

School Board of Brevard County

1254 S. Florida Avenue • Rockledge, FL 32955
Desmond K. Blackburn, Ph.D., Superintendent



April 16, 2018

MEMORANDUM

To: Leadership Team
From: Jim Powers *JP*
RE: **BPS, Integrated Pest Management Procedure (IPM)**

After reading the newly developed *Integrated Pest Management (IPM) Procedure* (attached), please distribute a copy to your school/department staff.

This new *IPM Procedure* is intended to clearly identify permissible use of select pesticides and herbicides by school-based staff, as well as define the related duties and responsibilities of the District's Maintenance Department and EH&S Department. Implementation can begin immediately.

Please do not hesitate to contact Jim Powers with any related questions, comments, or concerns.

FREQUENTLY ASKED QUESTIONS

Does my school/site have to do this (self-perform limited pest management practices)?

No – each school/site administrator has the choice to implement this privilege at their school/site.

Who pays for the pre-approved pesticides/herbicide?

Each school/site is responsible for purchasing the limited/approved pesticide products that their staff will be using at their facility.

Who can/can't apply the pre-approved types of pesticides/herbicide?

Employees deemed to be competent by the site-based administrator (Principal or Director) may; store, handle and apply the limited pesticide/herbicide products on their campus.

Will the District Support Offices continue to provide their standard IPM support if my school/site decides to self-perform the permissible pest control practices?

Yes – Even if your school/site administration decides to self-perform some or all of the permissible/limited pest control practices, District Support Offices will continue with the same level of support that is currently provided.

Can this privilege be taken away?

Yes – Individual school/sites may lose this privilege if the site-based administrator and their staff are documented as not following these procedures and creating an unacceptable health and safety risk.

Approved: _____

Dane Theodore, Assistant Superintendent of Facilities Services

Jim Powers, Environmental Health & Safety Manager

Plant Operation Department 9560: Office of Environmental Health & Safety / Facilities Services Division
Phone: (321) 633-3580 ext. 13074 · FAX: (321) 617-7756



Integrated Pest Management (IPM) and Pest Control Procedure

PURPOSE

To safely provide a reasonable level of pest management and pest control to all Brevard Public School District (BPS) buildings, equipment, and grounds as a means to prevent illnesses from pests and illness from pesticide-chemicals used to manage pests to the extent that pest and the use of pesticides do not detract from BPS's Educational Learning Process.

BPS Functional Definition of "Pest" -- *insects, small animals, or vegetation that measurably harms or otherwise competes with occupants of BPS properties and its prekindergarten through post-secondary educational mission.*

SCOPE & APPLICABILITY

This Procedure applies to all BPS properties (i.e schools, ancillary sites, and vehicles/equipment). It also applies to all occupants (students, staff, visitors, & vendors/contractors).

Addresses adequate means of managing pests based on Federal and State rules/regulations, as well as BPS Policy 8400 (EH&S Issues) and IPM industry best-practices.

Comply with the *Structural Pest Control Act, Chapter 482, Florida Statutes (F.S.)*. This law is administered and enforced by the Department of Agriculture and Consumer Services, and is divided into the following licensure categories:

- Commercial Structural Pest Control
- Commercial Landscape Maintenance Applicator Certification (LCLM)
- Limited Governmental or Private Applicator Certification
- Limited Urban Commercial Fertilizer Applicator Certification Program
- Limited Commercial Wildlife Management Certification

Comply with BPS District language established in *BPS Policy 8400 – entitled Environmental Health & Safety Issues*.

Least Aggressive, yet Effective Approach/ Philosophy

Use common pest prevention practices based on daily campus/building occupant behaviors first, before resorting to more aggressive and specialized pest prevention methods. Specifically, implement occupant/operator behavior education and modification practices to minimize the presence of pests [i.e. minimize food/debris attractants, minimize access to occupied spaces (keep doors closed), etc.], before resorting to more aggressive pest management practices.

Where basic operational pests management methods are found and documented to be ineffective, than more aggressive pest control practices may be used (i.e. pre-engineered suppression/termination products and devices used by job-class designated BPS staff and specialized/licensed contracted pest management services).

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PROCEEDURES

Schools & Ancillary Site-based Employees (Principals, Head Custodians, P.E. Teachers & Caf. Mgrs.)

