

# Healthy and Safe Schools Plan

## Neah-Kah-Nie School District 56

SECTION 1	Responsible Party and Locations .....	Page	1
SECTION 2	Radon Plan .....	Pages	2-12
SECTION 3	Lead/Copper in Water .....	Pages	12-13
SECTION 4	Lead Paint .....	Page	13
SECTION 5	IPM Plan .....	Pages	14-34

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### **SECTION 1 location, responsible party**

(5) At a minimum, the Healthy and Safe Schools Plan must include:

(a) The position within the school district's or public charter school's administration responsible for maintaining and implementing the Healthy and Safe Schools Plan (HASS); Superintendent or designee.

The Superintendent has designated

Steve Baertlein

Facilities Supervisor

As the person responsible for maintaining and implementing, the HASS Plan

(b) A list of all facilities that are included in the school districts or public charter school's Plan;

1. District Office, 504 North Third Avenue, Rockaway Beach
2. Neah-Kah-Nie Preschool, 504 North Third Avenue, Rockaway Beach
3. Neah-Kah-Nie High School, 24705 Hwy 101 North, Rockaway Beach
4. Neah-Kah-Nie Middle School, 25111 Hwy 101 North, Rockaway Beach
5. Garibaldi Grade School, 604 Cypress Street, Garibaldi
6. Nehalem Elementary School, 36300 Eighth Street, Nehalem

**END OF SECTION**

# Healthy and Safe Schools Plan

## Neah-Kah-Nie School District 56

### SECTION 2 Radon Plan

(c) A plan to test for elevated levels of radon as required under ORS 332.167;

The 2015 Legislature passed House Bill (HB) 2931 so that elevated radon levels in Oregon schools would be known. House Bill 2931 later became Oregon Revised Statute (ORS) 332.166-167. As directed by this statute, all school districts in Oregon must develop a plan to accurately measure school buildings for elevated radon levels. Under the statute, school districts must submit a plan to Oregon Health Authority (OHA) by September 1, 2016. Per ORS 332.166-167, actual testing of schools must be done on or before January 1, 2021 and the testing results sent to OHA and posted on the school or school district's website.

This plan will develop the protocols necessary for compliance. OHA's Testing for Elevated Radon in Oregon Schools, specifically Appendices A and D will be used to guide this effort.

The Neah-Kah-Nie School District has prepared a plan in harmony with the following guideline.

Per ORS 332.166-167, School Radon Measurement Teams (i.e. personnel appointed to measure a school site for elevated radon) must, at a minimum, conduct initial measurements in all frequently occupied rooms in contact with the soil or located above a basement or a crawlspace. Testing will occur in all frequently occupied spaces simultaneously per school site. Examples include: offices, classrooms, conference rooms, gyms, auditoriums, cafeterias & break rooms. A minimum of one detector for every 2000 sq. ft. of open floor space or portion thereof is required. United States Environmental Protection Agency (USEPA) studies indicate that radon levels on upper floors are not likely to exceed the levels found in ground-contact rooms. Testing rooms on the ground-contact floor or above unoccupied basements or crawlspaces is sufficient to determine if radon is a problem in a school. Areas such as rest rooms, hallways, stairwells, elevator shafts, utility closets, kitchens storage closets do not need to be tested.

Initial and follow-up testing, as needed, will use passive test devices. Active devices (electrically powered, continuous radon monitors) may be used in follow-up testing of locations, if needed, where it is important to determine that radon levels vary according to the time of day. Because testing under closed conditions is important to obtain meaningful results from short-term tests, the District will schedule testing during the coldest months of the year. "Closed building conditions" are defined as keeping all windows closed, keeping doors closed except for normal entry and exit, and not operating fans or other machines which bring in air from outside. Fans that are part of a radon-reduction system or small exhaust fans operating for only short periods of time may run during the test. Testing will occur between October and March in any given school year. Short term testing will be used with passive test kits will be used in "closed building conditions". Test Kits will be placed during weekdays with HVAC (heating, ventilation, air conditioning) systems operating as they do normally. The following is a detailed protocol instruction checklist:

## Healthy and Safe Schools Plan

### Neah-Kah-Nie School District 56

1. A Test Kit Placement Log and a Test Kit Location Floor Plan will be prepared for each school in which radon measurements are made. Schools will use their emergency/fire escape plan as a template. Test kit location will be accurately recorded on both a Log and Floor Plan. Test kits or testing services must meet the current requirements of the national certifying organizations, National Radon Proficiency Program (NRPP, [www.nrpp.info](http://www.nrpp.info)) or the National Radon Safety Board (NRSB, [www.nrsb.org](http://www.nrsb.org)). Testing must be done following the directions on the test kit.
  2. Per ORS 332.166-167, school radon measurement teams must, at a minimum, conduct initial measurements in all frequently occupied rooms in contact with the soil or located above a basement or a crawlspace. Room examples include offices, classrooms, conference rooms, gyms, auditoriums, cafeterias and break rooms.
  3. The number of test kits used to measure radon (detectors) must be determined by counting the number of appropriate rooms. One detector kit is used for each room that is 2000 square feet or less. Additional test kits are needed for larger rooms.
  4. Added to this number will be the test kits needed for Quality Assurance purposes.
  5. Test kits will be placed in all rooms in contact with the soil or located above a basement or crawlspace that are frequently occupied by students and school staff.
  6. Testing will occur during the time that students and teachers are normally present (during weekdays).
  7. In addition to placing detectors, additional test kits will be provided to serve as quality assurance measures (duplicate, blank, and spike measurements). Quality Assurance procedures will be conducted as described in OHA's [Testing for Elevated Radon in Oregon Schools](#).
  8. All test kits placed in the school site (detectors, duplicates, and blanks) must be noted on the Device Placement Log and Floor Plan by their serial number.
0. Test kits should be placed.
- a. Where they are least likely to be disturbed or covered up.
  - b. At least three feet from doors, windows to outside or ventilation ducts.
  - c. At least one foot from exterior walls.
  - d. At least 20 inches to six feet from floor.
  - e. About every 2,000 square feet for large spaces (e.g., a 3500 square foot gymnasium would require two test kits)

## Healthy and Safe Schools Plan

### Neah-Kah-Nie School District 56

Along with the five-item placement protocol above, School Radon Measurement Teams can simply place the test kit on the teacher's desk or up on a bookshelf, out of the way of students. To prevent tampering, kits may be suspended from a wall or ceiling (using string and thumb-tack/tape). If they are suspended, they should be 20 inches to 6 feet above the floor, at least 1 foot below the ceiling.

10. Test kits must **NOT** be placed:

- a. Near drafts resulting from heating, ventilating vents, air conditioning vents, fans, doors, and windows.
- b. In direct sunlight.
- c. In areas of high humidity such as bathrooms, kitchens, laundry rooms, etc.
- d. Where they may be disturbed at any time during the test

11. Testing with short-term test kits must be used under closed conditions (closed windows/doors except for normal exit/entry).

- a. Closed conditions: Short-term tests should be made under closed conditions in order to obtain more representative and reproducible results. Open windows and doors permit the movement of outdoor air into a room. When closed conditions in a room are not maintained during testing, the subsequent dilution of radon gas by outdoor air may produce a measurement result that falls below the action level in a room that actually has a potential for an elevated radon level. Schools shall only be tested for radon during periods when the HVAC system is operating as it does normally.
- b. All external doors should be closed except for normal use – structural and weatherization defects need to be repaired prior to testing.
- c. Closed conditions must be verified when placing and retrieving test kits.

12. Short-term test kits will be placed during colder months (October through March).

- a: Colder months: Because testing under closed conditions is important to obtain meaningful results from short-term tests, the District will schedule testing during the coldest months of the year. During these months, windows and exterior doors are more likely to be closed. In addition, the heating system is more likely to be operating. This usually results in the reduced intake of outside air. Moreover, studies of seasonal variations of radon measurements in schools found that short-term measurements may more likely reflect the average radon level in a room for the school year when taken during the winter heating season.
- b: The District will check and document local weather forecasts prior to placing test kits. Do not conduct short-term measurements (2-5 days) during severe storms or period of high winds. The definition of severe storm by the National Weather Service is one that generates winds of 58 mph and/or  $\frac{3}{4}$  inch diameter hail and may produce tornadoes.

13. Test Kits will be placed during weekdays with HVAC (heating, ventilation, air conditioning) systems operating as they do normally.

# Healthy and Safe Schools Plan

## Neah-Kah-Nie School District 56

### Suggested timeline:

Monday morning – Place kits (detectors/duplicates/blanks) per Test Kit Placement Log created for school. Record data, as needed, on Log.

Thursday morning – Pick up kits, record as needed, ship with (previously requested & received) spiked test kits to Radon Measurement Laboratory.

- a. Air conditioning systems that recycle interior air may be operated.
- b. Window air conditioning units may be operated in a re-circulating mode, but must be greater than 20 feet from the test kit.
- c. Ceiling fans, portable humidifiers, dehumidifiers and air filters must be more than 20 feet from the test kit.
- d. Portable window fans should be removed or sealed in place.
- e. Fireplaces or combustion appliances (except for water heaters/cooking appliances) may not be used unless they are the primary source of heat for the building.
- f. If radon mitigation systems are in place in the school, they should be functioning.

