

# Annual Integrated Pest Management Notice For School Year 2016 - 2017



Dear Parent, Guardian, or Staff Member:

This notice is being distributed to comply with the New Jersey School Integrated Pest Management Act. **The Midland School** has adopted an Integrated Pest Management (IPM) Policy and has implemented an IPM Plan to comply with this law. IPM is a holistic, preventive approach to managing pests that is explained further in the schools IPM Policy included with this notice.

All schools in New Jersey are required to have an Integrated Pest Management Coordinator (IPM Coordinator) to oversee all activities related to IPM and pesticide use at the school.

The IPM Coordinator for **The Midland School** is:

**Mike Castles**

Business Phone number: **908-722-8227**

Business Address: **94 Readington Road PO box 5026 North Branch NJ 08876**

The IPM Coordinator maintains the pesticide product label, and the Material Safety Data Sheet (MSDS) (when one is available), of each pesticide product that may be used on school property. The label and the MSDS are available for review by a parent, guardian, staff member, or student attending the school. Also, the IPM Coordinator is available to parents, guardians, and staff members for information and to discuss comments about IPM activities and pesticide use at the school.

As part of a school pest management plan **the Midland School** may use pesticides to control pests. The United States Environmental Protection Agency (EPA) and the New Jersey Department of Environmental Protection (DEP) register pesticides to determine that the use of a pesticide in accordance with instructions printed on the label does not pose an unreasonable risk to human health and the environment. Nevertheless, the EPA and the DEP cannot guarantee that registered pesticides do not pose any risk to human health, thus unnecessary exposure to pesticides should be avoided. The EPA has issued the statement that where possible, persons who are potentially sensitive, such as pregnant women, infants and children, should avoid unnecessary pesticide exposure.

## **The following items must be included with this annual notice:**

- **A copy of the school or school district's IPM policy.**
- **The date, time and place of any meeting if one is to be held for the purpose of adopting or modifying the school integrated pest management policy or plan.**
- **A list of pesticides that are in use or that have been used in the past 12 months on school property.**

**Annual Pesticide Usage List  
The Midland School  
For School Year 2016 - 2017**

Dear Parent, Guardian, or Staff Member:

Below are the dates of applications of weed control and fertilizer for the past 12 months.

Locations:

- Lawn outside of Gym/MAS Residential and Main Office area
- Hill between Bus and Staff parking lots
- Courtyard of 300 wing

Applied:

Monday March 28, 2016

Monday August 22, 2016

- Barricade (crabgrass control) Active Ingredient is Prodiamine
- Trimec 992 (broadleaf weed control) Active Ingredients are (3 ingredients):

- 1) 2, 4-dichlorophenoxyacetic acid
- 2) propionic acid
- 3) Dicamba

***All applications were done when school was closed for 4 or 5 consecutive days after.***

***\*\* No other pesticides were used at the Midland School\*\****

The next Safety/IPM meeting will be held at 3:15 at the Midland School on March 10, 2017

**School Integrated Pest Management Plan for  
The Midland School**

**for the School Year  
Starting September 2016 and  
Ending August 2017**



## **Table of Contents**

- 1) General School Information
- 2) Integrated Pest Management Statement
- 3) School IPM Policy
- 4) School IPM Plan Goals
- 5) Roles, Responsibilities, and Training
  - a) School Administration
  - b) School IPM Coordinator
  - c) Pest Management Professional (staff or contractor)
  - d) School Nurse
  - e) Kitchen Staff
  - f) Maintenance Staff
  - g) Staff, Teachers, and Students
  - h) Parents or Guardians of All Students Enrolled in the School
- 6) Pest Identification: Site Assessment and Ongoing Monitoring
- 7) Pest Prevention and Control
- 8) Pesticide Use: Notification, Posting, and Re-Entry
- 9) Record Keeping and Evaluation

## 1. General school information:

*The Midland School  
94 Readington Road  
PO Box 5026  
North Branch NJ 08876  
908-722-8227 ext 129  
Fax - 908-722-1547*

**School IPM Coordinator:** Mike Castles, Systems Administrator and Facilities Manager  
[castles@midlandschool.org](mailto:castles@midlandschool.org)

**Structural Pest Control performed by**  
**Cooper Pest Solutions. 351 Lawrence Station rd Lawrenceville NJ, 08648.**  
**1-800-949-2667**

**Turf and vegetation pest control performed by**  
**Fairway Green**  
**9 Ilene Ct #14 Hillsborough, NJ 08844**  
**(908) 281-7888**

