

CLATSOP COMMUNITY COLLEGE

Integrated Pest Management (IPM)

INTRODUCTION

Structural and landscape pests can pose significant problems on campus while the pesticides used to remediate these problems may also present health risks to people, animals and the environment. In order to maintain a healthy balance and to protect environmentally sound practices on campus, in conjunction with Senate Bill 637 (incorporated into ORS Chapter 634 upon finalization in 2009) it is the policy of Clatsop Community College to approach pest management through the adoption of the following Integrated Pest Management Plan,

This plan promotes four basic steps of integrated pest management through:

1. Education and communication;
2. Improved cultural awareness and sanitation practices;
3. Inspection and monitoring followed by physical and mechanical low impact control methods whenever possible;
4. And finally the use of more aggressive pesticides only when applied by a qualified professional and after all other measures have failed or a pest emergency has been declared by the College appointed IPM Plan Coordinator.

PURPOSE

It is the purpose of this plan is to achieve long-termed environmentally sound pest management practices and suppression through a variety of tactics meant to reduce food, water, shelter and access that creates the harborage of pests while focusing on:

1. Remediation of these conditions when and where they might occur;
2. Prevention practices to reduce or eliminate the conditions of property construction, operations and maintenance that promote the establishment, breeding and proliferation of pest populations through the use of sanitation and structural remediation or habitat manipulation to limit the risk of pest emergencies;
3. Management through the identification of acceptable pest populations and densities while monitoring the effectiveness of control measures in place, and the exclusion of any and all application of pesticides on a routine basis for what might be considered issues of aesthetics.
4. Through staff training and education in sanitation practices, monitoring and inspection, Clatsop Community College will preference the use of nonchemical pest control measures whenever effective, and will allow for more aggressive measures only through the use of qualified professionals and to mitigate declared pest emergency, as declared by the College appointed IPM Plan Coordinator.

IPM PLAN COMPONENTS

IPM Plan Coordinator – Clatsop Community College will appoint the Physical Plant Director as IPM Plan Coordinator to monitor and successfully implement the College IPM Plan with the authority and responsibility for the following:

- A. Attend not less than six hours of IPM training each year including a general review of IPM principles and the requirements of ORS 634.700 – 634.750, hands-on training for updated exclusion practices, monitoring & inspection techniques, and management strategies for common pests;
- B. Conduct outreach to the school community (custodians, maintenance, construction, grounds, faculty, and kitchen staff) about the school's IPM plan and provide necessary training;
- C. Oversee pest prevention efforts while working with the administration, custodian/maintenance staff and other campus users to reduce clutter and food in the classrooms and commons, and to reduce pest entry points.
- D. Assess and improve the pest monitoring/reporting/action protocol whenever possible.
- E. Assure that all notification, posting, and record-keeping requirements are met and proper procedures are followed when the decision to make a pesticide application is made;
- F. Respond to inquiries and complaints of noncompliance with the plan in writing and with records kept by the Coordinator.
- G. Place and check sticky insect monitoring traps and keep records of pest complaints using pest logs located in the Coordinator's office.
- H. Develop protocols and monitoring provisions for pest avoidance and prevention during construction and renovation projects, with authority to halt projects if protocols and provisions for pest avoidance and prevention are not being met.

TRAINING AND EDUCATION

Custodial - The IPM Plan Coordinator (or a designee of the Coordinator) will train custodial staff at least annually on sanitation, monitoring, inspection, and reporting, and responsibilities as outlined below:

- 1) Attend annual IPM training provided by the IPM Coordinator (or designee);
- 2) Monitor for pest-conducive conditions during daily work, and clean and sanitize when noticed (if this can be done in a short amount of time);
- 3) Report pest problems and pest-conducive conditions that she/he cannot resolve in a short amount of time to the IPM Plan Coordinator;
- 4) Report conditions to IPM Plan Coordinator to assist in reducing clutter and other pest-conducive environments throughout campus buildings;
- 5) Report and/or remove any unapproved pesticides (such as aerosol spray cans) discovered in the course of regular duties or during inspection and deliver those to the IPM Plan Coordinator;
- 6) Assist IPM Plan Coordinator to resolve issues found in annual inspection report;
- 7) Work with the IPM Coordinator to develop protocol and priority lists with deadlines for pest exclusion cleanup efforts that cannot be done in a short period of time.

