

Facilities Department

#### **Facilities Departments Sustainable Approach to Pest Management**

It is the Facilities Department's goal to achieve long-term, environmentally sound pest suppression through the use of a wide variety of technological advances and management practices. Facilities Department's sustainable approach to pest management extends beyond the application of pesticides, to include reducing the food, water, harborage, and access used by pests by eliminating any equipment, structural features, or management practices that are contributing to pest infestation. The Facilities Department has adopted the policy of using Integrated Pest Management (IPM) in order to reduce: 1) Potential human health risks; 2) a significant threat to public safety; 3) the loss or damage to College property; 4) the potential of pests from spreading into the community and; 5) enhance the quality of life for the campus community.

Applying pesticides safely and effectively in public spaces requires substantial expertise and skill. The sustainable approach considers if the action taken is: 1) The least hazardous to human health; 2) the least damaging to the natural environment; 3) the most likely to produce a permanent reduction of the pest; 4) the easiest to carry out effectively, and; 5) the most cost effective in the short- and long-term. A sustainable approach determines when to control pests, and whether to use mechanical, physical, biological, cultural, or chemical means. If a pesticide is required, the least hazardous material is chosen, the most precise application technique is used, and the minimal quantity of pesticide is used.

### The Implementation of IPM at Salt Lake Community College

The plan developed at SLCC is divided into 6 parts. Each can be implemented in various stages and modified to fit College buildings. The six basic parts of the SLCC pest management plan are: 1. Develop a policy statement; 2. Set management objectives for each various site; 3. Inspect, identify and monitor pest populations on a regular basis; 4. Set action thresholds for each pest; 5. Apply IPM strategies for control and; 6. Evaluate results and keep written records.

### Policy

Structural and landscape pests can and do pose significant problems to people, property, and the environment. Pesticides can also pose risks to people, property, and the environment. It is therefore the policy of the Facilities Department to implement Integrated Pest Management (IPM) procedures for the control of structural and landscape pests.

IPM procedures will determine when to control pests and whether to use mechanical, physical, cultural, biological, or chemical means. The Facilities Department IPM program depends on current, comprehensive information on the pest, its environment, and the best available pest control methods. Selected non-chemical pest management methods will be implemented whenever possible to provide the desired control of pests. The choice of using a pesticide will be based on a review of all other available options and a determination that these options are not acceptable or are not feasible. Cost or staffing considerations alone will not be adequate justification for use of chemical control agents. The full range of alternatives, including no action, will be considered.

The application of pesticides is subject to the Federal Insecticide, Fungicide, and Rodenticide Act (7 United States Code 136 et seq.), Environmental Protection Agency regulations in 40 Code of Federal Regulations, Occupational Safety and Health Administration regulations, and the Utah Dept. of Agriculture regulations. Records of pesticides use shall be maintained on site to meet the requirements of the state regulatory agency (Utah Department of Agriculture). In addition, pest surveillance data sheets that record the number of pests or other indicators of pest populations are to be maintained to verify the need for treatments.

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

Pesticide applicators must be educated and trained in the principles and practices of IPM and the use of pesticides approved by the College, and they must follow regulations and label precautions. Training is conducted in the following areas: Federal and State laws regulating structural pest control, Recognition of pests and damages of structural and vertebrate pests, Pesticide labels and MSDS's, Safety and use of PPE, Environmental Protection, Application equipment, techniques and calibration, Formulation and action of pesticides, Emergency spills, Non-chemical controls, Principles of IPM. Staff, students, faculty, and the public will be educated about potential College pest problems and the IPM policies and procedures to be used to achieve the desired pest management objectives.

