



Vestal Central School District

Integrated

Pest Management

Plan

2022-2023

# **Vestal Central School District (VCSD)**

## **Integrated Pest Management Plan**

Structural and landscape pests can pose significant hazards to people, property and the environment. Pesticides can also pose hazards to people, property and the environment. It is therefore the policy of this School District to incorporate Integrated Pest Management (IPM) procedures for control of structural and landscape pests. Pesticides will be used only as a means of last resort, and the least toxic pesticide alternative will be selected.

For playgrounds, turf, athletic or playing fields MOST pesticides will not be considered unless an emergency situation exists. The VCSD Board of Education will determine if a pesticide application will be appropriate for the situation.

### **Definitions**

**Pests** are populations of living organisms (animal, plants or microorganisms) that interfere with the human purposes for the school site. Pests include bees, wasps, beetles, ants, flies, as well as rats, mice, or birds. Pests also include weeds, fungus and microorganisms.

A **pesticide** is a poison specifically created to kill a living organism. Such as any substance intended to prevent or destroy insects, rodents, fungi, weed, or other forms of plant or animal life.

**Integrated Pest Management (IPM)** is a process for managing, preventing and suppressing pests with minimal impact on human health, the environment, and nontarget organisms.

Pest Management

Pests will be managed to:

- Reduce any potential human health hazard or to protect against a significant threat to public safety;
- Prevent loss or damage to school structures or property;
- Prevent pests from spreading in the community or to plant and animal populations beyond the site;
- Enhance the quality of life for students, staff and others.

### **Integrated Pest Management**

IPM incorporates all reasonable measures by properly identifying, monitoring, and controlling pests through the use of cultural, physical, biological and chemical control methods to reduce pests to acceptable levels. Pesticides must only be used as a last resort, and if pesticides are needed, the least toxic pest specific alternative will always be selected.

Pesticide applications may only be performed by individuals currently certified by the DEC as pesticide applicators or by a certified pesticide technician or an apprentice working under the direct on-site supervision of certified applicator pursuant to DEC Regulation Part 325.7. It is illegal for individuals other than those noted above to apply any pesticide products in a school building or on school grounds.

### **Key Components of an IPM Program**

- Site Inspection
- Pest Identification
- Preventive Actions
- Sanitation
- Action Threshold
- Monitoring
- Response Actions
- Public Notification
- Education
- Recordkeeping
- Selection of Pesticides
- Pesticide Storage and Purchase

## **Inspection/Pest Identification**

Routine inspection and accurate identification of pests are vital to ensure that control methods will be effective. Inspection includes determining potential locations of pest entry, sources of food, water, harborage, and looking for indication of pests. This may include rodent droppings, gnaw marks, sightings of pests such as bees or roaches, or the identification of wood or other structural damage.

Pests cannot be properly managed without being familiar with the pest's life cycle, habitat, and natural enemies. Knowing where specific pests live and what they eat will be the key to eliminating their habitat.

## **Preventative Actions**

Structural repairs and maintenance are key preventative actions or cultural controls in IPM. Some examples include:

- Keep doors shut properly when not in use
- Report and repair any water leaks promptly
- Remove clutter and debris
- Discard empty cardboard promptly
- Place weather stripping on doors
- Caulk and seal openings such as cracks and crevices, in walls floors, pavements and roofs
- Repair screens on windows, vents, floor drains, and louvers
- Routinely clean floor drains and grates
- Sweep and mop floors daily
- Empty trash baskets daily
- Power-wash areas with accumulated debris, such as floor drains, loading docks, dumpsters, and food carts
- Regularly clean grease from ovens, exhaust vents, and grease traps
- Ensure that the dumpster, recycling, and trash compactor bins close securely
- Replace or clean ceiling tiles, carpet, and other damaged items
- Caulk and seal openings around pipes and conduits
- Repair and or/replace worn or cracked grout
- Install or repair door sweeps
- Floor and sink traps are kept full of water
- Lockers and desks are emptied and cleaned twice per year
- Eaves and rain gutters are kept clear of debris

## **Sanitation**

Sanitation and personal responsibility for cleaning up after oneself are other notable areas to target in launching an IPM effort. Pests need adequate food, water, and shelter in order to survive. Eliminating or reducing these resources provides an environment that supports fewer pests.

