



Ashland School District IPM Program

Integrated Pest Management Program District 5

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I. INTRODUCTION

Structural and landscape pests can pose significant problems in schools. Pests such as mice and cockroaches can trigger asthma. Mice and rats are vectors of disease. Many children are allergic to yellow jacket stings. The pesticides used to remediate these and other pests can also pose health risks to people, animals, and the environment. These same pesticides may pose special health risks to children due in large part to their still-developing organ systems. Because the health and safety of students and staff is our first priority – and a prerequisite to learning – it is the policy of **Ashland School District** to approach pest management with the least possible risk to students and staff. In addition, Senate Bill 637 (incorporated into ORS Chapter 634 upon finalization in 2009) requires all school districts to implement integrated pest management in their schools. For this reason, the **Ashland School Board** adopts this integrated pest management plan for use on the campuses of our district.

II. WHAT IS INTEGRATED PEST MANAGEMENT?

Integrated Pest Management, also known as IPM, is a process for achieving long-term, environmentally sound pest suppression through a wide variety of tactics. Control strategies in an IPM program include structural and procedural improvements to reduce the food, water, shelter, and access used by pests. Since IPM focuses on remediation of the fundamental reasons why pests are here, pesticides are rarely used and only when necessary.

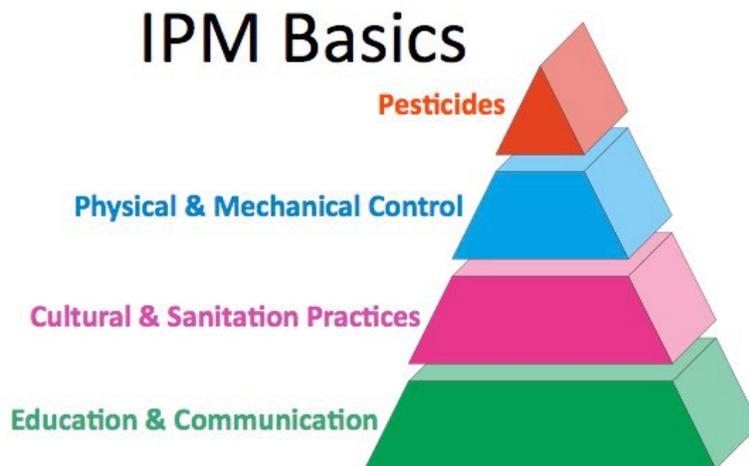
IPM Basics

Education and Communication: The foundation for an effective IPM program is education and communication. We need to know what conditions can cause pest problems, why and how to monitor for pests, proper identification, pest behavior and biology before we can begin to manage pests effectively. Communication about pest issues is essential. *A protocol for reporting pests or pest conducive conditions and a record of what action was taken is the most important part of an effective IPM program.*

Cultural & Sanitation: Knowing how human behavior encourages pests helps you prevent them from becoming a problem. Small changes in cultural or sanitation practices can have significant effects on reducing pest populations. Cleaning under kitchen serving counters, reducing clutter in classrooms, putting dumpsters further from kitchen door/loading dock, proper irrigation scheduling, and over-seeding of turf areas are all examples of cultural and sanitation practices that can be employed to reduce pests.

Physical & Mechanical: Rodent traps, sticky monitoring traps for insects, door sweeps on external doors, sealing holes under sinks, proper drainage and mulching of landscapes, and keeping vegetation at least 24 inches from buildings are all examples of physical and mechanical control.

Pesticides: IPM focuses on remediation of the fundamental reasons why pests are here; pesticides should be rarely used and only when necessary.



III. WHAT IS AN INTEGRATED PEST MANAGEMENT PLAN?

ORS 634.700 defines an IPM plan as a proactive strategy that:

(A) Focuses on the long-term prevention or suppression of pest problems through economically sound measures that:

- a) Protect the health and safety of students, staff and faculty;
- b) Protect the integrity of campus buildings and grounds;
- c) Maintain a productive learning environment; and
- d) Protect local ecosystem health;

(B) Focuses on the prevention of pest problems by working to reduce or eliminate conditions of property construction, operation and maintenance that promote or allow for the establishment, feeding, breeding and proliferation of pest populations or other conditions that are conducive to pests or that create harborage for pests;

