

**School Integrated Pest Management Plan  
For the  
Palmyra High School**

**For the School Year  
Starting 1 July 2019 and  
Ending 30 June 2020**



Plan prepared by: R. Holt

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**1. General school information:**

**School name:** Palmyra High School

Address: 5<sup>th</sup> & Weart Blvd. City: Palmyra

County: Burlington District: Palmyra Zip Code: 08065

Phone: 856-786-9400

**School IPM Coordinator:** R. Holt

Email: [rholt@palmyra.k12.nj.us](mailto:rholt@palmyra.k12.nj.us) Phone: 856-786-9400 x3181

**2. Integrated Pest Management Statement**

Integrated Pest Management (IPM) on school property is a long-term approach to maintaining healthy landscapes & facilities that minimizes risks to people and the environment. Palmyra High School will use: site assessment, monitoring, and pest prevention in combination with a variety of pest management tactics to keep pests within acceptable limits. Instead of routine chemical applications, cultural, mechanical, physical, and biological controls will be employed with selective use of pesticides when needed. Educational strategies are used to enhance pest prevention, and to build support for the IPM program

**3. School IPM Policy:** Attached in Appendix A

**4. School IPM Plan Goals:**

- a. The roles, responsibilities, and training of all members of the school community regarding IPM at the school are clearly defined.
- b. Pest identification: Initially, define indoor and outdoor pests for the school by historical account and/or by direct monitoring. Establish monitoring types and schedules, and recordkeeping.
- c. Pest prevention and control to maintain a healthy school environment: Outline non-chemical controls that will be routinely practiced at the school. Establish threshold levels for all anticipated pests. Define prescribed use of low impact versus non low impact pesticides for identified pests. Maintain records of all pesticide applications.
- d. Keep the school community informed: Maintain IPM records and make available for public inspection. Issue annual notice of school IPM program status. Establish pre-notification procedures for non low impact pesticide use. Adopt notification procedures for emergency use of non low impact pesticides. Establish posting procedures for indoor and outdoor areas that are treated with non low impact pesticides.
- e. Evaluate and revise the School IPM Plan annually.

**5. School IPM Roles & Responsibilities:** For an IPM program to be successful, members of the school community must be made aware of the school's policies on pest control and their respective roles in the overall pest management plan. The roles, responsibilities, and training for this school regarding pest management are outlined below:

**a. School Administrators:**

1. Adopt and implement a school IPM policy for the school property.
2. Implement IPM procedures to control pests and minimize exposure of children, faculty, and staff to pesticides.

3. Designate a School IPM Coordinator.
4. Report the effectiveness and recommend improvements to the School IPM Plan annually to the school board.
5. Coordinate pre- and post-notification of parents and staff of non low impact pesticide applications according to the school's notification procedure.
6. Obtain and maintain all pesticide application records for a minimum of 3 years; in the case of termiticides, maintain records a minimum of 5 years.
7. Prepare and send out 'Annual School IPM Program Notification Letter to Parents & Staff'. (See Appendix for sample letter to parents & staff).

**b. School IPM Coordinator:**

The School IPM Coordinator is jointly responsible with the school administration for the implementation of this School IPM Plan.

Role: The IPM Coordinator is the individual within the facility who is in charge of pest control activities for the school. This individual has the authority and backing of the school administration. The School IPM Coordinator has the primary responsibility for ensuring the IPM plan is carried out, and is the primary contact for the school community and public. Ultimately, this person is directly responsible for the integration of all IPM activities through the coordination of all parties including custodial, building, food service, outside vendors, Pest Management Professionals, grounds staff, students, parents, staff, and teachers.

Specific duties of a New Jersey School IPM Coordinator:

1. Implement the School IPM Policy and Plan.
2. Maintain information about the IPM Policy and Plan in place at the school.
3. Maintain information about pesticide applications on school property including records obtained from the pesticide applicator, Material Safety Data Sheets (MSDS) when available for pesticides used, and labels for all pesticide products used.
4. Maintain records of any pest monitoring and non-pesticide controls implemented.
5. Provide access to the above information for public review, respond to inquiries and provide information to students, staff, and parents or guardians regarding IPM.
6. Prepare and post signs as required in areas where non-low impact pesticides are to be applied.
7. Provide training in IPM practices to the school community as described in the individual 'Roles, Responsibilities, and Training' sections of the School IPM Plan.
8. Provides a signature on the 'School Integrated Pest Management Act Compliance Certification' Form when requested by pesticide applicators.
9. Ensure that all persons conducting pesticide applications have all NJDEP-required training, certification, and licensing. Also ensure that they follow the School IPM Policy and Plan, as well as all NJDEP School IPM regulations and the precautions of the pesticide label.
10. Obtain training sufficient to implement the Policy and Plan
11. Submit required information to the NJDEP.
12. For contracted services, the school administration will develop bid specifications, contracts, and contract addendums in accordance with the School IPM Policy and Plan.

13. Obtain and maintain all pesticide application records for a minimum of 3 years; in the case of termiticides, maintain records a minimum of 5 years.
14. Prepare and send out 'Annual School IPM Program Notification Letter to Parents & Staff'.
15. Consider all available options including no action with the school's Pest Management Professional prior to determining control(s) to be used.
16. Ensure that Pest Management Professional(s) make accurate entries in the 'Pesticide Application Log' when these pesticides are applied at the school.
17. Serve as the point of contact for contracted pest management services for the school.
18. Evaluate the efficacy of IPM practices on school property on an annual basis at a minimum.
19. Set up and moderates the annual evaluation of the School IPM Plan and revises the School IPM Plan accordingly.

Training:

The School IPM Coordinator will receive NJDEP-approved training that provides an overview of the principles of IPM, legal requirements, and how to implement the IPM Policy and Plan at the school per rules to be adopted by the NJDEP in the fall of 2004.

c. **Pest Management Professional:**

All pesticide applications made on school property must be made by applicators or operators licensed to apply pesticides by the NJDEP PCP per the New Jersey Administrative Code Title 7 Chapter 30; Subchapters 1-12. These 'Pest Management Professionals' may either be staff and /or a contractor as described below.

