
INTEGRATED PEST MANAGEMENT PLAN ADOPTION

POLICY ISSUE / SITUATION:

Senate Bill 637 (incorporated into ORS Chapter 634) requires all school districts to implement an integrated pest management plan in school buildings and on District grounds. Adoption of an Integrated Pest Management Plan by the School Board is a requirement of the legislation. The District's Integrated Pest Management Plan is provided for adoption.

BACKGROUND INFORMATION:

Integrated Pest Management (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. People 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 pest or pest conducive conditions and a record of what action was taken is the most important part of an effective IPM program.

Behavior & Sanitation: Knowing how human behavior encourages pests provides insight to prevent them from becoming a problem. Small changes in behavioral or sanitation practices can have significant effects on reducing pest populations.

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 unavoidable.

RECOMMENDATION:

Staff recommends that the Board adopt the District IPM Plan.

(12- 207) BE IT HEREBY RESOLVED that the Beaverton School District Board of Directors has adopted the District Integrated Pest Management Plan dated September 24, 2012.

Beaverton School District Integrated

Pest Management Plan

September 24, 2012

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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 the Beaverton 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 Beaverton School District School Board adopts this integrated pest management plan for use on the campuses of our district.

II. SCHOOL DISTRICT IPM PLAN COORDINATOR

The Superintendent or designee shall designate an IPM Plan Coordinator. The IPM Coordinator is essential for successful IPM implementation in our 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 Beaverton School District IPM plan;

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 is followed;

The Coordinator will periodically assess and improve the pest monitoring/reporting/action protocol.

E. Assuring that all notification, posting, and record-keeping requirements in section V are met when the decision to make a pesticide application is made;

F. Maintaining the approved pesticides list as per section VI; 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.

III. IPM Roles and Responsibilities

A. Responsibilities of School District Employees

1. *IPM Plan Coordinator Responsibilities*

See Section II above

2. *Custodial Services Responsibilities*

1) Attending IPM training provided by the IPM Plan Coordinator (or designee).

2) Placing and checking sticky insect monitoring traps in staff lounge, cafeteria, and kitchen as per the IPM Plan coordinators instructions.

3) Assuring the floor under serving counters and appliances in the kitchen is kept free of food and drink debris and working with custodians to keep floor drains clean.

4) Sealing up small cracks or holes when reported by teachers or noticed by custodian when this can be done in a short time

5) Keeping records of pest complaints and pest management actions using pest logs kept in custodial office.

6) Reporting pest problems that he/she cannot resolve in less than 15 minutes to the District Field Supervisor

7) Work with the IPM Plan Coordinator to help teachers who repeatedly refuse to reduce clutter and other pest-conducive conditions in their classrooms.

8) Reporting pest-conducive conditions to the IPM Plan Coordinator if the Custodial Foreman cannot fix them in a short time.

9) Remove any unapproved pesticides (such as aerosol spray cans) discovered during inspections or regular duties and setting them aside for the IPM Plan Coordinator to collect.

10) 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 are responsible for working with the IPM Plan Coordinator to ensure their daily tasks, projects and operations enhance effective pest management. This includes:

- 1) 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.
- 2) 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).
- 3) Working with the IPM Plan 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 .
- 4) Developing protocols and provisions for pest avoidance and prevention during construction and renovation projects. Work with the Project Managers and District Administrators to follow the IPM plan guidelines during Maintenance and Construction projects to eliminate pest conducive conditions.

4. Grounds Department Responsibilities

Grounds crews are responsible for:

- 1) Attending IPM training provided by the IPM Plan Coordinator (or designee).
- 2) Keeping vegetation (including tree branches and bushes) at a minimum of 24” from building surfaces.
- 3) Proper mulching in landscaped areas to reduce weeds.
- 4) Proper fertilization, over-seeding, mowing height, edging, drainage, aeration, and irrigation scheduling in turf areas to reduce weeds
- 5) When the decision is made to apply a pesticide, following notification, posting, record-keeping and reporting protocols in Section VI.

