

*Integrated Pest  
Management  
Program*

Sutherlin School District #130

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## Introduction

Structural and landscaping pest can pose significant problems in schools. Pest such as mice and cockroaches can trigger asthma. Mice and rats are vectors of disease. Many people are allergic to yellow jacket stings. The pesticides used to remediate this and other pest 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 risk and safety of students and staff is our first priority and prerequisite to learning. It is the policy of Sutherlin School to approach pest management with the least possible risk to students and staff. In addition Senate Bill 637 requires all K12 and Higher Education to implement integrated pest management in their schools. For this reason Sutherlin Schools adopts this integrated pest management plan through board policy for use on its campus.

## 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 only used when necessary.

***IPM Basics Education and Communication:*** The foundation for an effective IPM program in 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 recording of what action was taken is the most important part of an effective IPM program.

***Cultural and Sanitation:*** Knowing how human behavior encourages pests help you prevent them from becoming a problem. Small changes in cultural or sanitation practices can have significant effects on reducing pest populations. Cleaning under cafeteria serving counters, reducing clutter in classrooms, putting dumpsters further from cafeteria 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 and 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 of why pests are here; pesticides should be rarely used and only as necessary.

## Integrated Pest Management Plan Definition

ORS 634.700 defines an Integrated Pest Management (IPM) plan as a proactive strategy that focuses on the long-term prevention or suppression of pest problems through economically sound measures that:

- Protect the health and safety of students, staff and faculty;
- Protect the integrity of campus buildings and grounds;
- Maintain a productive learning environment;

- Protect local ecosystem health;
- 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;
- 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 applications of pesticides that are not low-impact pesticides;
- Includes regular monitoring and inspections to detect pests, pest damage and unsanctioned pesticide usage;
- Evaluates the need for pest control by identifying acceptable pest population density levels;
- Monitors and evaluates the effectiveness of pest control measures;
- 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;
- Excludes the application of pesticides for purely aesthetic purposes;
- Includes school staff education about sanitation, monitoring and inspection and about pest control measures;
- Gives preference to the use of nonchemical pest control measures;
- Allows the use of low-impact pesticides if nonchemical pest control measures are ineffective;
- 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 the school campus IPM plan. This plan fleshes out the required strategy from ORS 634.700-634.750 for Sutherlin Schools. ORS 634.700 allows for the routine application of pesticides designed to be consumed by pests. To avoid a proliferation of pest and or unnecessary 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.

### **IPM Plan Coordinator**

Note: ORS 634.7720 states that the Coordinator “must be an employee of the governed district, unit, school, or entity, unless the IMP coordinator or designee delegates pest management duties to an independent contractor.” The Board of Education designates the Facilities/Maintenance Director as the IPM plan coordinator, and is given the authority for overall implementation and evaluation of this plan.

The Coordinator is responsible for:

1. Attending not less than six hours of IPM training each year and shall include at least a general review of IPM principles and the requirement of ORS 634.700-634.750;
2. Conducting outreach to the campus community (custodians, maintenance, grounds, staff, faculty, and cafeteria staff) regarding the school's IPM plan;
3. Providing training;
4. Overseeing pest prevention efforts;
5. Working with custodians; staff, instructors, and maintenance to reduce clutter and food in the classrooms, and seal up pest entry points;
6. Assuring the decision-making process for implementing IPM is followed;
7. Assessing and improving the pest monitoring/report, action protocol;
8. Assuring that all notification, posting, and record-keeping requirements are met;
9. Maintaining the approved pesticides list;
10. Responding to inquiries and complaints about compliance with the plan by responding to inquiries and complaints in writing and keeping them on file with IPM records.