All **indoor applications** at this school are made by licensed, contracted Pest Management Professional(s). 'The contractor for indoor pest management services at this school is JP Pest Services. Our contact for the company is Jack Piraino, (215) 785-0616. The contractor will meet all specifications as contracted by the School per the attached contract (Appendix B)

All **outdoor applications** at this school are made by licensed contractor: Pest Management Professional(s). 'The contractor for outdoors pest management services at this school South Jersey Turf Consultants: Our contact for the company Chuck Perkins, 856-314-8132. The contractor will meet all specifications as contracted for. If specified in the contract, the contractor will provide horticultural services for landscape and turf management.

Other Specific Duties of Pest Management Professional(s) in the School IPM Program:

- a. Inspect school premises monthly for the presence of pests or signs of pest activity.
- b. Notify the IPM Coordinator when pests or signs of pest activity are found.
- c. Make written recommendations to the School IPM Coordinator for corrective actions to be taken by the school to reduce potential pest populations.
- d. Recommend to School IPM Coordinator appropriate non-chemical procedures to correct pest problems.
- e. When it is determined that a pesticide must be used, select and recommend necessary pesticides. Preference will always be given to low impact pesticides.
- f. When approved by the School IPM Coordinator, follow appropriate least-toxic procedures to correct pest problems. Never apply a non low impact pesticide without

first consulting in advance with the IPM Coordinator to allow them to proceed with all required notification and posting of the area to be treated.

- g. Provide School IPM Coordinator with MSDS (when available) of any pesticide that is applied on school property.
  - h. Provide application information as specified in the 'Non Low Impact Pesticide Application Log' when applying these pesticides at the school. This log is kept at Facility Management Office.
  - i. If a non low impact pesticide is to be used, provide a 'School Integrated Pest Management Act Compliance Certification' Form to the School IPM Coordinator for their signature ensuring all advance notification and posting has been performed as required.
  - j. Participate in the annual evaluation of the School IPM Program and Plan. Provide comments regarding any necessary modifications to the School IPM Plan.
  - k. Contractor must hold a valid Pesticide Applicator Certification in the state of New Jersey
- d. **Kitchen Staff:**  
Food handling and preparation areas are among the most critical areas for pest management. Kitchen staff must keep all food areas free of crumbs and food residue after use.

Other Duties of Kitchen Staff in the School IPM Program:

- a. Practice good sanitation of all kitchen and food service areas.

Training:

The Food Service Manager, will be responsible for training the kitchen staff in proper sanitation procedures when hired and annually thereafter

**Maintenance Staff:**

Maintenance staff maintains the cleanliness and take care of the school building and grounds. These staff members may be assigned to indoor and/or outdoor maintenance. School maintenance staff may make applications of pesticides that are "over-the-counter" disinfectants and antimicrobials such as Lysol® and toilet-bowl cleaner, and use "minimum risk" pesticides published by the federal EPA. If the use of other pesticide is necessary, only a licensed Pest Management Professional may make the application.

Other Duties of Maintenance Staff in the School IPM Program:

- a. Practice all sanitation and maintenance techniques.
- b. Provide a 'Pest Problem Report' to School IPM Coordinator whenever pests or signs of pest activity are discovered in the school building, or are a problem on school grounds.
- c. Recognize and correct conditions that may lead to pest problems such as water leaks, potential pest entryways, and poor sanitation practices.
- d. Manage specific pest issue(s) as directed by the IPM Coordinator, or other.

Training:

- a. The IPM Coordinator will be responsible for training the indoor/outdoor Maintenance Staff in proper sanitation procedures and schedules when hired and annually thereafter.

- b. The School IPM Coordinator must train the indoor Maintenance Staff in the pest detection and monitoring program and devices in place throughout the school when hired and annually thereafter.

e. **Staff, Teachers, and Students:**

Duties of Staff, Teachers, & Students in the School IPM Program:

- a. The most important responsibility of the students and staff is sanitation. Much of the prevention and reduction of pest infestation at the school site depends on whether or not students and staff clean up food leftovers, food in lockers, gum under desks, paper clutter, etc., or perform proper maintenance.
- b. Leave pest control and pest management to trained professionals.
- c. Will not move sticky traps or other pest monitoring devices.
- d. Report any evidence of pest activity to the School IPM Coordinator using the 'Pest Sighting Log.'

Training:

School staff, teachers, and students will be familiarized with their roles in the school's pest management system by the School Principal.

## **6. Pest Identification: Preliminary Site Assessment and Ongoing Monitoring**

One of the key principles of School IPM is site assessment to precisely define the presence of pests and the site conditions that contribute to their presence. Indoor and outdoor pests will be defined for the school by historical account, interviews, and by direct monitoring.

When the IPM program is implemented at the School, the Pest Management Professional(s) and/or School IPM Coordinator] will perform a thorough inspection of all school buildings and grounds to identify pest activity and conditions that are contributing to any pest problems.

**Indoor site assessment:** Pest Management Professional and School IPM Coordinator will compile reports regarding:

- Areas that currently have pests or show signs of pest activity.
- Areas that historically have had pests as well as identifying when this occurs during the school year.
- Conditions or behaviors contributing to pest problems that can be corrected.
- If already in use, location of detection and monitoring devices and bait stations.
- Recommendations for sanitation, structural repairs, and habitat modification.

### **Ongoing Monitoring**

Once a pest is correctly identified, monitoring methods and schedules, as well as controls will be determined based on its life cycle, food sources, habitat preferences, and natural enemies.

**Indoor** pests will be monitored via direct inspection, sticky traps, pheromone baits, tracking powder, mechanical traps, and glueboards as necessary

**Monitoring Records:** The School IPM Coordinator and Pest Management Professional will maintain and keep records of any pest monitoring, including traps.

