Integrated Pest Management Program

Introduction

The Integrated Pest Management (IPM) Program is a methodology that utilizes physical, mechanical, biological, educational and chemical means to maintain pest levels at acceptable levels (precautionary principle).

A low level will prevent unacceptable damage to people, public and private property, and to our environment. We will endeavor to use the least toxic and least harmful means to achieve these results. Chemical means will be used as a last resort. One element of this plan requires regular monitoring, documentation and review of the IPM process to determine its effectiveness. Appropriate changes and controls may be implemented for quality assurance.

Structural and landscape pests can pose significant problems to people, property and the environment. We recognize that chemical means used to control such pests pose their own health risks. It is the goal of the District to provide and maintain a safe and healthy environment for students, staff and the community. In order to achieve this goal the District has established and Integrated Pest Management Program. This program’s long-term goal is the eventual elimination of all chemical pesticides.

The “Precautionary Principle” is the long-term objective of the San Ramon Valley Unified School District. The Principle recognizes that:

- No pesticide product is entirely free from risk or threat to human health and
- Pesticide manufacturers should be required to demonstrate that their products are safe for use near children and that they are absent of such risks which include: cancer, neuralgic disruption, birth defects, genetic alteration, reproductive harm, immune system dysfunction, endocrine disruption, and acute poisoning.

This program recognizes that full implementation of the Precautionary Principle is not possible at this time. Nevertheless, the Board is committed to the process as set forth in this program.
1. Monitoring

Monitoring is the regular and ongoing process of inspection and observation of the areas where pest infestations can and do occur. Monitoring is an essential component of the IPM program. The purpose of monitoring is to determine when the action threshold level has been reached. Through proper monitoring, potential disruptive infestations can be managed with appropriate control measures.

2. Pest Action Threshold

Pest action threshold is an action level determined by the collective sensitivity of the occupants at a specific school site, classroom or work environment. The appropriate control method shall be implemented when the pest action threshold has been determined (best practices to achieve goal of reducing pest levels with the minimal use of pesticides).

Note: The presence of a pest does not necessarily require or initiate remedial action. The extent or existence of medical and/or economic damage will be used to determine the required action. In order to ensure the safety of students, staff and the community, there is no “acceptable level” of medical damage.

3. Implementing the Appropriate Action

Each pest or infestation may require a different treatment strategy. The following is a partial list of IPM treatment strategies:

- Modify pest habits.
- Consider and coordinate the use of a range of potential treatments for a pest problem, which may include physical, horticultural, and biological methods.
- If recognized, the district may use least-toxic treatments, which have been tried by other California agencies; other chemical applications may be used if approved by the EPA. The goal should remain in selecting an effective product, which poses the least possible hazard to people and the environment.

4. Banned Chemicals

The following high health risk pest management products will not be allowed:

- Pesticides linked to cancer (U.S.E.P.A. Class A, B, and C carcinogens and chemicals known to the State of California to cause cancer under Proposition 65).
- Pesticides that cause birth defects, reproductive or developmental harm (identified by the U.S.E.P.A. or known to the State of California under Proposition 65 as reproductive or developmental toxins).
- Pesticides that interfere with human hormones (identified by the U.S.E.P.A. as known, probable or possible endocrine disrupters).
- Pesticides classified as Toxicity Category I by the U.S.E.P.A.
- Carbamate and organophosphate pesticides.
Foggers, bombs, fumigants or sprays that contain pesticides identified by the State of California as potentially hazardous to human health (CFR 6198.5 see below)

This section does not apply to microbial pesticides or pesticides deployed in the form of a self-contained bait or trap.

5. Notification (Posting)

Proper Notification shall be given to the school site where the chemical pesticide will be applied.

- Pre-notification shall be given to all school sites where non-bait pesticide applications will be used. Pre-notification of chemical application must be posted at least three (3) days prior to application.
- Notification signs must be placed in the immediate area where the pesticide will be applied and must be clearly visible to the public.
- A notification sign must be placed at the main entrance to the school site in order to be clearly visible to the public.
- Information specific to the pesticide in the form of a Material Safety Data Sheet shall be available to the students, staff, and the public upon request.
- Notification signs must remain posted for three (3) days after the pesticide application.
- The notification sign shall:
  a) Be at least 8.5” x 11”
  b) Include the pesticide manufacturer, the name of the pesticide used, the E.P.A. number, and the active ingredient.
  c) Include the date the pesticide is applied
  d) Include the location(s) of application
  e) Include the target pest
  f) A signal word indicating the toxicity of the pesticide
  g) A contact name and phone number

6. Notification (e-mail)

Parents who wish to be notified of intended pesticide application at specific school sites will be notified by e-mail at least three (3) days in advance.