5. Nutrition Services Responsibilities

Kitchen staff are responsible for:

- 1) Attending IPM training provided by the IPM Plan Coordinator (or designee).

- 2) Assuring floor under serving counters is kept free of food and/or drink debris and working with custodians to keep floor drains clean.
- 3) Promptly emptying and removing corrugated cardboard material from storage areas.
- 4) Keeping all exterior kitchen doors closed.
- 5) Reporting pest conducive conditions that require maintenance (e.g. leaky faucets, dumpsters too near buildings, build-up of floor grease requiring spray washing, etc.) to the Custodial Foreman immediately.
- 6) Participating in any inspections of kitchen area conducted by custodian or IPM Plan Coordinator.
- 7) Checking sticky trap monitors once per month for cockroaches or drain flies and immediately reporting these pests and any sightings of rodents or rodent droppings to custodian. The custodian can take action and document incident in the pest log.

6. School Faculty Responsibilities

School faculty is responsible for:

- 1) Participating in basic IPM training provided by the IPM Plan Coordinator (or designee).
- 2) Keeping their classrooms and work areas free of clutter.
- 3) Making sure students clean up after themselves when food or drink is consumed in the classroom.
- 4) Reporting pests and pest conducive conditions to the custodial foreman, either orally or through e-mail so they can take action and document incident in the pest logs.
- 5) Following first steps of protocol for ant management before notifying the Custodial Foreman (clean up any food the ants are eating, kill 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

The School Principal is responsible for:

- 2) Participating in IPM training provided by the IPM Plan Coordinator (or designee).
- 3) Assuring that teachers keep their rooms clean and free of clutter.
- 4) Assuring that all faculty, administrators, staff, 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.
- 5) Working with the IPM Plan Coordinator to make sure all notifications of pesticide applications reach all faculty, administrators, staff, and parents (via e-mail to those that have e-mail, on the district's website, on the individual school's website, and posting in the main office at the school).
- 6) Assuring that all staff fulfill their role as outlined in the district's IPM plan (reducing pest conducive conditions and participation in monitoring, pest log recording and 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 our 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 used to form a plan of action and is always documented.

As much as possible, monitoring should be incorporated into the daily activities of school staff. Staff training on monitoring will include what to look for and how to report the information to the custodial foreman.

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 some documentation can be useful.
- 3) Careful inspection with proper documentation by the custodial foreman 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 to the Custodial Foreman who will document the problems. Level 2 monitoring is conducted by faculty, administrators, maintenance/construction, kitchen staff, school nurse, etc.

Staff will be expected to report pests or pest conducive conditions they observe during the normal course of their daily work. Pest problems will be reported to the Custodial Foreman who will take action and document the incidents in the pest log. Custodial and kitchen staff are expected to set and/or check sticky monitoring traps as per the district's IPM plan.

Level 3 monitoring (IPM Plan Coordinator and Custodial Foremen).

The IPM Plan Coordinator (or designee) and the custodial foreman will periodically conduct monitoring at level 3. The IPM Coordinator and Custodial Foreman will inspect buildings for:

- Unsanctioned pesticide use by teachers and school staff and report use to the IPM Coordinator.
- 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.).
- The results of 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 for:

- Unsanctioned herbicide use by coaches, volunteers, and others. Report any unsanctioned pesticide use to the IPM Coordinator.
- The results of their own 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 entry points of pests, and the number of pests.

All staff will be made aware of the traps and their purpose so they don't disturb them. Custodial Foreman will be responsible for setting them out and checking them once per

month and replacing them once every four months Kitchen staff will be responsible for checking those in the kitchen primarily for cockroaches and drain flies once per week

After receiving training from the IPM Plan Coordinator (or designee) in the use of pest monitoring sticky traps, Custodial Foreman will be responsible for checking traps placed in pre-determined “pest-vulnerable areas”. These areas include the staff room and kitchen (and any other areas determined by the Custodial Foreman or IPM Plan Coordinator). If the Custodial Foreman cannot interpret what they find in the monitors they will contact the IPM Plan Coordinator for assistance.