## 7. Pest Prevention and Control

Wherever possible, the School will take a preventive approach by identifying and removing, to the degree feasible, the basic causes of the problem rather than merely attacking the symptoms (the pests). This prevention-oriented approach is also best achieved by integrating a number of strategies. It is easier to spot a potential problem when the interior and exterior of the school is clean and uncluttered.

IPM employs a multi-tactic approach, integrating several strategies to combat a particular pest. Control strategies that remove a pest's food, water, and shelter (harborage), and limit its access into and throughout buildings and on school grounds will be employed as follows:

- Cultural control: for example, improve sanitation; reducing clutter; people change habits like leaving food in the classroom; maintain plant health by taking care of the habits and conditions; fertilization, plant selection (right plant/right place), and sanitation to exclude problematic pests and weeds.
- Physical control: for example, pest exclusion; removing pest access to the school building by sealing openings with caulk and copper mesh; repairing leaks and screens; removing pests by hand.
- Mechanical control: for example, insect monitors, light traps, rodent traps; till soil prior to planting to disrupt pest life cycles.
- Biological control: use of pest's natural enemies. For example, introduce beneficial insects or bacteria to the environment or, if they already exist, provide them with the necessary food and shelter; and avoid using broad-spectrum chemicals that will inadvertently kill beneficials.
- Least hazardous chemical controls with preference given to School IPM Act-defined 'low impact pesticides'.

Pesticides will be selected when other control methods are not effective or practical in resolving a pest problem. Pesticides will not be used on School property unless both the pest has been identified and its presence verified. It is neither possible, nor desirable to completely exterminate every pest and potential pest from every population on school property.

The IPM Coordinator will establish injury pest threshold levels and action thresholds for each individual pest species before making any chemical treatment. Action Thresholds for pesticide treatment are triggered if all other IPM tactics have not been able to control pest populations to an acceptable level. Appropriate threshold levels will be set, and may take into consideration economic losses (for example, amount of foodstuffs contaminated by pantry pests); health risks (for example, occurrence of disease-bearing pests); aesthetic evaluations (for example, temporary presence of ants); nuisance problems (for example, stinging insects); and pest visibility. (Pest Tolerance Thresholds Appendix D)

The New Jersey School IPM law defines 'low impact pesticides' and necessarily creates the distinction 'non low impact pesticides' for other pesticides not meeting their definition. The law and resulting model policy published by DEP make it clear that when pesticide use is needed, preference should be given to choosing a 'low impact pesticide', if possible. The School will give preference to choosing a 'low impact pesticide', as described below.



A low impact pesticide is a pesticide that is considered to have relatively minimal risk as compared to pesticides in general. The New Jersey School IPM law specifically defines what a low impact pesticide is in two parts. The first part consists of a federal EPA list of pesticides that it considers to be minimal risk and thus do not require formal registration. These pesticides are listed in the federal code at 40 CFR § 152.25. (See <http://www.pestmanagement.rutgers.edu/IPM/SchoolIPM/NJAct/40cfr15225.pdf>). The second part consists of a list of pesticide ingredients (such as boric acid or diatomaceous earth) and formulation types (such as gels or pastes) that are considered low impact. It is important to note that a substance considered "low impact" does not necessarily mean zero risk. All pesticides must be used properly to reduce potential risk from their use.

When it is determined that a non low impact pesticide must be applied to adequately control pests within established thresholds, application guidelines will be followed. Specifically, non low impact pesticides will be applied in a school building only when students are in another area of the building AND only if the area being treated with the pesticide is served by a different air handling system and is separated from the students by smoke or fire doors. Further, applications of non low impact pesticides on school property will be made in advance of when students will be present for instruction or extra-curricular activities, allowing for any label-prescribed entry restrictions; if there is no re-entry interval listed on the label, a minimum of 7 hours will be allowed prior to student re-entry on school property.

Emergency application of a non-low impact pesticide will only be made when the health or safety of a student or staff member is threatened. A "school pest emergency" is defined as "an urgent need to mitigate or eliminate a pest that threatens the health or safety of a student or staff member." One example would be the presence of stinging insects such as ground hornets in an athletic field where events are scheduled. If a pest emergency exists, the school may use pesticides without the normal 72-hour pre-notification to parents and staff, and the advance posting of signs. Rather, the posting must be done at the time of the application, and the notice to parents and staff must be done within 24 hours after the emergency application. The notice that goes to parents and staff must explain what the reason for the emergency was, and if possible, what could be done to prevent such an emergency use next time.

Treatments, whether pesticides or low impact pesticide materials, will only be applied on school property when and where needed. It is rarely necessary to treat an entire building or landscape area to solve a pest problem. Monitoring will be used to pinpoint where pest numbers are beginning to reach the action level and 'spot' treatments' will be confined to those areas.

The School IPM Coordinator and Pest Management Professional(s) will meet as required to cover monitoring reports and determine corrective action. The Pest Management Professional should make recommendations for corrective actions to the School IPM Coordinator. They will consider all options, including no control, and look at pest activity levels versus thresholds.

They will consider EPA-defined criteria for selecting a treatment strategy:

1. Least hazardous to human health
2. Least disruptive of natural controls
3. Least toxic to non-target organisms
4. Most likely to be permanent
5. Easiest to carry out safely and effectively
6. Most cost-effective

## 7. Most site-appropriate

They will generate a pest management priority list to optimize a plan of corrective actions.

All controls that are actually implemented will be documented in the log by the Palmyra High School IPM Coordinator and Pest Management Professional.

## 8. **Notification, Posting, and Re-Entry**

It is important to keep the school community informed of the school's implementation of the School IPM Plan. Accordingly, this section outlines the:

- Annual notification of School IPM program status.
- Pre-notification of planned use and notification of emergency use of non low impact pesticides.
- Posting requirements for areas inside and out that are treated with pesticides.
- Re-entry requirements for areas inside and out that are treated with pesticides.