Pest Prevention

Follow best practices pertaining to pest prevention, as a means to minimize the negative impacts of pest and the potential negative impacts of relying on pesticide-chemicals to control and manage pest in the school classrooms and school grounds. Best practice is based on good housekeeping, to include but not limited to the following:

- Do not prop-open perimeter doors/windows or otherwise leave the building envelope open. Report any/all discovered breaches in the building envelope to the Maintenance Department for expedient repair
- Minimize food debris everywhere on campus. Pick-up/remove food debris as soon as it is generated
- Properly containerize stored food products (air-tight sealed non-cellulose containers)
- Daily remove waste products away from the building (into sealed waste bags & closed dumpster containers)
- Do not feed wildlife or ferial neighborhood animals (i.e. birds, cats, etc.)
- Do not use cardboard boxes for storage (eliminate cardboard packaging within one day of sending/receiving parcel packaging)
- Minimize clutter (potential pest harborage)
- Report any/all water leaks (i.e. dripping plumbing fixtures) to Maintenance Department for expedient repair
- Eliminate sources of standing water.

Pest Treatment (Indirect)

Maintain a Pest Sighting Log, complete with description of pest, location, and date sighted. The Pest Sighting Log (filled-out by School Staff) is used by the Central Custodial Services (CCS) Department who have Certified Custodial Trainers experienced and licensed to safely apply pesticides, baits, and traps to indoor spaces. They also retain the knowledge, skills, and products necessary to respond in the most effective and least toxic approaches to common and less common pest situations. Ask Certified Training Custodians to assist site-based staff with reviewing IPM best practices and related BPS Procedures. Work directly with the CCS Department by conveying operational site conditions related to pest situations, and allowing them access to affected portions of the school campus.

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Pest Treatment (Limited & Direct)

Whereas Federal Laws extensively regulate the manufacturing, packaging, sales, and services associated with pesticides, for the purpose of protecting the public from pesticide exposure -- there are some law/rule exceptions pertaining to the use of low-toxicity retail pesticide products for the purpose of managing localized pest situations. Therefore, BPS District school and ancillary sites Administrators are permitted to purchase, store and use/apply the following products by competent school employees under the following conditions:

The following four (4) types of retail low-toxicity pesticides are permitted to be used by school staff:

- 1) Fire ant granular bait (active ingredient: 0.73% hydramethylnon -> common label, *Amdro*®) purchased at retail hardware stores, for the purpose of suppressing fire ants on school grounds. Shall not be commercial/agriculture grade product, but must be designated by label for urban-area use.
- 2) Household ant bait jell in safety housing/container (active ingredient: < 6% sodium tetraborate decahydrate -- AKA Borax -> common label, *Terro*®) purchased at retail hardware stores, for the purpose of suppressing common household insects inside school buildings. Shall not be the commercial/agriculture grade product, but must be designated by label for retail household use, and must be of the variety that provides an 'enclosed jell placement container' as necessary to prevent inadvertent contact with building occupants.
- 3) Low toxicity (water-based) wasp/bee spray, purchased at retail hardware stores, for the purpose of eliminating wasps nest on the exterior of the school building, PE equipment, and playground structures. Shall not be commercial grade product, but must be pre-packaged (no-mixing) and designated by label for retail/ household use.
 - Stinging insects (i.e. fire ants, carpenter ants, wasps, etc.) pose a significant medical emergency threat to persons susceptible to severe allergic reaction (anaphylaxis).
- 4) Low toxicity (active ingredient: < 3% glyphosate -> common label, *Round-Up*®) herbicide spray purchased at retail hardware stores, for the purpose of minimizing grass and weed vegetation growth in playground mulch (safety fall/impact material) located under and around elevated playground structures, and around sidewalks and school-grounds landscaping. Shall not be commercial grade product, but must be premixed and designated by label for retail/ household use.
 - Grass and weed growth within playground mulch is unwanted and a safety concern, as it can significantly diminish the fall protection factor inherent to engineered wood-fiber mulch (BPS & General Safety Industry - standard fall protection material).

Only competent school and ancillary site staff (i.e. Administrator, Head Custodian, P.E. Teacher, and Maintenance Worker) are permitted to use the four (4) pre-approved products listed above. They must follow all of the user and safety instructions provided by the product manufacture (typically found on containier labels) as it relates to user-safety and bystander-safety (i.e. preventing occupant re-entry into treated areas for designated period of product 'dwell-time', etc.).

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Must be applied in locations and times-of-day when/where the site-based administrator and user can assure that persons will not re-enter the treated area(s) prior to designated product 'dwell-time' (as indicated in product user instructions).

Stored pesticide product must always be secured in a location on-site that is only accessible to those employees permitted by the site-based administrator to use the product(s). The location must be located away from areas readily accessible to school students and school guest. Only purchase and store the amount of product necessary for routine site-based operations.

Individual school sites found not to strictly stay in compliance with this limited pesticide use practice will permanently lose their privilege, as administered through BPS Leadership and Labor Relations Authority.

