



Integrated Pest Management for K-12 Schools

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Background

Personal history

- Forester for Grand Rapids Public Schools, second largest district in Michigan

Community roots

- Two moms and local environmental council sought new approach
- Pesticide applications in GRPS stopped by 1993

State mandate

- Regulation 637 passed in 1992 amended in 1994
- In 1994, GRPS became first district in Michigan with state-reviewed IPM program

EnviroSafe

- Serving 76 school districts (480 buildings), the largest with 80 buildings and the smallest with one. Our average district has 7 buildings. Our districts range from urban to rural.

The laws and regulations

- Public Act 451, part 83**

 - This is the parent law which all pesticide rules and regulations come from.
 - Last amended in 2008 by Public Act 24
- Regulation 636**

 - This regulation covers the certification requirements for applicators.
 - Passed in 1992
- Regulation 637**

 - This regulation requires integrated pest management and parent notification
 - Passed in 1992, Amended 1994, 2008
- Public Act 24**

 - This act amended 637, changed notification requirements and made rules for daycares.
 - Passed in 2008

Regulation 636

This regulation began the change in how we as school districts used pesticides, who could use them and what was required.

- Certified applicator
- Registered technician
- Ready to use exemption
- Remember this passed in 1992

Certified Applicator - 636

What is this and do you need it? If you need it how do you get it?

- Certification that let's a person apply pesticides in specific areas (categories).
- Categories – an example is 3a and 3b which is turf and ornamental.
- Requires that the core exam be passed and a category specific exam be passed.
- Study material for the exams is obtained through the cooperative extension offices around the state.
- Exams are given throughout the state on a scheduled basis and are administered by the Department of Agriculture.
- The information can be found at the following website:
<https://secure1.state.mi.us/opes/>

Registered Technician - 636

What is this and do you need it? If you need it how do you get it?

- GRPS
- Requires that only the core exam be passed.
- Requires that category specific training be provided.
- Training must be done by a certified trainer and training program approved by the state??????

Ready to Use Exemption – 636

This gets a lot of school districts in trouble, so please understand this one.

- Exempts school district employees from having to be certified or registered if they are using only ready to use products.
- THIS DOES NOT EXEMPT THE DISTRICT FROM PARENT NOTIFICATION, POSTING AND RECORD KEEPING, IPM REQUIREMENTS, ETC.

What is ready to use (rtu) – 636

Ready to use is defined as any pesticide product that is applied from its original container and that does not require mixing or loading prior to application (Act 451 part 83, Pesticide Control).



Examples of rtu confusion

These are real world examples!

- District goes to local grain elevator?
- Applying weed and feed?
- We have our certified person mix it for our staff?
- We just put it in the spreader?
- It was just a can of hornet and wasp spray?
- In all of these districts there was no certification, parent notification, posting, recordkeeping or was there an IPM plan in place.

Regulation 637 - Interior

This regulation requires that the impacts of a pesticide application take into account the affects of the application on human health and safety.

- Before an application can take place a threshold level must be exceeded.
- There must be a site specific IPM plan in place for each building.
- The person doing the application must be IPM trained.
- Liquid or aerosol insecticide applications shall not be made in a room of a school building unless the room will be unoccupied by students or children for not less than 4 hours or longer if product label requires longer reentry.
- Records of the application must be kept for one year for general use products and three years for restricted use products.
- You must also keep a record of all the non-pesticide steps you used to solve or manage a problem.

Regulation 637 – Exterior

- Prior to exterior pesticide applications your staff should consult the Michigan Department of Agriculture Notification Registry to make sure neighboring property owners have not required prior notification.
- No liquid turf or ornamental applications shall take place within 100 feet of an “occupied” classroom building during normal school class hours or when persons are using the treatment area.
- In addition to the door posting that is required, the primary point(s) of entry shall be posted with a lawn marker. There are very specific requirements for this posting please refer to the regulation.
- Please remember that all the other rules, regulations and notification requirements apply to these applications.
- There is not a requirement for integrated pest management for exterior applications. We would however highly recommend that this approach be taken for your exterior applications.

Public Act 451 - Notification

- School districts must annually inform parents that they will receive advance notice of the application of a pesticide, other than a gel or bait formulation. This notice must occur not more than 30 days after the beginning of the school year.
- School districts in this annual notice must specify to parents that the advance notice of pesticide application will be given at least 48 hours before the application and that the notice will be given by two methods. The first method will be the posting of primary entrance doors (which must be defined) and the choice of any of the following: posting in public common area, e-mail, telephone, website or a written notice sent home with child.
- School districts in the annual notice must also inform parents that they have a right to receive advanced notice of a pesticide application by first class mail and how they request a mail notification. The mailed notifications must be postmarked 3 days before the application.
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Public Act 451 - Notification

- Parents must be informed in the annual notice that they have a right to review the program and records. The name, phone number and e-mail of the person in charge of the program.
- If the district wants to use a message system during the summer months parents must be informed how they access the information.
- Primary entrance doors posted and second method of notification 48 hours in advance and parents who requested notification by mail are notified at least 3 days before application. Parents do not need to be notified when school is not in regular session (i.e. summer) if the district has implemented a message notification system.
- The advance notice must contain the following information: a statement that a pesticide is expected to be applied, the target pest (yes, if you have roaches you have to post this on your primary entrances and tell your parents), the location of the application, date of application, name, telephone number and e-mail of contact person, and two phone numbers for pesticide information (national pesticide information center and MDA).

P.A. 451 – Emergency Notification

- Emergency applications are generally recognized as being applications for the control of stinging insects.
- Applications of a pesticide that enter the envelope of a building would be considered interior applications, even if you are standing outside. If these applications were in the aerosol or liquid formulation they would require the occupancy and reentry restrictions listed above be followed, even if they are applied in an emergency.
- If an emergency application is needed then “promptly” after the application the posting and notification requirements listed above must still be followed.

Common problems

When building a strong integrated pest management program, schools generally experience the following challenges:

- Hiring a contractor who is state-licensed and claims to do IPM but does not. These are really “include pesticide monthly” programs.
- Failing to have an IPM and/or pesticide policy within the district.
- Having in-house staff who are not licensed or trained using pesticides.
- Having blanket purchase orders with vendors or local stores that sell pesticides and do not specify who can purchase and use pesticides.
- New building construction that does not take into account pest management (e.g., aquariums, dumpster locations, landscape design)
- Not having a system for scheduled or preventative maintenance or for reporting maintenance concerns as they relate to pests.
- Failing to address notification, termites, bed bugs and head lice in their rfp or contracts.

Good practice

- Hire a contractor who is certified by a third party (e.g., Green Shield Certified).
- If the program is in-house, work to be IPM Star Certified.
- Adopt a policy which states who can purchase and use a pesticide, what pesticides can be used, as well as where, how, and when they can be used.
- Hold staff training on pesticide safety, what to look for regarding pests, and alternative solutions to resolving pests issues.
- Have staff who apply pesticides be certified or licensed.
- Tell vendors and local stores that no district staff are allowed to purchase pesticides without approval from the Operations Department.
- With new construction, have your pest management contractor or licensed in-house staff review plans and do a walk-through.
- Review maintenance from a pest management perspective and use a scheduling system to track repairs.
- Write an rfp or contract that requires contractors to handle parent notifications, includes termites, bed bugs, head lice.

Questions?

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