### **Annual Notification**

The School IPM Coordinator will prepare and post on the district web site an annual notice of school IPM program status to staff, parents, and guardians of each student enrolled at the school, at the beginning of each school year.

### **Notification and Posting of Non Low Impact Pesticide Use**

There are two situations when non low impact pesticides may be used on school property; when it is pre-planned and when it is an emergency.

1. Pre-Notification and Posting of Planned Non Low Impact Pesticide Use:  
At any time of the year when children may be present, the school will issue prior notification of all non-low impact pesticides to be used. Specifically, the building principal will issue notice to all staff, and parents/guardians of each student enrolled at the school. The area where the pesticide will be applied will be posted at least 72 hours prior and 72 hours following the application.
2. Emergency Use Notification and Posting for Non low Impact Pesticide Use:  
When an emergency application of pesticides is required, the building principal will issue notice of emergency use of non low impact pesticides used to all staff, and parents or guardians of each student enrolled at the school within 24 hours after the application or on the morning of the next school day, whichever is earlier. The reason for the emergency and any measures that will be taken so that emergency pesticide use may be avoided in the future may be included. The area where the pesticide is applied will be posted at the time of application, and will remain posted for 72 hours following the application.
3. In either planned or emergency applications of non low impact pesticides the notice shall contain:
  - common name of pesticide,
  - EPA registration number,
  - EPA statement on sensitive persons: "*Where possible, persons who potentially are sensitive, such as pregnant women, infants, and children, should avoid any unnecessary pesticide exposure*"
  - location description, date, and time of application (one date for indoor application; three dates for outdoor applications in case of cancellation),

- potential adverse effects of product,
- reasons for the application,
- contact information for the IPM Coordinator of the school or school district, and
- further label information or precautions for public safety.

In either planned or emergency applications of non low impact pesticides, the building principal will advise the parents and guardians and staff of the school of pesticide applications by the US Mail and email

In either planned or emergency applications of non low impact pesticides, the Contractor/IPM Coordinator will post signs:

- prominently in or adjacent to the area where the pesticide is to be applied.
- at each entrance to the building or school ground where the pesticide is to be applied.
- that are at least 8.5" by 11".

### **Re-Entry**

If there is application of a low impact pesticide on school property, it will be made so that adequate settling or drying occurs in advance of when students will be present for instruction or extra-curricular activities.

Students cannot enter a pesticide treated area for at least seven hours after the application of a non low impact pesticide, unless the pesticide label states a specific numerical re-entry time that is different than this. The use of low impact pesticides does not require an automatic seven-hour wait; students can re-enter after the pesticide application has dried or settled, or longer if the pesticide label specifies.

## **9. Record Keeping and Evaluation**

### **Record Keeping**

The School IPM Coordinator/contractor will maintain records as listed in their outlined role and responsibility for school IPM. An initial meeting will be held between the School IPM Coordinator and Pest Management Professional(s) at the beginning of the contract period to establish an IPM Log binder for these records.

The following records will be maintained in the IPM Log binder kept in the Palmyra High School Main Office:

- Pest Sighting Log
- Indoor Pest Thresholds
- Pesticide Application Log – if and when pesticides are used
- Annual School IPM Program Notification Letters to Parents & Staff
- When issued - Pre-Notification of the Use of Pesticides (72 hour pre-notification)
- When issued - Emergency Pesticide Use Notifications
- When posted - 'Notice of Pesticide Application' sign
- Specific contractor service reports

## **Evaluation**

At least annually, the School IPM Plan and School IPM Program of the Palmyra High School will be evaluated. This necessarily includes review of all records in the IPM log binder. Program evaluation involves reviewing monitoring data, actions taken, treatment impacts and effectiveness, and any other relevant observations. These records will provide information on previous and current pest populations and which strategies were applied. Comparing data will clearly indicate which pest management strategies were most effective for the amount of time and money spent. IPM practices and procedures will be modified, if necessary, based on past experience, results, and gained knowledge.

This evaluation will be coordinated by R. Holt, IPM Coordinator. The participants in the evaluation will be the building principal and building head custodian. The School IPM Coordinator will meet with the pest control contractor to evaluate the success or failure of this IPM Plan.

The following issues will be addressed during the evaluation of the School IPM Plan and Program:

- adequacy of pest control indoors
- areas of concern
- sanitation issues
- building maintenance issues
- adequacy of thresholds
- integrated pest management priorities

Following the evaluation, the School IPM Plan will be revised by R. Holt, IPM Coordinator, accordingly.

## APPENDIX A

### District Policy

#### **7422- SCHOOL INTEGRATED PEST MANAGEMENT PLAN (M)**

Section: Property  
Date Created: August, 2008  
Date Edited: July 2016

#### **M**

The New Jersey School Integrated Pest Management Act of 2002 requires school districts to implement a school integrated pest management policy that includes an Integrated Pest Management Plan. In accordance with the requirements of the Act, the Board shall ensure implementation of Integrated Pest Management (IPM) procedures to control pests and minimize exposure of children, faculty, and staff to pesticides. These procedures shall be applicable to all school property in the Palmyra School District.

#### IPM Coordinator (IPMC)

The Director of Buildings and Grounds shall be designated as the district's Integrated Pest Management Coordinator (IPMC) and is responsible for the implementation of the school integrated pest management policy.

#### Integrated Pest Management Procedures in Schools

Implementation of Integrated Pest Management (IPM) procedures will determine when to control pests and whether to use mechanical, physical, cultural, biological, or chemical methods. Applying IPM principles prevents unacceptable levels of pest damage by the most economical means and with the least possible hazard to people, property, and the environment.

The Integrated Pest Management Coordinator (IPMC) shall consider the full range of management options, including no action at all. Non-pesticide pest management methods are to be used whenever possible. The choice of using a pesticide shall be based on a review of all other available options and a determination that these options are not effective or not reasonable. When it is determined that a pesticide must be used, low impact pesticides and methods are preferred and shall be considered for use first.

