



Eugene School District 4J
Facilities Management
715 West Fourth Avenue
Eugene, OR 97402

Integrated Pest Management Plan

Lane County School District 4J

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Plan Questions and Appreciation:

Please direct any questions about this plan to the IPM Coordinator.

4J would like to thank Oregon State University, in particular Tim Stock and the entire School IPM team for providing a template plan that we adopted through review and modification. Thank you for your support!



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 people 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. With health and safety as our first priority it is the policy of Lane County School District 4J to approach pest management with the least possible risk to students, staff and public. In addition, ORS Chapter 634 requires all school districts to implement integrated pest management in their schools. For this reason, the Lane County School District 4J Board of Directors adopts this integrated pest management plan for use on the campuses of our district.

II. SCHOOL DISTRICT IPM COORDINATOR

The Superintendent has identified the IPM Coordinator as displayed on the district website. The Coordinator is key to a successful IPM program and is given the authority, after consultation with Facilities Administration, for overall implementation of this plan.

III. IPM ROLES AND RESPONSIBILITIES

A. Responsibilities of School District Employees

1. IPM Coordinator Responsibilities:

- A. Complete not less than six hours of IPM training each year as outlined in section IV.
- B. Conduct outreach to district staff, including but not limited to, custodians, maintenance, grounds, school faculty and kitchen staff about the school's IPM plan. The IPM Coordinator will provide training as outlined in Section IV below.
- C. Work with district staff to reduce clutter and food in the classrooms or other areas pest may migrate, as well as identifying pest entry points and ensuring they are properly sealed.
- D. Ensure the district roles and responsibilities in Section III are followed and continually assess and improve the pest monitoring/reporting/response protocol.
- E. Ensure that all notification, posting, and record-keeping requirements in Section V are met.
- F. Maintain a list of approved pesticides per Section VI.
- G. Respond to inquiries and complaints about the plan. Responses to inquiries and complaints should be in writing and a copy kept on record.

2. Custodial Services Staff Responsibilities:

- A. Attend annual IPM training provided by the IPM Coordinator, or designee.
- B. Assure floors under serving counters and appliances are kept free of food and drink debris.
- C. Submit a work order for sealing up pest entry points when found or reported.
- D. Keep record of pest complaints and pest management responses using pest logs kept in the custodial office. Submitting a work order to the IPM Coordinator when further action is required.
- E. Assist the IPM Coordinator in identifying areas that need assistance to reduce clutter and other pest-conducive conditions.



- F. Remove any pesticides discovered during inspections or regular duties. Submit a work order to the IPM Coordinator for disposal.
- G. Follow up on issues found in annual inspection report as instructed by the IPM Coordinator.

3. Maintenance department staff responsibilities:

- A. Attending IPM training provided by the IPM Coordinator, or designee on the basic principles of IPM.
- B. Working with the IPM Coordinator to ensure best practices are used for pest avoidance and prevention during daily tasks, projects and operations.
- C. Coordination of work orders that cannot be completed in a timely manner to ensure completion of said work is priority based.
- D. Monitoring for pest-conducive conditions during daily work, and sealing pest entry points when noticed.

4. Grounds Department Staff Responsibilities:

- A. Attending annual IPM training provided by the IPM Coordinator, or designee.
- B. Keeping vegetation, other than lawn, at least two feet from building surfaces.
- C. Proper mulching in landscaped areas to reduce weeds.
- D. Proper fertilizing, over-seeding, mowing height, edging, drainage, aeration, and irrigation scheduling in turf areas to reduce weeds.
- E. Entering a work order or coordinating with the IPM Coordinator when the need for a pesticide application is determined. The grounds department will not apply any pesticide prior to approval from the IPM Coordinator. Pesticide applications may only be done by a licensed applicator.
- F. Identifying and recording location of yellow jacket or hornet nests when found. Report these as requested by IPM coordinator.

5. Kitchen Staff Responsibilities:

- A. Attending IPM training provided by the IPM Coordinator, or designee.
- B. Assuring food preparation, serving and storage areas, including floors underneath are kept free of food and drink debris, when not in use.
- C. Assuring food and drink storage is in pest proof containers.
- D. Promptly emptying and removing corrugated cardboard materials.
Keeping exterior kitchen doors and/or screen doors closed.
- E. Reporting pest conducive conditions that require maintenance (e.g., leaky faucets, trash bins near kitchen, build-up of floor grease requiring spray- washing, uncovered drains, etc.) to custodial staff.
- F. Participating in inspections conducted by custodian or IPM Coordinator.

6. School Faculty Responsibilities:

- A. Attending basic IPM training provided by the IPM Coordinator, or designee. IPM training information may also be provided via electronic correspondence.
- B. Keeping their classrooms and work areas free of clutter.



- C. Making sure to clean up after food or drink is consumed in the classroom.
- D. Assuring food and drink storage is in pest proof containers.
- E. Reporting pests and pest conducive conditions to the custodian.
- F. Following first steps of protocol for ant management before notifying the custodian (clean up any food the ants are eating, remove visible ants, wipe down area where ants were with soapy water, notify custodian only if ants continue to be found after following these steps).