Products which are non and least toxic with control methods and strategies that have been considered, tried, and used by California state agencies, the following substances may be used without notification: Any pesticide, except for zinc, exempted from regulation by the United States Environmental Protection Agency pursuant to the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. Sec. 25 (b)………..

The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) provides for federal regulation of pesticide distribution, sale, and use. All pesticides distributed or sold in the United States must be registered (licensed) by EPA. Before EPA may register a pesticide under FIFRA, the applicant must show, among other
things, that using the pesticide according to specifications "will not generally cause unreasonable adverse effects on the environment."

FIFRA defines the term "unreasonable adverse effects on the environment" to mean: "(1) any unreasonable risk to man or the environment, taking into account the economic, social, and environmental costs and benefits of the use of any pesticide, or (2) a human dietary risk from residues that result from a use of a pesticide in or on any food inconsistent with the standard under section 408 of the Federal Food, Drug, and Cosmetic Act."

7. Record Keeping

The District shall keep and maintain records of each pest management action in the Maintenance Department, which include the following:

- The target pest
- The type, concentration, and quantity of pesticide used; or the management action used.
- The school site of the application.
- The date of the application
- The name(s) of the pesticide applicator
- The effectiveness and the outcome of the pesticide or management action.

Application records will be kept by the IPM Coordinator and at the school site (where the application took place).

8. IPM Committee

An IPM Committee shall be established to develop and implement the IPM plan. The committee shall be comprised of the Maintenance Department Director, the Custodial Department Director, the Environmental Health and Safety Specialist and Maintenance Department Grounds Lead.

The IPM Committee is designated with the responsibility of monitoring the implementation and effectiveness of the IPM Program, considering and approving pesticide application exemptions and for recommending changes and updates to the IPM Program.

9. IPM Coordinator

The District designates the Maintenance Department Director as the IPM Coordinator, responsible for ensuring the implementation of school district IPM activities, for communicating goals and guidelines of the IPM Program to staff, for providing proper employee training and for ensuring the proper maintenance of records and documents.

10. Emergency Exemption

The IPM committee may allow a trained District employee or any appropriately licensed company contracted to provide a pest control action for the District, in the application of a pesticide otherwise banned under this resolution based upon a finding that the
protection of public health requires the use of that pesticide. The IPM Committee may grant emergency exemptions. Such exemptions shall be granted on a per-case basis and shall apply to a specific pest problem for a limited time.

11. Training

Training of District personnel is critical to the success of this IPM Program. Qualified persons to ensure the safety of students, staff, the community and the environment will be selected to provide the training.

12. Contractors

All State of California licensed pest control companies contracted by the District shall follow all provisions of this policy.

13. Reference Information

California School IPM Program / Department of Pesticide Regulation
www.cdpr.ca.gov/schoolipm

6198.5. List of Active Ingredients Identified Pursuant to Section 13127 of the Food and Agricultural Code.

(a) Section 13127(a) of the Food and Agricultural Code requires the department to identify 200 active ingredients which the department determines have the most significant data gaps, widespread use, and which are suspected to be hazardous to people. The active ingredients are listed below in alphabetical order:

1. Acephate
2. Acrolein
3. Alachlor
4. Aldicarb
5. Aldrin
6. Alkyl (50%C14, 40%C12, 10%C16) Dimethyl Benzyl Ammonium Chloride
7. Allethrin
8. (Reserved)
9. Amitraz
10. Amitrole
11. Arsenic Pentoxide
12. Arsenic Trioxide
13. Asulam, Sodium Salt
14. Atrazine
15. Azinphos-Methyl
16. Barban
17. Bendiocarb
18. Benomyl
19. Bentazon, Sodium Salt
20. Boric Acid
21. Bromacil
22. Bromoxynil Octanoate
23. Captafol
24. Captan
25. Carbaryl
26. Carbofuran
27. Carbon Tetrachloride
28. Carboxin
29. Chloramben
30. Chlordane
31. Chlorodimeform
32. Chlorflurenol, Methyl Ester
33. (Reserved)
34. Chlorobenzilate
35. Chloroneb
36. Ortho-Benzyl-Para-Chlorophenol
37. Chloropicrin
38. Chlorothalonil
39. Chlorpyrifos
40. Chlorosulfuron
41. Chlorothal-Dimethyl
42. (Reserved)
43. Coumaphos
44. Creosote
45. Cryolite
46. Cyanazine
47. Cyanuric Acid, Monosodium Salt
48. Cycloate
49. Cyhexatin
50. 2,4-D
51. 2,4-D, Dimethylamine Salt
52. Daminozide
53. DDVP
54. Deet
55. Demeton
56. Diazinon
57. Dicamba
58. Diclofenil
59. Para-Dichlorobenzene
60. 1,2-Dichloropropane, 1,3-Dichloropropene and Related C-3 Compounds
61. 1,3-Dichloropropene
62. Diclofop Methyl
63. Dicofol
64. Didecyl Dimethyl Ammonium Chloride
65. Diethatyl-Ethyl
66. Dimethoate
67. Dimethyl phthalate
68. 2,4-Dinitrophenol
69. Dinocap
70. Dinoseb
71. Dioxathion
72. Diphacinone
73. Diphenamid
74. Diphenylamine
75. Dipropyl Isocinchomeranate
76. Diquat Dibromide
77. Diuron
78. Endosulfan
79. Endothall, Mono (N,N-Dimethylalkylamine) Salt
80. Endrin
81. EPN
82. EPTC
83. Ethalfluralin
84. Ethephon
85. Ethofumesate
86. Ethoprop
87. (Reserved)
88. Ethylene Dibromide
89. Ethylene Dichloride
90. Ethylene Glycol, Monomethyl Ether
91. Ethylene Oxide
92. Fenamiphos
93. Fenarimol
94. Fensulfothion
95. Fenthion
96. Ferbam
97. Fluchloralin
98. Flucythrinate
99. Fluometuron
100. Fluvalinate
101. Folpet
102. Formaldehyde
103. Fosamine, Ammonium Salt
104. Glyphosate, Isopropylamine Salt
105. Heptachlor
106. (Reserved)
107. Imazalil
108. Iprodione
109. (Reserved)
110. Lindane
111. Linuron
112. Lithium Hypochlorite
113. Malathion
114. Maleic Hydrazide, Diethanolamine Salt
115. Maleic Hydrazide, Potassium Salt
116. Mancozeb
117. Maneb
118. Mefluidide, Diethanolamine Salt
119. Metaldehyde
120. Metam-Sodium
121. Methidathion
122. Methomyl
123. Methyl Bromide
124. Methylene Chloride
125. Methylenebis (Thiocyanate)
126. Methyl Parathion
127. Metolachlor
128. Metribuzin
129. Mevinphos
130. Molinate
131. Monocrotophos
132. MSMA
133. Naled
134. Naphthalene
135. Napropamide
136. Naptalam, Sodium Salt
137. Nitrapyrin
138. Norflurazon
139. Octylbicycloheptene Dicarboximide
140. Oryzalin
141. Oxadiazon
142. Oxamyl
143. Oxycarboxin
144. Oxyfluorfen
145. Oxythioquinox
146. Paraquat Dichloride
147. Parathion
148. PCNB
149. PCP
150. Pebulate
151. Pendimethalin
152. Permethrin
153. Petroleum Distillate, Aromatic
154. Phenothrin
155. Ortho-Phenylphenol
156. Phorate
157. Phosalone
158. Phosmet
159. Phosphamidon
160. (Reserved)
161. Picloram
162. Pine Oil
163. Piperonyl Butoxide, Technical
164. PMA
165. Prometryn
166. Propamocarb
167. Propargite
168. Propetamphos
169. Propoxur
170. Propyzamide
171. Pyrethrins
172. Resmethrin
173. Rotenone
174. Simazine
175. Sodium Arsenite
176. (Reserved)
177. Sulfur Dioxide
178. Sulfuryl Fluoride
179. Terbacil
180. Terrazole
181. Tetrachlorophenol
182. Tetrachlorvinphos
183. Tetramethrin
184. Thiabendazole, Hypophosphite Salt
185. Thiobencarb
186. Thiophanate-Methyl
187. Thiram
188. Toxaphene
189. Triadimefon
190. S,S,S-Tributylphosphorotrithioate
191. Tributyltin Benzoate
192. Tributyltin Oxide
193. Trichlorophon
194. Trichloro-S-Triazinetrione
195. Triclopyr
196. Trifluralin
197. Triforine
(b) The director has determined that certain of the active ingredients listed in subsection (a) are chemically and toxicologically similar to other active ingredients registered by the department. Such similar active ingredients have been placed into groups. Completion of the mandatory health effects studies, required pursuant to Section 13127 of the Food and Agricultural Code, for an active ingredient listed in the group will satisfy the data requirements for all of the active ingredients in the group, unless adverse effects reported pursuant to Section 6210 indicate that the mandatory health effects studies should be completed for other active ingredients within the group.