#### Development of IPM plans

The Superintendent, in collaboration with the school Building Principal(s) and the IPMC, shall be responsible for the development of the IPM Plan for the school district. The school district's Integrated Pest Management (IPM) Plan is a blueprint of how the school district will manage pests through IPM methods. The school district's IPM Plan will state the school district's goals regarding the management of pests and the use of pesticides for all school district property. The Plan will reflect the school district's site-specific needs and a description of how each component of the school district's Integrated Pest Management Policy and Regulation will be implemented for all school property.

#### Education/Training

The school community will be educated about potential pest problems and IPM methods used to achieve the pest management objectives.

The IPMC, other school staff, and pesticide applicators involved with implementation of the district's IPM policy will be trained in appropriate components of IPM as it pertains to the school environment.

Students and parents/legal guardians will be provided information on this policy and instructed on how they can contribute to the success of the IPM program.

#### Recordkeeping

Records of pesticide use shall be maintained on site to meet the requirements of the State regulatory agency and the Board.

Records shall also include, but are not limited to, pest surveillance data sheets and other non-pesticide pest management methods and practices utilized.

#### Notification/Posting

The Building Principal of each school, working with the IPMC, is responsible for timely notification to students, parents or legal guardians and the school staff of pesticide treatments pursuant to the School Integrated Pest Management Act.

#### Re-entry

Re-entry to a pesticide treated area shall conform to the requirements of the School Integrated Pest Management Act.

#### Pesticide Applicators

The IPMC shall ensure that applicators follow State regulations, including licensing requirements and label precautions, and must comply with all components of the School Integrated Pest Management Policy.

#### Evaluation

The Superintendent will report annually to the Board on the effectiveness of the IPM Plan and make recommendations for improvement as needed.

The school district's Integrated Pest Management Plan, Policy and Regulation shall be implemented not later than June 12, 2004. The Board directs the Superintendent to develop Regulations/Procedures for the implementation of School Integrated Pest Management Plan.

N.J.S.A. 13:1F-19 through 13:1F-33

Adopted: 12 August 2008

The School Integrated pest Management Act of 2002

N.J.A.C. Title 7 Chapter 30 Subchapters 1 – 12

Pesticide Control Act of 1971



# Indoor Pest Thresholds

Pest	Classrooms/ Public Areas	Storage/ Maintenance Areas	Infirmary	Kitchen/ Cafeteria	Grounds
Ants (common house)	100/room	25/100 ft <sup>2</sup> in 2 successive periods	25/room	10/room	No threshold
Ants (carpenter)	10/room	10/room	10/room	10/room	1 nest within 25 ft.
Bees (honey)	5/room	5/room	1/room	1/room	If children threatened
Bees (bumble)	5/room	5/room	1/room	1/room	If children threatened
Bees (carpenter)	5/room	5/room	1/room	1/room	If children threatened; 1 carpenter bee/5 linear feet
Cockroaches	5/room	5/room	2/room	2/room	If noticeable or invading
Crickets	No threshold	No threshold	No threshold	No threshold	No threshold
House Flies	No threshold	No threshold	10/room	10/room	15/trash can; 200/dumpster
Lice (head or body)	<i>Take no action, refer to nurse</i>				
Mice	1/room	1/room	1/room	1/room	Burrows or activity in any student area
Rats	1/room	1/room	1/room	1/room	Any burrows/activity
Silverfish	3/room	5/room	1/room	2/room	N/A
Centipede	1/room	2/room	1/room	2/room	N/A
Spiders (poisonous)	1/room	1/room	1/room	1/room	1/activity area
Spiders (others)	5/room	5/room	5/room	5/room	Only if nuisance
Wasps, Hornets, Yellowjackets	3/room	5/room	1/room	1/room	10/10 minutes at trash; 1 if threatening children

## APPENDIX C

# Annual Integrated Pest Management Notice

For School Year 2018 - 2019

Dear Parent, Guardian, or Staff Member:

This notice is being distributed to comply with the New Jersey School Integrated Pest Management Act. Palmyra School District has adopted an Integrated Pest Management (IPM) Policy and has implemented an IPM Plan to comply with this law. IPM is a holistic, preventive approach to managing pests that is explained further in the schools IPM Policy included with this notice.

All schools in New Jersey are required to have an Integrated Pest Management Coordinator (IPM Coordinator) to oversee all activities related to IPM and pesticide use at the school.

The IPM Coordinator for the school district is:

Ron Holt  
Palmyra High School  
5<sup>th</sup> & Weart Blvd  
Palmyra, NJ 08065  
856-786-9400 x 3181

The IPM Coordinator maintains the pesticide product label, and the Material Safety Data Sheet (MSDS) (when one is available), of each pesticide product that may be used on school property. The label and the MSDS are available for review by a parent, guardian, staff member, or student attending the school. Also, the IPM Coordinator is available to parents, guardians, and staff members for information and to discuss comments about IPM activities and pesticide use at the school.

As part of a school pest management plan the Palmyra School District may use pesticides to control pests. The United States Environmental Protection Agency (EPA) and the New Jersey Department of Environmental Protection (DEP) register pesticides to determine that the use of a pesticide in accordance with instructions printed on the label does not pose an unreasonable risk to human health and the environment. Nevertheless, the EPA and the DEP cannot guarantee that registered pesticides do not pose any risk to human health, thus unnecessary exposure to pesticides should be avoided. The EPA has issued the statement that where possible, persons who are potentially sensitive, such as pregnant women, infants and children, should avoid unnecessary pesticide exposure.

