

OAKLAND UNIFIED SCHOOL DISTRICT

Board Policy

BP 3511.2

Facilities

Integrated Pest Management

The Governing Board recognizes the importance of eliminating the application of potentially hazardous chemicals from school sites to ensure the health and safety of the students. To that end, the Board directs the State Administrator or designee to adopt an Integrated Pest Management policy and implement an IPM program that utilizes biological, physical, mechanical, chemical and educational methods to maintain pest levels low enough to prevent unacceptable damage or annoyance to people, property, and the environment.

The Superintendent or designee (IPM Coordinator) shall ensure all parents receive annual notification of possible pesticides and herbicides that may be used on District property, shall maintain pesticide application records for a minimum of 4 years, shall allow parents the opportunity to register and then notify them of individual pesticide applications, and shall ensure all required postings are in place prior to any pesticide application. In addition, the Superintendent or designee shall work with the IPM committee to be made up of teachers, parents Buildings & Grounds staff, school administrators, District administrators, and community and/or public organizations to ensure the IPM program is administered in accordance with the approved policy.

Integrated Pest Management Policy

Integrated Pest Management (IPM) is a strategy that utilizes biological, physical, mechanical, chemical, and educational methods to maintain pest levels low enough to prevent unacceptable damage or annoyance to people, property, and the environment. A good IPM program requires, among other things, regular monitoring and record keeping to evaluate a situation in order to determine the proper treatment. Chemical controls are to be used only when all other non-chemical forms of treatment fail. Only the least toxic chemicals (chemicals with low or no acute or chronic toxicity to humans) shall be used.

Structural and landscape pests can pose significant problems to people, property, and the environment, yet the pesticides used to control such pests pose their own health risks. It is the goal of Oakland Unified School District to provide a safe and healthy environment for all students and staff. To achieve this goal the District has established an Integrated Pest Management Policy. This policy shall focus on long-term techniques to control pests. The District's long-term goal is the eventual elimination of all chemical pest control methods.

The Precautionary Principle is the long-term objective of the Oakland Unified School District. This principle recognizes that:

- 1) No pesticide product is completely free from risk or threat to human health.
- 2) Industrial producers should be required to prove that their pesticide products demonstrate the absence of the risks, which include cancer, neuralgic disruption, birth defects, genetic alteration, reproductive harm, immune system dysfunction, endocrine disruption, and acute poisoning, rather than requiring that the government or the public prove that human health is being harmed.

Monitoring

Monitoring is the regular and ongoing inspection and observation of the areas where pest infestations can and do occur. Monitoring is essential in the IPM program to determine when the action threshold level has been reached. Through the use of written records and monitoring disruptive conditions can be anticipated, and pest populations can be quantified. To achieve this goal it may be necessary to designate one person to be responsible for the monitoring and record keeping of pest episodes.

Pest Action Threshold

Pest action threshold is a tolerance level determined by the collective sensitivity of the occupants at a specific site. The appropriate control method shall be implemented when the pest action threshold level has been determined.

Note: The presence of a pest does not necessarily require remedial action. The extent or existence of medical and/or economic damage will be used to determine the required action. For

the Safety of OUSD students and staff, it shall be determined that there is no “acceptable level” of medical damage.

Implementing the Appropriate Action

For each pest or infestation different treatment strategies may be required that will be determined. The following are a list of IPM treatment strategies:

- 1) Modify pest habits
- 2) Consider and coordinate the use of a range of potential treatments for the pest problem, including physical, horticultural, and biological methods.
- 3) If recognized least toxic treatments have been tried and failed, chemical applications may be used. Chosen chemicals will pose the least possible hazard to people and environment.

For a detailed description of each step see Appendix A.

Banned Chemicals

The following high health risk pest management products will not be allowed on the Approved List:

- 1) 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).
- 2) 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 Prop. 65 as reproductive or developmental toxins).
- 3) Pesticides that interfere with human hormones (identified by the U.S.E.P.A. as known, probable or possible endocrine disrupters).
- 4) Pesticides classified as Toxicity Category I by the U.S.E.P.A.
- 5) Carbamate and organophosphate pesticides.
- 6) Foggers, bombs, fumigants or sprays that contain pesticides identified by the State of California as potentially hazardous to human health (CFR 6198.5).

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

**Products with the active ingredient of Glyphosate, Isopropylamine Salt are exempt from this section, including but not limited to Round-Up.

***This section does not apply to fertilizers, preemergence herbicides, and other various ground maintenance products.

Notification

Proper notification shall be given to the site where the chemical will be applied. Notification shall follow the mandatory section of Senate Bill 2260 the Health Schools Act of 2000, which states the following:

- 1) Parents who register with the District shall be notified 72 hour in advance of any pesticide application.
- 2) Warning Signs shall be visible to all persons entering a treated area and shall be posted for:
 - a) 24 hours prior to the application
 - b) remain posted until 72 hours after the application
 - c) in case of an emergency a Warning Sign shall be immediately posted and remain posted until 72 hours after the application.