Maintenance - The IPM Plan Coordinator (or a designee of the Coordinator) will train maintenance staff annually to identify pest-conducive conditions and mechanical control methods (such as door sweeps on external doors and sealing holes under sinks) and their responsibilities as outlined below:

- 1) Attend annual IPM training provided by the IPM Plan Coordinator (or designee);
- 2) Monitoring for pest-conducive conditions during daily work, and sealing small holes and cracks when noticed (if this can be done in a short amount of time);
- 3) Report pest problems and pest-conducive conditions that she/he cannot resolve in a short amount of time to the IPM Plan Coordinator;
- 4) Report conditions to IPM Plan Coordinator to assist in reducing clutter and other pest-conducive environments on campus;
- 5) Report and/or remove any unapproved pesticides (such as aerosol spray cans) discovered in their regular duties or during inspection and deliver those to the IPM Plan Coordinator;
- 6) Assist IPM Plan Coordinator with resolving issues found in annual inspection report;
- 7) Work with the IPM Plan Coordinator to develop protocol and priority lists with deadlines for sealing holes, installing external door sweeps, and other pest exclusion needs which cannot be done in a short period of time.

Grounds - The IPM Plan Coordinator (or designee) will train grounds staff at least once per year on identifying pest-conducive conditions and control methods, review the annual report of any pesticide or herbicide applications on campus, and the responsibilities as outlined below:

- 1) Attend annual IPM training provided by the IPM Plan Coordinator (or designee);
- 2) Work with the IPM Plan Coordinator to reduce conditions conducive to weeds, gophers, moles, yellow jackets, and other outdoor pests;
- 3) Keep vegetation (including tree branches and bushes) trimmed at least 18 inches from building surfaces wherever possible;
- 4) Provide proper mulching in landscaped areas to reduce weeds;
- 5) Proper fertilization, over-seeding, mowing height, edging, drainage, aeration, and irrigation scheduling in turf areas to reduce weeds;
- 6) When the decision is made to apply a pesticide or herbicides, to follow all notification, posting, record-keeping and reporting protocols required.

Kitchen and Food Service Staff, Contractors and Vendors - The IPM Plan Coordinator (or designee) will train kitchen staff at least once per year on the basic procedures of IPM and responsibilities as outlined below:

- 1) Attend annual IPM training provided by the IPM Coordinator (or designee);
- 2) Assure floor under serving counters and movable equipment is kept free of food and drink debris;
- 3) Avoid long-term storage or use of cardboard boxes;

- 4) Remove recyclable products daily;
- 5) Keep outside doors closed at all times (except during deliveries and emptying trash);
- 6) Keep all food items in sealed containers;
- 7) Immediately report any sightings of rodents or rodent droppings to the IPM Plan Coordinator, and follow up with an email to the Coordinator (for records);
- 8) Report to the Coordinator any pest-conducive conditions that require maintenance (e.g., leaky faucets, drainage issues, trash and recycle removal, etc.).

General College Faculty and Staff - The IPM Plan Coordinator (or designee) will present to the faculty and staff at least once per year the basic procedures of IPM and the responsibilities as outlined below.

These short (15 – 20 minutes) presentations will become part of the College In-Service and/or presented at faculty meeting, and/or as part of new employee orientation. During the training, the IPM Plan Coordinator (or designee) will review the following:

- 1) What pest-conducive conditions are (clutter, food debris, moisture, cracks, holes, etc.), and the importance of reporting these in a timely manner;
- 2) Importance of keeping classrooms and work areas free of clutter;
- 3) Importance of student, faculty, and staff cleanup efforts during and after food or drink is consumed in the classroom or as part of any scheduled events and activities;
- 4) Importance of reporting pests and pest-conducive conditions to the IPM Plan Coordinator.

COLLEGE ADMINISTRATION RESPONSIBILITIES

- 1) Provide scheduled time(s) for faculty and staff to receive annual training provided by the IPM Plan Coordinator (or designee).
- 2) Attend annual IPM training provided by the IPM Plan Coordinator (or designee).
- 3) Assure College staff maintain a clean and clutter free workspace in accordance with the IPM Plan Coordinator's instructions and the College IPM Plan.
- 4) Assure all employees and students receive annual notice of the College IPM Plan scheduled training opportunities.
- 5) Work with the IPM Plan Coordinator to ensure notifications of pesticide application are provided to employees and students.

It is the responsibility of the College administration to make the College IPM Plan available to the population of the main campus, all satellite campus facilities, President's administrative team, various department directors, and to any and all contractors and vendors, as applicable. And while it is the shared responsibility of everyone to keep work areas clutter free, and to report pests and pest-conducive conditions to the IPM Plan Coordinator, it is the responsibility of the College administration to support and promote these goals.

IPM PROCESS

Monitoring is the key to the IPM program. Sharing relevant and accurate information enables effective pest management decisions to be made. Furthermore, regular and ongoing inspections where pest problems may occur in addition to maintaining data collection records support IPM program success.