## 2. Integrated Pest Management Statement

Integrated Pest Management (IPM) on school property is a long-term approach to maintaining healthy landscapes & facilities that minimizes risks to people and the environment. The Midland School will use: site assessment, monitoring, and pest prevention in combination with a variety of pest management tactics to keep pests within acceptable limits. Instead of routine chemical applications, cultural, mechanical, physical, and biological controls will be employed with selective use of pesticides when needed. Educational strategies are used to enhance pest prevention, and to build support for the IPM program

## 3. Integrated Pest Management (IPM) Policy for The Midland School

The New Jersey School Integrated Pest Management Act of 2002 requires all New Jersey schools to implement a school integrated pest management (IPM) policy.

The law requires the superintendent of the school district, for each school in the district, the board of trustees of a charter school, and the principal or lead administrator of a private school, as appropriate, to implement Integrated Pest Management (IPM) procedures to control pests and minimize exposure of children, faculty, and staff to pesticides. The Midland School shall therefore develop and maintain an IPM plan as part of the school's policy.

### **IPM Procedures at the Midland School**

The IPM procedures listed in The Midland School IPM Plan will aid in determining when to control pests and whether to use mechanical, physical, cultural, biological or chemical methods. Applying the IPM plan will aid in preventing unacceptable levels of pest damage through the most economical means and with the least possible hazard to people, property, and the environment.

In accordance with the core principles of IPM, no action will also be considered an option depending upon the circumstances of the pest-related situation. Non-pesticide pest management methods will be used whenever possible as the primary management method. The choice of using a pesticide will be based on the pest action thresholds determined by The Midland School, and upon review that non-chemical methods were not effective in achieving a satisfactory level of pest activity. When it is determined that a pesticide must be used, low impact pesticides and methods will be preferred and considered for use first. Permission and approval of **Mike Castles, IPM Coordinator**, will be required at all times for the application of non-low impact pesticides.

### **IPM Coordinator**

Kristen Zizemann, the Principal of The Midland School, has designated Mike Castles, Systems Administrator and Facilities Manager, as the IPM Coordinator for the **current** school year. Mr. Castles will be responsible for the implementation of the school IPM policy and plan, and remaining in communication with The Midland School's pest control vendor(s)

### **Education and Training**

The school community will be educated about potential pest problems and IPM methods used to achieve the pest management objectives.

The IPM Coordinator, other school staff, and pesticide applicators involved with implementation of the school IPM policy will be trained in appropriate components of IPM as it pertains to the school environment.

Students, parents/guardians will be provided information on this policy and instructed on how they can contribute to the success of the IPM program.

### **Record keeping**

Records of pesticide use shall be maintained on site in The Midland School IPM Book, kept with Mr. Castles, in order to meet the requirements of the state regulatory agency and the school board.

Records shall also include, but are not limited to, pest surveillance data sheets and other non-pesticide pest management methods and practices utilized.

It will be the responsibility of the pest control vendor(s) to complete the proper log forms upon completion of each service.

### **Notifications and Postings**

Kristen Zizemann, Principal of The Midland School, will be responsible for timely notifications to students' parents or guardians and the school staff of pesticide treatments, pursuant to the NJ School IPM Act (C.13:1F-25 through C.13:1F-28).

### **Re-entry Period**

The re-entry period to a pesticide treated area shall conform to the requirements of the NJ School IPM (C.13:1F-29).

### **Pest Control Vendor**

Mr. Castles, IPM Coordinator, will ensure that applicators follow state regulations, including licensing requirements and label precautions, and comply with all components of The Midland School IPM Policy. Furthermore, in line with the NJ School IPM Act, no applications of non-low

impact pesticides will occur during school hours or when students are present on school grounds, unless in the event of an emergency.

### **Evaluation**

Mr. Castles, IPM Coordinator, will annually meet with Kristen Zizelmann, Principal, and review the previous school year's IPM plan, policy, and implemented program in order to determine the effectiveness of the current documents (The Midland School IPM Plan and Policy) based on the services provided by the pest control vendor(s) to and make recommendations for improvement as needed.

Mr. Castles, IPM Coordinator, will also annually meet with a representative from the pest control vendor(s) to for an annual review of the previous year's services, and evaluate pest pressures and actions taken in an effort to improve The Midland School IPM program.

