

# OFFICE OF ENVIRONMENTAL AFFAIRS AND OCCUPATIONAL HEALTH & SAFETY

## **Pest Management Plan**

Issued: March 2011 Last Update:

#### **PURPOSE**

Naugatuck Valley Community College is committed to providing a healthy and safe campus for all who use the facilities at NVCC. This will be accomplished by following the policy and procedures for pest management based on applicable federal and state laws and best management practices regarding pesticide use. The goal of this document is to minimize the amount of pesticides used through the use of Integrated Pest Management (IPM). By reducing pesticide use at NVCC, we will lower the potential exposure of those who use our facilities and lower the environment impact.

#### **DEFINITIONS**

A "pest" is any population of living organisms (animals, plants, or microorganisms) that can cause damage or interfere with the use of NVCC facilities and grounds for human purposes.

A "pesticide", under Connecticut General Statute Section 22a-47, is any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, or any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant. Pesticides include fungicides, insecticides, herbicides and rodenticides.

"Restricted use pesticides" are those that are restricted by the administrator of the U.S. EPA. Only a licensed pesticide applicator may apply these pesticides.

A "lawn care pesticide" is any pesticide registered by the U.S. EPA and labeled pursuant to the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) for use in lawn, garden, and ornamental sites or areas.

An "Integrated Pest Management (IPM)" is the use of all available pest control techniques including judicious use of pesticides, when warranted, to maintain a pest population at or below an acceptable level, while decreasing the unnecessary use of pesticides. Alternative methods of pest control may include structural maintenance, sanitation, and mechanical and biological. These methods will help to eliminate conditions that are favorable to pest infestation.

A "certified pesticide applicator", under Connecticut State Statute Section 19a-79a, means a pesticide applicator with (1) supervisory certification under section 22a-54, or (2) operational certification under section 22a-54, who operates under the direct supervision of a pesticide applicator with said supervisor certification.

#### CT STATUTES GOVERNING PESTICIDES APPLICATION

**State Agencies:** State law requires NVCC to use IPM methods and techniques before making any indoor or outdoor application of a pesticide.\*

Contractors and vendors hired for pest management must abide by this guidance and incorporate IPM methods in the services rendered.

<sup>\*</sup>Section 22a-66l requires states agencies to use IPM if the Commissioner of Environmental Protections has provided a model pest control management plan.

Day Care Centers: State law states that no person shall apply a lawn care pesticide on the grounds of any day care center, except where an emergency application is necessary to eliminate an immediate threat to human health (e.g. mosquitoes with evidence they carry infectious disease, black legged or deer ticks, and stinging insects), provided an analysis determines such emergency application is necessary, and does not involve a restricted-use pesticide. Children enrolled in the Child Development Center will not be permitted to enter an area where a pesticide has been applied until it is safe to do so according to the provisions of the pesticide label. Parents or guardians of each child enrolled in the Child Development Center will be given notification 24 hours prior to any application of pesticide on the grounds of the Child Development Center. Should an emergency application be necessary, notification will be given as soon as practicable.

#### **NOTICE-OF-APPLICATION**

A notice-of-application must accompany all applications of pesticide, whether indoors or outdoors. The signage, shown below and provided in Attachment E, must be posted at all likely entrance points to the treatment area. For outdoor applications, the sign should be made from durable materials that can withstand the elements during the posting period.

# PESTICIDE APPLICATION



In situations where an outdoor application of a pesticide is made within one hundred yards of any property line, the applicator must post a sign notifying the public of the pesticide application at each conspicuous point of entry. In addition, a commercial applicator making an outdoor application within one hundred yards of any property line shall post signage at conspicuous locations no farther apart than every one hundred fifty feet or part thereof of road frontage of treated property. The professionally printed sign must meet the requirements of CT General Statute Section 22a-66. These signs are available at the point of pesticide purchase.

#### **PEST CONTOL MANAGEMENT PLAN**

NVCC will abide by a pest control management plan that describes all pest control activities on campus. The plan will be consistent with an applicable model plan provided by the Commissioner of Environmental Protection as described in Section 22a-66l of the CT General Statutes. This plan must contain the elements given in Attachment D.

The Coordinator of EAOH&S will revise this plan by January 1 of each year to reflect changes in pest control activities or the intentions of NVCC. This plan will be retained by NVCC and will be made available for inspection upon request of an agent of the Department of Environmental Protection.

#### **PESTICIDE SELECTION**

NVCC shall follow the principals of IPM and the model plans provided by the DEP in determining when to control pests and whether to use mechanical, physical, biological, or chemical means. The Dean of Administration or his/her designee shall ensure that NVCC follows IPM procedures so as to use the most appropriate and least

toxic method of control. Contractors and vendors hired for pest management must abide by this guidance and incorporate IPM methods in the services rendered.