Examples include:

- Consume food only in designated areas
- Clean up and properly dispose of leftover food
- Do not leave food in lockers or desks
- Store food and beverages only in designated areas and in tightly sealed containers
- Promptly dispose of any trash that contains food
- Keep instructional food items in tightly sealed containers (home and career class)
- Keep areas in and near refrigerators, vending machines, and microwaves clean and free of spills
- Rinse recycled items thoroughly
- Do not store soda cans and recycle plastic for long periods

## **Tolerance Action Threshold**

A tolerance and action threshold defines the point at which specific pests can no longer be tolerated, thus initiating a pest-specific treatment action. Tolerance levels may be based on various circumstances including health problems, illness caused by pests, pest damage resulting in monetary

loss or structural or aesthetic damage. The tolerable number of any one pest is likely to be adjusted for different sites with different histories, conditions and pest management objectives.

## **Monitoring**

While education is the human key to IPM, monitoring is the engineering key to the IPM program. Identification of pests and the location of their habitat and food are essential steps in IPM. Monitoring also provides a window into the world of the pest, the size of the population, their entry route into the building, as well as sanitation or structural problems that may have permitted their entry in the first place. Both visual techniques and monitoring traps may be used in this investigation. Monitoring is the periodic estimation of relative pest population levels; information gained through monitoring is evaluated to determine whether control measures are required.

The use of sticky and pheromone traps are an effective method of determining the extent of a potential pest problem. Pheromones treated traps attract specific target insects, such as a wide variety of beetles and moths. Pheromones are the natural physical scents, which insects use to communicate and attract each other. Traps should never be placed in areas readily accessible to students where they may be disturbed, moved or tampered with. Once the pest is identified and the source of its activity pinpointed, habitat modifications primarily repair, exclusion, and sanitation efforts may greatly reduce the prevalence of the pest. Focusing on long-term prevention or suppression with minimal impact on human health, the environment, and non-target organisms should then be implemented. This approach may utilize cultural, biological, physical, and chemical pest population control methods to reduce target pests to acceptable levels.

## **Response Actions**

There are many methods available to treat pest problems. These methods include habitat modifications, physical and mechanical controls and chemical control. Ideally, pest control treatment options should be:

- Least toxic to human health
- Appropriate to the site and maintenance system
- Most likely to prevent recurrence of the problem
- Most cost-effective in the short and long-term
- Easiest to carry out safely and effectively
- Least disruptive to natural enemies (in landscape situations)

## **Habitat Modification**

Eliminating or reducing the food, water and shelter needed by a pest.

## **Physical and Mechanical Controls**

Traps are a common mechanical control. A HEPA filter vacuum cleaner can be used for cockroaches, spiders, and many temporary invading pests. Removal by vacuum cleaner, fly swatter or even a container may be the simplest and most effective control for occasional pests. Screening, weather-stripping, caulking, physically pulling weeds are all examples of physical control.

## **Biological Controls**

Introducing and conserving natural enemies to control pest species is often appropriate for interior ornamental plants and on school grounds.

## **Chemical Controls**

Many different kinds of pesticides are currently available for use against urban and structural pests. Pesticides include insecticides, rat and mouse poison, weed-killers, disinfectants, mold and mildew products, plant disease control products and other chemicals designed for killing pests.

The health of school residents and long-term suppression of pests is the primary goal of this IPM program. To accomplish these objectives, we look for non-chemical alternatives first. When non-chemical methods are unavailable or ineffective, pesticide use may be justified.

For playgrounds, turf, athletic or playing fields the following options can be selected and applied and do not need approval from the Board of Education.