### **Authorizing Regulatory references**

The School Integrated Pest Management Act of 2002

N.J.A.C. Title 7 Chapter 30 Subchapters 1-12

Pesticide Control Act of 1971

## **4. The Midland School IPM Plan Goals**

- That the roles, responsibilities, and training of all members of the school community are clearly defined in this plan and followed during the school year.
- That should pest problems occur, the pest is properly identified and monitoring and non-chemical control methods are first implemented.
- That the emphasis is placed on pest prevention and control in an effort to maintain and healthy school environment.
- That the school community is well informed and notified regarding pest activity and actions, and that pest-related information is available for those who need it.
- That proper notification procedures are carried out to the school community.
- That The Midland School IPM Plan and Policy are evaluated and revised on an annual basis.

## **5. Roles, Responsibilities, and Training**

For an IPM program to be successful, all members of the school community must be made aware of the school's policies on pest control and their respective roles in the overall pest management plan. The roles, responsibilities, and training for this school regarding pest management are outlined below:

### **a) School Administrators**

Specific duties of New Jersey School Administrators required by the School IPM Act and regulations:

1. Adopt and implement a school IPM Policy and IPM Plan for the school property.
2. Implement IPM procedures to control pests and minimize exposure of children, faculty, and staff to pesticides.
3. Designate a School IPM Coordinator. The IPM Coordinator should be someone who is familiar with the school buildings and grounds, such as the buildings and grounds maintenance staff.
4. Report effectiveness and recommend improvements to the School IPM Plan annually to local school or governing boards.

Other **duties required by law of the school administration but that may be delegated** to specific individuals, such as the School IPM Coordinator (see next section) are:

5. Coordinate pre- and post-notification of parents and staff of non low impact pesticide applications according to the school's notification procedure. [See Appendix for sample 'Pre-Notification of the Use of Pesticides' (72 hour pre-notification) form and 'Emergency Pesticide Use Notification' form].
6. Prepare and post signs as required in areas where non low impact pesticides are to be applied. (See Appendix for sample 'Notice of Pesticide Application' sign for indoor and outdoor applications).
7. Obtain and maintain all pesticide application records for a minimum of 3 years; in the case of termiticides, maintain records a minimum of 5 years.
8. Prepare and send out 'Annual School IPM Program Notification Letter to Parents & Staff'. (See Appendix for sample letter to parents & staff).

#### **b) School IPM Coordinator**

The School IPM Coordinator, **by law**, is jointly responsible with the school administration for the implementation of this School IPM Plan.

**Role:** The IPM Coordinator is the individual within the facility who is in charge of pest control activities for the school. This individual has the authority and backing of the school administration or management. The School IPM Coordinator has the primary responsibility for ensuring the IPM plan is carried out, and is the primary contact for the school community and public. Ultimately, this person is directly responsible for the integration of all IPM activities through the coordination of all parties including custodial, building, food service, outside vendors, Pest Management Professionals, grounds staff, students, parents, staff, and teachers.

#### **Specific duties of a New Jersey School IPM Coordinator required by law or regulation:**

1. Implement the School IPM Policy and Plan.
2. Maintain information about the IPM Policy and Plan in place at the school.
3. Maintain information about pesticide applications on school property including records obtained from the pesticide applicator, Material Safety Data Sheets (MSDS) when available for pesticides used, and labels for all pesticide products used.
4. Maintain records of any pest monitoring and non-pesticide controls implemented. (See 'IPM Pest Activity Monitoring and Control Log' for sample log).
5. Provide access to the above information for public review.
6. Respond to inquiries and providing information to students, staff, and parents or guardians regarding IPM.
7. Provide training in IPM practices to the school community as described in the individual 'Roles, Responsibilities, and Training' sections of the School IPM Plan.
8. Provides a signature on the 'School Integrated Pest Management Act Compliance Certification' Form when requested (see Appendix for sample form) by pesticide applicators.
9. Ensure that all persons conducting pesticide applications have all NJDEP-required training, certification, and licensing. Also ensure that they follow the School IPM Policy and Plan, as well as all NJDEP School IPM regulations and the precautions of the pesticide label.
10. Obtain training sufficient to implement the Policy and Plan. The School IPM Coordinator will receive NJDEP-approved training that provides an overview of the principles of PIM, legal requirements, and how to implement the IPM Policy and Plan at the school as required by the NJDEP School IPM Regulations in Subchapter 13.
11. Submit required information to the NJDEP.