The following substances may be used without notification as that process is described in this section V.:

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)). However, use of any of these substances, will be reported to the District's IPM Committee when it next meets. Said report shall include at least the following information: name of substance, site, amount, target pest, and least toxic methods employed before the chemical or pesticide was used.

Record Keeping

The District shall keep records of each pest management action, which include the following:

- 1) Product name
- 2) Manufacture's name
- 3) United States Environmental Protection Agency's product registration number
- 4) Intended date and areas of application
- 5) Reason for the pesticide application

A copy of the "Warning Sign" shall be kept at the school site and the total amount of material used shall be maintained by the school site. A copy of this information shall also be provided to the IPM Coordinator or their designee and shall be made available to the public. All records shall be kept for a minimum of four (4) years.

IPM Committee

An IPM Committee shall be established to develop the implementation guidelines and oversee the implementation of the new policy. This committee shall be comprised of parents, teachers, Facilities and Planning, Buildings & Grounds staff, school administrators, District administrator, community and/or public organizations.

IPM Coordinator

The District shall designate an IPM Coordinator. This person shall be responsible for coordinating school district efforts to adopt IPM techniques, communicate goals and guidelines of the IPM Program to staff and students, provide proper training, tracking pesticide use and ensure that related information is available to the public, and presenting an annual report to the school board evaluating the progress of the IPM Program.

Training

Training of personnel is critical to the success of an IPM Program. Staff, students, pest managers, and the public shall be educated about potential school pest problems and the IPM policy and procedures that will be used to achieve the desired pest management objectives. Within five (5) months of this policy, the IPM Coordinator will agree on an education plan for these constituencies. The committee will be kept informed of plan progress.

Emergency Exemption

The IPM Coordinator may allow a trained District staff of any company contracted to provide pest control to the District to apply a pesticide otherwise banned under this resolution based upon a finding that the protection of public health requires the use of that pesticide. Such exemptions shall be granted on a per case basis and shall apply to a specific pest problem for a limited time. The IPM coordinator may grant emergency exemptions if action is required before the next meeting of the IPM Committee. The IPM coordinator shall report all such emergency exemptions to the IPM Committee.

Contractors

All pest control companies contracted by the District shall follow all provisions of the policy.

Appendix A

Implementing the Appropriate Pest Control Action

For each pest or infestation different treatment strategies may be required that will be determined. The following are a list of IPM treatment strategies in detail:

- 1) Modify pest habits:
 - A) Food, water, harborage, entry points and other conditions that attract and sustain pest populations will be eliminated proper sanitation which will involve a coordinated effort by ALL building extend to all areas of the school facility and grounds and must be reviewed regularly to improve performance and correct oversight. Sanitation records must be kept with regards to cleaning schedules, complaints, etc.
- 2) Coordinating the use of a range of potential treatments for pest problems including physical, biological, and horticultural pest control methods, including the following:
 - A) Physical controls:
 - Vacuuming
 - Desiccants (diatomaceous earth, silica aerogel)
 - Barriers (stick, slippery, soapy water)
 - Traps (mechanical, sticky)
 - Environmental manipulation (temperature, humidity, light)
 - Electric currents (electrogun, electric fences and/or traps)
 - Manual removal (hands, nets, lice combs), designing, constructing and modifying indoor and outdoor areas to reduce and eliminate pest habitats.
 - B) Biological controls:
 - Controls include conservation of pests' natural predators, parasites, and diseases and augmentation of these natural enemies through their purchase and release.
 - C) Horticultural controls:
 - Pest resistant plant varieties
 - Proper management practices (watering, pruning, mowing)
 - Design or redesigning landscapes to prevent pests

Appendix B

How to Read a Material Safety Data Sheet (MSDS)

Information regarding pesticides used on District property will be found in the form of a Material Safety Data Sheet (MSDS). A MSDS provides information regarding health hazards associated with a chemical, proper safety procedures to take when using that chemical, as well as first aid and emergency procedures for spills, fire, etc.

MSDS's may vary in appearance but will contain the following information:

1. Chemical Product and Company Identification – This section includes the name, address, and telephone number of the company that produced the chemical, as well as the chemical name, trade name and formula.
2. Composition/Information on Ingredients – This section lists the hazardous chemicals and the percent of concentration. Information on “Threshold Limit Value” (TLV) or “Permissible Exposure Level” (PEL), if established, will be in this section as well.
 - a. This information describes the exposure level that should not be exceeded during an Average 8-hour workday. A material's Chemical Abstract Service (CAS) number must also be listed.
3. Hazards Identification – The first part of this section describes the material's appearance and important information for emergency personnel. The second part of this section describes potential adverse health effects, routes of exposure, symptoms of exposure, acute and/or chronic health effects, and if the chemical is carcinogenic.
4. First Aid Measures – In this section first aid treatments for accidental exposure are described.
5. Fire Fighting Measures – This section provides information to trained fire fighters emergency responders, employees and other professionals with basic fire fighting guidance and unusual fire or explosion hazards. This section also helps determine the chemical's flash point.
6. Accidental Release Measures – This section describes procedures to follow if the chemical accidentally spills or is released. It will cover evacuation procedures, protective equipment, containment clean up techniques, and proper disposal.
7. Handling and Storage – This section describes general handling precautions, ways to prevent releases and over exposure to the chemical. It also explains necessary storage conditions to avoid damage to the container, contact with incompatible materials and possible reactions, evaporation or decomposition of the chemical and flammable or explosive atmospheres.