(C) Incorporates the use of sanitation, structural remediation or habitat manipulation or of mechanical, biological and chemical pest control measures that present a reduced risk or have a low impact and, for the purpose of mitigating a declared pest emergency, the application of pesticides that are not low-impact pesticides;

(D) Includes regular monitoring and inspections to detect pests, pest damage and unsanctioned pesticide usage;

(E) Evaluates the need for pest control by identifying acceptable pest population density levels;

- (F) Monitors and evaluates the effectiveness of pest control measures;
- (G) Excludes the application of pesticides on a routine schedule for purely preventive purposes, other than applications of pesticides designed to attract or be consumed by pests;
- (H) Excludes the application of pesticides for purely aesthetic purposes;
- (I) Includes school staff education about sanitation, monitoring and inspection and about pest control measures;
- (J) Gives preference to the use of nonchemical pest control measures;
- (K) Allows the use of low-impact pesticides if nonchemical pest control measures are ineffective; and
- (L) Allows the application of a pesticide that is not a low-impact pesticide only to mitigate a declared pest emergency or if the application is by, or at the direction or order of, a public health official.

The above definition is the basis for **our school district's** IPM plan. This plan clarifies the required strategy from ORS 634.700 – 634.750 for **our school district**.

Note: As mentioned above, ORS 634.700 allows for the routine application of pesticides designed to be consumed by pests. To avoid a proliferation of pests and/or unnecessary applications of pesticides, several steps must be taken before **any** “routine” applications are allowed:

- 1) Staff must be educated on sanitation, monitoring, and exclusion as the primary means to control the pest.
- 2) An acceptable pest population density level must be established.
- 3) The use of sanitation, structural remediation or habitat manipulation, or of mechanical or biological control methods must be incorporated into the management strategy of the pest.
- 4) Documentation that the above steps were ineffective.
- 5) The pesticide label must be read thoroughly to make sure the pesticide will be used in strict compliance with all label instructions.

IV. SCHOOL DISTRICT IPM PLAN COORDINATOR

Note: ORS 634.720 states that the Coordinator “must be an employee of the governed district, unit, school or entity, unless the governing body delegates pest management duties to an independent contractor.”

The Facilities Director designates Jeff Rogers as the IPM Plan Coordinator. The Coordinator is key to successful IPM implementation in **our school district**, and is given the authority for overall implementation and evaluation of this plan. The Coordinator is responsible for:

A. Attending not less than six hours of IPM training each year

The training will include a general review of IPM principles and the requirements of ORS 634.700 – 634.750. It will also include hands-on training on updated exclusion practices, monitoring & inspection techniques, and management strategies for common pests.

Note: ORS 634.720 requires IPM plan coordinators to complete six hours of training each year. Contact your property and liability insurance provider, your Education Service District, or the OSU School IPM Program for information on IPM coordinator training courses that cover the above.

B. Conducting outreach to the school community (custodians, maintenance, construction, grounds, faculty, and kitchen staff) about the school's IPM plan;

The IPM Plan Coordinator (or designee) will provide training as outlined in Section VII below.

C. Overseeing pest prevention efforts;

The Coordinator will work with custodians, teachers, and maintenance to reduce clutter and food in the classrooms, and seal up pest entry points.

D. Assuring that the decision-making process for implementing IPM in the district (section V) is followed;

The Coordinator will continually assess and improve the pest monitoring/reporting/action protocol.

E. Assuring that all notification, posting, and record-keeping requirements in section VI are met when the decision to make a pesticide application is made;

F. Maintaining the approved pesticides list as per section VIII; and

G. Responding to inquiries and complaints about noncompliance with the plan.

Responses to inquiries and complaints will be in writing and kept on record with the Coordinator.

V. IPM DECISION-MAKING PROCESS

A. Responsibilities of School District Employees

1. IPM Plan Coordinator Responsibilities

See Section IV above

2. Custodial Services Responsibilities

Custodial Services staff is responsible for the following:

- 1) Periodic IPM training provided by the ASD Safe Schools Trainings.
- 2) Placing and checking sticky insect monitoring traps in staff lounge, cafeteria, and kitchen as per the IPM Plan Coordinator's instructions.
- 3) Keeping records of pest complaints using electronic communication in addition to work orders, and verbal.
- 4) Assuring floor under serving counters is kept free of food and drink debris.
- 5) Sealing up small cracks or holes when reported by teachers or noticed as needed.
- 6) Reporting his/her pest management actions in email to the IPM Coordinator.
- 7) Reporting pest problems that he/she cannot resolve in a timely manner to the IPM Plan Coordinator.
- 8) Reporting Staff to the IPM Plan Coordinator who need assistance to reduce clutter and other pest-conducive conditions in their classrooms in a positive way.
- 9) Reporting pest-conducive conditions to the IPM Plan Coordinator if the custodian cannot fix them in a timely manner.
- 10) Confiscating any unapproved pesticides (such as aerosol spray cans) discovered during inspections or regular duties and delivering them to the IPM Plan Coordinator.
- 11) Following up on issues found during inspections as instructed by the IPM Plan Coordinator (IPM Plan Coordinator will determine which schools receive in-depth inspections based on pest and incident history).

3. *Facilities/Maintenance Responsibilities*

Staff involved in Facilities Maintenance and construction is responsible for working with the IPM Plan Coordinator to ensure their daily tasks, projects and operations enhance effective pest management. This includes:

- 1) Receiving instruction from the IPM Plan Coordinator (or designee of the Coordinator) on the basic principles of IPM, sealing pest entry points, and sanitation during construction projects as needed.
- 2) Continually monitoring for pest conducive conditions during daily work, and sealing small holes and cracks when noticed, or scheduling through a work order.

3) Working in conjunction with the Coordinator to develop a protocol and priority list through the work order software for: sealing holes, installing external door sweeps, and other pest exclusion needs on larger projects.

4) Developing protocols and provisions for pest avoidance and prevention during construction and renovation projects. The IPM Plan Coordinator has the authority to contact the Facilities Director if these protocols and provisions are not being met.

4. Grounds Department Responsibilities

Grounds crews are responsible for:

1) Taking periodic IPM training provided by the ASD Safe Schools Trainings.

2) Keeping vegetation (including tree branches and bushes) at least three feet from building surfaces.

3) Proper mulching in landscaped areas to reduce weeds.

4) Proper fertilization, over-seeding, mowing height, edging, drainage, aeration, and irrigation scheduling in turf areas to reduce weeds (see OSU turf management publications [EC 1521](#), [EC 1278](#), [EC 1550](#), [EC 1638-E](#), and [PNW 299](#) - available free online at <http://extension.oregonstate.edu/catalog/>).

5) When the decision is made to apply a pesticide, following notification, posting, record-keeping and reporting protocols in Section VI. After attaining Ashland School Board approval.

5. Kitchen Staff Responsibilities

Kitchen staffs are responsible for:

1) Taking periodic IPM training provided by the ASD Safe Schools Training's

2) Assuring floor under serving counters is kept free of food and drink debris.

3) Promptly emptying and removing corrugated cardboard materials.

4) Keeping exterior kitchen doors closed.

5) Reporting pest conducive conditions that require maintenance (e.g., leaky faucets, dumpster too near building, build-up of floor grease requiring spray-washing, etc.) to proper staff either orally or using electronic communication.

6) Participating in any inspections conducted by custodian or IPM Plan Coordinator.

7) Checking sticky trap monitors as needed for cockroaches or drain flies. Immediately reporting these pests and any sightings of rodents or rodent droppings to custodian and in electronic communication to IPM Coordinator.

6. School Faculty Responsibilities

School faculties are responsible for:

- 1) Taking IPM training as needed provided by ASD Safe Schools trainings.
- 2) Keeping their classrooms and work areas free of clutter.
- 3) Making sure students clean up after themselves when food or drink is consumed in the classroom.
- 4) Reporting pests and pest conducive conditions to the custodian, verbally or by electronic communication.
- 5) Following first steps of protocol for ant management before notifying the custodian (clean up any food the ants are eating, kill visible ants, wipe down area where ants were with soapy water, notify custodian only if ants continue to be found after following these steps).

7. School Principal Responsibilities

The School Principal is responsible for:

- 1) Scheduling time for teachers to take IPM ASD Safe Schools Trainings as needed.
- 2) Taking IPM ASD Safe Schools Trainings as needed.
- 3) Assuring that teachers keep their rooms clean and free of clutter in accordance with the IPM Plan Coordinator's instructions.
- 4) Assuring that all faculties, administrators, staff, know that the Ashland School District does not use Pesticides or herbicides unless approved by the Ashland School Board in advance and applied by a licensed Vendor.
- 5) Working with the IPM Plan Coordinator to make sure all notifications of pesticide applications reach all faculty, administrators, staff, adult students and parents (via the method most likely to reach the intended recipients).
- 6) Assuring that all staff fulfill their role as outlined in the district's IPM plan (reducing pest conducive conditions, participation in monitoring and pest log recording, taking needed IPM training(s), cooperation with the district's IPM Plan Coordinator).

