

North County Environmental Resources

IPM Plan

(Draft provided by the IPM Institute as part of the IPM STAR or GREEN SHIELD CERTIFIED evaluation process)

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INTRODUCTION

Integrated Pest Management (IPM) is an approach that establishes a sustainable approach to managing pests by combining biological, cultural, physical and chemical tools in a way that minimizes economic, health and environmental risks.

NCER has adopted this Integrated Pest Management Plan for the buildings and grounds NCER manages. The plan outlines procedures to be followed to protect the health and safety of staff, patients and visitors from pest and pesticide hazards. The plan is designed to voluntarily comply with policies and regulations promulgated by the Department of Agriculture for public buildings and health care facilities.

Objectives of this IPM plan include:

- Elimination of significant threats caused by pests to the health and safety of patients, staff and the public.
- Prevention of loss or damage to structures or property by pests.
- Protection of environmental quality inside and outside buildings.

This IPM plan will be stored in the office of the IPM Coordinator.

IPM COORDINATOR

The Chief Operating Officer (COO) or designee shall be NCER'S IPM Coordinator and be responsible to implement the IPM plan and to coordinate pest management-related communications between NCER, its landlords, service providers, staff and patients.

The COO shall designate an employee at each NCER-managed facility to serve as the IPM Site Coordinator for the site.

IPM COMMITTEE

NCER will maintain an IPM or other safety-related committee with responsibility for annual review of the IPM program and for assisting the IPM Coordinator in resolving pest-related issues. The committee will address IPM issues as needed and at least annually. Minutes will be taken of committee meetings and kept on file by the IPM Coordinator. Membership will include the IPM Coordinator and IPM Site Coordinators.

POSTING AND NOTIFICATION OF PESTICIDE APPLICATIONS

The IPM Coordinator shall be responsible to annually to notify employees and enforcement agency of the facility, requesting notification of planned and emergency applications of pesticides in facility buildings and on facility grounds.

When pesticide applications are scheduled in NCER-managed buildings or on grounds, NCER Service Providers and staff shall provide notification in accordance with law, including:

- 1. Posting a pest control information sign with the date, time and location of the application and the product applied in an appropriate area and including contact information for additional details.
- 2. Providing this information to all individuals working in the building.
- 3. Providing this information to all who have requested notification of individual applications of pesticides.

Where pests pose an immediate threat to the health and safety of customers or employees, NCER may authorize an emergency pesticide application and shall notify by telephone anyone who has requested such notification. Disinfectants, anti-microbials and self-contained or gel-type pesticide baits applied in inaccessible areas are exempt from posting, notification and the 7-hour reentry requirement.

RECORD KEEPING & PUBLIC ACCESS TO INFORMATION

NCER will maintain records of all Service Provider visits and pest control treatments for at least three (3) years. Information regarding pest management activities will be made available to the public at the NCER's administrative office. Requests to be notified of pesticide applications may also be made to this office.

TRAINING

All NCER staff will be provided with training on NCER's IPM policy at hire and during annual update training. Training will include the rationale for the IPM policy and program and specific elements including use of the pest-sighting log and prohibition on pesticide applications by non-certified individuals.

Additionally, designated staff including the IPM Coordinator, IPM Site Coordinators and those who conduct regular inspections of NCER facilities will receive advanced training on identifying pest infestations and pest-conducive conditions. This training will improve the ability of NCER staff to oversee Service Providers and NCER staff compliance with NCER's IPM policy and plan.

GENERAL IPM STRATEGIES

Pest management strategies may include education, exclusion, sanitation, maintenance, biological and mechanical controls, and pre-approved, site-appropriate pesticides.

An Integrated Pest Management decision at NCER shall consist of the following steps:

- 1. Minimizing import of materials sources known to harbor pests
 - a. Source site approval prior to receiving materials
 - b. Appropriate training of receiving inspector to identify pests
 - c. Certification of woods from known host locations (eg. Pine bark beetle from forest woods)

- 2. Identify onsite pest species.
- 3. Estimate pest populations and compare to established action thresholds.
- 4. Select the appropriate management tactics based on current on-site information.
- 5. Assess effectiveness of pest management.
- 6. Keep appropriate records.

Decisions concerning whether or not pesticides should be applied in a given situation will be based on a review of all available options. Efforts will be made to avoid the use of pesticides by adequate pest proofing of facilities, good sanitation practices, selection of pest-resistant plant materials, and appropriate horticultural practices.

When it is determined that a pesticide must be used in order to meet pest management objectives, the least-hazardous material, adequate for the job, will be chosen.

All pesticide storage, transportation, and application will be conducted in accordance with the requirement of the Federal Insecticide, Fungicide, and Rodenticide Act (7 United States Code136 et seq.), Environmental Protection Agency regulations in 40 CFR, Occupational Safety and Health Administration regulations, NCER policies and procedures, and local ordinances.

No person shall apply, store, or dispose of any pesticide on NCER-managed property without an appropriate pesticide applicator license. All pesticide applicators will be trained in the principles and practices of IPM and the use of pesticides approved for use by the local enforcement agency and NCER. All applicators must comply with the IPM policy and follow appropriate state and local regulations and label precautions when using pesticides in or around NCER facilities.

Pest-specific strategies will be included in the IPM Program Specifications provided to each service provider.

NCER SERVICE PROVIDER ROLES

NCER service providers including cleaning, pest control and landscape maintenance will be guided by written and signed contracts including NCER-developed IPM program specifications for structural pest control providers.

Service providers will be directed to provide special attention to pest-vulnerable areas including food storage, preparation and serving areas; washrooms; custodial closets; mechanical rooms and entryways into the building. Service providers will be directed to provide special attention to pest-vulnerable areas including material storage areas, potential breeding areas, and perimeter of the site.

Service providers or other IPM experts will be asked to provide input on any NCER facility renovation or reconstruction projects including reviewing plans for pest-conducive conditions, suggesting pest-proofing measures and inspecting construction where applicable to prevent and avoid pest problems.

NCER STAFF ROLES

NCER administration will provide support to assist the IPM Coordinator in maintaining an IPM program that relies on minimal pesticide use. Such support will include efforts to promptly address any structural,

horticultural, storage, or sanitation changes recommended by the coordinator to reduce or prevent pest problems.

Furthermore, NCER administration will assist the Coordinator in developing and delivering materials and programs for employees, and the customers to educate them about the importance of good sanitation, effective bmp's, and pest control.

The facility director is responsible for ensuring staff compliance with the IPM policy and plan, including the attached check list.

PEST-SPECIFIC STRATEGIES

The following strategies will be used for frequently encountered pests:

Initial and Monthly Evaluation and Consultation with Pest Control Service provider will be on file in administrative office to identify specific pest controls and monitoring to maintain effective dynamic IPM at NCER facilities.