12. The IPM coordinator is also responsible for annual revisions of The Midland School IPM Plan and Policy based on the annual meeting with a representative from the pest control vendor(s) to In order to carry out the duties prescribed above, the School IPM Coordinator will:

- Distribute and train school community in the use of the “Facilities Pest Log,” kept in the IPM book with Mr. Castles when activity is noticed.
- Keep all “Facilities Pest Log” and “Pesticide Application History” forms in the IPM book, and write actions taken to remedy pest problems on appropriate forms.
- Consider all available options (including no action) with the school’s Pest Management Professional prior to determining control(s) to be used.
- Ensure that Pest Management Professional(s) make accurate entries in the “Pesticide Application History” log forms when any pesticides are applied at the school.
- Serve as the point of contact for contracted pest management services for the school.
- Evaluate efficacy of IPM practices on school property on a monthly basis at a minimum.
- Set up and moderate the annual evaluation of the School IPM Plan and revise the plan accordingly.

**Training:** The School IPM coordinator will receive NJDEP-approved training that provides an overview of the principles of IPM, legal requirements, and how to implement the IPM Policy and Plan at The Midland School as per the NJ School IPM Act.

### c) **Pest Management Professional**

All pesticide applications made on property of The Midland School must be done so by NJDEP certified pesticide applicators with certification in NJDEP (Pesticide Control Program) Category 13: School IPM. All certified pesticide applicators will be employees of

All indoor and exterior applications at The Midland School are made by a licensed pesticide applicator of the pest control vendor(s).

**Other Specific Duties of Pest Management Professionals employed by** the pest control vendor(s) to Meet with the IPM coordinator upon arrival prior to starting each and every service.

- Inspect school premises for the presence of pests or signs of pest activity during each regularly scheduled service.
- Inspect all pest vulnerable areas (PVAs), monitors, and devices during each regularly scheduled service.
- Notify the IPM coordinator when pests or signs of pest activity are found.
- Make written recommendations to the School IPM coordinator for corrective actions to be taken by the school to reduce potential pest populations.
- Recommend to School IPM coordinator of appropriate non-chemical procedures to correct pest problems.
- School IPM coordinator is consulted and approval granted for use of low impact and non-low impact pesticides.
- When it is necessary, select and recommend proper pesticides to manage pest problem to the IPM coordinator. Preference is always for the use of low-impact pesticides.
- Follow appropriate least-toxic procedures to correct pest problems. Always handle a pest problem with non-chemical methods first. If non-chemical methods are unable to achieve satisfactory level of pest activity according to pest action thresholds, then use low impact pesticides prior to use of non-low impact pesticides.

- IPM Book must contain most current CD containing MSDS for all pesticide products applied on school property.
- If a non-low impact pesticide is to be used, provide a “School Integrated Pest Management Act Compliance Certification” form to the IPM coordinator for his/her signature ensuring all advance notification and posting has been performed as required. Applicators are not liable for damages resulting from the failure of the school to provide the notification or posting as required by the NJ School IPM Act.
- Meet with the IPM coordinator upon completion of each service prior to leaving the campus.
- Participate in the annual evaluation of The Midland School IPM Plan and Policy with the IPM coordinator and provide comments regarding any necessary modifications to the plan and policy.

**Training:** All required training for the pest management professionals employed by pest control vendor(s) is the responsibility of the pest control vendor(s), and will follow the regulatory guidelines as listed under NJ Administrative Code Title 7 Chapter 30, Subchapters 1-13.

All pesticide applicators providing services to The Midland School will be certified pesticide applicators in Core, 7A, and 13 by the NJ Department of Environmental Protection.

#### **d) School Nurse and Health Office**

The school nurse will consider potential pesticide exposure when evaluating a child’s health complaint. The school nurse should have access to MSDS sheets for any chemical used on school property and be aware of any children with asthma or chemical sensitivities.

#### **Other Duties of the School Nurse in the School IPM Program:**

- Keep copies and review MSDS of all pesticides used on school property.
- Maintain easy access to Poison Control Center hotline at 1-800-222-1222 in case acute poisoning is suspected.
- Monitor for headlice (a common problem for children between 3 and 10 years old).
- Educate parents and staff about preventing headlice spread when it occurs.
- Notify the School IPM Coordinator whenever pests are detected in the health office.
- Carry out all appropriate recommendations that are made by either the contracted pest management professional or the IPM coordinator in an effort to manage any existing pest problems or to prevent pest problems from occurring.
- Alert IPM coordinator and pest management professional of students’ insect allergies.