### 14. The District will not conduct initial measurements under the following conditions:

- a. During abnormal weather or barometric conditions (e.g., storms and high winds). If major weather or barometric changes are expected, it is recommended that the 2 to 5-day testing be postponed. USEPA studies show that barometric changes affect indoor radon concentrations. For example, radon concentrations can increase with a sudden drop in barometric pressure associated with storms.
- b. During structural changes to a school building and/or the renovation of the building's envelope or replacement of the HVAC system

### 15. After receiving the results of the initial testing, School Radon Measurement Teams will follow the "Interpreting initial results" section of the OHA's Testing for Elevated Radon in Oregon Schools.

### **Follow-up Measurements**

Follow-up testing (in rooms with initial short-term measurement of 4.0 pCi/L or higher) should start within one month after receiving the initial test results. Follow-up testing must be made in the same location in a room. When conducting follow-up testing using short-term methods will be done in the same conditions as the initial measurement. Follow-up testing using passive short-term test kits should follow the same Quality Assurance procedures and requirements (i.e. percentages of duplicates/blanks/spikes), including quality assurance calculations. Follow directions under Radon Test Placement Strategy and Protocol Checklist and Test Kit Placement again.

# Healthy and Safe Schools Plan

## Neah-Kah-Nie School District 56

### Report of Results & Distribution

ORS 332.166-167 requires that school districts make all test results available: to the district's school board; the Oregon Health Authority (to post on its website), 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.

US EPA, OHA Oregon Radon Awareness Program, and numerous non-governmental groups recommend that the school district 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.

Initial testing will be conducted in accordance with ORS 332.166-167 before January 1, 2021. Because buildings age and ground beneath them settles, radon entry may increase due to cracks in the foundation. For that reason, ORS 332.166-167 requires that schools be tested once every 10 years regardless of initial testing results or whether mitigation was done.

Suggested times, for retesting, in addition to that required under ORS 332.166-167, are as follows:

1. Current national guidelines (ANSI/AARST, 2014) recommend that school buildings be re-tested every five years.
2. If radon mitigation measures have been implemented in a school, retest these systems as a periodic check to ensure that the radon mitigation measures are working. EPA does not provide a specific interval, but OHA recommends that schools with radon mitigation measures retest every 5 years.
3. Retest after major renovations to the structure of a school building or after major alterations to a school's HVAC system. These renovations and alterations may increase radon levels within a school building.
4. If major renovations to the structure of a school building or major alterations to a school's HVAC system are planned, retest the school before initiating the renovation. If elevated radon is present, radon-resistant techniques can be included as part of the renovation

# Healthy and Safe Schools Plan

## Neah-Kah-Nie School District 56

### GLOSSARY

**Radon** - A gaseous radioactive decay product of radium.

**Blanks** - Measurements made by analyzing unexposed (closed) detectors that accompanied exposed detectors to the field. The School District use of blanks is to assess any change in analysis result caused by exposure other than in the environment to be measured. Background levels may be due to leakage of radon into the detector, detector response to gamma radiation, or other causes.

**Closed-Building Conditions** - Means keeping all windows closed, keeping doors closed except for normal entry and exit, and not operating fans or other machines which bring in air from outside. Fans that are part of a radon-reduction system or small exhaust fans operating for only short periods of time may run during the test.

**Duplicates** - Duplicate measurements provide a check on the precision of the measurement result and allow the user to make an estimate of the relative precision. Large precision errors may be caused by detector manufacture or improper data transcription or handling by suppliers, laboratories, or technicians performing placements. Precision error can be an important component of the overall error. The precision of duplicate measurements are monitored and recorded as quality records.

**Spikes** – Measurements used to assess the accuracy of a lab analysis and/or how accurately detectors supplied by a laboratory (i.e. test kit manufacturer) measure radon. “Spikes” are test kits that have been exposed to a known concentration of radon in a chamber approved by the National Radon Proficiency Program (NRPP) or National Radon Safety Board (NRSB). The process for completing this aspect of a radon measurement effort’s Quality Assurance/Quality Control plan is laid out in the Radon Test Placement Strategy and Protocol Checklist below.

# Healthy and Safe Schools Plan

## Neah-Kah-Nie School District 56

### Appendix A: Test Kit Placement Guide

Once the number of test kits is determined, they will be placed in the frequently-occupied rooms as identified in the “What Rooms Should Be Tested?” Section above.

- a. Be sure to check these items before placing the radon test kits:
  - f1 Closed building conditions have been maintained in the building for 12 hours.
  - f1 HVAC system is operating as it normally would when students and faculty are present.
  - f1 Testing is being done during a time that students and faculty are present.
- b. As detectors are placed in the rooms determined during section 1, thorough and accurate data needs to be recorded on the device log and floor plan (see sample below).

