

INTRODUCTION:

Integrated Pest Management (IPM) is an effective and environmentally sensitive approach to pest control. It is a coordinated approach intended to prevent unacceptable levels of pests by the most economical means and with the least possible hazard to people, property, and the environment. IPM programs take advantage of all pest management options with an emphasis on prevention. An IPM approach employs a combination of strategies including sanitation, monitoring, habitat modification, and the judicious use of pesticides when necessary.

IPM POLICY STATEMENT:

The School Board of Brevard County's rule on Pest Management is as follows:

- (a) The district shall adopt an integrated pest management (IPM) program using non-toxic, least toxic, least-impact control methods that minimize health risks to students, employees, non-target species and the environment. This program will include appointment of a district IPM coordinator and advisory committee, implementation of training for custodians and applicators, and provide for notification to all affected persons when chemical use becomes necessary. The advisory committee, as a part of the IPM policy of the district, shall quarterly review and evaluate the district's progress towards its pesticide use, reduction and minimization goals. This program shall also include implementation of an IPM Awareness program.
- (b) The district shall implement an IPM program consistent with the EPA guidelines with the following two-fold purpose:
 - 1. To substantially reduce and/or eliminate the use of toxic chemical controls; and,
 - 2. To use pest and environmental knowledge to prevent unacceptable levels of pest presence or damage while eliminating hazards to people, property, and the environment.

ROLES AND RESPONSIBILITIES:

IPM Coordinator

The Industrial Hygienist (Office of Plant Operations) is designated the IPM Coordinator. This person is authorized to make work requests, pest prevention and control recommendations, and participate in the selection and purchasing of approved supplies.

The IPM Coordinator or his/her designee will:

1. Coordinate IPM activities to ensure compliance with the School Board rule.
2. Coordinate IPM Advisory Committee meetings.
3. Coordinate with the IPM Advisory Committee and district staff to gather current information on pesticide or pest related health and safety issues, and research and development of suitable and cost effective IPM methods to enable reduction of pesticide use.
4. Coordinate IPM education and training.
5. Coordinate the development of an IPM Awareness program. Work with the IPM Advisory Committee, teachers, staff, and students to identify and carry out ideas for student or community involvement in the IPM program.
6. Coordinate the development of an IPM resource library in the Plant Operations Office.
7. Coordinate with planning, design, construction, and maintenance staffs to develop procedures for consideration of pest control implications of planned new construction and building or site modifications.
8. Coordinate written notification to all pest control, construction, maintenance, and landscape contractors, of the need to adhere to the district's IPM program.
9. Coordinate with custodial, building and grounds maintenance staff to ensure implementation of pest prevention measures.
10. Coordinate development of predetermined pest thresholds requiring remedial action.
11. Coordinate development of a hierarchy of control measures specific to each pest type.
12. Develop a list of pesticides pre-approved for application by district staff and/or outside contractors (Appendix 1).
13. Provide oversight for district staff or outside contractors engaged in pest management activities. Coordinate the development of written procedures.
14. Coordinate with principals and district administration to carry out posting and notification, record keeping, education and training provisions of this program.
15. Respond to appeals to decisions made by the district in regards to pesticide usage and provide responses to the school principal or site administrator with notification to the IPM Advisory Committee.
16. Coordinate retention of pesticide Material Safety Data Sheets (MSDS's), product labels, and, if available, information about inert ingredients.

17. Coordinate pesticide inspection, identification, monitoring, and usage record retention.
18. Coordinate establishment of metrics and report progress against baseline with the intent of meeting the goals of the IPM program.
19. In conjunction with district health/safety and pest control personnel, ensure that federal, state and local pesticide regulations related to labeling requirements, worker protection measures, record keeping, notification, posting, applicator licensing, and hazardous materials storage are followed.

IPM Advisory Committee

The IPM Advisory Committee is comprised of representatives from stakeholder groups (e.g., parents, teachers, concerned citizens, district staff).

The IPM Advisory Committee is empowered to:

1. Quarterly review and evaluate the district's progress toward its pesticide use, reduction and minimization goals.
2. Provide current information on pesticide or pest related health and safety issues, and research and development of suitable and cost effective IPM methods to enable reduction of pesticide use.
3. Assist in the development of an IPM resource library in the Plant Operations Office.
4. Assist the IPM Coordinator in developing and implementing an IPM Awareness program targeting student and community involvement.
5. Assist in the development of predetermined pest thresholds requiring remedial action.
6. Assist in the development of a hierarchy of control measures specific to each pest type.
7. Make recommendations to the IPM Coordinator on pre-approved pesticides to be used for the various applications.
8. Assist the district in availing itself of new treatment techniques and practices that are effective in pest prevention and control.
9. Review and recommend action to the IPM Coordinator in response to parental, staff, or chemically sensitive individuals' appeals regarding pesticide usage.
10. Assist the district as deemed necessary by the IPM Coordinator and Office of Plant Operations.

School Principals/Site Administrators

School Principals/Site Administrators or their designees will:

1. Ensure compliance with the IPM program at their school or site.
2. Generate work orders for pest prevention and control activities, as required.