#### **Training of School Nurse and Health Staff:**

In addition to required professional training, the school nurse and health staff should also be aware of public health pests of significance that may impact student health; see EPA’s List of Pests of Significant Public Health Importance at [http://www.epa.gov/opppmsd1/PR\\_Notices/pr2000-draft.htm](http://www.epa.gov/opppmsd1/PR_Notices/pr2000-draft.htm).

Furthermore, copies of selected pesticide resources on poisoning should be obtained and may include: Recognition and Management of Pesticide Poisonings, Routt Reigart and James Roberts, 5th edition, U.S. Environmental Protection Agency, March 1999; available online at <http://www.epa.gov/opffead1/safety/healthcare/handbook/handbook.htm>.

#### **e) Kitchen Staff**

The Midland School does not have dedicated kitchen staff nor a kitchen that is used on a regular basis for food preparation. Rather, the kitchen area is primarily used for education. The kitchen is not currently used as a food preparation facility.

Regardless, the kitchen area and food storage rooms will be serviced monthly by a pest management professional. Regular pest monitoring will occur in the kitchen area and food storage rooms in order to prevent or address pest problems early on.

The Midland School will use its internal procedures for proper clean-up and maintenance of the kitchen and food storage rooms in an effort to prevent pest problems from occurring.

**f) Maintenance Staff**

Maintenance staff maintains the cleanliness and take care of the school building and grounds. These staff members may be assigned to indoor and/or outdoor maintenance. School maintenance staff may make applications of pesticides that are "over-the-counter" disinfectants and antimicrobials such as Lysol® and toilet-bowl cleaner.

**Other Duties of Maintenance Staff in the School IPM Program:**

- Practice excellent sanitation and maintenance techniques in all interior and exterior areas of the school property.
- Recognize and correct conditions that may lead to pest problems such as water leaks, potential pest entryways, and poor sanitation.
- Carry out all appropriate recommendations that are made by either the contracted pest management professional or the IPM coordinator in an effort to manage any existing pest problems or to prevent pest problems from occurring.
- Manage specific pest issue(s) as directed by the IPM coordinator. This will not include pesticide application.

**Training of Maintenance Staff**

- The IPM coordinator will be responsible for training the indoor Maintenance Staff in proper sanitation procedures and schedules when hired and annually thereafter.
- The School IPM Coordinator must train the indoor Maintenance Staff in the pest detection and monitoring program and devices in place throughout the school when hired and annually thereafter.
- If landscaping or turf maintenance is required by their duties, grounds maintenance staff will be trained in accepted horticultural practices grounded in IPM, but will **not be permitted to apply any pesticides** in an effort to manage pests.

**g) Staff, Teachers, and Students**

Staff, teachers, and students should be familiar with the concept of IPM and the benefits that an IPM program brings to the school environment. The general staff and students should understand the role that they play and how they can contribute to a successful School IPM program.

**Duties of Staff, Teachers, & Students in the School IPM Program:**

- The most important responsibility of the students and staff is sanitation. Much of the prevention and reduction of pest infestation at the school site depends on whether or not students and staff clean up food leftovers, food in lockers, gum under desks, paper clutter, etc., or perform proper maintenance. Students and staff will be expected to take measures to ensure a clean environment that is not attractive or conducive to pest activity.

- Practice good storage practices by not allowing areas to become cluttered, thus creating conducive condition for rodents and other pests.
- Notify the IPM Coordinator of any mechanical or physical deficiencies that interfere with proper cleaning, storage, or that create conditions conducive to pest activity.
- Notify the IPM Coordinator if any pest activity is observed in areas associated with any food service areas.
- Leave pest control and pest management to trained professionals, but follow or carry out appropriate recommendations that are made by either to contracted pest management professional or the IPM coordinator in an effort to manage any existing pest problems or to prevent pest problems from occurring.
- Will not move sticky traps or other pest monitoring devices.

#### **Training of Staff, Teachers, & Students:**

- School staff, teachers, and students will be trained in their roles in the school's pest management system by the School IPM Coordinator.
- On-site educational programs may be provided by Cooper Pest Solutions but will be subject to additional fees. Training will be geared to provide an overview on pest identification and the conditions that promote pests. Staff and students will also be educated on pest reduction strategies connecting people's behavior such as eating at desks, leaving crumbs on the floor, etc. to pest problems.
- Education must be focused to increase people's willingness to share their environment with other organisms so that people are less likely to insist on toxic treatments for harmless organisms.
- They will be instructed in how to log pest complaints using the "Facilities Pest Log."
- Pamphlets and fact sheets will be made available at the time of training and/or posted on bulletin boards if necessary at the discretion of the IPM coordinator.

