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NORTHFIELD PUBLIC SCHOOLS



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Management Plan

for

Integrated Pest Management (IPM)

OCTOBER 2017



IEA Project #201710490

Northfield Public Schools

Management Plan for Integrated Pest Management (IPM)

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Contact Person: Jim Kulseth
Phone Number: 507-645-3435
Email Address: jkulseth@northfieldschools.org

1.0 Purpose

The Minnesota Legislature passed the Janet B. Johnson Parent Right-To-Know Act in 2000. This law requires public and non-public K-12 schools, planning to apply pesticides specified in the law, to provide a notice of intent to parents and employees.

2.0 Introduction

Integrated Pest Management (IPM) is a decision-making process following a set of detailed procedures describing how particular pest problems will be avoided or managed. Such pest management tactics will involve the activities of all users of a school facility – teachers, students, administration, and parents - not just staff responsible for pest management.

IPM is:

- Monitoring pests to detect problems early
- Acting against pests only when necessary
- Choosing the most effective control option with the least risk to people and the environment
- Applying the growing knowledge about pests to create long-term, low-risk solutions

Routine pesticide applications made on a regular calendar-based schedule are not part of IPM. Allowing pests to flourish, increasing health risks to building occupants and others, is also not a part of IPM.

IPM has the potential to save time and money. By taking actions to avoid pest problems and applying pesticides only when necessary, many schools will reduce costs over the long term, while achieving excellent pest control results.

2.1 Authority and References

Minnesota Statute 121A.30—Pesticide Application at Schools

May be referred to as the “Janet B. Johnson Parent Right-To-Know Act”

Minnesota Statute 18B.01 & 18B.095—School Buildings & Grounds

3.0 Responsibility for Compliance

The Integrated Pest Management Coordinator for Northfield Public Schools is:

Jim Kulseth
Director of Buildings & Grounds
(507) 645-3435

The responsibilities for this individual include the following:

- Publish the annual pesticide notice by September 15, if the district applies a pesticide of toxicity category I, II, III, or a restricted use pesticide (pesticide product categories can be determined at <http://app.education.state.mn.us/HealthAndSafety/Pesticide.do>)
- Provide that a copy of the estimated schedule of pesticide application to be available at the school office
- Notify parents requesting notice for pesticide use outside the estimated application dates in a timely manner
- Handle, store, and dispose of pesticides in compliance with Federal, State, and local requirements
- Require the appropriate licenses and insurance from the State for district employees responsible for pesticide application
- Evaluate and update this plan as necessary

3.1 General Notification

General notification must be provided to parents and employees by September 15th of every school year. This notice must:

- State that an estimated schedule of pesticide applications is available for review or copying at the school office.
- State that long-term health effects on children from the application of pesticides or the class of chemicals to which they belong may not be fully understood.
- Inform parents that they may request the school to notify them before pesticide applications made on days other than those specified in the estimated schedule.

3.2 Individual Notification

Upon a parent's request, an employee having general control and supervision of the building or district must provide reasonable notice, upon request, of a pesticide application outside of the estimated schedule. This notice must include the following:

- The pesticide to be applied
- The time of the planned application
- The location at the school of the planned application

The district may request reimbursement for the school's reasonable costs of providing this notice, including any costs of mailing, from individuals requesting notification.

3.3 SDSs

Safety Data Sheets (SDS) are maintained for each chemical applied. SDSs are filed in each area the chemicals are stored and at the district office. Though this is not required by the Janet B. Johnson Parents Right-to-Know Act, the district wants to provide as much information as possible to concerned parents and employees. These are kept with the management plan and the official notices in each school office.

3.4 Pesticide Application

If required, pesticides will be applied by a state licensed professional. A copy of this license will be kept on file with the management plan. Otherwise, applicators who are employees of an educational institution who apply pesticides as part of their job duties on sites owned, rented, or leased by their employer must be certified and licensed to apply restricted use pesticides; otherwise, licensure for employees is not required.

The district has contracted with a licensed contractor to apply pesticides in the district as necessary. If necessary, contact the IPM Coordinator or the pesticide contractor for a copy of their state license and a Certificate of Liability Insurance. The application of pesticides is subject to the Federal Insecticide, Fungicide, and Rodenticide Act (7 United States Code 136 et seq.), school district policies and procedures, Environmental Protection Agency regulations, Occupational Safety and Health Administration regulations, and state and local regulations.

Contractors must complete a Pesticide Application Record each time they apply pesticides. This record must be kept for five (5) years. A copy of the record must be provided to the district. Sample record forms are available online.