During the 12 months proceeding this notice the following chemical treatments were used on the Palmyra School District athletic fields and grounds:

Allectus Turf Insectide – MSDS# 6248-A  
Allectus Fertilizer MSDS# 4321427-06-LPI  
NOW Selective vegetation control – MSDS# 4007



## APPENDIX D

### School IPM ACT

#### CHAPTER 117

**AN ACT** concerning the implementation of integrated pest management policies in public and private schools, and supplementing Title 13 of the Revised Statutes.

**BE IT ENACTED** by the Senate and General Assembly of the State of New Jersey:

#### **C.13:1F-19 Short title.**

1. This act shall be known and may be cited as the "School Integrated Pest Management Act."

#### **C.13:1F-20 Findings, declarations relative to the "School the Integrated Pest Management Act."**

2. The Legislature finds and declares that in 1992, the National Parent Teacher Association passed a resolution calling for the reduced use of pesticides in schools and calling on policy makers to consider all possible alternatives before using any pesticides; that the National Education Association and many national public interest organizations have announced support for reducing or eliminating pesticide use in schools; that the State, as well as 87 local government entities throughout the State, have adopted integrated pest management policies for their buildings and grounds; that childhood cancer is continuing to increase at the alarming rate of one percent per year; that the overall incidence of childhood cancer increased 10 percent between 1974 and 1991, making cancer the leading cause of childhood death from disease; and that approximately 4,800,000 children in the United States under the age of 18 have asthma, the most common chronic illness in children, and the incidence of asthma is on the rise.

The Legislature further finds and declares that children are more susceptible to hazardous impacts from pesticides than are adults; that numerous scientific studies have linked both cancer and asthma to pesticide exposure; that the United States Environmental Protection Agency has recommended the use of an integrated pest management system by local educational agencies, which emphasizes nonchemical ways of reducing pests, such as sanitation and maintenance; that integrated pest management is an effective and environmentally sensitive approach to pest management that relies on common sense practices; that integrated pest management programs use current, comprehensive information on the life cycles of pests and their interaction with the environment, and that this information, in combination with available pest control methods is used to manage pest damage with the least hazard to people, property and the environment and by economical means; and that integrated pest management programs take advantage of all pest management options possibly including, but not limited to, the judicious use of pesticides; that a notification process should be established for schools under which each student, parent, guardian, staff member, and teacher shall be notified of a pesticide application; that parents and guardians have a right to know that there is an integrated pest management system in their children's schools; that an integrated pest management system provides long-term health and economic benefits; and that parents and guardians should have a right to be notified in advance of any use of a pesticide in their children's schools.

The Legislature therefore determines that it is in the public interest of all of the people of New Jersey that the schools in this State establish an integrated pest management policy.

#### **C.13:1F-21 Definitions relative to the "School Integrated Pest Management Act."**

3. As used in this act:

**"Charter school"** means a school established pursuant to P.L.1995, c.426 (C.18A:36A-1 et seq.).

**"Commissioner"** means the Commissioner of Environmental Protection.

**"Department"** means the Department of Environmental Protection.

**"Integrated pest management coordinator"** or **"coordinator"** means an individual who is knowledgeable about integrated pest management systems and has been designated by a local school board, the board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, as the integrated pest management coordinator pursuant to section 5 of this act.

**"Low Impact Pesticide"** means any pesticide or pesticidal active ingredient alone, or in combination with inert ingredients, that the United States Environmental Protection Agency has determined is not of a character necessary to be regulated pursuant to the "Federal Insecticide, Fungicide, and Rodenticide Act," 7 U.S.C. s.136 et seq. and that has been exempted from the registration and reporting requirements adopted pursuant to that act; any gel; paste; bait; antimicrobial agent such as a disinfectant used as a cleaning product; boric acid; disodium octoborate tetrahydrate; silica gels; diatomaceous earth; microbe-based insecticides such as bacillus thuringiensis; botanical insecticides, not including synthetic pyrethroids, without toxic synergists; and biological, living control agents.

**"Pesticide"** means any substance or mixture of substances labeled, designed, intended for or capable of use in preventing, destroying, repelling, sterilizing or mitigating any insects, rodents, nematodes, predatory animals, fungi, weeds and other forms of plant or animal life or viruses, except viruses on or in living man or other animals. "Pesticide" shall also include any substance or mixture of substances labeled, designed or intended for use as a defoliant, desiccant or plant regulator.

**"School"** means any public or private school as defined in N.J.S.18A:1-1.

**"School integrated pest management policy"** means a managed pest control policy that eliminates or mitigates economic, health, and aesthetic damage caused by pests in schools; that delivers effective pest management, reduces the volume of pesticides used to minimize the potential hazards posed by pesticides to human health and the environment in schools; that uses integrated methods, site or pest inspections, pest population monitoring, an evaluation of the need for pest control, and one or more pest control methods, including sanitation, structural repair, mechanical and biological controls, other nonchemical methods, and when nonchemical options are ineffective or unreasonable, allows the use of a pesticide, with a preference toward first considering the use of a low impact pesticide for schools.

**"School pest emergency"** means an urgent need to mitigate or eliminate a pest that threatens the health or safety of a student or staff member.

**"School property"** means any area inside and outside of the school buildings controlled, managed, or owned by the school or school district.

**"Staff member"** means an employee of a school or school district, including administrators, teachers, and other persons regularly employed by a school or school district, but shall not include an employee hired by a school, school district or the State to apply a pesticide or a person assisting in the application of a pesticide.

**"Universal notification"** means notice provided by a local school board, a board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, to all parents or guardians of children attending a school, and staff members of a school or school district.

#### **C.13:1F-22 Development of model school integrated pest management policy.**

4. a. No later than 12 months after the effective date of this act, the commissioner, in consultation with the Commissioner of Education, the New Jersey School Boards Association, and the New Jersey Cooperative Extension of Rutgers, The State University shall develop a model school integrated pest management policy that is based upon recommended integrated pest management plans for schools disseminated by the United States Environmental Protection Agency and that conforms to the rules adopted by the department pursuant to the "Pesticide Control Act of 1971," P.L.1971, c.176 (C.13:1F-1 et seq.).
- b. No later than 18 months after the effective date of this act, the superintendent of the school district, for each school in the district, the board of trustees of a charter school, and the principal or chief administrator of a private school, shall adopt and implement a school integrated pest management policy for the school property consistent with the model policy developed pursuant to subsection a. of this section and that complies with the provisions of this act.