Protocol for all test kits include the following; be sure that each detector placed is:

- f1 in a location where it will be undisturbed
- f1 out of direct sunlight
- f1 three feet from all doors and windows
- f1 four inches from all other objects
- f1 at least 1 foot from all exterior walls
- f1 at least 20 inches to 6 feet from the floor
- f1 out of direct air flow from vents
- f1 four feet from heat source

To protocol above, School Measurement Teams in other states simply place the test kit on the teacher’s desk or up (out of the way of students) on a bookshelf.

- c. Specific protocol for duplicate measurements. If the test kit you are placing is duplicate measurement also be sure to:
  - f1 Placed duplicate (side-by-side) test kit 4-5 inches away from test kit for that room.



## Healthy and Safe Schools Plan Neah-Kah-Nie School District 56

d. Specific protocol for blank measurements. If the test kit you are placing is a blank measurement, also be sure to:

f1 Unwrap blanks, open, but then immediately close and reseal them.

f1 Place the test kit next to the detector kit(s) for the room 4-5 inches away.

e. Specific protocol for spiked test kits.

f1 Arrange for the spiked test kits to arrive back from the Certified Performance Test Chamber to the School Measurement Team as close to the day that kits are retrieved from the school as possible. [See *Quality Assurance Procedures for a School Radon Measurement Program* in OHA's Testing for Elevated Radon in Oregon Schools.]

f. Testing Period.

The minimum length of time test kits should be left out is 48 hours, but not exceed seven days. [It's best to follow test kit manufacturer's instructions for more specific recommendations.] It's best if devices should be left in place for four days to ensure optimum results.

Many schools place short-term kits on Monday morning and pick them up on Thursday morning. Retrieving Kits: Once the testing period has ended, all test kits placed at a school site (detectors, duplicates, & blanks) need to be retrieved. This should be done on the same date. Complete the data sheet when retrieving detectors.

f1 Record ending date and time (kits were pick up) information, per the "Test Kit Placement Log" [Appendix D of OHA's Testing for Elevated Radon in Oregon Schools.]

f1 Record ending information on the test kit package (if required).

g. Prepare and mail all kits.

f1 Seal and prepare test kits to be mailed to the lab by the manufacturer's instructions.

f1 Include those spiked kits (not identified as such) in the same box(es) as other kit types.

f1 Mail all test kits (detectors, duplicates, blanks, spikes) to the Radon Measurement Laboratory using a mail service that guarantees delivery to the laboratory within two days at maximum, but **preferably overnight** shipping.

# Healthy and Safe Schools Plan Neah-Kah-Nie School District 56

\_\_\_\_\_  
Signature/title

\_\_\_\_\_  
Date

**Please mail, email or fax the signed document.**

MAIL TO: Oregon Radon Awareness Program  
800 NE Oregon St, Suite 640  
Portland, OR 97232-2162

FAX TO: 971-673-0979

EMAIL TO: [radon.oregon@state.or.us](mailto:radon.oregon@state.or.us)

The Radon Testing process has many layers and requires exhaustive planning, primarily that of planning how to test effectively and have in place a plan and budget for any mitigation strategies. To meet the deadline of testing to be completed by January 1, 2021, the Neah-Kah-Nie School District has started the project development process. Below you see a **MODEL ONLY** of how this plan might look. This is in the development stages. Our plan will begin no later than March of 2019. The District website will be updated as we progress through this vital project.

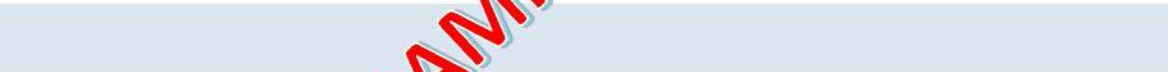
### ***Proposed Radon testing schedule***

TASK	Start Date	Duration (days)	End Date
Develop Measurement Team	3/5/18	3	8-Mar
Plan Overview with District Staff	3/25/18	1	26-Mar
In-Service to Train Head Custodians	8/20/18	1	21-Aug
Prepare Placement Logs/location floor plan	8/27/18	5	1-Sep
Determine number test kits	9/10/18	1	11-Sep
Update Placement Logs	9/11/18	1	12-Sep

"SAMPLE ONLY"

## Healthy and Safe Schools Plan Neah-Kah-Nie School District 56

		1	25-Sep
Determine final schedule based Spiking services	9/24/18	1	2-Oct
Communicate final schedule to all Stakeholders	10/1/18	5	6-Oct
Order Kits (All Locations -6)	10/1/18	2	8-Oct
Kits received	10/6/18	2	10-Oct
Pre-load Spike Lab with 3% (20 kits)	10/8/18		
Dispense Kits (GGS)	10/22/18	1	23-Oct