### **Custodial Service Responsibilities**

Custodial services is responsible for the following:

1. Attending annual IPM training provided by the IPM plan coordinator (or designee);
2. Placing and checking sticky insect monitoring traps in break rooms, kitchens, and cafeteria as per the IPM plan coordinator's instructions.
3. Reporting counts and types of trapped pests to IPM coordinator (or designee);
4. Assuring flooring under serving counters is kept free of food and drink debris;
5. Recording his/her pest management actions in the pest logs;
6. Reporting pest problems he/she cannot resolve in less than 15 minutes to the IPM plan coordinator;
7. Reporting staff and instructors to the IPM plan coordinator who repeatedly refuse to reduce clutter and other pest-conducive conditions in their classrooms.
8. Reporting pest-conducive conditions to the IPM plan coordinator if the custodian cannot fix them in less than 15 minutes;
9. Confiscating any unapproved pesticides (such as aerosol spray cans) discovered during regular duties and delivering them to the IPM plan coordinator;
10. Following up on issues found in annual inspection report as instructed by the IPM plan coordinator.

### **Maintenance Responsibilities**

Facilities maintenance and staff are responsible for working with the IPM Plan Coordinator to ensure their daily tasks, projects and operations enhance effective pest management. Including:

1. Receiving training from the IPM plan coordinator (or designee of the coordinator) on the basic principles of the IPM, sealing pest entry points and sanitation during construction projects;
2. Continually monitoring for pest conducive conditions during daily work, and sealing small holes and cracks when noticed and repair can be made in less than 15 minutes;
3. Submitting a work request when holes and cracks are noticed but cannot be repaired in less than 15 minutes;
4. Developing protocols and provisions for pest avoidance and prevention during construction and renovation projects.

### **Grounds Department Responsibilities**

Grounds staff is responsible for:

1. Attending annual IPM training provided by the IPM plan coordinator (or designee).
2. Keeping vegetation (including tree branches and brushes) at least three feet from building surfaces.
3. Proper mulching in landscaped areas to reduce weeds.
4. When possible, adhere to proper fertilization, over-seeding, mowing height, edging, drainage, aeration, and irrigation scheduling in turf areas to reduce weed populations.
5. When the decision is made to apply a pesticide, following the outlined notification posting, record-keeping and reporting protocols.

### **Cafeteria Staff Responsibilities**

Cafeteria staff is responsible for:

1. Attending annual IPM training provided by the IPM plan coordinator (or designee).
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 cafeteria doors closed.
5. Reporting pest-conducive conditions that requires maintenance (e.g., leaky faucets, dumpster too near building, build up of floor grease requiring spray washing, etc.) to proper staff.
6. Participating in any inspections conducted by custodial/maintenance staff or IPM plan coordinator.
7. Checking sticky trap monitors once per month for cockroaches or drain flies. Immediately reporting these pests and any sightings of rodents or rodent droppings to proper staff through the work order request process.

### **Staff and Faculty Responsibilities:**

Staff and faculty are responsible for:

1. Attending annual IPM training provided by the IPM plan coordinator (or designee).
2. Keeping their classrooms and work area free of clutter.
3. Making sure students clean up after themselves when food and drink is consumed in the classroom.
4. Reporting pests and pest-conducive conditions to campus services through the work order request process.

### **Superintendent Responsibilities:**

The school superintendent is responsible for:

1. Scheduling time for staff and instructors to receive annual training provided by the IPM plan coordinator (or designee).
2. Attending annual IPM training for staff and instructors.
3. Assuring that staff and instructors keep their rooms clean and free of clutter in accordance with the IPM plan, (the IPM plan coordinator may make recommendations).

4. Assuring that all faculty, administrators, staff, adult students and parents receive the annual notice (provided by the IPM plan coordinator) of potential pesticide products that could be used on school property.
5. Working with the IPM plan coordinator to make sure all notifications of pesticide applications reach all faculty, administrators, staff and students (via the method most likely to reach the intended recipients).
6. Assuring that all staff fulfill their role as outlined in the school's IPM plan.

**Monitoring – Reporting – Action Protocol**

Monitoring is the most important requirement of ORS 634.700 – 634.750. It provides timely and accurate information used 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 gathering from these inspections is always documented. As much as possible, monitoring should be incorporated into the routine activities of school staff. Staff training on monitoring should include what to look for and how to report the information.