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

When the staff observes pests or pest conducive conditions they should report them to the Custodial Foreman for him/her to write them down and follow protocol under #5 *Action below.*

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 custodial foreman. The Custodial Foreman must contact the maintenance office immediately. The maintenance office will then contact the IPM Plan Coordinator.

5. Action!

a) Structural

Any items (such as sealing up holes) that maintenance/construction staff or custodial staff observes that they can resolve in a short amount of time should be taken care of and the action should be noted in the pest log by the Custodial Foreman.

Pest Logs will be faxed or scanned/emailed to the IPM Plan Coordinator once per month if there are items noted on the log. If nothing is noted in the log, the IPM Coordinator will determine further actions to be taken and when.

If the actions needed are not something the Custodial Foreman can accomplish alone or with minimal assistance, the Custodial Foreman will work with the District Field Supervisor 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 custodial foreman will then generate a work order with a proposed deadline for completion based on the severity of the risk or nuisance.

The IPM Coordinator will monitor the completion of the IPM Work Orders by working with the District Field Supervisors. Upon completion of the work, the IPM Coordinator and the school Custodial Foreman will be notified.

The IPM Coordinator will keep records of time and money spent to manage the pest, and quantities of chemicals used.

Ants:

When Custodians observe a small number of ants they must:

1. Spend the time needed trying to find out where the ants are coming from.
2. Kill the ants with a paper towel or vacuum up.
3. Remove any food or liquid the ants were eating.
4. Wipe down the area with soapy water or disinfectant to remove the pheromone trails.
5. Document actions in the pest log.

If the ants come back or there are more than a small number of them:

The Custodian will:

1. Assess the entry point of the ants.
2. Vacuum up the ants and any food debris nearby (dispose of the vacuum bag after vacuuming up ants).
3. Seal up the cracks or holes where the ants are entering the building or submit a work order.
4. Wipe down the area with soapy water or disinfectant to remove pheromone trails.
5. Document the above actions in the pest log.
6. Contact the Custodial Supervisor.

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

1. Educating the staff on proper sanitation, monitoring and exclusion as the primary means to control ants in the buildings
2. Establish an acceptable pest population density (e.g. 10 or more ants)
3. Improve sanitation (cleaning up crumbs and other food sources) and structural remediation (sealing up cracks and holes that provide entry points for ants)

b) Grounds

When pests on grounds reach a threshold established by the Grounds Foreman/lead and the IPM Plan Coordinator, action will be taken as provided by the IPM Plan Coordinator.

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, drain flies, ants, silverfish, mice, rats, raccoons, cats, dogs, opossums, skunks, and nutria is zero.

Acceptable thresholds for safety concerns of other pests will be determined by the IPM Plan Coordinator and the Maintenance Department.

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 Coordinator). Site Custodial Foreman will accompany the IPM Coordinator during the inspections as needed. The inspections will focus on compliance with the IPM Plan and an inspection of the kitchen, staff room, and any other place of concern. After each routine inspection the IPM Coordinator will write a one-page report on findings and recommendations. The report will be submitted to the school Principal and Custodial Foreman.

2. Annual Inspections:

The IPM Plan Coordinator will conduct annual inspections at individual schools. Site custodians will assist the IPM Coordinator with the annual inspection. The annual inspections will be more thorough than the routine inspections, and will use the Annual IPM Inspection Form to guide the inspections. The specific school or schools to be inspected will be determined by the IPM Plan Coordinator 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/Safety Concerns (see also Section V. B. below)

IMPORTANT: If a pest emergency is declared that is a safety concern, 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 shall 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 prepare an annual IPM report. The report will include a summary of data gathered from Pest Logs, as well as costs for contracted pesticide services 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.

Prevention and management steps taken that proved to be ineffective and led to the decision to make a pesticide application will be included in the annual report of pesticide applications (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”.

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.

B. Training for Custodial Staff

The IPM Plan Coordinator (or a designee of the Coordinator) will train custodial staff 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 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 Grounds Foreman will train grounds staff. Prior to training, the Grounds Foreman will meet with the IPM Plan Coordinator to review the annual report of pesticide applications and plan training for all grounds staff. The 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.