- Anti-microbial pesticides\*
- Anti-microbial products\*
- The use of an aerosol product with a directed spray, in containers of 18 fluid ounces or less, when used to protect individuals from an imminent threat from stinging and biting insects, including venomous spiders, bees, wasps and hornets
- nonvolatile insecticidal baits in tamper resistant bait stations in areas inaccessible to children
- The application of a pesticide classified by the United States EPA as an exempt material under 40 CFR Part 152.25
- The use of horticultural soap and oils that do not contain synthetic pesticides or synergists

\*As defined by FIFRA in 7 U.S.C. Section 136 (MM) and 136Q (H) (2)

## **Public Notification**

Education is essential to an effective IPM program. IPM will only succeed if the entire school community understands supports, and consciously works to make the program a success. Education should include not only the teachers, but also school nurses, cafeteria employees and housekeeping and administrative personnel as well. The school safety committee, required by Commissioner's Regulation §155.4(d)(1), is an excellent starting point for this process. The committee's district officials, staff, bargaining unit and parent representatives will be enlisted to promote and advocate for IPM's successful implementation throughout the school community. Notification to the school community of potential pesticide applications is an additional component of IPM education.

- I. The Pesticide Neighbor Notification Law, Section 409-h of the Education Law and Part 155.24 of the Regulations of the Commissioner of Education, has formalized the notification process and provides specific direction on when and how the notification must take place. The Neighbor Notification Law, effective July 1, 2001, applies to all public and nonpublic elementary and secondary schools and details specific parties who must be notified, as well as the times and circumstances related to such notification.
  - A. This requirement states that schools provide a written notice to all parents, guardians, and staff at the beginning of each school year or summer school session that includes the following points:
    - a statement that pesticide products may be used periodically throughout the school year
    - a statement that schools are required to maintain a list of parents, guardians, and staff who wish to receive 48 hour written advanced notice from the school of an actual pesticide application at relevant facilities
    - instructions on how to register with the school district to be on such list for notification
    - the name and number of the school representative to contact for further information

If children are enrolled after the beginning of the school year or summer school session, notification shall be provided within one week of such enrollment.

- B. All schools must also provide additional written notification to all parents, guardians, and staff four times each year to inform them of any pesticide applications that have occurred. Notification must occur at the following intervals:
  - within ten days of the end of the school year;
  - within two school days of the end of winter recess;
  - within two school days of the end of spring recess
  - within two days of the end of summer school (to summer school participants only).

Notifications must include the following information for the period since the previous notice:

- the dates and locations of pesticide applications;
- the products used for each application which required prior notification;

- information on emergency applications;
- a statement that schools are required to maintain a list of parents, guardians, and staff who wish to receive 48 hour written advanced notice from the school of an actual pesticide application at relevant facilities
- instructions on how to register with the school district to be on such list for notification
- the name and contact number of the school representative to contact for further information
- and the following paragraph.

This notice is to inform you of a pending pesticide application to a school facility. You may wish to discuss with the designated school representative what precautions are being taken to protect your child from exposure to these pesticides. Further information about the product(s) being applied, including any warnings that appear on the label of the pesticide(s) that are pertinent to the protection of humans, animals, or the environment, can be obtained by calling the National Pesticide Telecommunications Network Information phone number 1-800-858-7378 or the New York State Department of Health Center for Environmental Health info line at 1-800-458-1158.

- C. The district will establish, maintain and update a list of staff and persons in parental relationships requesting written notification 48 hours in advance of pesticide applications at relevant facilities, both during the school year and summer school session.
- D. At least 48 hours prior to an actual application, an additional written notice must be disseminated to all parents, guardians, and staff that have registered to receive the advanced application notification. This notification must explain the following:
- the specific date, alternative dates (for outdoor applications) and location of the upcoming pesticide application at the relevant facility;
  - the pesticide product name and EPA product registration number;
  - the name and contact number of the school representative to contact for further information;
  - the 48-hour notice must also include the following statements:

This notice is to inform you of a pending pesticide application to a school facility. You may wish to discuss with the designated school representative what precautions are being taken to protect your child from exposure to these pesticides. Further information about the product(s) being applied, including any warnings that appear on the label of the pesticide(s) that are pertinent to the protection of humans, animals, or the environment, can be obtained by calling the National Pesticide Telecommunications Network Information phone number 1800-858-7378 or the New York State Department of Health Center for Environmental Health info line at 1-800-458-1158.