**Pest Logs**

**Pest logs are the documents that monitoring levels 2 and 3 use to document the written observations. Each building and each kitchen/cafeteria will keep a pest log.**

**Pest Log: Sample School Kitchen**

Report of Pest Sighting				Respondent	
Date	Name	Location	Pest/Problem Description	Action Taken	Initial & Date
1/12/13	S. Lewis	Floor next to freezer.	Crickets present.	Sticky trap set	J.D. 1/12/13

**Three levels of monitoring**

1. Casual observing / looking with no record keeping.
2. Casual observing / looking with written observations.
3. Careful inspection with written observation.

**Levels 1 and 2 monitoring (staff and faculty)**

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 during the normal course of their daily work. Custodial, maintenance and cafeteria staff are expected to set and/or check sticky monitoring traps as per the school's IPM plan.

**Level 3 Monitoring**

The IPM plan coordinator (or designee) will periodically conduct monitoring at level 3 with the custodial, grounds, and maintenance staff of pest-conducive conditions inside and outside the building (structural deterioration, holes that allow pests to enter, conditions that provide pest harborage).

Monitoring should include:

- ◆ 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 screen, food preparation procedures that provide foods for pests, etc.)
- ◆ Their own management activities (caulking / sealing, cleaning set out traps, treating pests, etc.) and their effects on the pest population.
- ◆ The condition of the plants (vigor and appearance).
- ◆ The amount of plant damage.
- ◆ Kind and abundance of pests (weeds, insects, mites, moles, etc.) as well as natural enemies (ladybugs, spiders, lacewing larva, etc.)
- ◆ Weather conditions (record any unusually dry, hot, wet or cold weather in the past few weeks.
- ◆ Proper drainage.
- ◆ Human behaviors that affect the plants or pests (foot traffic that compacts the soil).
- ◆ Physical damage to plants caused by people.
- ◆ Management activities (pruning, fertilizing, mulching, aeration, treating pests, etc.) and their effects on the plants and the pest population.

### **Sticky monitoring traps for insects**

Sticky traps are neither a substitute for pesticides nor an alternative for reducing pest populations, but rather a diagnostic tool to aid in identifying a pest's presence. All staff will be made aware of the traps and their purpose so they don't disturb them. Custodians will be responsible for setting them out and checking them once per month and replacing them once every four months.

Cafeteria staff will be responsible for weekly monitoring of those traps in the cafeteria to identify (cockroaches and drain flies).

Custodial staff will be responsible for checking traps placed in pre-determined "pest-vulnerable areas" in the break rooms, kitchens, cafeteria, concession stands, classrooms, custodial closets/rooms, and with animals/plants on a monthly basis, and replacing them every four months. If custodial staff cannot interpret what they find in the monitors they will contact the IPM coordinator for assistance.

### **Reporting pests, signs of pests, and conducive conditions**

When staff or faculty observes pest or pest-conducive conditions they should report the observation in the pest log and to the building supervisor who will notify the Facilities department through SchoolDude.

### **Reporting "Pests of concern"**

A 'pest of concern' is a pest determined to be a public health risk or significant nuisance pest.

These include:

- ◆ Cockroaches (disease vectors, asthma triggers)
- ◆ Mice and rats (disease vectors, asthma triggers)

- ◆ Yellow jackets (sting can cause anaphylactic shock)
- ◆ Nutria
- ◆ Racoons
- ◆ Cats
- ◆ Dogs
- ◆ Opossums
- ◆ Skunks
- ◆ Bedbugs

When pests of concern (or their droppings, nests, etc) are observed, staff should immediately contact the building supervisor to notify the IPM plan coordinator.

### **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, skinks and nutria is zero. Acceptable thresholds for other pests will be determined by the IPM plan coordinator.

Small Ants:

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

1. Spend two minutes trying to find out where the ants are coming from
2. Kill the ants with a paper towel or similar
3. Remove any food or liquid the ants were eating
4. Wipe down the area with soapy water or disinfectant to remove pheromone trails
5. Record observation in the pest log.
- 6.