7. School Principal Responsibilities:

- A. Attending basic IPM training provided by the IPM Coordinator, or designee. IPM training information may also be provided via electronic correspondence.
- B. Assuring that faculty and volunteers keep their rooms and workspaces clean and free of clutter.
- C. Assuring that all faculty, administrators, staff, adult students and parents receive the annual notice that will be provided by the IPM Coordinator of potential pesticide products that could be used on school property as per Section V.
- D. Working with the IPM Coordinator to make sure all notifications of pesticide applications reach all faculty, administrators, staff, adult students and parents (via the method most likely to reach the intended recipients).
- E. Assuring that all school assigned staff fulfill their role as outlined in the district's IPM plan (reducing pest conducive conditions, participation in monitoring and pest log recording and attendance at IPM training(s)).

B. Monitoring, Reporting, & Response Protocol

Monitoring is the backbone of the IPM Program. Staff must engage in regular monitoring with accurate and timely reporting so effective pest management decisions can be made. This is defined as the regular and ongoing observation of areas where pest problems do or may occur. Information gathered during monitoring is reported to formulate action plans.

1. Acceptable Thresholds (pest population density levels)

A threshold is the number of pests that can be tolerated before taking action. The acceptable threshold is 0 for pests of concern that include bed bugs, cockroaches, nutria, mice, opossums, raccoons, rats, skunks, unaccompanied cats and dogs or yellow jackets.

Acceptable thresholds for other pests will be determined by the IPM Coordinator and the Facilities Department.

2. Monitoring and Reporting

- A. Level 1 monitoring and reporting (all district staff):
As much as possible, monitoring of workspace for signs of pests should be incorporated into the daily activities of school staff. Staff will be expected to report "pests of concern" or pest conducive conditions they observe during the normal course of their daily work. Reporting will be done by communicating



observations to custodial staff (primary), or administration staff (secondary) who will document in that site's Pest Log.

Custodial staff will send the Pest Logs to the IPM Coordinator as requested. Custodial staff should indicate on the pest log when the document was forwarded to the IPM Coordinator. The Coordinator will then determine further actions to be taken.

B. Level 2 monitoring (IPM Coordinator and Custodial staff):

The IPM Coordinator, or designee and Custodians will periodically conduct monitoring and document for:

1. Non-approved pesticide use.
2. Pests or conducive conditions inside and outside of the building (structural deterioration, entry points and conditions that provide pest harborage).
3. The level of sanitation inside and outside of building (waste disposal procedures, level of cleanliness inside and out, conditions that supply food and drink to pests).
4. The amount of visible pest damage to the building and the quantity and location of pest sign.
5. 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.).
6. Their own management activities (caulking/sealing, cleaning, setting out traps, treating pests, etc.) and their effects on the pest population.

C. Level 3 monitoring (Grounds staff):

Grounds staff will monitor the condition of district Turf and Landscape areas for:

1. Damage or impact caused by pests.
2. Human behaviors that affect the plants or pests (foot traffic that compacts the soil, physical damage to plants caused by people, inappropriate plantings, etc.)
3. Management activities (pruning, fertilizing, mulching, aeration, treating pests, etc.) and their effects on the plants and the pest population.

3. Response

A. Minor Measures:

If pests or conditions observed through monitoring can be appropriately addressed by maintenance or custodial staff, these measures and their results shall be documented in the School or Department Pest Log for review by the IPM Coordinator.

B. Intermediate Measures:

If pest issues require intervention beyond the available resources of custodial or maintenance staff, the IPM Coordinator shall be notified to assist in planning and implementing control measures.

C. Further Assistance:



If the actions needed exceed that which the Custodial staff or IPM Coordinator can accomplish alone or with minimal assistance, the Coordinator will arrange for further assistance from facilities staff and/or outside contractors. The IPM Coordinator will monitor the progress, and inspect the completion of follow up work and update the site pest log after completion of the work order.

C. Inspections

After each inspection the IPM Coordinator will write a brief report on findings and recommendations. Distribution of the report will be determined in collaboration with the facilities manager. Site custodians are required to accompany the IPM Coordinator during the following inspections:

1. Annual Inspections:

The IPM Coordinator will conduct annual IPM inspections at individual schools. Site custodians are required to assist the Coordinator with the annual inspection. The annual inspections will use the Annual IPM Inspection Form to guide the inspections.

2. Additional Inspections:

The IPM Coordinator, or designee will also conduct additional inspections of schools as necessary throughout the year. Schools may be selected for inspection based on a review of the Annual IPM Report, Annual Report of Pesticide Applications, or as a result of a specific pest issue. The IPM Coordinator's inspection may also be part of another overall building inspection, but will generally consider compliance with the District's IPM Plan and protocols and may include, but not be limited to an inspection of the kitchen, food storage, staff room and any other place of concern.

D. Pest Emergencies (see also Section V. 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 Coordinator, after consultation with school 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, they may declare a pest emergency. Examples include, but are not limited to, yellow jackets in areas frequented by children and a half a dozen mice or rats running through occupied areas of a school building.