The choice of using a pesticide will be based on a review of all other available options and a determination that these options are not acceptable or feasible. The full range of alternatives, including no action, will be taken. Cost or staffing considerations alone will not be adequate justification for the use of chemical control agents.

The pest and the site of infestation shall be carefully studied to determine level of damage. Strategies for managing the pest will be influenced by the pest species and whether that species poses a threat to people, property, or the environment.

When it is determined that a pesticide must be used, the treatment selected will:

- Be least hazardous to human health;
- Be least damaging to the environment;
- Be effective at controlling the target pest;
- Have minimal negative impacts to non-target organisms; and
- Be applied in accordance with the label of the EPA-registered product.

The IPM Hierarchy of Actions given in attachment F should be used when deciding on what pest control action to take.

#### **PROCEDURE**

1. Should a need for an application of a pesticide arise (subsequent to a thorough assessment of the situation), a NVCC staff member must complete the Pesticide Use Request Form (Appendix A). If a contractor is hired to apply pesticide, the Building Maintenance Supervisor or his/her designee will complete the form. The form will be submitted to the Facilities Director for approval at least five business days prior to the intended date of application.

The circumstances surrounding the need for pesticide application will be reviewed and further information may be requested in order to approve or deny the request. The Facilities Director will forward a copy of the completed form to the Coordinator of EAOH&S and to the Director of the Child Development Center if the pesticide application occurs on the grounds occupied by the Center. The Director of Child Development Center must receive notification at least 36 hours prior to application in order to allow for advance parent/guardian notification.

- 2. The Office of EAOH&S will maintain a record of its pesticide applications for a period of five years. Additionally, pest surveillance data sheets that record the number of pests or other indicators of pest populations that verify the need for treatment will also be maintained.
- 3. The use of privately acquired pest control products by non-maintenance personnel (e.g. Raid, ant killers, etc.) will not be permitted in or on campus buildings or properties.
- 4. Persons mixing, loading, applying moderately toxic or very toxic pesticides, or cleaning equipment used with such pesticides must hold a valid applicator certificate under CT General Statute section 22a-54.

- 5. The Material Safety Data Sheet for the pesticide must be available upon employee request. Staff located in the treatment area will be notified by the person submitting the request prior to the application of any pesticide.
- 6. Entry to the areas of pesticide application will be restricted according to the pesticide label. The person completing the Pesticide Use Request Form will be responsible for placing signage notifying the public about the application and when it is safe to re-enter the area according to label information. See page 2 for further information regarding notice-of-application.
- 7. Parents and guardians of children enrolled in the Child Development Center at NVCC shall receive notification of the College's pest management plan including this document at the time of enrollment (Attachment B). Parents and guardians will receive notification at least 24 hours prior to any pesticide application to the grounds of the Center. The notification will include: 1) the name of the active ingredient of the pesticide, 2) the target pest, 3) the location of the application, and 4) the date or proposed date of application (Attachment C). Should an emergency application occur, notice will be given as soon as practicable.
- 8. All applications of pesticides to the areas occupied by the Child Development Center, both indoors and outdoors, shall be made by a certified pesticide applicator.
- 9. All non-emergency applications of pesticides within and on the grounds of the Child Development Center will be prohibited during regular school hours or planned activities.
- 10. Restricted-use pesticides, when needed, will be applied only by a certified pesticide applicator.
- 11. Persons applying pesticide shall be trained in the principles of IPM.
- 12. Persons applying pesticide must follow all label precautions, including use of personal protective equipment.
- 13. Pesticides shall be stored in a secure site that is not accessible to unauthorized persons.
- 14. Consider mixing all pesticide formulations outside.
- 15. Sanitary measures shall be enforced and buildings regularly cleaned and repaired in order to prevent infestations, minimize the use of pesticides, and eliminate routine spraying.

# **ATTACHMENT A**



# **Pesticide Use Request Form**

**Directions:** Complete this form and submit to the Director of Facilities at least five business days prior to the intended date and time of application. In cases of emergency application, please submit within 24 hours of application.

Name:	Date of request:
Describe the need for pesticide use. Please inc	clude targeted pest, area of concern, and results of monitoring:
Describe each Integrated Pest Management (IF	PM) method implemented:
If IPM was not used, explain why:	
Pesticide Trade Name & Active Ingredient:	EPA Registration #
Restricted-use pesticide yes no;	Check one: Scheduled Application Emergency Application
	am/pm Rate of application:
	ct label:
	azards:
Personal protective equipment required:	
Name of applicator (unlicensed):	
	License #
Name of commercial operator:	License#
Office Use Only:	
Health & Safety Literature Reviewed:	Copies to Offices: EAOH&S Director of CDC:
Notification made to occupants located in the	area of pesticide application:
Approved by:	Date:

Comments:

#### **ATTACHMENT B**



750 Chase Parkway • Waterbury, CT 06708 www.nvcc.commnet.edu

Dear Parents and Guardians,

In accordance with Connecticut Public Act 99-165, "An Act Concerning Notice of Pesticide Applications at Schools and Day Care Centers," the administration of Naugatuck Valley Community College is providing you with this information regarding pesticide application at the College.