#### **h) Parents or Guardians of All Students Enrolled at The Midland School**

##### **Duties of Parents/Guardians:**

- Learn about IPM practices and follow them at home so that pests are not carried to school in notebooks, backpacks, lunch bags, clothing, or children's hair.
- Make sure children are aware of their role in School IPM program.
- Encourage children to lend a hand in cleaning up.
- Discourage children from keeping food in their lockers and desks, aside from the day's lunch and snacks.
- Be aware of current pest management practices at The Midland School. Review the annual notice, as well as all other pesticide use notices.

##### **Training:**

Pamphlets, fact sheets, and notifications will be sent home to parents and guardians at discretion of IPM coordinator. MSDS of any pesticide product used on campus will be available to the school community upon request.

#### **6. Pest Identification: Site Assessment and Ongoing Monitoring**

Pest presence noticed between monthly services will be noted and documented in the "Facilities Pest Log" by the IPM coordinator or authorized faculty and staff. Entries in the "Facilities Pest Log" will be checked by the pest management professional and actions noted.

Pest presence that goes beyond the pest action threshold or a pest emergency will be notified to the pest control vendor(s) right away, rather than waiting for the next regularly scheduled maintenance service.

When pest activity is found at The Midland School, the pest management professional will have the pest identification confirmed, perform a thorough inspection of the area of concern, and then perform non-chemical control methods.

Low-impact pesticides and non-low impact pesticides will be used with permission from the IPM coordinator if non-chemical methods fail to achieve satisfactory level of pest activity and/or the pest action threshold has been reached and/or surpassed.

The initial site assessment has been completed for The Midland School. The following pest vulnerable areas (PVAs) have been identified and included for inspection and monitoring at every monthly service.

**Indoor PVAs:**

- **Kitchen and food storage room**
- **All bathrooms**
- **Boiler Room**
- **Staff Kitchen**
- **Instructional Kitchen**
- **Independent living Kitchen**
- **Storage Room**
- **Main Entrance Area**
- **Around class room 516**

**Outdoor PVAs:**

- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

Ongoing monitoring will entail the use of mechanical rodent catch devices, glueboards and sticky traps, and light traps where necessary. A map detailing the location of all monitoring devices will be prepared and kept in the IPM book.

All monitoring devices will be checked once a month. If a pest problem occurs, the frequency of checks will be escalated depending upon the pest, and brought back to monthly checks once the pest problem is solved.

If mechanical rodent catch devices are used on the interior of the building, the pest control vendor(s) will inspect the device at least once each month.

The exterior of the building will be inspected on a monthly basis for conducive conditions that may promote pest activity. If such conditions are found, recommendations will be made to the IPM coordinator in order to mitigate the problem(s). The pest management professional will also be inspecting surrounding vegetation, noting possible conditions that may promote pest activity and making recommendations to the IPM coordinator in order to mitigate the problem(s).

The pest management professional will complete the proper work order, update the "Pesticide Application History" log, updated the "Facilities Pest Log," and update the "Pest Monitoring Log" after every monthly service.

## **7. Pest Prevention and Control**

Wherever possible, the School will take a preventive approach by identifying and removing, to the degree feasible, the basic causes of the problem rather than merely attacking the symptoms (the pests). This prevention-oriented approach is also best achieved by integrating a number of strategies. It is easier to spot a potential problem when the interior and exterior of the school is clean and uncluttered.

IPM employs a multi-tactic approach, integrating several strategies to combat a particular pest. Control strategies that remove a pest's food, water, and shelter (harborage), and limit its access into and throughout buildings and on school grounds will be employed as follows:

- Cultural control: for example, improve sanitation; reducing clutter; people change habits like leaving food in the classroom; maintain plant health by taking care of the habits and conditions; fertilization, plant selection (right plant/right place), and sanitation to exclude problematic pests and weeds.
- Physical control: for example, pest exclusion; removing pest access to the school building by sealing openings with caulk and copper mesh; repairing leaks and screens; removing pests by hand.
- Mechanical control: for example, insect monitors, light traps, rodent traps; till soil prior to planting to disrupt pest life cycles.
- Biological control: use of pest's natural enemies. For example, introduce beneficial insects or bacteria to the environment or, if they already exist, provide them with the necessary food and shelter; and avoid using broad-spectrum chemicals that will inadvertently kill beneficials.
- Least hazardous chemical controls with preference given to School IPM Act-defined 'low impact pesticides'.