3. Work with the IPM Coordinator or designee, maintenance and custodial staff, teachers, and students to ensure that pest prevention and control techniques are being implemented.
4. Coordinate with teachers to ensure that captive animals in classrooms are being properly cared for and their food is properly stored so as not to attract pests.
5. Ensure personnel performing pest management actions at their school/site are acting only within their scope of authority, education, and training.
6. Ensure that school/site staff, parents, and students do not bring pesticides onto district property.
7. Ensure that pesticide applications at the school/site are performed only by district-approved pest control personnel.
8. Retain and make available for public inspection copies of school/site pesticide use, pesticide MSDS's, and pesticide product labels. If available, information on inert ingredients for pesticides being used must also be at the school/site.
9. In cooperation with school district administration, ensure that posting and notification, education, and training provisions of these procedures are carried out as specified.
10. Provide support for an IPM Awareness program and ideas for student or community involvement.

Pest Control Personnel

Pest Control Personnel will:

1. Inspect semiannually all interior and exterior areas of SBBC schools and ancillary buildings to identify areas of significance to the IPM program. Inspect twice monthly all food storage areas, food preparation areas, lunch rooms, vending machine areas, and toilet and locker rooms. Employ monitoring devices in food and toilet/locker areas continuously when the devices can be made inaccessible to children.
2. Report inspection/monitoring results to the IPM Coordinator, the Principal for schools, and the Site Administrator for ancillary buildings. Meet with or report to appropriate personnel to discuss inspection recommendations that need to be implemented.
3. Respond to requests for pest control services within established time frames.
4. Fully examine and document non-chemical control techniques prior to pesticide use. Provide written recommendations and verbal explanation to appropriate staff.
5. Develop predetermined pest thresholds requiring remedial action.
6. Utilize pesticides as a last resort, incorporating non-toxic, least toxic, least impact methods. When pest thresholds are exceeded, use the smallest amount of the least toxic product that will meet pest management objectives. Utilize approved pesticides (Appendix 1) only and in accordance with regulations and label requirements. Seek specific approval of the IPM Coordinator on a case-by-case basis for use of conditionally approved pesticides (Appendix 2).

7. Coordinate selection and purchasing of pesticide supplies with the IPM Coordinator.
8. Provide MSDS's and product labels for each pesticide to the IPM Coordinator and the school principal, site administrator, or their designated representative prior to use.
9. Ensure pesticides are used in food service areas in a way that will not contaminate food, utensils, equipment or employee's clothing. Adequately control pest and vermin in all food service facilities and in all other areas where food is consumed.
10. Ensure a minimum of two weeks advance notification is given to the IPM Coordinator and the school principal, site administrator, or their designated representative in the event fogging, spraying, or dusting type pesticide applications are required. Ensure notification of pesticide-sensitive individuals and posting in accordance with regulatory requirements and this IPM program.
11. Apply fogs, sprays, or dusts other than during instructional hours except in the case of emergencies. Coordinate emergency actions with the IPM Coordinator or designee.
12. Provide training on pest prevention and pest control initiatives to appropriate personnel as needed. Provide specific instructions on an individual basis.
13. For each school/site, maintain files and provide copies to the IPM Coordinator and the school principal, site administrator, or their designated representative, (a) inspection, identification, and monitoring records and recommendations, (b) non-chemical control recommendations, (c) pesticide application records specifying location of treatment, specific type, concentration, and amount of pesticide applied, and (d) pesticide MSDS's, product labels, and manufacturer information on inert ingredients, if available.
14. Track overall use of pesticides monthly for (a) all schools, (b) all ancillary buildings, (c) all exterior grounds, and (d) all athletic fields to determine whether pesticide reduction/minimization goals are being achieved.
15. Ensure that federal, state and local pesticide regulations related to labeling requirements, worker protection measures, record keeping, notification, posting, applicator licensing, and hazardous materials storage are followed.
16. Develop procedures for all pest control related activities.

Planning, Design, and Construction Staff

Planning, Design, and Construction Staff will:

1. Work with the IPM Coordinator or designee to ensure consideration of pest control implications of planned new construction and building or site modifications.
2. Provide written notification to outside contractors of the need to adhere to the district's IPM program.

Maintenance, Cafeteria, and Custodial Staff

Maintenance, Cafeteria, and Custodial Staff will:

1. Work with the IPM Coordinator or designee to ensure consideration of pest control implications of building or site modifications.
2. Participate in facility inspections to identify pest problems.
3. Report pest activity promptly to the school principal/site administrator or designee.
4. Participate in implementation of pest prevention and control measures.
5. Perform recommended housekeeping, exclusion, and repair efforts within their capabilities and responsibilities. Refer remaining recommendations to school/site administrators so that work orders may be generated.
6. Perform pest management actions only within their scope of authority, education, and training.

GENERAL GUIDELINES:

The actions and interactions of the people involved in the district's IPM program are the key to its success. Roles and responsibilities are clearly defined in order to provide for effective pest management with minimal risk.