If the ants come back or there are more than a small number of them:

1. Spend two minutes trying to find out where the ants are coming from
2. Record observation in the pest log
3. Ask the custodian to come with vacuum and sealant as soon as he/she is able

The custodian will:

1. Spend two minutes trying to find out where the ants are coming from
2. Vacuum up the ants and any food debris nearby (vacuum up a tablespoon of cornstarch to kill most of the ants in the vacuum bag, then put the vacuum bag inside plastic garbage bag, seal it, and dispose of it properly)
3. Seal crack or hole where ants were coming from (do what can be done in less than 15 minutes)
4. Wipe down the area with soapy water or disinfectant to remove pheromone trails
5. The custodian will jot down the actions taken above in the pest log.

To avoid a proliferation of small ants and/or unnecessary applications of pesticides, the routine use of ant baits is not permitted without first:

1. Educating staff on sanitation, monitoring, and exclusion as the primary means to control the ants.
2. Establishing an acceptable pest population density (e.g. 10 ants)
3. Improving sanitation (e.g cleaning up crumbs and other food sources) and structural remediation (sealing up cracks or holes where the ants are coming from).

If the IPM plan coordinator deems the use of low-impact pesticide baits are necessary, they will be placed in childproof containers, and used only in areas that are out of sight and reach of children/students. Small amounts of low-impact pesticide gels or pastes may also be placed in cracks and crevices or low-impact pesticide dusts may be sprayed into wall voids.

Staff must be informed that sanitation is important to ensure the effectiveness of any bait that is used. Ants are less likely to take bait if there are more attractive food and water sources nearby.

## **Inspections**

### *Routine Inspections*

The IPM plan coordinator will conduct routine inspections of campus facilities throughout the year. Custodial, maintenance and grounds staff are required to accompany the coordinator during the inspection if so directed. The inspections will focus on compliance with this plan and inspection of the cafeteria, break rooms, and any other places of concern. Inspection documents will be retained within the IPM Coordinator's office.

### Annual inspections

The IPM plan coordinator will conduct annual inspections at individual campuses. Custodial, maintenance and grounds staff are required to assist the coordinator with the annual inspection. The annual inspections will be more thorough than the routine inspections, and will use the annual IPM Inspection Form (see Appendix 2) to guide the inspections. The specific facilities to be inspected will be determined by the IPM plan coordinator and the Superintendent based on a review of the annual number of pest problems and pesticide applications reported.

### Pest Emergencies

**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 students, a nutria in an area frequented by students, or more than half a dozen mice or rats running through occupied areas of a school building.

### Structural Action

Any items (such as sealing up holes) that maintenance staff or custodial staff observes that they can resolve in less than 15 minutes should be taken care of and recorded in the pest log. Custodial staff will review pest logs twice per week. Any items he/she cannot resolve in less than 15 minutes should be marked in order of priority.

Pest logs will be provided to the IPM plan coordinator once per week. The coordinator will determine further action to be taken and when. If the actions needed are not something the coordinator can accomplish alone or with minimal assistance, the coordinator will meet with maintenance and/or a pest management professional to develop a protocol and priority list with deadlines for sealing holes, installing external door sweeps, and other pest exclusion or pest management needs. The coordinator

will then generate a work request with a proposed deadline for completion based on the severity of the risk or nuisance. The coordinator will monitor the completion of the work order.

### **Required Training/Education**

ORS 634.700 (3) (i) requires staff education “*about sanitation, monitoring and inspection and about pest control measures*”. All staff should have at least a general review of IPM principles and strategy as outlined in this plan.

- 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.
- B. **Training for Custodial staff** -- The IPM Plan Coordinator (or a designee of the Coordinator) will train custodial staff at least annually on sanitation, monitoring, inspection, reporting, and their responsibilities.
- C. **Training for Maintenance staff** – The IPM Plan Coordinator (or designee) will train maintenance staff at least once per year on identifying pest conducive conditions and mechanical control methods (such as door sweeps on external doors and sealing holes under sinks), and their responsibilities.
- D. **Training for Grounds staff** – The IPM Plan Coordinator (or designee) will train grounds staff at least once per year. Each year before the training a pest management professional will meet with the IPM Plan Coordinator to review the annual report of pesticide applications and plan training for all grounds staff. The annual training will review this IPM plan (especially grounds department responsibilities. Grounds staff will also be trained in basic monitoring for common pests on grounds.
- E. **Training for Cafeteria staff** – The IPM Plan Coordinator (or designee) will train cafeteria staff at least once per year on the basic principles of IPM and their responsibilities.
- F. **Training for Staff and faculty** – The IPM Plan Coordinator (or designee) will arrange to train staff and faculty at least once per year on the basic principles of IPM and their responsibilities as outlined in this plan.