B. Monitoring – Reporting – Action Protocol

Monitoring is the most important requirement of ORS 634.700 – 634.750. It is the backbone of Ashland School District's IPM Program. It provides recent and accurate information to make intelligent and effective pest management decisions. It can be defined as the regular and ongoing inspection of areas where pest problems do or might occur. Information gathered from these inspections is always retained digitally.

As much as possible, monitoring should be incorporated into the daily activities of school staff. Staff training on monitoring should include what to look for and how to record and report the information.

1. Three levels of monitoring

There are three levels of monitoring:

- 1) Casual observing/looking with no record keeping is not helpful
- 2) Casual observing/looking with written observations can be useful
- 3) Careful inspections with written observations is always useful

Level 2 monitoring (all staff)

All staff will be trained to improve their "casual observing/looking" to level 2, and to report any pests and pest-conducive conditions they observe. Level 2 monitoring is conducted by faculty, administration, maintenance/construction, kitchen staff, school nurses, etc.

After completing ASD Safe Schools Trainings on pests and pest conducive conditions, staff will be expected to report pests or pest conducive conditions they observe during the normal course of their daily work.

Reporting will be done by recording observations electronically or reporting them to the custodian for him/her to make record of it. Custodial, maintenance, and kitchen staff are expected to set and/or check sticky monitoring traps as per the district's IPM plan as needed.

Level 3 monitoring (Coordinator and Custodial staff)

The IPM Plan Coordinator (or designee) and Custodians will periodically conduct monitoring at level 3. Coordinator and Custodial staff will monitor structures:

- Pest conducive conditions inside and outside the building (structural deterioration, holes that allow pests to enter, conditions that provide pest harborage)
- The level of sanitation inside and out (waste disposal procedures, level of cleanliness inside and out, conditions that supply food and water to pests)
- The amount of pest damage and the number and location of pest signs (rodent droppings, termite shelter tubes, cockroaches caught in sticky traps, etc.)

- Human behaviors that affect the pests (working conditions that make it impossible to close doors or screens, food preparation procedures that provide food for pests, etc.)
- Their own management activities (caulking/sealing, cleaning, setting out traps, treating pests, etc.) and their effects on the pest population.

Level 3 monitoring (Grounds staff)

Grounds staff will monitor Turf and Landscape:

- The condition of the plants (vigor and appearance)
- The amount of plant damage
- pH, phosphorus, and potassium levels of turf (soil test as needed)
- Type and abundance of pests (weeds, insects, mites, moles, etc.) as well as natural enemies (ladybugs, spiders, lacewing larvae, syrphid fly larvae, etc.)
- Weather conditions (record any unusually dry, hot, wet, or cold weather as needed)
- Proper drainage
- Human behaviors that affect the plants or pests (foot traffic that compacts the soil, physical damage to plants caused by people, insistence on having certain plants grow in inappropriate situations, etc.)
- Management activities (pruning, fertilizing, mulching, aeration, treating pests, etc.) and their effects on the plants and the pest population.

2. *Sticky monitoring traps for insects*

Affected staff will be made aware of traps and their purpose so they don't disturb them.

3. Reporting (pests, signs of pests, and conducive conditions)

When staff observe pests or pest conducive conditions they should report them to the custodian for him/her to communicate to the IPM Coordinator.

4. Reporting “Pests of Concern”

“A pest of concern” is a pest determined to be a public health risk or a significant nuisance pest. These include cockroaches (disease vectors, asthma triggers), mice & rats (disease vectors, asthma triggers), yellow jackets (sting can cause anaphylactic shock), cornered nutria, raccoons, cats, dogs, opossums, skunks (they can bite), and bed bugs (significant nuisance pest).

When pests of concern (or their droppings, nests, etc.) are observed, staff should immediately tell the building custodian and IPM Coordinator.

5. Action!a) Structural

Any items (such as sealing up holes) that maintenance/construction staff or custodial staff observes should be taken care of, or a work request issued.