E. Annual IPM Report

In January of each year, the IPM Coordinator will prepare an Annual IPM Report. The report will include a summary of data gathered from Pest Logs. The report will include a review of the prevention and management steps taken and associated effectiveness of the previous years program. Report content will be developed in collaboration with the facilities manager. The annual report is not intended to duplicate the required pesticide application report (see section V.D.)



IV. REQUIRED TRAINING/EDUCATION

ORS 634.700 (3) (i) requires staff education “about sanitation, monitoring and inspection and about pest control measures”.

Trainings may be completed by electronic means. The IPM coordinator will make a determination on the type(s) of training and delivery methods in collaboration with the facilities manager and supervising staff of different departments listed below.

A. IPM Coordinator Training

ORS 634.720 (2) requires that the IPM 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, identification and biology for common pests, common challenges with monitoring, reporting, response protocols, proper use of monitoring tools, and hands-on training on proper inspection techniques.

B. Training for Custodial Staff

The IPM Coordinator, or designee will train custodial staff on sanitation, monitoring, inspection, reporting and their responsibilities as outlined in this IPM plan.

C. Training for Maintenance Staff

The IPM Coordinator, or designee will train maintenance staff on identifying pest conducive conditions, mechanical control methods (door sweeps on external doors and sealing holes under sinks, etc.) and their responsibilities as outlined in this IPM plan.

D. Training for Grounds Staff

The IPM Coordinator, or designee will train grounds staff on monitoring, inspection, reporting and their responsibilities as outlined in this IPM plan. Grounds staff will training in basic trapping for common pests on grounds.

E. Training for Kitchen Staff

The IPM Coordinator, or designee will train kitchen staff on the basic principles of IPM and their responsibilities as outlined in this IPM plan.

F. Training for Faculty and Principal

The IPM Coordinator, or designee will train faculty and principals on the basic principles of IPM and their responsibilities as outlined in this IPM plan.

G. Other Training

Basic training and or handout materials on the principles of IPM and the main points of this IPM Plan may also be made available to school nurses, administrative staff, coaches, and contractors.



V. 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. Each year, all faculty, administrators, staff, adult students and parents will be reminded of the district website that holds the list of potential pesticide products that could be used in the event that other pest management measures are ineffective. This information will be provided to all the above via the District website.

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 Coordinator.

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 Coordinator determines to be appropriate. The IPM coordinator will determine an appropriate reentry time based on a variety of considerations including the times at which students would normally be expected to be in the area, environmental conditions and whether the area will be cleaned before students are present.

The IPM Coordinator, or designee will give written notice of proposed pesticide use 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 Coordinator, or designee, shall place warning signs around pesticide application areas at least 24 hours before the application occurs and not remove until at least 72 hours after the application occurs.

The 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 Coordinator).

B. Notification and Posting for Emergencies

Important Notes:

1. The IPM Coordinator may not declare a pest emergency until after consultation with the school administration and facilities administration.
2. If a pesticide is applied at a campus due to a pest emergency, the IPM Coordinator



shall review the IPM plan to determine whether modification of the plan might prevent future pest emergencies.

If a pest emergency is declared, the area must be evacuated and appropriate signage provided around the affected area before taking any other steps.

If a pest emergency makes it impracticable to give the 24 hour advance pesticide application notice before the pesticide application occurs, the IPM Coordinator shall send the notice no later than 24 hours after the application occurs. The IPM Coordinator, or designee shall place notification signs around the area as soon as practicable but no later than the time of application.

C. Record Keeping of Pesticide Applications

The IPM Coordinator shall keep a copy of the following pesticide product information on file at the custodian's office at the school where the application occurred and at the office of the IPM Coordinator:

1. A copy of the SDS
2. The brand name and USEPA registration number of the product
3. The approximate amount and concentration of product applied
4. The location of the application
5. The pest condition that prompted the application
6. The type of application and whether the application proved effective
7. The pesticide applicator's license numbers and pesticide trainee or certificate numbers of the person applying the pesticide
8. The name(s) of the person(s) applying the pesticide
9. The dates on which notices of the application were given
10. The dates and times for the placement and removal of warning signs
11. Copies of all required notices given, including the dates the IPM Coordinator gave the notices

The above records will be kept on file for at least four years following the application date.

D. Annual Report of Pesticide Applications

In January of each year, the IPM Coordinator will produce an annual report of all pesticide applications made the previous year. The report will contain the following for each application:

1. The brand name and USEPA registration number of the product applied
2. The approximate amount and concentration of product applied
3. The location of the application
4. The prevention or management steps taken that proved to be ineffective and led to the decision to make a pesticide application
5. The type of application and whether the application proved effective



VI. APPROVED LIST OF LOW-IMPACT PESTICIDES

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 most current and adopted list of approved low-impact pesticides is available below **(Please note the district will not use any product with an active ingredient of glyphosate)**. All pesticides will be used in strict accordance with label instructions.

http://blogs.oregonstate.edu/schoolipm/files/Low_Impact_Pesticide_List.pdf