Education is a vital component of pest management. The district shall provide initial training and/or materials to inform participants of their roles and responsibilities, as well as address participants' concerns. The district shall also provide continuing education opportunities such as in-services, seminars and regular IPM training opportunities for the Plant Operations staff, school/site administrators and faculty, maintenance and custodial staff, and staff pest control personnel. Informational bulletins will be provided to staff, parents, and students periodically informing them of important topics relative to the IPM program and of their roles in pest prevention and control. Teachers should be encouraged to incorporate school pest control and IPM information into curricula and class projects so that students might participate in the implementation of the school's IPM program.

Pest management objectives will differ from site to site and will be consistent with the district's goals of protecting the health and safety of students and staff, maintaining the integrity of buildings and structures, providing the safest playing or athletic surfaces possible, and maintaining a productive working and learning environment. They will not be based on aesthetic criteria alone.

The district shall attempt to prevent pest problems whenever possible. Pest prevention measures will include regular inspections and monitoring, sanitation and pest proofing, and modification of environmental conditions leading to pest problems. Procedures shall be established for consideration of pest control implications of planned new construction of buildings or site modifications to ensure that pest problems are not created.

When pest sightings are reported, the district will monitor and keep records of pest populations and preventative measures undertaken. Monitoring and prevention techniques will normally involve the use of traps and containerized baits to pinpoint or prevent problem areas. Such devices will be used only where inaccessible to children.

The district will establish thresholds to indicate pest population levels at which the various levels of control measures will be undertaken. These thresholds may be numerical or narrative descriptions of pests or pest damage. Control measures will not normally be undertaken if pest damage or populations are below these levels.

When pests or pest damage exceed tolerance thresholds, non-chemical control measures are preferred. Pesticides will be used as a last resort, provided that other pest prevention and non-chemical control measures are unavailable, unfeasible, or have failed to reduce pests below tolerance thresholds. Cost or staffing considerations alone will not be adequate justification for use of pesticides or other chemical control agents.

When pesticide use is required, the smallest appropriate amount of the least-toxic product that will meet pest management goals will be used. A decision logic will be used which includes pesticides approved for each pest type and will give a hierarchy of control options based on pesticide toxicity and other considerations. The district will not routinely administer space spraying type pesticide applications indoors.

When it becomes necessary to use a pesticide, after all other prevention and control measures have been taken, the district will utilize a pesticide that is on a pre-approved chemical list. It is the district's goal not to use organophosphates or any other high toxicity pesticide inside school buildings. The EPA toxicity ratings will be used, in part, as a basis for compiling the pre-approved pesticide list. The list will be approved by the IPM Coordinator and will be coordinated with the IPM Advisory Committee.

School principals and site administrators shall receive the pre-approved pesticide list at the beginning of the school year or as soon as information becomes available. Parents, students, and staff may appeal the pre-approved pesticide list and pesticide usage to the principal/site administrator and the IPM Coordinator.

A conditionally approved pesticide list will also be maintained. All applications of pesticides on this list must be specifically approved in writing by the IPM Coordinator on a case-by-case basis.

Handling of all pesticide products will be done by properly trained and certified pesticide applicators. School/site staff are not authorized to bring pesticides onto district property, or to apply pesticides. With the exception of materials such as traps, containerized baits, and boric acid-containing pastes, pesticide applications will be done only during non-instructional hours and a minimum of one week advance notice shall be given to parents and staff through the school principal/site administrator. The name and telephone number of the contact person will be provided should additional

information be required. Posting notices in areas to be treated or that have been treated is mandatory and must be in accordance with regulatory requirements. Notices shall be prominently posted on all school/site main doors and near the application area(s). All schools/sites will have available copies of MSDS's and labels for any pesticides to be used in that facility, prior to that application.

The district will retain a current registry of pesticide-sensitive students, staff or others who have requested special consideration in the event of the use of pesticides. If an occupant has been identified as potentially sensitive to pesticides, administrative measures will be taken to reduce any health risk to that person.

Emergency pesticide applications may not allow for one week prior notification. These applications must be coordinated with the IPM Coordinator or designee. The area of application must be cleared of personnel and issues relative to pesticide-sensitive individuals must be resolved prior to application.

Record keeping will allow the district to determine if pest management objectives have been met. The IPM program will be periodically reviewed to evaluate pest prevention and control objectives, and to identify areas where more work is needed.

IPM IMPLEMENTATION PLAN:

The following seven step plan guides the implementation of the district's IPM program. The IPM program has no distinct start and finish. To be successful, it must be a continuous program requiring full support of all participants.

- Step 1:** Develop an official IPM policy statement.
- Step 2:** Designate pest management roles and responsibilities; assure good communication among participants; and educate or train the people involved.
- Step 3:** Set pest management objectives for the schools/sites.
- Step 4:** Inspect schools/sites and identify and monitor pest populations for potential problems.
- Step 5:** Set action thresholds. These are the levels of pest populations or site environmental conditions that require remedial action.
- Step 6:** Apply IPM strategies to control pests.
- Step 7:** Evaluate results to determine if pest management objectives are reached, and keep written records of all aspects of the program.

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