#### **C.13:1F-23 Designation of integrated pest management coordinator.**

5. a. Each local school board of a school district, each board of trustees of a charter school, and each principal or chief administrator of a private school, as appropriate, shall designate an integrated pest management coordinator to carry out the school integrated pest management policy required pursuant to section 4 of this act.

- b. The integrated pest management coordinator for a school or school district shall:
- (1) maintain information about the school or school district's school integrated pest management policy and about pesticide applications on the school property of the school or the schools within the school district;
  - (2) act as a contact for inquiries about the school integrated pest management policy; and
  - (3) maintain material safety data sheets, when available, and labels for all pesticides that are used on the school property of the school or of the schools in the school district.

**C.13:1F-24 Maintenance of records of pesticide application; notices of policy.**

6. a. The local school board of a school district, the board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, shall request from the pesticide applicator and shall maintain records of pesticide applications used on school property at each school or for each school in the school district for three years after the application, and for five years after the application of a pesticide designed to control termites, and on request, shall make the data available to the public for review.
- b. Annually, each local school board, each board of trustees of a charter school, or each principal or chief administrator of a private school, as appropriate, shall include a notice of the school integrated pest management policy of the school or school district in school calendars or other forms of universal notification.
- c. The notice shall include:
- (1) the school integrated pest management policy of the school or school district;
  - (2) a list of any pesticide that is in use or that has been used in the last 12 months on school property;
  - (3) the name, address, and telephone number of the integrated pest management coordinator of the school or school district;
  - (4) a statement that: (a) the integrated pest management coordinator maintains the product label and material safety data sheet, when available, of each pesticide that may be used on school property; (b) the label and data sheet is available for review by a parent, guardian, staff member, or student attending the school; and (c) the integrated pest management coordinator is available to parents, guardians, and staff members for information and comment;
  - (5) the time and place of any meetings that will be held to adopt the school integrated pest management policy; and
  - (6) the following statement:  
*"As part of a school pest management plan, (insert school name) may use pesticides to control pests. The United States Environmental Protection Agency (EPA) and the New Jersey Department of Environmental Protection (DEP) register pesticides to determine that the use of a pesticide in accordance with instructions printed on the label does not pose an unreasonable risk to human health and the environment. Nevertheless, the EPA and DEP cannot guarantee that registered pesticides do not pose any risk to human health, thus unnecessary exposure to pesticides should be avoided. The EPA has issued the statement that where possible, persons who are potentially sensitive, such as pregnant women, infants and children, should avoid unnecessary pesticide exposure."*
- d. After the beginning of each school year, each local school board, each board of trustees of a charter school, or each principal or chief administrator of a private school, as appropriate, shall provide the notice required pursuant to subsection b. of this section to: (1) each new staff member who is employed during the school year; and (2) the parent or guardian of each new student enrolled during the school year.

**C.13:1F-25 Permitted use of certain pesticides; notice.**

7. a. If a local school board, board of trustees of a charter school or principal or chief administrator of a private school, as appropriate, determines that a pesticide, other than a low impact pesticide, must be used on school property, a pesticide may be used only in accordance with this section.
- b. At least 72 hours before a pesticide, other than a low impact pesticide, is used on school property, the local school board, the board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, shall provide to a parent or guardian of each student enrolled at the school and each staff member of the school, notice that includes:
- (1) the common name, trade name, and federal Environmental Protection Agency registration number of the pesticide;
  - (2) a description of the location of the application of the pesticide;
  - (3) a description of the date and time of application, except that, in the case of outdoor pesticide applications, one notice shall include three dates, in chronological order, on which the outdoor pesticide applications may take place if the preceding date is canceled;
  - (4) a statement that The Office of Pesticide Programs of the United States Environmental Protection Agency has stated: *"Where possible, persons who potentially are sensitive, such as pregnant women, infants, and children, should avoid any unnecessary pesticide exposure";*

- (5) a description of potential adverse effects of the pesticide based on the material safety data sheet, if available, for the pesticide;
  - (6) a description of the reasons for the application of the pesticide;
  - (7) the name and telephone number of the integrated pest management coordinator for the school or the school district; and
  - (8) any additional label instruction and precautions related to public safety.
- c. The local school board of a school district, the board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, may provide the notice required by subsection b. of this section by:
- (1) written notice sent home with the student and provided to each staff member;
  - (2) a telephone call;
  - (3) direct contact;
  - (4) written notice mailed at least one week before the application; or
  - (5) electronic mail.
- d. If the date of the application of the pesticide must be extended beyond the period required for notice under this section, the local school board, the board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, shall reissue the notice required under this section for the new date of application.

**C.13:1F-26 Posting of sign prior to use of certain pesticides.**

8. a. At least 72 hours before a pesticide, other than a low impact pesticide, is used on school property, the local school board, the board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, shall post a sign that provides notice of the application of the pesticide (1) in a prominent place that is in or adjacent to the location to be treated; and (2) at each entrance to the building or school ground to be treated.
- b. A sign required pursuant to subsection a. of this section for the application of a pesticide shall
- (1) remain posted for at least 72 hours after the end of the treatment;
  - (2) be at least 8 ½ inches by 11 inches; and
  - (3) state the same information as that required for prior notification of the pesticide application pursuant to section 7 of this act.
- c. In the case of outdoor pesticide applications, each sign shall include three dates, in chronological order, on which the outdoor pesticide application may take place if the preceding date is canceled due to weather. A sign shall be posted after an outdoor pesticide application in accordance with subsection b. of this section.
- d. The requirement imposed pursuant to this section shall be in addition to any requirements imposed pursuant to the "Pesticide Control Act of 1971," P.L.1971, c.176 (C.13:1F-1 et seq.), and any rules or regulations adopted pursuant thereto.