This information is provided at the beginning of a school year and for students transferring to the Child Development Center during the year. Pertinent policy information follows:

- Naugatuck Valley Community College (NVCC) applies pesticides based on an Integrated Pest Management Plan (IPM) in accordance with Public Act 99-165, to minimize the amount of pesticides used.
- NVCC employs certified pesticide applicators for the application of pesticides at the Child Development Center.
- NVCC prohibits the non-emergency use of pesticides during school hours.
- The administration will approve the use of a pesticide only after all available options, including no action, have been considered.
- The Director of the Child Development Center will notify parents and guardians prior to the use of pesticides on the grounds of the Child Development Center.
- You have a right to be notified of each pesticide application, as well as of any changes in the
  pesticide application policy. Complete the "Pesticide Application Notice Request" (see
  attachment) and return it to the Director's office (K400).
- A copy of our pesticide management and pesticide application policy is included.

Should you have any questions or comments, please contact the Child Development Center's office at (203) 596-8604.

Best regards,

Dana D. Elm Environmental Affairs Coordinator

# **ATTACHMEMT C**



# **Notice for Parent or Guardian**

Dear Parent or Guardian:		
We are writing to notify you about a pesticide application to the grounds of the Child Development Center. Please see the information provided below. If you have questions regarding this notice, please contact Marianne Generali at 203-596-8604.		
Sincerely,		
Marianne Generali Director of Child Development		
Notice of Pesticide Application		
Date Form is Completed:		
Location of Planned Pesticide Application:		
Target Pest:	-	
Name of Pesticide and Active Ingredient:		
Planned Date/Time of Pesticide Application:		

## ATTACHMENT D

# **Elements of a Pest Control Management Plan**

The Pest Control Management Plan must include:

- The name and business of the state department, agency, or institution preparing and implementing the plan;
- A description of the objectives of the plan;
- The name, business address, and telephone number of a contact person employed by the agency familiar with the objectives and contents of the plan;
- A list and description of integrated pest management options to be implemented by the agency;
- A list and description of integrated pest management options rejected and the reasons for rejecting each option;
- A list and description of pesticide use programs to be implemented by the agency including but not limited to the following:
  - The types and amounts of pesticide to be used;
  - The need for pesticide use and purposes for which the pesticides are to be used;
  - The locations to be treated and the timing and frequency of pesticide application to each location;
  - The name and business registration number of any commercial pesticide application business that the agency plans to have perform pesticide applications for it;
  - Maps identifying the location of any public water supply watershed or well field, as delineated in the "Atlas of the Public Water Supply Sources and Drainage Basins of Connecticut" published by the DEP, within which any pesticide application may be made, and special considerations regarding pesticide applications in those areas.

# **ATTACHMENT E**

**Notice of Application** 

# PESTICIDE APPLICATION

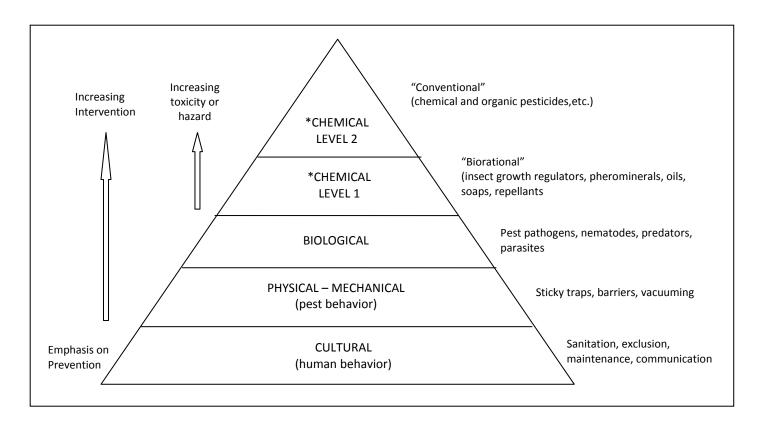


Pesticide name: _	
Date applied:	

Do not re-enter until: \_\_\_\_

# **ATTACHMENT F**

# **IPM Hierarchy of Actions**



<sup>\*</sup>Formulation of chemicals should emphasize minimizing potential exposure to non-targets.