Spikes arrive	10/24/18	2	26-Oct
Collect Kits	10/25/18	1	26-Oct
Ship Kits for testing along spikes (overnight)	10/26/18	3	29-Oct
Dispense Kits (DO-Preschool)	10/29/18	1	30-Oct
Dispense Kits (Middle School)	11/26/18	1	27-Nov
GGS results received	11/20/18	3	23-Nov
Spikes arrive	11/28/18	2	30-Nov
Collect Kits	11/29/18	1	30-Nov
Ship Kits for testing along spikes (overnight)	11/30/18	2	2-Dec
Dispense Kits (High School)	12/3/18	1	4-Dec
DO-Preschool- results received	12/4/18	3	7-Dec
Spikes arrive	12/5/18	2	7-Dec

## Healthy and Safe Schools Plan Neah-Kah-Nie School District 56

Dispense Kits (NES)	12/10/18	1	11-Dec
High School results received	12/8/18	3	11-Dec
Spikes arrive	12/12/18	2	14-Dec
Collect Kits	12/13/18	1	14-Dec
Ship Kits for testing along spikes (overnight)	12/14/18	2	16-Dec
Middle School results received	12/11/18	2	13-Dec
High School results received – Steve, I don't think this is correct	12/17/18	2	19-Dec
NES results received	12/24/18	2	26-Dec
Collect Kits	12/6/18	1	7-Dec
Ship Kits for testing along spikes (overnight)	12/7/18	2	9-Dec
Review findings/initiate mitigation Plan(s) if applicable	1/1/19	5	6-Jan

END OF SECTION

### SECTION 3 Lead/Copper in Water

**(d) A plan to test for and reduce exposure to lead in water used for drinking or food preparation. An Oregon Health Authority accredited lab must be used for all testing.**

**Statewide plan for reducing student exposure to lead in drinking water:**

**Information for schools and childcare facilities**

**In April 2016, The Governor directed the OHA and the Oregon Department of Education (ODE) to review existing programs and create a plan to address the problem of lead in school water.**

**In response, OHA and ODE will:**

- **Recommend all school districts and childcare facilities to test for lead in buildings. *(the Neah-Kah-Nie School District shall include copper testing simultaneously)***
- **Recommend schools and childcare facilities to use accredited drinking water testing labs to process water samples for lead.**
- **Develop a database and method for transferring lead test records from accredited labs to OHA as a reportable test result.**
- **Provide drinking water technical expertise from OHA to schools and childcare facilities as needed to support them as they test water in their buildings.**

**Actions schools and childcare facilities can take:**

**The key steps that need to be taken by school districts and early learning environments include:**

# Healthy and Safe Schools Plan

## Neah-Kah-Nie School District 56

### 1. Identify sources of lead:

Schools and childcare facilities should test all taps used for drinking or food preparation in the building to identify any lead problems. Follow the Environmental Protection Agency's 3 T's Revised Technical Guidance to ensure that samples for lead are collected properly and from the right places. Use an OHA-accredited drinking water laboratory to analyze samples for lead.

### 2. Stop access:

Prevent access to water taps that have more than 20 parts per billion (ppb) of lead. This should include shutting off taps, covering water fountains, and providing bottled water to students and staff members.

### 3. Communicate:

### 4. Make results from tests for lead in water available to students, families, and the community as quickly as possible.

- Current results can be found on the District website at the following link.
- The Neah-Kah-Nie School District shall conduct lead *and copper* testing yearly for the next 4 years. *The testing will begin every July through July 2020, after which the District will reevaluate the schedule. All fixtures used for drinking and food preparation shall be tested.* Excluded; all others including showers, hose bibs, and lab sinks.

### 5. Mitigate and correct:

Replace the sources of lead in building plumbing. Again, EPA 3T's Guidance should be followed.

**END OF SECTION**

## **SECTION 4      Lead Paint**

- (e) A plan to reduce exposure to lead paint that includes the following compliance with the United States Environmental Protection Agency's Renovation, Repair and Painting Program Rule.

The EPA's Renovation, Repair and Painting (RRP) rule requires that renovations of child-occupied facilities be carried out only by Lead-Safe Certified renovation firms, using certified renovators trained in lead-safe work practices. This is to ensure that these renovations do not inadvertently contaminate your facility and expose children to hazardous lead dust.

- If the District conducts renovation, repair, or painting activities in a pre-1978 child-occupied facility we will contract with a [Lead-Safe Certified firm](#) and any of our employees who conduct renovation, repair, or painting activities will become trained and certified renovators.

