

IPM in Schools: Top Ten Things Schools are Making Mistakes on During TDA Inspections

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What is IPM?

Integrated pest management - a strategy that relies on accurate identification and scientific knowledge of target pest, reliable monitoring methods to assess pest presence, preventative measures to limit pest problems and thresholds to determine when corrective control measures are needed. Under IPM, whenever economical and practical, multiple control tactics should be used to achieve best control of pests. These tactics include, but are not limited to, the judicious use of pesticides.

Top Ten Noncompliant Issues

- 10. IPM Coordinator has not conducted periodic facility inspections on campus buildings.
- 9 (tie with 10). School district does not have a monitoring program to determine when pest are present.
- 8. Use records lack school address where pesticides/device were used.
- 7. Incidental Use: Information about designating, registering, and required training from the school districts IPM Coordinator.
- 6. IPM Program records were not maintained for the required period of time.

Top Ten Noncompliant Issues

5. Program lacks a system for keeping records of facility reports, pest-related service reports, pesticide applications, and pesticide complaints.
4. (TIE with 3) Records for approval of yellow category use are not maintained.
3. No Plan for educating and informing school district employees about their roles in the IPM Program
2. Name and license number of person applying pesticides.
1. IPM Program lacks written guidelines that identify threshold for when pest control actions are justified.

IPM Program Issues vs. Applicator Issues

IPM Program Issues

- Noncompliant mostly with Regulation 7.150.
- These are items that can be resolved by reviewing the IPM policy the school district has developed.
- Can still be an issue even when a contracted company is used.
- Primarily the responsibility of IPM Coordinator.

Thresholds (#1)

- Rule was added in July 2009.
- 7.150 a (1) A (F) – “Essential Element”
- Requires that districts and IPM Coordinators set and follow written thresholds to decide whether control actions are necessary.
- “ACTION” Thresholds

Thresholds (continued)

- State does not mandate or set any threshold. Up to the discretion of the school district and IPM Coordinator/Applicators.
- District should take top ten pest and set a numerical or qualitative threshold.
- *Action Thresholds in School IPM Programs* – Maryland Department of Agriculture - http://schoolipm.ifas.ufl.edu/DOC/MD_THRES.PDF

Education and Information to School District Employees (#3)

- 7.150 a (1) A (E) – Essential Element
- Requires that the District have a policy/procedure to inform teachers and other school district staff of the district's IPM program.
- Information provided should go beyond “you can't use pesticides” and explain the Regulations and principle at practice.

Education and Information to School District Employees (cont)

- State does not mandate how IPM Coordinators disseminate IPM information to school district employees.
- Best methods include the ability to update as frequently as needed.
- Be able to show your Inspector how the district educates and informs their employees.

Yellow Category Approvals (#4)

- 7.150 b (3) B
- Required for use of a yellow category pesticide.
- Two types of noncompliance:
 - "I didn't know it was a yellow pesticide."
 - Lack of knowledge of the requirement.
- Approvals must be kept for two years.

Yellow Category Approvals (cont)

- Yellow Category Pesticides are:
 - EPA toxicity of category III or IV
 - CAUTION signal word or no required word
 - Does not meet green requirements.
 - Botanical insecticide containing more than 5% synergist
 - Synthetic Pyrethroids
 - Used for more than crack and crevice

Yellow Category Approvals (cont)

- Yellow Category Pesticides: Round-up, Demon, Talstar, Demand
- Great list of Green Category pesticides: <http://citybugs.tamu.edu/factsheets/ipm/ent-4003/>

While we are at it....

- Red Category Approvals:
 - Also maintained for two years
 - Also requires written justification from the applicator to the IPM Coordinator, but requires additional signed approval from the IPM Coordinator too.
 - Please see 7.150 d (6) C for specification of a red category pesticide.

Facility Inspection Reports, pest-related service reports, applications, complaints (#5)

- 7.150 a (1) D
- Record-keeping system is required.
- Not specified by regulation.
- Be able to show Inspector examples/files of Use Records, facility inspection records, pest-related work orders, and pesticide complaints (if any).

IPM Records (#6) must be maintained for....

- 2 years!!!
- These records include but are not limited too: IPM Policy, yellow category approvals, red category approvals, all use records, facility inspection reports, emergency waivers, incidental use training records, etc...

Incidental Applications (#7)

- 7.155
- Any district employee who applies a green or yellow category pesticide in a incidental or emergency situation (imminent risk to health), and that duty is not a routine job duty.

Incidental Applications (cont.)

- Each employee must be given an Incidental Use for Schools Fact Sheet during training given by the IPM Coordinator. The IPM Coordinator must keep records of the all trainings given annually.
- Use records (and justification if necessary) for all incidental use applications must be kept by the IPM Coordinator.

Periodic Facility Inspections (#9)

- 7.150 b (3) C
- Inspectors are looking for records of inspections. Frequency of the periodic inspections are at the discretion of the IPM Coordinator; but interval of inspections should be influenced by facility's frequency of pest issues.

Facility Inspection form:
<http://schoolipm.tamu.edu/forms/ipm-inspection-monitoring-and-sighting-logs/>

Monitoring Program (#10)

- 7.150 a (1) B
- Inspectors are looking for monitoring logs/records. A BIG part of IPM is being pro-active rather than reactive. Monitoring can be done by sighting logs, glue boards, and other forms of monitoring stations. A combination of monitoring methods is best.

Monitoring Program (continued)

Monitoring Forms:
<http://schoolipm.tamu.edu/forms/ipm-inspection-monitoring-and-sighting-logs/>

Applicator Issues

- Noncompliant with Regulation 7.144
- These items center around applications. School districts with contracted pest control should discuss any finding with their contracted company. Any noncompliant finding is the noncompliance of the contracted company (other than lost records).

Name and License number of Applicator (#2)

- 7.144 a (9)
- A noncompliant finding with applicator records from a Structural Inspector is strictly regarding a structural applicator's use records. It does not include Ag applicators.
- Structural Applicator: Requires the name and license of the applicator on all use records for pesticide applications or use of a pesticide device. Structural applicators may use their Legacy Certified Applicator license number.

Name and License number of Applicator (continued)

- Ag Applicator: Required to put name and license number of person responsible for the application. If the applicator is different person than the licensed individual then the name of the applicator actually making the application must be recorded.
- Be sure your IPM Policy allows applications by trained but unlicensed applicators.

Address Requirement (#8)

- 7.144 a (8)
- Use records require “service” address – actual address of application (intersection if no address). Be sure to include application site location too. Never hurts to be specific with use records!

Mixing Rate or % of active ingredient (tied for #10)

- 7.144 a (5)
- Applicator may use either the % of active ingredient - .02% solution or the mixture 2 oz/ 1 gallon water or other materials.
- RTU products do not require a mixing rate.

Questions?

Thank you!
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