Under the direction of the IPM Plan Coordinator, scheduled inspection will be conducted by the campus custodial, building maintenance and ground personnel, monitoring structures, and building perimeters for the following:

- 1) Pest-conducive conditions inside and outside the building (structural deterioration, holes that allow pests to enter, conditions that provide pest harborage);
- 2) The level of sanitation inside and out (waste disposal procedures, level of cleanliness inside and out, conditions that supply food and water to pests);
- 3) The amount of pest damage and the number and location of pest signs (rodent droppings, termite shelter tubes, cockroaches caught in sticky traps, etc.);
- 4) Human behaviors that affect the pests (food preparation procedures, concessions procedures, classroom food, etc.);
- 5) Their own management activities (caulking/sealing, cleaning, setting out traps, treating pests, etc.) and their effects on the pest population;
- 6) Any pests or pest-conducive conditions will be reported to the IPM Plan Coordinator and documented as required.

Monitoring for Insects - Sticky traps may also be used for monitoring purposes and are neither a substitute for pesticides nor an alternative for reducing pest populations. Sticky traps are 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 these traps and their purpose so not to disturb them. The IPM Plan Coordinator and/or custodial and building maintenance staff will be responsible for the placement of these traps when in use, checking them once per month, and replacing them once every four months. Sticky traps could be placed in areas such as the kitchen and any other pest-vulnerable environments as deemed necessary by the Coordinator.

Monitoring for Mice - In addition to the placement of these sticky traps, monitoring will also take place for signs of mice (droppings, gnawing, hair, etc.) and snap traps will be placed in the kitchen and any other area deemed necessary by the IPM Plan Coordinator. These traps will also be checked daily when in use and replaced as needed.

Reporting of Pest Sightings, Signs of Pests, and/or Pest Conducive Conditions or Concerns - Any pest sighting or pest concern determined to be a public health risk or a significant nuisance including but not necessarily limited to cockroaches (disease vectors, asthma triggers), mice and rats (disease vectors, asthma triggers), yellow

jackets (sting can cause anaphylactic shock), cornered nutria, raccoons, cats, dogs, opossums, skunks or other nuisance pest should be reported to the Physical Plant staff and/or by contacting the IPM Plan Coordinator immediately.

Action - Upon notification of pest concerns the IPM Plan Coordinator (or designee) will identify priority of each incident based on severity of risk or nuisance of each event, and then schedule corrective actions with the custodial, grounds keeping, and/or building maintenance staff as applicable. Whenever possible resolution will be performed through structural repair and/or building and site cleanup, and the IPM Plan Coordinator will keep accurate records of all pest incidents, management, and control efforts in the form of accurate ongoing pest management logs housed in IPM Plan Coordinator's office.

If corrective actions require the use of chemical pesticides or other practices beyond the scope of what can be provided in-house, the proper contracted services for pest control will be used and the IPM Coordinator will develop a plan and provide proposed project timelines for completion while coordinating schedules through the office of the Vice President, Finance and Operations, by communicating project scope and projected completion dates for all work performed.

Any chemical pesticide use or other more aggressive measures will be used only when applied by a qualified professional and after all other measures have failed, or as deemed necessary in the event of pest emergency declared by the College appointed IPM Plan Coordinator.

Pest Emergencies - In the event of pest emergencies, the area of concern will be evacuated and cordoned off before taking any other steps, and as applicable, the IPM Plan Coordinator (or designee) will consult with the College administration to determine whether the pest presence creates an immediately threat or health and safety concern to students, faculty and staff, or the public using any campus facility. Examples of possible pest emergencies could include, but are not necessarily limited to yellow jackets swarms, nutria in an area frequented by the general population, mice or rats in college building or other similar events. The IPM Plan Coordinator will keep records of any and all declared emergencies and the corrective actions taken.

Acceptable Thresholds - Acceptable thresholds represent the number of pests that can be tolerated before taking action. There is no acceptable threshold for cockroaches, mice, rats, raccoons, cats, dogs, opossums, skunks, and nutria. Thresholds for other pests will be determined by the IPM Plan Coordinator and the College administration based on risk and/or overall campus health and safety on a case by case basis, or as applicable.

Annual Inspections - The IPM Plan Coordinator will conduct an annual inspection during which she/he will inspect or review human behaviors that affect pest populations and/or working conditions that encourage or support pests, as well as management

activities (caulking/sealing, cleaning, setting traps, treating of known pests problems), and the effect of these efforts on pest population.