In addition, copies of the mandatory health effects studies submitted to the United States Environmental Protection Agency (U.S. EPA) for any of the active ingredients listed below shall also be submitted by the registrant to the department. The groups are listed below, the active ingredient(s) listed in subsection (a) have an * after their name:

1. Alkyl (50%C14, 40%C12, 10%C16) Dimethyl Benzyl Ammonium Chloride *
   Alkyl (60%C14, 30%C16, 5%C12, 5%C18) Dimethyl Benzyl Ammonium Chloride
   Alkyl (25%C12, 60%C14, 15%C16) Dimethyl Benzyl Ammonium Chloride
   Alkyl (47%C12, 18%C14, 10%C18, 10%C16, 15%C8-C10) Dimethyl Benzyl Ammonium Chloride
   Alkyl (50%C12, 30%C14, 17%C16, 3%C18) Dimethyl Benzyl Ammonium Chloride
   Alkyl (58%C14, 28%C16, 14%C12) MACASK 0 T Dimethyl Benzyl Ammonium Chloride
   Alkyl (61%C12, 23%C14, 11%C16, 5%C8-C10-C18) Dimethyl Benzyl Ammonium Chloride
   Alkyl (65%C12, 25%C14, 10%C16) Dimethyl Benzyl Ammonium Chloride
   Alkyl (67%C12, 25%C14, 7%C16, 1%C8, C8, C10, C18) Dimethyl Benzyl Ammonium Chloride
   Alkyl (90%C14, 5%C12, 5%C16) Dimethyl Benzyl Ammonium Chloride
   Alkyl (93%C14, 4%C12, 3%C16) Dimethyl Benzyl Ammonium Chloride
   Roccal-R (61%C12, 23%C14, 11%C16, 5%C18)
   Tetradecyldimethylbenzyl Ammonium Chloride

2. Aluminum Phosphide *
   Magnesium Phosphide
   Zinc Phosphide

3. Boric Acid *
   Boric Oxide
   Borax
   Sodium Metaborate
   Disodium Octaborate Tetrahydrate
   Sodium Tetraborate (Pentahydrate)

4. Bromacil *
   Bromacil, Dimethylamine Salt
   Bromacil, Lithium Salt
   Bromacil, Sodium Salt

5. Bromoxynil Octanoate *
   Bromoxynil, Butyric Acid Ester

6. Chloramben *
   Chloramben, Ammonium Salt
Chlordimeform *  
Chlordimeform Hydrochloride

7. Ortho-Benzyl-Para-Chlorophenol *  
Ortho-Benzyl-Para-Chlorophenol, Potassium Salt  
Ortho-Benzyl-Para-Chlorophenol, Sodium Salt

8. Copper Hydroxide *  
Copper Sulfate (Anhydrous)  
Copper Sulfate (Pentahydrate)  
Copper Ammonium Carbonate  
Copper Bronze Powder  
Copper Carbonate, Basic  
Copper Oxide  
Copper Oxychloride  
Copper Oxychloride Sulfate  
Copper-Sulfate (Basic)  
Copper-Zinc Sulfate Complex  
Cupric Oxide

9. Cyanuric Acid, Monosodium Salt *  
Trichloro-S-Triazinetrione *  
Dichloro-S-Triazinetrione  
Sodium Dichloro-S-Triazinetrione

