan 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 governing body 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 for assistance in determining a pesticide a.i. cancer classification.

The most current list of approved low-impact pesticides is available upon request at the Facilities Office, 2020 SE Fleming Ave, Gresham, OR 97080

The process for creating and updating our school district's approved list is available through the Facilities Office.