

IEA, INC.

NORTHFIELD PUBLIC SCHOOLS



Contact Us:

BROOKLYN PARK OFFICE

9201 W. BROADWAY, #600
BROOKLYN PARK, MN 55445
763-315-7900

MANKATO OFFICE

610 N. RIVERFRONT DRIVE
MANKATO, MN 56001
507-345-8818

ROCHESTER OFFICE

210 WOOD LAKE DRIVE SE
ROCHESTER, MN 55904
507-281-6664

BRAINERD OFFICE

601 NW 5TH ST. SUITE #4
BRAINERD, MN 56401
218-454-0703

MARSHALL OFFICE

1420 EAST COLLEGE DRIVE
MARSHALL, MN 56258
507-476-3599

VIRGINIA OFFICE

5525 EMERALD AVENUE
MOUNTAIN IRON, MN 55768
218-410-9521

www.ieasafety.com

800-233-9513

**Management Plan
for
Integrated Pest Management (IPM)**

Northfield Public Schools

Management Plan for Integrated Pest Management (IPM)

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Contact Person: Cole Nelson

Phone Number: 507-645-3435

Email Address: cnelson@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 are responsible for pest management.

IPM includes:

- 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 responsibilities for the program administrator, or designee 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 a copy of the estimated schedule of pesticide application, to be available at the school office
- Notify parents (requesting notice) regarding 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 of Minnesota 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 are 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 of a pesticide application that is 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 cost to provide this notice, including any costs of mailing, from individuals requesting notification.

3.3 Safety Data Sheets

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. Although it 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 Orkin 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

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.

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 (6) 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

(Posted on District website: <https://northfieldschools.org/news/annual-notifications/>)

The following is provided for your information. If you have questions, please call the School District office at 507.663.0600.

Indoor Air Quality

Northfield Public Schools continues to improve an indoor air quality management plan for the district. The management plan is based on the Environmental Protection Agency's (EPA) "Tools for Schools." It addresses policies and procedures that will be used in the schools to address indoor air quality issues. The plan's goal is to provide indoor air quality that contributes to a favorable learning environment for students, productivity for teachers and staff, and an environment that is as healthy as possible. However, the intent of the plan is not to solve all indoor air quality concerns in a school, rather the intent is to provide a road map to assist in managing indoor air quality. The Indoor Air Quality Committee has joined the Health and Safety Committee to review and continually update the management plan.

If you have any questions concerning indoor air quality or would like to see the EPA Tools for Schools checklists, please contact the District Indoor Air Quality Coordinator at (507) 663-0610.

Janet B. Johnson Parents' Right-to-Know Act

Northfield Public Schools recognizes the importance of our students' and employees' health and well-being. Therefore, we are examining and reducing our use of pesticides and utilizing Integrated Pest Management techniques in our school buildings and on school grounds to minimize the possible long-term unknown health effects of pesticides. Northfield Public Schools will make available, in the school district office, for parents and employees, the estimated schedule of application of pesticides classified by the United States Environmental Protection Agency as designated under the Federal Insecticide, Fungicide and Rodenticide Act. Parents may also request that the school district notify him/her prior to the application of such pesticides on a day different from the days specified in the notice. If a person would like to be notified prior to application, please provide an email address or a name and telephone number to the Buildings & Grounds Department at 507.663.0610.

AHERA Annual Asbestos Notification

The Asbestos Hazard Emergency Response Act (AHERA) of 1986 requires the district to notify parents annually concerning asbestos-containing building materials in the schools, and that the management plan for each building is available for their review. Federal law requires a periodic walk-through (called "surveillance") every six months of each area containing asbestos. In addition, the law requires all buildings to be re-inspected every three years after a management plan went into effect.

Any questions concerning this notice, or an explanation of our Asbestos Management Plan can be directed to the Director of Buildings and Grounds at 507.663.0610.

Lead-In-Water Annual Notification

Minnesota Statute 121A.335 requires public school buildings serving prekindergarten through grade 12 to test for lead in water every 5 years. This statute also requires school districts to make the results of the testing available to the public for review and to notify parents of the availability of the information. Notification may be accomplished by publishing a statement in the "Back to School" newsletter or publication that is available to staff, student, parents and the public.

Northfield Public Schools is committed to providing a safe working and learning environment for employees and students. The district has developed a lead in water management plan, which is available to view on the district website, and testing program that complies with Minnesota Statute 121A.335, as well as recommendations from the Environmental Protection Agency's (EPA's) Lead Contamination Control Act (LCCA) of 1988 and the Minnesota Department of Health (MDH), and Minnesota Department of Education (MDE). Lead in Water results can be reviewed at the District Office.

Northfield Public Schools last completed Lead in Water testing in 2016 and Radon testing of school district facilities in 2017. State law mandates Lead in water testing every 5 years and Radon testing is recommended every 5 years. Northfield Public Schools will be completing both areas of testing again in 2022, as mandated by law and the school district's plan.

For more information on Northfield Public Schools lead reduction and testing program, please contact the Director of Buildings and Grounds at 507.663.0610.

Appendix B

Estimated Application Schedule

Estimated Schedule of Pest Control Service Visits

Note: This form has been created to comply with M.S. 123B.575, Subdivisions 1-14. It should be filled out and maintained in the office of every school building in which regular pest control service visits are scheduled. It is recommended that a new form be filled out at the beginning of each school year.

For: Northfield Public Schools

Our district utilizes a licensed, professional pest control service firm for the prevention and control of rodents, insects, and other pests in and around the district's buildings. Their program consists of:

1. *Inspection and monitoring* to determine whether pests are present, and whether any treatment is needed.
2. Recommendations for *maintenance and sanitation* to help eliminate pests without the need for pest control materials.
3. Utilization of *non-chemical measures* such as traps, caulking and screening; and
4. Application of *EPA-registered pest control materials* when needed (this means pest control materials are not necessarily applied on every service visit).

Pests can sting, bite, cause contamination, damage property, and spread disease; therefore, we must prevent and control them. The long-term health effects on children from the application of such pest control materials, or the class of materials to which they belong, may not be fully understood. All pest control materials are chosen and applied according to label directions per Federal law.

Service visits are scheduled during the weeks starting with the dates listed below:

The 3 rd Tuesday of each month

In addition, service visits may be scheduled during the following break times when school is not in session:

- MEA Break
- Thanksgiving
- Christmas
- Winter Break
- Spring Break

Parents of students may request to receive, at their expense, prior notification of any application of a pest control material, should such an application be deemed necessary on a day different from the days specified in this schedule.

Submitted for: Orkin
Pest Control Service Company

Phone: 507-645-3435

Appendix C

*Pesticide Applicator License
(On file at District Office)*