If a public health emergency exists which poses an imminent threat to human health and does not allow for the full 48-hour prior notification, the school must still make a good faith effort to notify, in writing, those on the 48-hour list as close to the 48-hour mark of the application as possible.

Further, upon making such emergency application, the IPM coordinator shall notify the Commissioner of the Department of Health on the appropriate form of the pesticide applied and the reason for such application.

The 48-hour notification registry and written notification provides parents and staff an opportunity to receive an accurate and timely accounting of what pesticide products have been and will be used in school buildings and on school grounds.

The following applications are not subject to prior notification requirements:

- a school remains unoccupied for a continuous 72 hours following an application;
- anti-microbial products;
- nonvolatile rodenticides in tamper resistant bait stations in areas inaccessible to children;
- nonvolatile insecticidal baits in tamper resistant bait stations in areas inaccessible to children;

- silica gels and other nonvolatile ready-to-use pastes, foams, or gels in areas inaccessible to children;
- boric acid and disodium octaborate tetrahydrate;
- the application of EPA designated biopesticides;
- the application of EPA designated exempt materials under 40CFR152.25;
- the use of aerosol products with a directed spray in containers of 18 fluid ounces or less when used to protect individuals from an imminent threat from stinging and biting insects including venomous spiders, bees, wasps, and hornets;

E. A copy of the forty-eight hour notification shall also be posted in a public location within the relevant facility.

Persons in parental relation, staff and other individuals may notify the Commissioner of Education or his/her designee of a school's alleged failure to comply with the requirements of this notification procedure (see attached State Education Department Complaint Form).

II. According to Social Services Law Section 390-c and due to Recess Resources (daycare facility) being located in the Central Junior/Administration building, the following notice requirements will be adhered to when the Vestal Central School District applies pesticides:

A notice of each pesticide application shall be posted conspicuously visible to persons dropping off or picking up children. Such notice shall be posted not less than 48 hours prior to the pesticide application.

This notice shall include:

- the location and specific date of the application, and 2 alternative dates (for outdoor applications);
- the pesticide product name and EPA product registration number;
- the name and contact number of the school representative to contact for further information; and
- The 48-hour notice must also include the following statement:

This notice is to inform you of a pending pesticide application at this facility. You may wish to discuss with the designated school representative what precautions are being taken to protect your child from exposure to these pesticides. Further information about the product(s) being applied, including any warnings that appear on the label of the pesticide(s) that are pertinent to the protection of humans, animals, or the environment, can be obtained by calling the National Pesticide Telecommunications Network Information phone number 1-800-8587378 or the New York State Department of Health Center for Environmental Health info line at 1-800-458-1158.

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- a school remains unoccupied for a continuous 72 hours following an application;
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- silica gels and other nonvolatile ready-to-use pastes, foams, or gels in areas inaccessible to children;
- boric acid and disodium octaborate tetrahydrate;
- the application of EPA designated biopesticides;
- the application of EPA designated exempt materials under 40CFR152.25;
- the use of aerosol products with a directed spray in containers of 18 fluid ounces or less when used to protect individuals from an imminent threat from stinging and biting insects including venomous spiders, bees, wasps, and hornets;

## **Education**

For the IPM program to be successful, all people; administrators, teachers, support and maintenance staff, students and the public must be made aware of this program, and their respective roles in the overall pest management plan.

Whether their individual role simply entails cleaning up after themselves, caulking cracks, or removing food from their lockers and desks, it takes the entire school community to effectively implement and maintain an IPM program. Informational brochures, and notices to parents, students, teachers, and staff are all techniques to communicate IPM awareness news to the school community.

## **Recordkeeping**

Knowing where, when, and what pests have been seen on school grounds can help focus pest control efforts and can be helpful to professional pest control operators. Careful IPM recordkeeping leads to better-educated and informed decision-making in managing school pest problems.