8. Exposure Controls/Personal Protection – Exposure controls include ventilation, Administrative or engineering controls. This section also describes proper personal Protective equipment for normal use as well as emergency response.
9. Physical and Chemical Properties – This section includes the material's boiling point, solubility in water, viscosity, specific gravity, melting point, evaporation rate, molecular weight, odor, appearance, etc.
10. Stability and Reactivity – This section will list materials and instances that could be hazardous when combined with the chemical listed on the MSDS.
11. Toxicological Information – This section reflects any testing on animals and the results as well as any human known poisonings and the effects/outcome.
12. Ecological Information – This section gives information on the acute or chronic effect the chemical may have on the environment.
13. Disposal Considerations – This section describes proper disposal information including special disposal methods, and RCRA waste classifications and EPA waste identification numbers and descriptions.
14. Transport Information – This section provides shipping information for the employer, distributor, emergency responder and transporter.
15. Regulatory Information
16. Other Information

APPENDIX C
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DEFINITIONS CONTINUED
DEFINITIONS

TERM	DEFINITION
PROGRESSIVE NONCHEMICAL ACTIVE METHODS AND INGREDIENTS	Sanitation, exclusion, reduced temperature or increased temperature changes in plant health for turf and ornamentals; and physical lethal control measures such as snap traps and the introduction of natural parasites, predators, or disease organisms.
HALF-LIVES	An ingredient in a pesticide that destroys, repels, mitigates, desiccates, defoliates, or retards the growth of a target pest or plant as defined in FIFRA (7 USC 136(A)).
REDUCED RISK PROGRESSIVE PESTICIDE	Chemical methods and techniques. These approaches modify the habitat to reduce pest populations and minimize the role of chemical controls in pest management. The amount of time during which the biological activity of a pesticide product decreases by one half of its original concentration. Five half-lives reduce the biological activity of a pesticide product to 3.125% of its original concentration. Reduced risk products are essentially non-phytotoxic and have a low potential for reduced risk.
INDEPENDENT SELECTION	One who does not have a direct financial stake in the traditional pest control industry. Integrated Pest Management (IPM) is the coordinated use of pest and environmental control risk products first.
INTEGRATED PEST MANAGEMENT SIGNAL WORD	IPM systems utilize a high quantity and quality of technical information on the pest and its interaction with the environment (site). Because IPM programs apply a holistic approach to pest management decision-making, they take advantage of ALL low risk management options, emphasizing natural biological methods, and the appropriate use of selective pesticides as a last resort. IPM strategies incorporate environmental considerations by emphasizing pest management measures that minimize intrusion on natural bio-diversity ecosystems. Thus, IPM is: A system utilizing multiple methods * A decision-making process * Biologically based * Cost effective * Site specific
STRUCTURAL AND BEHAVIORAL MODIFICATION	Non-pesticidal methods for managing pest populations, which includes modification of structures to exclude or eliminate life support for pests. Behavioral modifications are changes in the way students, staff, and District personnel take action such as removing trash and garbage at close of business, thorough cleaning actions, and not eating in classrooms.
TOXICITY CATEGORY	The EPA uses the LD50 to rank pesticides into four toxicity categories. The most acutely toxic pesticides are in Category I, and the least toxic in Category IV. To measure acute toxicity, pesticides are fed to laboratory animals to see how much it takes to kill half of the test population. The result is the LD50 - the lethal dose for 50% of the test population.
IPM COORDINATOR	An existing District position responsible for oversight and implementation of the District's IPM policy.
PEST ACTION THRESHOLD	The following demonstrates how the signal word replaces to the toxicity category: A pest action threshold is a tolerance level determined by the sensitivities of the occupants and should reflect the pest management objective for the site. The presence of a pest does not, in itself, necessarily require pesticidal action. When pest populations exceed action thresholds, action will be taken. Precise recommendations or actions to achieve specific results are an essential part of the IPM program. Specific recommendations including an explanation of the benefits should be based on the evaluation of all available data obtained through monitoring.
PESTICIDE	(1) Any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, and (2) any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant (FIFRA, 7 USC 136 (U))
PEST MANAGEMENT OBJECTIVE	A pest management objective is a road map for pest control that defines goals to be accomplished. The pest management objective is specific to the site's needs and considers the occupants, conditions, pest problems, and resources available.