The Coordinator will monitor the completion of the work order. If the work is not completed as expected, the Coordinator may write a follow-up e-mail to the Facilities Director.

The Coordinator will keep records of time and money spent to manage the pest, including copies of original receipts.

Small Ants:

When staff observe a small number of ants (e.g. under 10 ants) they must:

- 1st) Spend two minutes trying to find out where the ants are coming from
- 2nd) Kill the ants with a paper towel or similar
- 3rd) Remove any food or liquid the ants were eating
- 4th) Wipe down the area with soapy water or disinfectant to remove pheromone trails
- 5th) Record the above electronically as prudent.

If the ants come back or there are more than a small number (e.g. under 10 ants) of them:

- 1st) Spend two minutes trying to find out where the ants are coming from
- 2nd) Record the above electronically as prudent.
- 3rd) Ask the custodian to come with vacuum and sealant as soon as he/she is able.

The custodian will:

- 1st) try to find out where the ants may be coming from.
- 2nd) Vacuum up the ants and any food debris nearby.
- 3rd) Seal up the crack or hole where the ants were coming from.
- 4th) Wipe down the area with soapy water or disinfectant to remove pheromone trails
- 5th) Record as prudent.

b) Grounds

When pests on grounds reach a threshold established by the Grounds staff lead and the IPM Plan Coordinator, action will be taken as determined by the Coordinator.

6. Acceptable Thresholds (pest population density levels)

A threshold is the number of pests that can be tolerated before taking action. The acceptable threshold for cockroaches, mice, rats, raccoons, cats, dogs, opossums, skunks, and nutria is 0.

Acceptable thresholds for other pests will be determined by the IPM Plan Coordinator.

C. Inspections**1) Routine Inspections**

The IPM Plan Coordinator will conduct routine inspections of different schools throughout the year and retain pertinent information for use in writing the IPM Report, and to create best practices for IPM.

2) Annual Inspections

The IPM Plan Coordinator will conduct annual inspections at individual schools, and retain pertinent information for use in writing the IPM Report, and to create best practices for IPM.

D. Pest Emergencies (see also Section VII. B. below)

IMPORTANT: If a pest emergency is declared, the area must be evacuated and cordoned off before taking any other steps. When the IPM Plan Coordinator, after consultation with school faculty and administration, determines that the presence of a pest or pests immediately threatens the health or safety of students, staff, faculty members or members of the public using the campus, or the structural integrity of campus facilities, he or she may declare a pest emergency. Examples include (but are not limited to) yellow jackets swarming in areas frequented by children, a nutria in an area frequented by children, a half a dozen mice or rats running through occupied areas of a school building.

E. Annual IPM Report (completed by IPM Plan Coordinator)

In January of each year, the IPM Plan Coordinator will provide the Facilities Director an annual IPM report. The IPM report will include all costs associated with the IPM program.

Prevention and management steps taken that proved to be ineffective and led to the decision to make a pesticide application will be copied and pasted or incorporated into the annual report of pesticide applications (see section VII. D)

VI. REQUIRED TRAINING/EDUCATION

ORS 634.700 (3) (i) requires staff education “Provided by ASD Safe Schools trainings”.

A. IPM Plan Coordinator Training

ORS 634.720 (2) requires that the IPM Plan Coordinator “shall complete not less than six hours of training each year. The training shall include at least a general review of IPM principles and the requirements of ORS 634.700 to 634.750.”

Content should include health and economic issues associated with pests in schools, exclusion practices, pest identification and biology for common pests, common challenges with monitoring-reporting-action protocols, proper use of sticky monitoring traps for insects, and hands-on training on proper inspection techniques.

Contact your Education Service District or the OSU School IPM Program for information on OSU-approved training courses.

B. Training for Custodial Staff

Will be provided by ASD Safe Schools IPM trainings as needed.

C. Training for Maintenance and Construction Staff

Will be provided by ASD Safe Schools IPM trainings as needed.

D. Training for Grounds Staff

Will be provided by ASD Safe Schools IPM trainings as needed. Additional available resources found at:

OSU turf management publications [EC 1521](#), [EC 1278](#), [EC 1550](#), [EC 1638-E](#), and [PNW 299](#) (available free online at <http://extension.oregonstate.edu/catalog/>). Grounds staff will

E. Training for Kitchen Staff

Training will be provided by ASD Safe Schools IPM trainings as needed.