4.0 District Policy Guidelines

Northfield Public Schools pest management practices are based on the following principles:

- Wherever possible, prevention of pests will be the primary strategy to hinder their establishment and reduce the need for pesticide use.
- Management strategies will be selected after consideration of the full variety of available options. Strategies will include all practical structural, non-chemical, and biological measures. Chemical measures will be utilized only as a last resort, when other methods fail.

- When necessary, monitoring results will be used objectively to determine action thresholds (the defined level of unacceptable numbers of a particular pest) at which least toxic controls will be employed.
- Design of future landscapes and buildings will be completed in-line with current pest management strategies.
- Knowledge of the pest's identity, biology, and life cycle will establish the basis for selection of appropriate management strategies.

Pests are managed to:

- Reduce any potential human health hazard or to protect against a significant threat to public health
- Prevent loss of or damage to school structures or property
- Prevent pests from spreading into the community, or to plant and animal populations beyond the site
- Enhance the quality of life for students, staff, and the community

Methods currently used at Northfield Public Schools include:

- Pesticides
- Chemical baits
- Live traps
- Sticky traps
- Dust formulations
- Spot pesticide application
- Landscape plants

4.1 Identification of Key Pests and Action Thresholds

A key pest is one that is usually encountered at unacceptable levels at least once each school year. Typical key pests in and around school buildings include ants, birds, cockroaches, head lice, yellow jackets, and rodents. Typical pests on grounds are weeds and crabgrass.

For key pests, it makes sense to plan ahead and determine which inspection and monitoring procedures will be used to detect problems early and how many pests or how much pest damage can be tolerated before action must be taken.

Key pests for Northfield Public Schools are:

- Ants
- Flies
- Mice
- Bees, wasps, and yellow jackets
- Cockroaches
- Head lice
- Weeds, crabgrass

See Appendix B for Integrated Pest Management Pest Fact Sheet Series from the Minnesota Department of Agriculture.

Checklists and evaluation forms for the interior and exterior management of pests can be found in Appendix C.

4.2 Emergency Application

The Minnesota Department of Health (MDH) recognizes that there may be emergency situations that require schools to take immediate action to control pests. For example, bees and wasps have the potential to cause a life-threatening allergic reaction (i.e., anaphylactic shock) in some children. While emergency situations are rare, MDH considers it prudent policy for schools to be able to respond to an immediate health threat in a timely manner. Therefore, a school principal or other person having general control and supervision of the school may take immediate action without prior notification if the situation constitutes an emergency. MDH defines an emergency as *a situation that poses an immediate threat to the health and safety of people on school property.*

4.3 Records Retention

Schools are required to keep a copy of the notifications for at least six years in a manner available to the public.

5.0 Exemptions

The following are exempt from notification under the law:

- Any school that does not apply pesticides or that applies only toxicity category IV pesticides
- Home schools
- Emergency pesticide applications required by state or local health officials
- Disinfectants, sanitizers, deodorizers, or microbial agents used for general cleaning purposes

6.0 Liability

Under state statute 121A.30, subd. 12 and 13, failure to comply with the requirements of this section may not be presented as evidence in any lawsuit based upon physical injury resulting from exposure to pesticides applied at a school. Also, nothing in this section affects the duty of a parent or a student to comply with the compulsory attendance law or the duty of a school employee to comply with the provisions of an applicable employment contract or policy.

Appendix A

Notifications

MEMO



To: To Whom It May Concern

From: Cassie Bowser, IEA Health & Safety Consultant

Date: November 2017

Re: Annual Notifications

Northfield Public Schools District's annual notifications can be found on the district website:

https://northfieldschools.org/files/indoorairquality_righttoknow_asbestos.pdf

Appendix B

Integrated Pest Management Pest Fact Sheet Series

Maintained in the Health & Safety files

Appendix C

Concern Form and Checklists

Integrated Pest Management Concern Form

Name:	Date:
School Building:	Phone:
Classroom or Location:	

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Routine pesticide applications, made on a regular calendar-based schedule, are not part of IPM. Allowing pests to flourish, in effect increasing health risks to building occupants and others, is also not a part of IPM.

IPM has the potential to save time and money. By taking actions to avoid pest problems and applying pesticides only when necessary, many schools will reduce costs over the long term while achieving excellent pest control results.

If you have an IPM concern, please use the space below to describe the nature of the concern and any potential causes. Please indicate specific details if possible.

In the event you need to be contacted, what is the best time of day to reach you?

Please return this form to your building Principal.

For Department Use Only:

Date Received: _____

Appendix D

Estimated Application Schedule

MEMO



To: To Whom It May Concern

From: Cassie Bowser

Date: November 2017

Re: Integrated Pest Management

Northfield Public Schools estimates a monthly application schedule for pest management.

Appendix E

Pesticide Applicator License

Maintained in the Health & Safety files