### **Pesticide Applications – Notifications – Posting and Record Keeping**

Any pesticide application (this includes weed control products, ant bait, and all professional and over the counter products) on school property must be made by a licensed commercial or public pesticide applicator. At the beginning of each school year, all faculty, administrators, staff, adult students and parents will be given a list of potential pesticide products that could be used in the event that other pest management measures are ineffective. They will also be informed of the procedures for notification and posting of individual applications, including those for pest emergencies. This information will be provided to all the above via electronic notification.

#### **Notification and Posting for Non-emergencies**

When prevention or management of pests through other measure proves to be ineffective, the use of a low-risk pesticide is permissible. Documentation of these measures is a per-requisite to the approval of

any application of a low-risk pesticide. This documentation will remain on file with the IPM Plan Coordinator. The IPM plan coordinator (or designee) will give written notice of a proposed pesticide application (via the method most likely to reach the intended recipients at least 24 hours before application occurs). The notice must identify the name, trademark or other type of pesticide product, the IPA 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 designee), 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 reentry time (specified on product label), and provide the telephone number of a contact person (the person who is making the application and/or the IPM plan coordinator.)

### **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 administration.
2. If a pesticide is applied at a campus due to a pest emergency, the IPM plan coordinator shall review the IPM plan to determine whether modification of the plan might prevent future pest emergencies.
3. 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 impractical 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 practical 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.

### **Record Keeping of Pesticide Applications**

The IPM plan coordinator (or designee) shall keep a copy of the following pesticide product information on file in the office of the IPM plan coordinator:

- ◆ A copy of the label;
- ◆ A copy of MSDS;
- ◆ The brand name and EPA registration number of the product;
- ◆ Approximate amount and concentration of product applied;
- ◆ Location of the application;
- ◆ Pest condition that prompted the application;
- ◆ Type of application and whether the application proved effective;
- ◆ Pesticide applicator's license numbers and pesticide trainee or certificate numbers of the person applying the pesticide;
- ◆ Name(s) of the person(s) applying the pesticide;
- ◆ Dates on which notices of the application were given;
- ◆ Date and times for the placement and removal of warning-signs; and
- ◆ Copies of all required notices given, including the date on the IMP plan coordinator gave notice.

The above records must be kept on file in the office of the IPM plan coordinator, for at least four years following the application date.

### **Approved List of Low-impact Pesticides**

Note: All pesticides must be used in strict accordance with label instructions. According to ORS 634.705(5), the IPM plan shall include a list of low impact pesticides for use with their integrated pest management plan. The approved list of pesticides may include any product on the except that:

- a) Contain a pesticide product or active ingredient that has the signal words “Warning” or “danger” on the label;
- b) 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; or
- c) Contain pesticide products classified as carcinogenic to humans or likely to be carcinogenic to humans under the United States Environmental Protection Agency 2003 Draft Final Guidelines for Carcinogen Risk Assessment. As part of pesticide registration under the Federal Insecticide Fungicide and Rodenticide Act FIFRA and re-registration required by the Food Quality Protection Act (FQPA), EPA Office of Pesticide Programs (OPP) classifies pesticide active ingredients (a.i.) with regards to their potential to cause cancer in humans. Depending on when a pesticide active ingredient was last evaluated the classification system used may differ as described above.

The National Pesticide Information Center (<http://npic.orst.edu/>) can be contacted at 1.800.858.7878 or [npic@ace.orst.edu](mailto:npic@ace.orst.edu) for assistance in determining a pesticide a.i. cancer classification.