Central Custodial Services Department - Coordinate Integrated Pest Management Practices

The Central Custodial Services (CCS) Department, comprised of Certified Custodial Trainers and supported by a Custodial Coordinator and Supervisor, shall remain current with governing regulatory rules and best practices applicable to Pest Management and Pest Control Services. Utilize the technical IPM educational and consultation services provided by:

The University of Florida, Institute of Food and Agricultural Sciences (UF/IFAS) and the local/Brevard County Extension Office.

The Florida Department of Agriculture and Consumer Services (FDACS)

Administer initial and refresher training and re-certification for specific classes of BPS employees who perform commercial-type pest control practices, including but not limited to applying pesticides/herbicides, baits, and vermin trapping. Maintain training and certification records on file for accountability and audit purposes.

Routinely administer awareness and best-practice training to BPS school and ancillary site personnel as a means to keep BPS school and ancillary site communities aware of the core pest prevention methods associated with sanitation and good housekeeping. This training shall clearly explain the health and safety hazards associated with improper use of chemical-based pesticides, and clearly explain that commercial-grade (concentrated) pesticides shall not be used by site-based personnel (i.e. Custodians, P.E. Teacher, Coaching Staff, volunteers, etc.). In addition, this site-based training shall clearly define the limited permissible practices of using (purchase, store & apply) low-toxicity (retail: ready-to-use) products that non-licensed personnel are legally (and safety) permitted to use, under conditions where basic sanitation practices are not enough to control pest situations that negatively impact BPS Educational Processes.

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Assist the BPS Purchasing Department with solicitation and selection of contracted IPM commodity vendors and professional IPM services that are necessary to support the classes of BPS employees designated to perform commercial-type pest control practices (i.e. Certified Training Custodians, Grounds Technicians, etc.).

Where contracted commercial pest control services are needed (i.e. termite prevention/treatment) the CCS Department shall develop scopes-of-work and oversee contracted services to help insure compliance with specific pesticide licensing and application rules, in addition to insuring effectiveness of the work performed.

Maintain an operating budget for the purchase of pesticides used by designated BPS employees (primarily: Lawn Care Technicians & Certified Training Custodians) and where needed, the purchase of contracted services. The CCS Department shall maintain records to include but not limited to; personnel training/licenses, vendor licenses, commercial pest control product purchases, pesticide application work records, product safety data sheets, and incident reports.

Receive and respond to any/all notices received by the Florida Department of Agriculture and Consumer Services (DACS) identifying residence in Brevard County who are registered for 'Pre-notification' of pesticide applications. Specifically, provide documented "notification" to registered citizens prior to pesticide applications and control the commercial application of pesticides on BPS property that are within the geographic control zone prescribed by DACS for individually registered (chemically sensitive) citizen.

Establish pest-sighting protocol and record keeping (logbook form) for individual school/site management.

Utilize the BPS Facilities/Maintenance Department's work control database (and associated work request/approval modules) to track and document the type, location and purpose for the application of commercial-grade pesticides, baits, and traps necessary for interior pesticide treatments. Apply pesticides, baits, and traps where necessary based on site conditions and the extent the pest situation is impacting the school's Educational Process. For each pest situation, determine if a particular pesticide(s) is/are necessary (or not) based on effectiveness of recent (on-site) pest prevention practices, evidence of infestation (all stages of pest's life-cycle present), and potential continued harm to occupants. Always follow product user-instructions for the safe mixing and application of specific preapproved commercial -grade products. For products that require a 'dwell-time' and require personnel to remain out of the treated area during the 'dwell-time', always apply products in a way (i.e. time of day, locations, etc.) to minimize the potential for inadvertent reentry to treated areas. Always use warning signage when/where required by product user instructions for 'dwell-time' and 'restricted access.'

Always follow Wildlife Management Rules and Best Practices when trapping and/or deterring vermin and other forms of unwanted wildlife. Due to the importance of protecting surface and ground water, the CCS Office shall oversee a contract for specialized aquatic herbicide application services necessary to control aquatic vegetation in all BPS retention ponds.

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Environmental Health & Safety Department – Quality Control and Assurance Oversight Services

Periodically research and review regulatory rules and regulations applicable to the purchase, use, and application of pesticides and nuisance animal control devices/methods. Update related BPS Policies and Procedures as necessary for BPS to stay contemporary with specific rules/regulations and IPM Industry best practices.

Act as a liaison between; regulatory agencies, specialized contracted services, BPS school communities, and the BPS Board with regard to occasional impacts (disruption) to the BPS Learning Processes caused by nuisance animals that are Federal and/or State designated as either protected or endangered species.

Where necessary, perform health-risk analysis when considering a specific change from practical pest management methods to more aggressive pest control methods.