E. Training for Nutrition Services Staff

The IPM Plan Coordinator (or a designee of the Coordinator) will train kitchen staff on the basic principles 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 make training available to faculty and Principals on the basic principles of IPM and their responsibilities as outlined in Section V. A.

G. Other Training

Basic training on the principles of IPM and the main points of this IPM Plan will also be made available to school nurses, administrative staff, superintendents, coaches, and students.

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 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 on the district's website, on the individual school's website, and posting in the main office at the school.

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.*

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 (on the district's website, on the individual school's website, and posting in the Main Office at the school) 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*

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 school's main office where the application occurred, the Central Office Risk Management Department, and at the office of the 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 school's main office where the application occurred, and at the office of the IPM 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 prepare 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

VI. 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 most current list of approved low-impact pesticides will be available on the District's website at www.beaverton.k12.or>departments>facilities>links

Appendix A

Low-Impact Pesticide List

List of products that meet the requirements of a Low-Impact Pesticide as required in ORS 634.700 – 634.750.

After receiving requests from several members of the Oregon School Facilities Management Association (OSFMA), the OSU School IPM Program e-mailed all members to offer assistance (via an OSU toxicologist with expertise in pesticide toxicology) with creating their “low-impact” pesticides lists. Members were asked to provide the active ingredient, EPA registration number, and product name of any “caution” labeled products they were using (or considering using) for the toxicologist to review.

Below is a list of the reviewed products that meet the requirements of the law, as well as abridged comments from the reviewer (for complete comments and the list with complete background information, see http://ipmnet.org/Tim/IPM_in_Schools/new_ORIGINAL_low-impact_review.pdf).

We will periodically review future requests (that include the active ingredient, EPA registration number, and product name of “caution” labeled products) from school IPM coordinators who have completed the OSU School IPM Program’s IPM coordinator training, and post updates to this list on our website.

Abridged Reviewer Comments:

Using the NPIC Pesticides and Active Ingredient Retrieval System, I checked the EPA registration numbers for each product. I then used EPA’s publication “Chemicals Evaluated for Carcinogenic Potential” to assign carcinogen classifications. For those active ingredients not classified in this 2006 publication I used other EPA sources, such as the Reregistration Eligibility Determinations or Federal Register Notices on the establishment of tolerances.

Signal words and carcinogen classification for the active ingredients on the review list were compared to language in ORS 634.705 Adoption of integrated pest management plan and related provisions; exceptions; low-impact pesticide list, Section (5), which states:

A governing body shall adopt a list of low-impact pesticides for use with the 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. [2009 c.501 §3]

Labels for all products on the review list have the signal word “Caution”. No products on the list have a carcinogen classification under the 1986 Guidelines of “human carcinogen” or “probable human carcinogen”. No products on the list have a carcinogenic classification of “carcinogenic to humans” under the 2003 draft guidelines.

List of “low-impact pesticides” that meet the requirements of ORS 634.700 – 634.750

Product Name	Formulation	EPA Registration #	Active Ingredient
Advion Ant Gel	Bait Gel	352-746	Indoxacarb
Advion Cockroach Gel Bait	Bait Gel	352-652	Indoxacarb
Aquamaster	Liquid	524-343 (-ZF)	Glyphosate, isopropylamine salt
Bee Bopper II, ARI Wasp and Hornet Killer	Pressurized liquid	7754-44	Tetramethrin d-Phenothrin
Casoron 4G	Granular	400-168	Dichlobenil
Crossbow	Emulsifiable Concentrate	62719-260-5905	2,4-D, butoxyethyl ester Triclopyr, butoxyethyl ester
K-Orthine Dust	Dust	432-772	Deltamethrin
Delta Dust	Dust	28293-322	Deltamethrin
Demand G Insecticide	Granular	100-1240	Lambda-cyhalothrin
The Andersons 0.25% Granular Dithiopyr Herbicide	Granular	9198-213	Dithiopyr
EcoEXEMPT G Granular Insecticide	Granular	Exempt	Eugenol (clove oil) Thyme oil
EcoEXEMPT IC-2 Insecticide Concentrate	Concentrate	Exempt	Rosemary Oil
EcoPCO WP-X Wettable Powder Insecticide	Wettable Powder	67425-25-655	Pyrethrins 2-Phenylethyl propionate