## Healthy and Safe Schools Plan Neah-Kah-Nie School District 56

"Child-occupied facilities" (i.e., a building, or a portion of a building, constructed prior to 1978 and visited regularly by the same child, such as schools, child care facilities and hospitals) are likely to contain lead-based paint. EPA's [Lead Renovation, Repair and Painting \(RRP\) rule](#) provides important protections for you and your facility, and also requires that you take certain actions to protect children in your care.

**END OF SECTION**

DRAFT

**Healthy and Safe Schools Plan  
Neah-Kah-Nie School District 56**

**SECTION 5 IPM Plan**

**(f) A plan to implement integrated pest management practices as required under ORS 634.700 through 634.750;**

# **INTEGRATED PEST MANAGEMENT PLAN**

## **CONTENTS**

- I. INTRODUCTION**
- II. WHAT IS INTEGRATED PEST MANAGEMENT?**
- III. WHAT IS AN INTEGRATED PEST MANAGEMENT PLAN?**
- IV. SCHOOL DISTRICT IPM PLAN COORDINATOR**
- V. IPM DECISION-MAKING PROCESS**
  - A. Responsibilities of School District Employees**
    - 1. IPM Plan Coordinator**
    - 2. Custodial Services**
    - 3. Maintenance/Construction**
    - 4. Grounds Department**
    - 5. Kitchen Staff**
    - 6. Faculty**
    - 7. Principal**
  - B. Monitoring – Reporting – Action Protocol**
    - 1. Three levels of monitoring**
    - 2. Sticky monitoring traps for insects**

## **Healthy and Safe Schools Plan Neah-Kah-Nie School District 56**

- 3. Reporting (pests, signs of pests, and conducive conditions)**
- 4. Reporting “Pests of Concern”**
- 5. Action!**
- 6. Acceptable Thresholds**

**C. Inspections**

**D. Pest Emergencies**

**E. Annual IPM Report (completed by IPM Plan Coordinator)**

### **VI. REQUIRED TRAINING/EDUCATION**

**A. IPM Plan Coordinator**

**B. Custodial Staff**

**C. Maintenance and Construction Staff**

**D. Grounds Staff**

**E. Kitchen Staff**

**F. Faculty and Principal**

**G. Other Training**

### **VII. PESTICIDE APPLICATIONS: REQUIRED NOTIFICATION, POSTING, RECORD-KEEPING AND REPORTING**

**A. Notification and Posting for Non-Emergencies**

**B. Notification and Posting for Emergencies**

**C. Record Keeping of Pesticide Applications**

**D. Annual report of Pesticide Applications**



# Healthy and Safe Schools Plan

## Neah-Kah-Nie School District 56

### VIII. APPROVED LIST OF LOW-IMPACT PESTICIDES LIST OF APPENDICES

#### 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 Neah-Kah-Nie 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 Superintendent and the Board of Directors, having policymaking and general oversight responsibility for the 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.

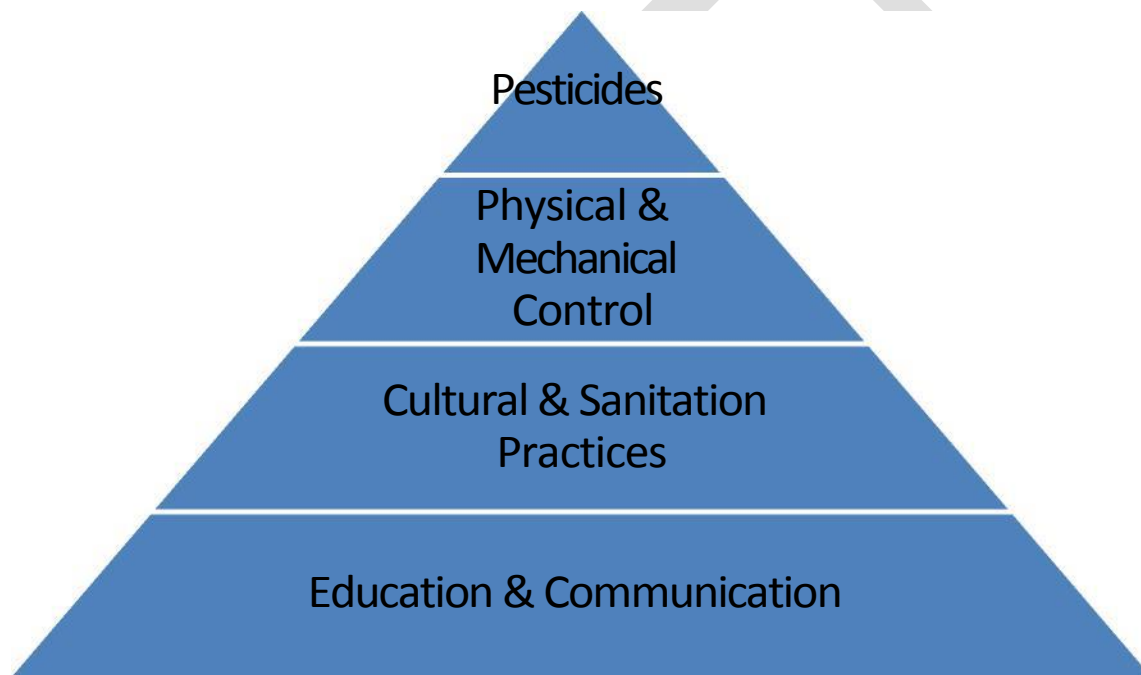
## Healthy and Safe Schools Plan Neah-Kah-Nie School District 56