Documentation is critical; all staff shall report pest or pest evidence sightings to their supervisors. Follow-up actions and activities will be maintained. Copies of labels, MSDSs, as well as the date, time and pest-specific pesticide application locations will be recorded. Finally, the name of the applicator and a photocopy of their DEC certification should also be retained. Information on pesticide products must also be recorded pursuant to Occupational Safety and Health Act (OSHA) regulations. All IPM and pesticide applications records should be made available for inspection to anyone who wants to review such materials.

The State Pesticide Reporting Law (PRL) (Chapter 279 of the Laws of 1996) mandates pesticide applicators and technicians, including school districts who employ certified applicators, to record and report, at least annually, all pesticide applications to DEC. This reporting requirement includes pesticide applications that have been performed by DEC certified school personnel. The annual report must be sent to DEC no later than February 1 of the year following the calendar year for which the report is submitted. The information and records maintained for each pesticide application must be retained at least three years. The information which must be maintained includes: the EPA registration number of the pesticide which was applied; the product name; the quantity of each pesticide used; the date on which the pesticide was applied; and the location of the pesticide application address (including the five-digit zip code). The pesticide dosage rate, the method of application, the target organism, as well as the place of application must also be recorded. Questions pertaining to this law should be directed to the: DEC Bureau of Pesticides Management, Pesticides Reporting Section at 1-888-457-0110 (toll-free from within New York State).

## **Selection of Pesticides**

The IPM plan shall include the use of mechanical, biological and physical treatments for pest control to be implemented prior to the use of specific toxic pesticides. Only EPA registered pesticides will be used. The school's preferred pesticide for use would be pesticide baits and pesticide sprays with the single word CAUTION as a warning.

## **Pesticide Storage and Purchase**

Pesticide purchases will be limited to the amount authorized for available use during the year. Pesticides will be stored and disposed of in accordance with the USEPA-registered label directions and state regulations. Pesticides must be stored in an appropriate, secure site not accessible to students or unauthorized personnel.

## **ROLES AND RESPONSIBILITIES**

Many people have roles and responsibilities in carrying out an effective IPM program:

The Vestal School District Superintendent, school principals, facilities maintenance staff, custodians, construction, landscape, and IPM or pest management contractors, other school staff, students or other building occupants, parents, and the public. All are stakeholders in ensuring an effective IPM Program. The roles and responsibilities of the stakeholders are:



## **Director of Facilities and Operations**

The Director has primary responsibility for leading the development and implementation of an IPM policy and program. Duties include:

- Accurate identification of school pests
- Adoption of suitable IPM methods
- Oversight of pest management contractors or staff engaged in monitoring of pest problems and pest management actions
- Coordination with principals and district administration to carry out education and IPM training provisions of this policy
- Coordination with site planning and maintenance staff and construction contractors to carryout procedures for consideration of pest control implications of planned new construction and building or site modifications
- Review and follow-up on work orders for structural improvements or repairs and housekeeping and sanitation measures that may be required to reduce or prevent recurrence of pest problems
- Coordination with community sports teams for the maintenance of district sports fields
- Recording all pesticide use in accordance with Education Law 409-h and other applicable State laws and regulations
- Recording all pest sightings by staff, students and parents
- Should insure that federal, state, and local pesticide laws are followed, such as label requirements, record keeping, posting, notification, applicator licensing, hazardous materials storage laws and requirements and worker protection measures including the assignment of personal protective equipment.
- Assure that pesticides are applied only when school is not in session or when the area can be completely secured against access by school staff and students
- Providing for notification of pesticide applications, as called for by this plan

## **IPM Coordinator**

The Board of Education appoints an IPM Coordinator. The Coordinator will be responsible for implementing the IPM Policy and drafting and implementing the IPM Plan. The coordinator's responsibilities will include, but not be limited to, the following:

- Assuring notifications comply with applicable State Laws and regulations, specifically Education Law 409-h, Part 155.24 of the Regulations of the Commissioner of Education and this policy
- Recording all pesticide use in accordance with Education Law 409-h and other applicable State laws and regulations
- Recording all pest sightings by staff, students and parents
- Meeting with pesticide applicators to share information on what pest problems are present in the school
- Assuring that all of the pest control contractor's recommendations on maintenance and sanitation are carried out where feasible
- Assuring that any pesticide use is done when school is not in session or when the areas can be completely secured against access by school staff or students
- Maintaining and updating the District's 48-hour notification list
- Evaluating the school's progress on the IPM plan
- Assuring that all individuals employing the use of pesticides are properly trained and certified in the use of such pesticide
- Any other duties required by State law or Regulation or the Board of Education pertaining to pest control or IPM policy

## **Safety Team**

The District-Wide School Safety Team should promote and advocate the IPM's successful implementation throughout the school community. The committee could review and recommend action in response to parental, staff, student or community complaints.

## **Administrators**

The most important responsibilities of the administrative staff are to promote preventative actions that enhance the quality of life for the student, staff and community.

## **School Nurse**

The school nurse shall be aware of any children with asthma or chemical sensitivities.

## **Maintenance and Custodial Staff**

School maintenance staff and custodians are responsible for working with the Director of Facilities and Operations to monitor and manage pest problems and report pest sightings as described in this plan and its implementing procedures and recordkeeping. Staff with certified applicator's licenses may be responsible for pesticide applications. Custodians, through the normal daily cleaning, should be alert to and report evidence of pest presence to the Head Custodian.

## **Pesticide Applicators**

Pesticide applications may only be performed by individuals currently certified by the New York State DEC as pesticide applicators or by certified applicator pursuant to DEC Regulation Part 325.7. Further, pesticide applicators must be over the age of 21 years old as recommended by the DEC.

## **Food Service Staff**

It is essential that kitchen staff understands the importance of good sanitation and proper food storage and play an active role in implementing the IPM program. In addition, kitchen staff can provide important information by reporting the presence of pests.

## **Students, Other Staff and Community Members**

Much of the prevention and reduction of pest infestation depends on whether or not food is left in the classrooms, common areas and lockers. In addition, staff and students can provide important information by reporting the presence of pests.

## **Contractors**

The Vestal School District should notify all pest control, construction and landscape contractors of the need to adhere to the district's IPM policy in any pest control, planning, new construction, repair, or maintenance work for the district. Pest control contractors should be hired to inspect, not just to treat, pest problems.

Pest control contractors should be expected to write up recommendations for structural improvements or repairs and housekeeping and sanitation measures that may be required to reduce or prevent recurrence of pest problems. These should be submitted to the Director of Facilities and Operations.

Contractors should submit any pesticide use proposals to the Director of Facilities and Operations for review and action.

The Contractor is responsible for ensuring that posting and notification provisions for this policy are carried out if pesticides are used. He will notify the Building Principal, the Director of Facilities and Operations and the Head Custodian.

Through the diligence and commitment of all members of the school environment - parents, staff, students, and community members, IPM will result in healthy learning environments.



Office of Facilities Planning, Room 1060 Education Building Annex  
Telephone: (518) 474-3906  
Email: [emscfp@nysed.gov](mailto:emscfp@nysed.gov)  
[www.p12.nysed.gov/facplan/](http://www.p12.nysed.gov/facplan/)

**Public and Nonpublic  
Elementary and Secondary School  
Pesticide Neighbor Notification  
Complaint Form  
(please print)**

**INSTRUCTIONS:** This form is to be used to file complaints relating to public or nonpublic elementary or secondary schools pursuant to alleged noncompliance with section 409-h of the State Education Law (Pesticide Neighbor Notification Law). Information provided on this form will be used to investigate the school's compliance with section 409-h. Please provide detailed facts relative to your complaint. Please attach additional information as necessary.

School District or Nonpublic School Name:

Building Name & Address:

Your Name & Telephone Number:

Your Address:

Please provide a detailed description of the complaint:


**EMAIL completed form to:**

**[EMSCFP@NYSED.GOV](mailto:EMSCFP@NYSED.GOV)**

**-OR-**

**MAIL completed form to:**

**New York State Education Department  
Office of Facilities Planning  
89 Washington Avenue, Room 1060 EBA  
Albany, New York 12234**