Annual IPM Report - In January of each year the IPM Plan Coordinator will submit an annual integrated pest management report to the Vice President, Finance & Operations. The report will include a summary of data gathered from Pest Logs and/or the Coordinator's notes for the year, as well as costs associated with pest emergencies, contracted services and pesticide applications. The report will also include prevention and management actions taken which proved to be ineffective, and therefore led to the decision to contract outside service for pesticide applications.

Notification and Posting for Non-Emergencies - When prevention or management through other measures proves ineffective, the use of low-risk pesticides is permissible on campus if provided by a licensed commercial or public pesticide applicator and may occur while buildings are in use. Documentation of the reasons why this is necessary and approval through the office of Vice President, Finance and Operations, is a prerequisite, with all documentation of these events to remain on file with the IPM Plan Coordinator.

All pesticide labeling will be followed which specifies reentry time after application, and/or no pesticide will be applied to an area of campus where students, faculty, and staff are to be present before the expiration of that reentry time. If labeling does not specify timeframes for reentry this will be determined by the IPM Plan Coordinator, working with contracted services to set appropriate limits based on area ventilation and whether that space should be cleaned before regular users are present.

The IPM Plan Coordinator (or designee) will give written notice of the proposed pesticide applications at least 24 hours in advance, and will identify the pesticides used by trademark or type with the EPA registration number of the product, expected area of application, date and time proposed for the work to be done, and reasons why these steps have become necessary. Warning signs will be placed around the application area 24 hours prior to the work being done to include "Warning: pesticide-treated area," actual date and time for the application, actual reentry time, when that space can be used again, and contact information for any questions or concerns.

Notification and Posting for Pest Emergencies - A pest emergency can be declared only after the IPM Plan Coordinator (or designee) has informed the College administration and with the approval of the Vice President, Finance and Operations, and/or the College President's office. Once declared, the area of emergency must be evacuated and cordoned off before taking any steps and the Coordinator (or designee) shall place notification signs around the area as soon as practical, but no later than at the time any pesticide application occurs.

While it may be impractical to provide the required notice 24 hours prior to the use of any pesticides in a pest emergency, the IPM Plan Coordinator will follow the incident through a public notice to the campus population no later than 24 hours after any

application occurs. The notice will include relevant incident information. Within 72 hours the IPM Plan Coordinator will review the nature of the emergency and facts to determine if plan modifications are necessary.

(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.)

Record Keeping of Pesticide Applications - The IPM Plan Coordinator (or designee) shall keep a copy of the following pesticide product information on file in the Physical Plant office and in the office of the College Vice President, Finance and Operations:

- Copy of the label
- Copy of the MSDS
- Brand name and USEPA registration number of the product
- Approximate amount and concentration of product applied
- Location of the application
- Pest condition that prompted the application
- Type of application and whether the application proved effective
- Pesticide applicator’s license numbers and pesticide trainee or certificate numbers of the person applying the pesticide
- Name(s) of the person(s) applying the pesticide
- Dates on which notices of the application were given
- 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 for four (4) years following the application date.

Annual Reporting of Pesticide Applications: - In January of each year, the IPM Plan Coordinator will provide an annual report of all pesticide applications made the previous year and this report will contain the following:

- Brand name and USEPA registration number of the product applied
- Approximate amount and concentration of product applied
- Location of the application
- Prevention or management steps taken that proved to be ineffective and led to the decision to make a pesticide application
- Type of application and whether the application proved effective

Approved List of Low Impact Pesticides - According to ORS 634.705 (5), the governing body of a school district shall adopt a list of low-impact pesticides for use with their integrated pest management plan. The governing body may include any product on the list except products that:

- (a) Contain a pesticide product or active ingredient that has the signal words “warning” or “danger” on the label;

- (b) Contain a pesticide product classified as a human carcinogen or probable human carcinogen under the United States Environmental Protection Agency 1986 Guidelines for Carcinogen Risk Assessment; or
- (c) Contain a pesticide product classified as carcinogenic to humans or likely to be carcinogenic to humans under the United States Environmental Protection Agency 2003 Draft Final Guidelines for Carcinogen Risk Assessment.

As a part of pesticide registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) and re-registration required by the Food Quality Protection Act (FQPA), EPA Office of Pesticide Programs (OPP) classifies pesticide active ingredients (a.i.) with regards to their potential to cause cancer in humans. Depending on when a pesticide active ingredient was last evaluated the classification system used may differ as described above.

The National Pesticide Information Center (<http://npic.orst.edu/>) can be contacted at 1.800.858.7378 or npic@ace.orst.edu for assistance in determining a pesticide a.i. cancer classification.

At the beginning of each school year, all administrators, faculty, staff and students will be provided access to a list of potential pesticide products 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 by public postings on campus, the College website and/or other normal methods of information distribution on campus.

Draft IPM Plan prepared by
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