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

## Healthy and Safe Schools Plan Neah-Kah-Nie School District 56

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 of mechanical, biological and chemical pest control measures that present a reduced risk or have a low impact and, for the purposes 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 Neah-Kah-Nie School District's IPM plan. This plan fleshes out the required strategy from ORS 634.700 – 634.750 for Neah-Kah-Nie School District.

## **Healthy and Safe Schools Plan Neah-Kah-Nie School District 56**

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.”

Neah-Kah-Nie School District Board of Directors designates Steve Baertlein as the IPM Plan Coordinator. The Coordinator is key to successful IPM implementation in the Neah-Kah-Nie 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.

# Healthy and Safe Schools Plan

## Neah-Kah-Nie School District 56

**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**

**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 of School District Employees**

##### **1. IPM Plan Coordinator Responsibilities**

See Section IV above

##### **2. Custodial Services Responsibilities**

Custodial Services staff is responsible for the following:

1) Taking Safe School's training online, and attending annual in-service for 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 Coordinator's instructions.

3. Keeping records of pest complaints using pest logs placed in the staff lounge, cafeteria and kitchen.

4. Assuring floor under serving counters is kept free of food and drink debris.

5. Sealing up small cracks or holes when reported by teachers or noticed by custodian when this can be done in less than 15 minutes.

6. Recording his/her pest management actions in the pest logs.

7. Reporting pest problems that he/she cannot resolve in less than 15 minutes to the IPM Plan Coordinator.

8. Reporting teachers to the IPM Plan Coordinator who repeatedly refuse to reduce clutter and other pest-conducive conditions in their classrooms.

9. Reporting pest-conducive conditions to the IPM Plan Coordinator if the custodian cannot fix them in less than 15 minutes.

## **Healthy and Safe Schools Plan Neah-Kah-Nie School District 56**

10. Confiscating any unapproved pesticides (such as aerosol spray cans) discovered during inspections or regular duties and delivering them to the IPM Plan Coordinator.

11. 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:

1) Taking IPM Training module online, and receive 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 time of 15 minutes or less.

3) 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 of 15 minutes or less.

4) 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:

1) Taking IPM module on Safe Schools and attending annual IPM training provided during summer in-service by the IPM Plan Coordinator (or designee).

2) Keeping vegetation (including tree branches and bushes) at least three feet from building surfaces.

3) Proper mulching in landscaped areas to reduce weeds.

## Healthy and Safe Schools Plan Neah-Kah-Nie School District 56

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. Kitchen Staff Responsibilities

Kitchen staff is responsible for:

1) Take IPM training module on Safe Schools, and attending annual IPM training provided by the IPM Plan Coordinator (or designee).

2) Assuring floor under serving counters is kept free of food and drink debris.

3) Promptly emptying and removing corrugated cardboard materials.

4) Keeping exterior kitchen doors closed.

5) Reporting pest conducive conditions that require maintenance (e.g. leaky faucets, dumpster too near building, build-up of floor grease requiring spray-washing, etc.) to proper staff either orally or using pest logs.

6) Participating in any inspections conducted by custodian or IPM Plan Coordinator.

7) 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 is responsible for:

1) Taking Safe Schools IPM module provided, and attending annual 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 custodian, either orally or via the pest logs.

## Healthy and Safe Schools Plan Neah-Kah-Nie School District 56

5) 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, notify custodian only if ants continue to be found after following these steps).

### 7. School Principal Responsibilities

The School Principal is responsible for:

1) Scheduling time for teachers to take Safe Schools IPM module annually which is provided by the IPM Plan Coordinator or designee.

2) Attending annual IPM training for teachers.

3) Assuring that teachers keep their rooms clean and free of clutter in accordance with the IPM Plan Coordinator's instructions.

4) 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.

5) Working with the IPM Plan Coordinator to make sure all notifications of pesticide applications reach all faculty, administrators, staff, adult students and parents via a method most likely to reach the intended recipients like hard copy notifications, e-blasts or communication tools as necessary.