10. Sodium Dichloro-S-Triazinetrione (Dihydrate)

11. 2,4-D *  
2,4-D, Dimethylamine Salt *  
2,4-D, Alkanolamine Salts (Ethanol and Isopropanol Amines)  
2,4-D, Butoxyethanol Ester  
2,4-D, Butoxypropyl Ester  
2,4-D, Butyl Ester  
2,4-D, Diethanolamine Salt  
2,4-D, Diethylamine Salt  
2,4-D, N, N-Dimethyleoyl-Linoleylamine Salt  
2,4-D, Dodecylamine Salt  
2,4-D, 2-Ethylhexyl Ester  
2,4-D, Isooctyl Ester  
2,4-D, Isopropyl Ester  
2,4-D, Morpholine Salt  
2,4-D, Octyl Ester  
2,4-D, N-oleyl-1, 3-Propylenediamine Salt  
2,4-D, Propyl Ester  
2,4-D, Propyleneglycolbutylether Ester  
2,4-D, Sodium Salt  
2,4-D, Tetradecylamine Salt  
2,4-D, Triethylamine Salt  
2,4-D, Triisopropylamine Salt

12. Dicamba *  
Dicamba, Diethanolamine Salt  
Dicamba, Dimethylamine Salt  
Dicamba, Monoethanolamine Salt

13. Didecyl Dimethyl Ammonium Chloride *  
Diocetyl Dimethyl Ammonium Chloride
Octyl Decyl Dimethyl Ammonium Chloride
Octyl Dodecyl Dimethyl Ammonium Chloride

14. Dinoseb *
   Dinoseb, Amine Salt
   Dinoseb, Ammonium Salt
   Dinoseb Sodium Salt
   Dinoseb, Triethanolamine Salt

15. Diphacinone *
   Diphacinone, Sodium Salt

16. Endothall, Mono (N, N-Dimethylalkylamine) Salt *
   Endothall
   Endothall, Mono (N, N-Diethylalkylamine) Salt
   Endothall, Di-potassium Salt

17. Lithium Hypochlorite *
   Calcium Hypochlorite
   Sodium Hypochlorite

18. Maleic Hydrazide, Diethanolamine Salt *
   Maleic Hydrazide, Potassium Salt *
   Maleic Hydrazide

19. (Reserved)

20. MSMA *
   DSMA

21. Paraquat Dichloride *
   Paraquat Bis (Methylsulfate)

22. PCP *
   PCP, Potassium Salt
   PCP, Sodium Salt

23. Petroleum Distillate, Aromatic *
   Kerosene
   Petroleum Oil, Paraffin Based
   Isoparaffinic Hydrocarbons
   Petroleum Derivative Resin
   Petroleum Distillates
   Petroleum Distillates, Refined
   Petroleum Hydrocarbons
   Petroleum Naphthenic Oils
   Petroleum Oil, Unclassified
   Petroleum, Unrefined

24. Ortho-Phenylphenol *
   Ortho-Phenylphenol, Ammonium Salt
   Ortho-Phenylphenol, Potassium Salt
   Ortho-Phenylphenol, Sodium Salt

25. Picloram *
   Picloram, Triisopropanolamine Salt
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<tr>
<th></th>
<th>Description</th>
<th>Alternative Descriptions</th>
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<td>26</td>
<td>PMA * Phenymercuric Oleate</td>
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<td>Pyrethrins * Pyrethrum Narc</td>
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<td>28</td>
<td>Tetrachlorophenol * 2,3,4,6-Tetrachlorophenol, Potassium Salt Tetrachlorophenol, Sodium Salt</td>
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<tr>
<td>29</td>
<td>Thiabendazole, Hypophosphite Salt * Thiabendazole</td>
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<tr>
<td>30</td>
<td>Thiophanate-Methyl * Thiophanate</td>
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<td>31</td>
<td>Tributyltin Benzoate * Tributyltin Oxide * Tributyltin Methacrylate Bis (Tributyltin) Adipate Tributyltin Acetate Tributyltin Chloride Tributyltin Chloride Complex of Ethylene Oxide Condensate of Abietylamine Tributyltin Fluoride Tri-N-Butyltin Maleate Tributyltin Monopropylene Glycol Maleate Tributyltin Neodecanate Tributyltin Resinate</td>
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NOTE: Authority cited: Section 12781, Food and Agricultural Code.
Reference: Section 13127, Food and Agricultural Code.