**C.13:1F-27 Applicability of notice and posting requirements.**

9. The provisions of sections 7 and 8 of this act shall apply if any person applies a pesticide, other than a low impact pesticide, on school property, including a custodian, staff member, or commercial applicator. These provisions shall apply to a school during the school year, and during holidays and the summer months, only if the school is in use by children during those periods. During those periods, notices shall be provided to all staff members and the parents or guardians of the students that are using the school in an authorized manner.

**C.13:1F-28 Emergency use of certain pesticides; notice requirements**

10. a. A pesticide, other than a low impact pesticide, may be applied on school property in response to an emergency, without complying with the provisions of sections 7 and 8 of this act, provided the requirements of subsection b. of this section are met.
- b. Within 24 hours after the application of a pesticide pursuant to this section, or on the morning of the next school day, whichever is earlier, the local school board, the board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, shall provide to each parent or guardian of a student enrolled at the school, and staff member of the school, notice of the application of the pesticide for emergency pest control that includes: (1) the information required for a notice under section 7 of this act; (2) a description of the problem and the factors that qualified the problem as an emergency that threatened the health or safety of a student or staff member; and (3) if necessary, a description of the steps that will be taken in the future to avoid emergency application of a pesticide pursuant to this section.

- c. The local school board, the board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, may provide the notice required by subsection b. of this section by: (1) written notice sent home with the student and provided to the staff member; (2) a telephone call; (3) direct contact; or (4) electronic mail.
- d. When a pesticide is applied pursuant to this section, the local school board, the board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, shall post a sign warning of the pesticide application at the time of the application of the pesticide, in accordance with the provisions of section 8 of this act.
- e. If there is an application of a pesticide pursuant to this section, the local school board, the board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, shall modify the school integrated pest management policy of the school or school district if necessary, to minimize the future emergency applications of pesticides under this section.

**C.13:1F-29 Application of pesticides; re-entry period requirements**

- 11. a. A pesticide, other than a low impact pesticide, shall not be applied on school property where students are expected to be present for academic instruction or for organized extra-curricular activities prior to the time prescribed for re-entry to the application site by the United State Environmental Protection Agency on the pesticide label, except that if no specific numerical re-entry time is prescribed on a pesticide label, such a pesticide, other than a low impact pesticide, shall not be applied on school property where students are expected to be present for academic instruction or for organized extra-curricular activities within seven hours of the application.
- b. A pesticide, other than a low impact pesticide, shall not be applied in a school building when students are present. Students may not be present in an untreated portion of a school building unless the area being treated with a pesticide, other than a low impact pesticide, is served by a separate ventilation system and is separated from the untreated area by smoke or fire doors.
- c. A low impact pesticide may be applied in areas of a school building where students will not contact treated areas until sufficient time is allowed for the substance to dry or settle, or after the period of time prescribed for re-entry or for ventilation requirements on the pesticide label has elapsed.
- d. This section shall not apply when pesticides are applied on school property for student instructional purposes or by public health officials during the normal course of their duties.

**C.13:1F-30 Immunity from liability of commercial pesticide applicator.**

- 12. A commercial pesticide applicator shall not be liable to any person for damages resulting from the application of a pesticide at a school if the damages are solely due to the failure of the local school board, the board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, to provide the notice required prior to the application of a pesticide pursuant to the provisions of section 7, 8, 9, or 10 of P.L.2002, c.117 (C.13:1F-25, C.13:1F-26, C.13:1F-27 or C.13:1F-28).

**C.13:1F-31 Development, availability of form for certifying compliance.**

- 13. The department shall develop and make available to commercial pesticide applicators a form which a commercial pesticide applicator may request an integrated pest management coordinator to sign prior to the application of a pesticide, other than a low impact pesticide, on school property. The form developed pursuant to this section shall set forth a certification by the integrated pest management coordinator that the notice and posting requirements for the application of a pesticide established pursuant to section 7 and section 8 of this act, or the posting requirement established pursuant to section 10 of this act, as appropriate, have been complied with. Upon being presented by a commercial pesticide applicator with a form pursuant to this section, the signature of the integrated pest management coordinator shall be required as a condition for the application of the pesticide.

**C.13:1F-32 Issuance of administrative order; notice of violation.**

14. a. The Department of Environmental Protection may issue an administrative order against a local school board, the board of trustees of a charter school, or a principal or chief administrator of a private school that fails to adopt and implement a pesticide use and school integrated pest management policy in compliance with the provisions of this act. Upon identification of a violation of this act, the department shall issue a notice of violation by certified mail or personal service to the person responsible for the violation that identifies the violation and states that an administrative order may be issued requiring compliance with the act. Any notice of violation or administrative order shall (1) specify the provision or provisions of this act, or the rule or regulation adopted pursuant thereto, of which the person is in violation; (2) cite the action that caused the violation; and (3) require compliance with the provision of this act or the rule or regulation adopted pursuant thereto of which the person is in violation. In addition, any administrative order issued pursuant to this section shall give notice to the person of his right to a hearing on the matters contained in the order. The person shall have 20 days from receipt of the order within which to deliver to the commissioner a written request for a hearing. Subsequent to the hearing and upon finding that a violation has occurred, the commissioner may issue a final order. If no hearing is requested, the order shall become a final order upon the expiration of the 20-day period.
- b. The provisions of section 10 of P.L.1971, c.176 (C.13:1F-10) shall not apply to this act.

**C.13:1F-33 Rules, regulations.**

15. The commissioner shall adopt, pursuant to the provisions of the "Administrative Procedure Act," P.L.1968, c.410 (C.52:14B-1 et seq.), such rules or regulations as are necessary to implement the provisions of this Act.

This act shall take effect immediately. Approved December 12, 2002.