Perform periodic school and ancillary site inspections to insure School-based Staff (i.e. Custodians, Teachers, Coaches, and Administrators) and District Office Support Staff (i.e. Grounds/Maintenance, Food Services, Warehouse, Transportation) are complying with the BPS Policy 8400 (EH&S Issues) and this Procedure.

A primary emphasis and focus is placed on preventing occupant exposures to pesticides by monitoring specific classes of occupants who have varied levels of permission for the purchase, storage, use/application, and disposal of both prepackaged (low-concentration retail purchase) and bulk-packaged (high-concentrate wholesale purchase) pesticides. A secondary emphasis is placed on preventing impacts to natural resources (school-grounds, neighboring properties, etc.).

With the assistance of BPS Leadership, the EH&S Office shall enforce any/all BPS school site and ancillary sites found to be out of compliance with the environmental, health, and safety aspects of this Policy and Procedure. The decentralized organization structure of BPS places each BPS school-site Principal and each BPS ancillary-site Director ultimately responsible for compliance at their assigned property/location.

Periodically assess BPS school and ancillary sites for pest vulnerabilities primarily relates to; unprotected openings in the building envelope, food debris, improper food storage and waste disposal. Work directly with BPS Maintenance Trades and Site-based Staff with installation of building materials/equipment to help prevent pests from entering buildings. Where needed, guide Site-based Staff in performing operational practices such as insuring perimeter doors remain closed (not propped-open for nighttime cleaning operations, school programs, etc.), sealed/secured food containers, and secured waste disposal.

Maintenance Department – Grounds and Building-infrastructure Services

Grounds Services

Receive periodic training from CCS Department and keep Grounds Maintenance Technicians adequately trained and licensed to apply commercial-grade pesticides for the following purposes:

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- athletic field turf management (prevention of damage by insects prone to competitive turf)
- Physical Education (P.E.) field management (fire ants suppression)
- fence-line vegetative weed control (minimize rodent harborage & visual aesthetics)

Purchase and maintain adequate Personal Protection Equipment (PPE) and product specialized dispensing equipment to minimize and/or eliminate the potential for worker exposure to commercial-grade pesticide products.

Purchase, store, transport, and dispense pesticides (including fertilizers) as necessary for seasonal grounds care. This includes purchasing only those herbicides, pesticides and fertilizers necessary for grounds services and use only pre-approved vendors and products (selected by: BPS Purchasing Dept. & CCS Office). Store bulk purchased products in an enclosed area(s) within Ancillary Maintenance Compounds.

Utilize the BPS Facilities/Maintenance Department's work control database (and associated work request/approval modules) to track and document the type, location and purpose for the application of herbicides and pesticides (including fertilizer). Always follow product user-instruction for the safe mixing and application of specific preapproved products. For products that require a 'dwell-time' and require personnel to remain out of the treated area during the 'dwell-time', always apply products in a way (i.e. time of day, locations, etc.) to minimize the potential for inadvertent reentry to treated areas. Always use warning signage when/where required by product user instructions for 'dwell-time' and 'restricted access.'

Infrastructure: Carpentry Services

Respond to work orders requesting the repair to sections of building exterior where small openings are found to inadvertently allow pests (i.e. insects, rodents, birds, etc.) to enter buildings and structures.

Respond to work orders requesting the minor modification to building components and site-based equipment (i.e. install door sweeps & mullions) to prevent pest (i.e. insects, rodents, birds, etc.) from entering buildings and structures.

General Maintenance Trades

Are permitted to purchase and use low toxicity residential-grade wasp/bee spray purchased from hardware stores for the purpose of eliminating wasps nest and other stinging insects that prohibit safe access to exterior building systems and equipment for the purpose of repairing and maintaining exterior school infrastructure. This is especially important for employees working at heights (i.e. from a ladder, utility-pole, or at roof-edge, etc.), and the threat of a fall/injury resulting from stinging insects.

They must follow all of the user instructions provided by the product manufacture as it relates to the user's safety and any bystanders (i.e. preventing re-entry into treated areas for designated period of time, etc.).

Must be applied in exterior locations, with site-based administrator's permission, and times-of-day when/where the site-based administrator and user can assure that persons will not re-enter the treated area prior to designated product 'dwell-time.'

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The pesticide product must always be secured in a location on-site (or in the service vehicle/truck) that is only accessible to them or their co-workers. Only purchase and store the amount of product necessary for routine maintenance service operations. Individual support staff employees and their direct-line supervisor found not to strictly stay in compliance with this limited pesticide use practice, will permanently lose their privilege, as administered through BPS Leadership and Labor Relations Authority.