### Passive Fire Protection and Integrated Pest Management

A new initiative called Passive Fire Protection (PFP) is destined to have a major impact on indoor pest management programs. PFP is designed to systematically eliminate breaches in fire walls by sealing gaps around plumbing pipes, electrical conduits and holes left in walls from remodeling and other activities. PFP is typically mandated and enforced by the State Fire Marshal's office. In turn, this program reduces the access and harborage of indoor pests such as rodents and arthropods in the exact same manner as Integrated Pest Management (IPM) personnel typically perform. By working with architects, contractors and facility maintenance staff to mandate a rigid PFP program (something they increasingly realize is a responsible requirement) the facility manager can also make large progress in enacting an in-house IPM program.

# Public Posting Policy

The Facilities Department posts public notifications for pesticide applications for the use of liquid spray and aerosol products, dusts, powders, fumigants or any fogger product or aerosol product that discharges to a **wide area**. This requirement also applies to all external service providers making pesticide applications on SLCC property.

Posting notifications for pesticide applications are necessary because people that are exposed to substances which may pose a significant risk to health and well-being have a right to receive basic information (Right-to-know) and allows people to take precautionary steps. Postings also educate the public about pesticide safety.

Notification postings are placed at several conspicuous, primary points of entry to the treated site and are in place at least 24 hours in advance of applications and maintained in place for at least 48 hours after application. Signs are a minimum of 4" x 5", be constructed of durable, weatherproof materials, and in contrasting colors (yellow background with black letters). Signs for outdoor applications contain a graphic to discourage people from walking on the turf or landscape. Although the Utah Department of Agriculture does not have specific guidelines for postings, the following information is generally included:

### The back side of the posting:

- □ Address and specific area being treated.
- □ Name and phone number of official contact person(s).
- □ Name of person making the application.
- □ Brand name of the product as it appears on the pesticide label.
- $\Box$  Date of pesticide application.
- □ EPA registration number.
- $\Box$  Active ingredient of pesticide.
- $\Box$  Restricted-entry interval.
- □ Name, address and phone number of the nearest medical facility.

□ A location where the MSDS's (Material Safety Data Sheet) and product labels can be obtained.

## The front side of the posting states:

□ A pesticide application is scheduled at this site; OR Pesticides are periodically applied to this site.

- □ Keep off until dry OR label directions for reentry periods.
- □ Business (Department) name of the licensee making the application.

Products applied that carry a Worker Protection Standard label may have other specific requirements for posting (check the product label for specific requirements). These notices may be part of a larger sign containing additional information.

# Such prior notification does not apply to the following:

a. Antimicrobial products developed for sanitary and custodial services as defined by FIFRA in 7 U.S.C. Section 136 (mm) and 136q(h)(2);

b. 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 or biting insects.

c. The use of non-volatile insect or rodent bait in a tamper resistant container;

d. The application of a pesticide which the EPA classifies as exempt under 40 CFR Part 152.25;

e. The application of a pesticide which the EPA has determined as meeting its reduced risk criteria, including a biopesticide;

f. The use of boric acid and disodium octaborate tetrahydrate;

g. The use of horticultural soap and oils that do not contain synthetic pesticides or synergists;

h. The application of a granular pesticide that is solid, ground applied pesticide that is not a dust or powder;

i. The application of a pesticide by direct injection into a plant or the ground;

j. The spot application of a pesticide in a manually pressurized or non-pressurized container of thirty-two fluid ounces or less to an area of less than nine square feet; and

k. An emergency application of a pesticide when necessary to protect against an imminent threat to human health, providing that a good faith effort to supply the written notice has been made. Upon making an emergency application, the VP of facilities will be notified in writing with the name of the applicator, certified applicator number of said person, the location of the application, the date of application, product name and EPA registration number, and the reason for the application.

I. Crack and crevice applications where the pesticide delivery system is through the use of a straw designed to apply the pesticide in a narrow band.

m. The application of a non-volatile gel or bait to a concealed area in amounts less than 3 oz.

n. The application of a pesticide from a non-pressurized application device in the form of trunk drench, in which the applicator is present until the pesticide leaches completely into the soil and is immediately covered by soil.