### **Action Thresholds**

No pesticide applications will take place unless the action thresholds for the pest have been reached. Action Thresholds do not trigger the automatic use of pesticides, but rather trigger the opportunity for pesticides to be considered as a control option particularly if other IPM tactics have not been able to control pest populations to an acceptable level.

Pesticides will be selected when the action threshold has been reached and other non-chemical control methods are not effective or practical in resolving a pest problem. Pesticides will not be used on School property unless both the pest has been identified and its presence verified. It is neither possible, nor desirable, to completely exterminate every pest and potential pest from every population on school property.

When it is determined that a non low impact pesticide must be applied to adequately control pests within established thresholds, application guidelines **per the law** will be followed. Specifically, non-low impact pesticides will be applied in a school building only when students are in another area of the building AND only if the area being treated with the pesticide is served by a different air handling system and is separated from the students by smoke or fire doors. Further, applications of non-low impact pesticides on school property will be made in advance of when students will be present for instruction or extra-curricular activities, allowing for any label-prescribed entry restrictions; if there is no re-entry interval listed on the label, a minimum of 7 hours will be allowed prior to student re-entry on school property.

**Per the law**, emergency application of a non-low impact pesticide will only be made when the health or safety of a student or staff member is threatened. A "school pest emergency" is defined in the law as "an urgent need to mitigate or eliminate a pest that threatens the health or safety of a student or staff member." If a pest emergency exists, the school may use pesticides without the normal 72-hour pre-notification to parents and staff, and the advance posting of signs. Rather, the posting must be done at the time of the application, and the notice to parents and staff must be done within 24 hours after the emergency application. The notice that goes to parents and staff must explain what the reason for the emergency was, and if possible, what could be done to prevent such an emergency use next time.

Treatments, whether pesticides or low impact pesticide materials, will only be applied on school property when and where needed. It is rarely necessary to treat an entire building or landscape area to solve a pest problem. Monitoring will be used to pinpoint where pest numbers are beginning to reach the action level and 'spot' treatments' will be confined to those areas.

The pest management professional will make recommendations for corrective actions to the School IPM Coordinator on a regular monthly basis, depending on what is found/seen. The pest management professional will consider all options, including no control, and look at pest activity levels versus thresholds.

All controls that are actually implemented, both chemical and non-chemical, will be documented in the IPM book by the pest control vendor(s) and communicated to the IPM coordinator.

## **8. Pesticide Use: Notification, Posting, and Re-Entry**

### **Annual Notification**

The IPM coordinator will prepare and send an annual notice of school IPM program status to parents or guardians of each student enrolled at the school, and all staff members at the beginning of each school year. Once the annual notice has been sent, the IPM coordinator will also give this information to new staff or the parents/guardians of new students upon their arrival.

The Annual Notice must include:

- a copy of The Midland School IPM Policy
- the name, address, and telephone number of the School IPM Coordinator
- a list of any pesticide that is in use or has been used within the last 12 months on school property
- a statement that:
  - the IPM coordinator maintains the product label and material safety data sheet of each pesticide that may be used on school property
  - the pesticide product label and MSDS is available for review by a parent, guardian, staff member, or student attending the school upon request to the IPM coordinator
  - the IPM coordinator is available to parents, guardians, and staff members for information and comment
  - the time and place of any meetings that will be held to adopt/revise the school IPM policy
  - the following statement: "As part of a school pest management plan, (insert school name) may use pesticides to control pests. The United States Environmental Protection Agency (EPA) and the New Jersey Department of Environmental Protection (DEP) register pesticides to determine that the use of a pesticide in accordance with instructions printed on the label does not pose an unreasonable risk to human health and the environment. Nevertheless, the EPA and DEP cannot guarantee that registered pesticides do not pose any risk to human health, thus unnecessary exposure to pesticides should be avoided. The

EPA has issued the statement that where possible, persons who are potentially sensitive, such as pregnant women, infants and children, should avoid unnecessary pesticide exposure."

### **Notification and Posting of Non-Low Impact Pesticide Use**

There are two situations when non-low impact pesticides may be used on school property: when it is pre-planned and when it is an emergency.

1. Pre-Notification and Posting of Planned Non-Low Impact Pesticide Use:

At any time of the year when children may be present, the school will issue prior notification of all non-low impact pesticides to be used. Specifically, **Mike Castles, IPM coordinator**, will issue notice to all staff, and parents/guardians of each student enrolled at the school. The area where the pesticide will be applied will be posted at least 72 hours prior and 72 hours following the application.