			Oil of thyme
Envoy Plus	Emulsifiable Concentrate	59639-132	Clethodim
Generation mini blocks	Pellets/tablets	7173-218	Difethialone
Gourmet Liquid Ant Bait	Impregnated Materials	73766-2	Disodium Octaborate Tetrahydrate
Grant's Ant Control A bait stations	Impregnated Materials	1663-33	Hydramethylnon
Hi-Yield Super Concentrate Kill-Zall II	Soluble Concentrate	42750-61-7401	Glyphosate, isopropylamine salt
InTice Thiquid ant bait	Soluble Concentrate	73079-7	Sodium Tetraborate Decahydrate
Landmaster BW	Soluble Concentrate	42750-62	2,4-D, isopropylamine salt Glyphosate, isopropylamine salt
Maxforce FC Professional Insect Control Roach Killer Bait Gel	Bait gel	432-1259	Fipronil
Maxforce Professional Insect Control Roach Killer Bait Gel	Bait Gel	432-1254	Hydramethylnon
Milestone VM Plus	Emulsifiable Concentrate	62719-572	Aminopyralid, triisopropanolamine salt Triclopyr, triethylamine salt
MotherEarth D Pest Control Dust	Dust	499-509	Diatomaceous Earth (amorphous silica)
MotherEarth Granular Scatter Bait	Granular	499-515	Boric Acid
MotherEarth Wasp & Hornet	Pressurized Liquid	499-519	d-Limonene
Optigard Ant Gel Bait	Ready-to-Use Solution	100-1260	Thiamethaxom
Orange Guard	Ready-to-Use Solution	61887-1-AA	d-Limonene
Patrol Insecticide	Emulsifiable Concentrate	100-1066	Lambda-cyhalothrin
Phantom Termiticide-Insecticide	Emulsifiable Concentrate	241-392	Chlorfenapyr
QuickSilver Herbicide	Emulsifiable Concentrate	279-3301	Carfentrazone-ethyl

Raid wasp and hornet spray	Pressurized Liquid	4822-553	Cypermethrin Prallethrin
Rescue W H Y spray for wasp, hornet, & yellowjacket nests	Pressurized Liquid	Exempt	Lemongrass oil Clove oil (eugenol) Rosemary oil Geranium oil
Rodeo	Soluble Concentrate	62719-324	Glyphosate, isopropylamine salt
Round Up Pro Max	Soluble Concentrate	524-579	Glyphosate, potassium salt
Safari 20 SG Insecticide	Emulsifiable Concentrate	33657-16-59639	Dinotefuran
Safer Brand Wasp and Hornet Killer	Liquid Aerosol	36488-47	d-Limonene Pyrethrins Potassium Salts of Fatty Acids Indian Palmarosa Oil
Snapshot 2.5 TG	Granular	62719-175	Trifluralin Isoxaben
Talstar P Professional Insecticide	Emulsifiable Concentrate	279-3206	Bifenthrin
Temprid SC Insecticide	Soluble Concentrate	432-1483	Imidacloprid beta-Cyfluthrin
Termidor SC	Soluble Concentrate	7969-210	Fipronil
Terro Liquid Ant Baits	Ready-to-Use Solution	149-8	Sodium Tetraborate Decahydrate
TZone	Emulsifiable Concentrate	2217-920	Dicamba 2,4-D, 2-ethylhexyl ester Triclopyr, butoxyethyl ester Sulfentrazone
Whitmire PT 515 Wasp Freeze	Pressurized Liquid	499-362	d-trans Allethrin d-Phenothrin

² International Agency for Research on Cancer (IARC) found that there is inadequate evidence to link amorphous silica with cancer effects in humans or test animals. (<http://www.epa.gov/oppsrrd1/REDs/factsheets/4081fact.pdf>).