6) 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 trainings, 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 Neah-Kah-Nie 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



## Healthy and Safe Schools Plan Neah-Kah-Nie School District 56

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 minutes) 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 convenient access locations for staff 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) 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
- The condition of the plants
- The amount of plant drainage
- pH, phosphorus, and potassium levels of turf soil test every 3-4 years in all grounds areas
- 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

# Healthy and Safe Schools Plan

## Neah-Kah-Nie School District 56

- 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.

### Level 3 monitoring (Grounds staff)

Grounds Staff will monitor Turf and Landscape:

#### **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 and other areas that are often pest-vulnerable which 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.

#### **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.

## Healthy and Safe Schools Plan Neah-Kah-Nie School District 56

### 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 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 and/or the Pest Management Professional (PMP), with a copy to the Chief Operating Officer. 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, usually 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
- 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) Jot down the above in the Pest Log

If the ants come back or there are more than a small number, usually 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 a vacuum and sealant as soon as he/she is able

The custodian will:

## Healthy and Safe Schools Plan Neah-Kah-Nie School District 56

- 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 a 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) Jot down the above 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 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 Chief Operating Officer (COO).

### **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 Chief Operating Officer (COO) 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

## Healthy and Safe Schools Plan Neah-Kah-Nie School District 56

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 inspection 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 Chief Operating Officer (COO) 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 Chief Operating Officer (COO) 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 PMPs 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).

# Healthy and Safe Schools Plan

## Neah-Kah-Nie School District 56

### **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.

#### **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.

#### **B. 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.

#### **C. 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. Grounds staff will also be trained in basic monitoring for common pests on grounds.

#### **D. Training for Kitchen Staff**

## **Healthy and Safe Schools Plan Neah-Kah-Nie School District 56**

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

### **E. 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 principles 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.

### **F. Other Training**

Basic training on the principles 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, 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 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 school 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

## Healthy and Safe Schools Plan Neah-Kah-Nie School District 56

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 Chief Operating Officer.
- 3)The Chief Operating Officer 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.



## Healthy and Safe Schools Plan Neah-Kah-Nie School District 56

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 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 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 Chief Operating Officer 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:

## Healthy and Safe Schools Plan Neah-Kah-Nie School District 56

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

### VII. 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;**

**d) 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**

**b) 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 1-800-8587378 or [npic@ace.orst.edu](mailto:npic@ace.orst.edu) for assistance in determining a pesticide a.i. cancer classification. The most current list of approved low-impact pesticides will be available on our website at [www.nknsd.org](http://www.nknsd.org). The process for creating and updating our school district’s approved list will be available at this link [www.nknsd.org](http://www.nknsd.org)

# Healthy and Safe Schools Plan Neah-Kah-Nie School District 56

## LIST OF APPENDICES

Appendix 1 Pest Management for Specific Pests

(Lifecycle, What-Where-How they Eat/Drink/Shelter, Monitoring, Prevention, Threshold Levels, Management Options, Evaluation of Options Chosen for Specific Pests)

a-Ants (Small Ants)

b-Ants (Carpenter Ants)

c-Bats

d-Bed Bugs

e-Nesting Birds (starlings, sparrows, swallows, pigeons)

f-Geese

g-Grounds Pests

h-Mice (House Mouse)

i-Rats (Norway Rat)

j-Yellow Jackets and European Paper Wasps

Appendix 2 Annual Inspection Form

Appendix 3 Pest Logs

Appendix 4 Outlines of Training for Custodians, Maintenance Staff, Grounds Staff, Kitchen Staff, and Faculty

Appendix 5 Template for annual fall notification of potential pesticides to be used

Appendix 6 Pesticide Application Notification Form

Appendix 7 Pesticide Application Posting Sign

Appendix 8 Pesticide Application Recordkeeping Form

Appendix 9 Template for Annual IPM Report

Appendix 10 Template for Annual Pesticide Application Report

Appendix 11 Hiring an Outside Contractor

In-House vs. Contractor – Bid Specifications – Important Things to Remember – Sample bid Appendix 12 References and Source Material

(g) A plan to communicate results for all tests required under the Healthy and Safe Schools Plan:

## Healthy and Safe Schools Plan Neah-Kah-Nie School District 56

### COMMUNICATION PLAN:

(A) The school district or public charter school must make all test results available to the public within five business days of receiving the results;

(B) The school district or public charter school must make the results available to the public by posting the results on the school district or public charter school website, sending notice of the results over the email system, and making the results available in hardcopy at the main administration office; and

(C) The school district or public charter school must provide detailed information explaining the test results.

Stat. Auth.: ORS 326.051

Stat. Implemented: ORS 326.051

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