2. Emergency Use Notification and Posting for Non-low Impact Pesticide Use:

When an emergency application of pesticides is required, **Mike Castles, IPM Coordinator**, will issue notice of emergency use of non low impact pesticides used to all staff, and parents or guardians of each student enrolled at the school within 24 hours after the application or on the morning of the next school day, whichever is earlier. The reason for the emergency and any measures that will be taken so that emergency pesticide use may be avoided in the future may be included. The area where the pesticide is applied will be posted at the time of application, and will remain posted for 72 hours following the application.

In either situation, the school is **required by law to make NJDEP-prescribed notification and posting** as described below. The Appendix contains sample written notification forms, 'Pre-Notification of the Use of Pesticides' (72 hour pre-notification) and 'Emergency Pesticide Use Notification', and a sample posting sign (for indoors & outdoors) 'Notice of Pesticide Application'. The specific 'what', 'how' and 'where' requirements of the law that will be followed on School property on posting and notification follows:

**What:** In either planned or emergency applications of non-low impact pesticides, **New Jersey law requires** content of both notification and posting as follows:

- common name of pesticide,
- EPA registration number,
- EPA statement on sensitive persons: "Where possible, persons who potentially are sensitive, such as pregnant women, infants, and children, should avoid any unnecessary pesticide exposure"
- location description, date, and time of application (one date for indoor application; three dates for outdoor applications in case of cancellation),
- potential adverse effects of product,
- reasons for the application,
- contact information for the IPM Coordinator of the school or school district, and
- Further label information or precautions for public safety.

**How:** In either planned or emergency applications of non low impact pesticides, the IPM coordinator will advise the parents and guardians and staff of the school of pesticide applications by the following method of notification.

- written note that the students take home (see Appendix for sample notice)
- written note that is mailed at least one week prior to the application (see Appendix)
- phone call



- direct contact
- email

**Where:** In either planned or emergency applications of non low impact pesticides, per New Jersey law, the IPM coordinator will post signs:

- Prominently in or adjacent to the area where the pesticide is to be applied.
- At each entrance to the building or school ground where the pesticide is to be applied.
- That are at least 8.5" by 11".

### **Re-Entry**

If there is application of a low impact pesticide on school property, it will be made so that adequate settling or drying occurs in advance of when students will be present for instruction or extra-curricular activities.

Students cannot enter a pesticide treated area for at least seven hours after the application of a non-low impact pesticide, unless the pesticide label states a specific numerical re-entry time that is different than this. The use of low impact pesticides does not require an automatic seven-hour wait; students can re-enter after the pesticide application has dried or settled, or longer if the pesticide label specifies.

## **9. Record Keeping and Evaluation**

the pest control vendor(s) will maintain records as listed in their outlined role and responsibility for school IPM.

The following records will be maintained in the IPM book kept with the IPM coordinator at all times:

- Pesticide Application History Log
- Pest Monitoring Log
- Facilities Pest Log
- Pest Action Thresholds
- IPM Priority Checklists
- Annual School IPM Program Notification Letters to Parents & Staff
- Pre-Notification of the Use of Pesticides (72 hour pre-notification)
- Emergency Pesticide Use Notifications
- School Integrated Pest Management Act Compliance Certification Forms
- Posting Sign (for indoors & outdoors) 'Notice of Pesticide Application'

At least annually, the School IPM Plan and Policy of The Midland School will be evaluated. This necessarily includes review of all records in the IPM book. Program evaluation involves reviewing monitoring data, actions taken, treatment impacts and effectiveness, and any other relevant observations. These records will provide information on previous and current pest populations and which strategies were applied. Comparing data will clearly indicate which pest management strategies were most effective for the amount of time and money spent. IPM practices and procedures will be modified, if necessary, based on past experience, results, and gained knowledge.

This evaluation will be coordinated by Mike Castles, IPM Coordinator, along with a representative of the pest control vendor(s)

The following issues will be addressed during the evaluation of the School IPM Plan and Policy:

- adequacy of pest control indoor and outdoor
- areas of concern
- sanitation issues
- building maintenance issues
- new less toxic pest control tactics
- adequate support by all members of the community
- adequacy of thresholds
- revise integrated pest management priorities

A written evaluation will be completed and the School IPM Plan and Policy will be revised accordingly by Mike Castles, IPM Coordinator.