F. Training for Faculty and Principal

Training will be provided by ASD Safe Schools IPM trainings as needed.

VII. PESTICIDE APPLICATIONS: REQUIRED NOTIFICATION, POSTING, RECORD KEEPING, AND REPORTING

Any pesticide application on school property must be made by a licensed vendor after School Board approval. Proper communication will be made to affected people.

The IPM Plan Coordinator (or a designee of the Coordinator) will give written notice of a proposed pesticide application (via the method most likely to reach the intended recipients) at least 24 hours before the application occurs.

The notice must identify the name, trademark or type of pesticide product, the EPA registration number of the product, the expected area of the application, the expected date of application and the reason for the application.

The IPM Plan Coordinator (or a designee of the Coordinator) shall place warning signs around pesticide application areas beginning no later than 24 hours before the application occurs and ending no earlier than 72 hours after the application occurs.

A warning sign must bear the words "Warning: pesticide-treated area", and give the expected or actual date and time for the application, the expected or actual reentry time, and provide the telephone number of a contact person (the person who is to make the application and/or the IPM Plan Coordinator).

A. Notification and Posting for Emergencies

Important Notes:

- 1) *The IPM Plan Coordinator may not declare the existence of a pest emergency until after consultation with school faculty and administration and Facilities Director.*
- 2) *If a pesticide is applied at a campus due to a pest emergency, the Plan Coordinator shall review the IPM plan to determine whether modification of the plan might prevent future pest emergencies, and provide a report of such to the Facilities Director.*
- 3) *The Facilities Director shall review and take formal action on any recommendations in the report if prudent.*

The declaration of the existence of a pest emergency is the only time a non-low-impact pesticide may be applied.

If a pest emergency is declared, the area must be evacuated and cordoned off before taking any other steps.

If a pest emergency makes it impracticable to give a pesticide application notice no later than 24 hours before the pesticide application occurs, the IPM Plan Coordinator shall send the notice no later than 24 hours after the application occurs.

The IPM Plan Coordinator or designee shall place notification signs around the area as soon as practicable but no later than at the time the application occurs.

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.

B. Record Keeping of Pesticide Applications

The IPM Plan Coordinator or designee shall keep a copy of the following pesticide product information on file **at the head custodian’s office at the school where the application occurred, and at the office of the IPM Plan Coordinator:**

- A copy of the label
- A copy of the MSDS
- The brand name and USEPA registration number of the product
- The approximate amount and concentration of product applied
- The location of the application
- The pest condition that prompted the application
- The type of application and whether the application proved effective
- The pesticide applicator’s license numbers and pesticide trainee or certificate numbers of the person applying the pesticide
- The name(s) of the person(s) applying the pesticide
- The dates on which notices of the application were given
- The 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 **at the head custodian’s office at the school where the application occurred, and at the office of the IPM Plan Coordinator,** for at least four years following the application date.

C. Annual Report of Pesticide Applications

In January of each year, the IPM Plan Coordinator will provide Facilities Director an annual report of all pesticide applications made the previous year. This report will be included in the IPM Report. The report will contain the following for each application:

- The brand name and USEPA registration number of the product applied
- The approximate amount and concentration of product applied
- The location of the application
- The prevention or management steps taken that proved to be ineffective and led to the decision to make a pesticide application
- The type of application and whether the application proved effective

Low Impact Pesticide List

Pesticides on this list may not contain a pesticide product or active ingredient that has the words “warning” or “danger” on the label. These cannot 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. These also cannot contain a pesticide product classified as a human carcinogen or likely to be carcinogenic to humans under the United States Environmental Protection Agency 2003 Draft Final Guidelines for Carcinogen Risk Assessment.

ANTS

TERRO ant killer II Liquid Ant Baits (6 pack) EPA Reg. No.149-8

WEEDS

Roundup Promax Herbicide EPA Reg.No.524-579

WEEDS

Roundup QuikPro Herbicide EPA Reg.No.524-535

WEEDS

RoundUp Pro Concentrate EPA Reg.No.524-529

WASP & HORNET SPRAY

Raid Wasp & Hornet Killer EPA Reg. No.4822-553

WASP HORNET YELLOWJACKET

Rescue! W-H-Y Attractant EPA Reg.No. 84565-3-49407

Integrated Pest Management

IPM Website Link

(Pending approval and Implementation)