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Bridgeport Board of Education

Pesticide Application Policy

Pesticide Application Policy

Section 1.0 – General

Public Act No. 99-165 requires that local or regional boards of education operating with or without an integrated pest management plan for schools provide a system for notification of application of pesticides. Under this Act, a “pesticide” is defined as a “fungicide used on plants, an insecticide, a herbicide or a rodenticide but does not mean a sanitizer, disinfectant, antimicrobial agent or a pesticide bait”.

Section 2.0 – Statement of Policy

Application of pesticides in buildings and on grounds of schools under the control of the Bridgeport Board of Education is governed by the procedures outlined in the integrated pest management plan (Section 5.0). Additionally, the timing of pesticide applications will be such that proper notification, as detailed in Section 3.0, may be accomplished. Further, the restrictions placed on pesticide application by Public Act 99-165, as detailed in Section 4.0 will be honored.

Section 3.0 – Notification

In accordance with Public Act 99-165, certain notifications must be made to parents and guardians of enrolled students of Bridgeport Board of Education School System, as well as to staff. On or after July 1, 2000 a letter stating the policy of the Bridgeport Board of Education will be sent to the staff of each school and to the parents or guardians of each child. This notification must be sent every year at the beginning of school. Additionally, this letter must be sent to the parents or guardians of any child who transfers to the school during the school year. The letter shall contain the following information (A model letter is included as Appendix I):

- Any staff, parent, or guardian who would like prior notice of pesticide applications at the school may register at the school for this notice.
- Procedures for notification in the event of emergency application of pesticides shall be included
- Any modification to the pesticide application policy shall be included in this letter.

Notification of planned applications of pesticides must be mailed to parents and guardians so that they may be received 24 hours prior to the application. Notice shall be given by any means practicable to school staff who have registered for such notice. In the event of emergency pesticide application, notification shall be made to registered individuals on or before the day of application.

All notifications shall include the following information:

- Name of the active ingredient of the pesticide being applied.
- The target pest
- The location of the application on the school property.

- The date of the application.
- The name of the school administrator, or a designee, who may be contacted for further information.

Forms for this notification are included as Appendix II.

Section 4.0 – Restrictions

Public Act 99-165 requires that no person, other than a pesticide applicator with supervisory certification under section 22a-54 of the general statutes or a pesticide applicator with operational certification under section 22a-54 of the general statutes under the direct supervision of a supervisory pesticide applicator, may apply pesticide within any building or on the grounds of any school, other than a regional vocational agriculture center. However, emergency application of pesticide to eliminate an immediate threat to human health where it is impractical to obtain the services of certificated personnel is exempt.

No application of pesticide may be made in any building or on the grounds of any school during regular school hours or during planned activities at any school. However, in the event of an immediate threat to human health, if it is necessary to make the application during such a period and the pesticide is not a restricted use pesticide (22a-47 of the General Statute), pesticides may be applied during school hours or during planned activities.

No child may enter an area where pesticide application has been made until it is safe to do so according to the provisions on the pesticide label.

Any permittee making use of the school or its grounds for a planned activity may have their permit revoked to provide for the application of pesticides.

Section 5.0 – Integrated Pest Management Plan

General

Integrated Pest Management (IPM) is defined as 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. The primary goal of IPM is to reduce the amounts of pesticides applied by using alternative methods of pest control which may include structural maintenance, sanitation and mechanical or biological control. These methods will help to eliminate conditions that are favorable to pest infestation, making their survival more difficult.

Exterior school grounds will be inspected by City personnel and contractors for the purpose of identifying areas of pest infestation (weed, insect and disease) on the grounds of the school, making recommendations for corrective measures that should be implemented and develop a comprehensive integrated pest management (IPM) plan. Bridgeport Board of Education maintenance employees as well as contractor representatives will be responsible for the inspection of building interiors and exteriors for the same purpose. The IPM plan will utilize all methods of pest control, which may include modifying cultural practices, monitoring for pest

populations, mechanical and biological control, and the judicious use of pesticides. If possible, pesticides will not be applied on a routine basis; however, they may be used as tool-to-maintain pest populations at or below an acceptable level while maintaining plant health as aesthetic quality. The selection of pesticides that may be used will be based on a predetermined hierarchy that will utilize least toxic products as first choice. Whenever practicable, biological controls such as predatory insects, beneficial nematodes or microbial pesticides will be used. Proper implementation of this program will reduce the volume, toxicity and frequency of application of pesticides and other chemicals, thereby reducing negative environmental impact and the risk of potential exposure of building occupants and visitors to the grounds who may be sensitive to their use.

Both contractors and the Director of Maintenance shall meet to discuss areas that have been problematic or sensitive (e.g. wet, shady and or high traffic areas or areas where there is a history of high pest pressure). Areas that are sensitive to pesticide use will also be discussed. (Play areas, sports field, etc.)

Once these areas have been identified, various pest control options and the speed of control necessary as well as threshold/action levels based on pest population, species, plant health and aesthetic considerations will be discussed and determined between the contractors and the City.

The contractors shall submit recommendations for corrective measures in writing to the Board of Education, specifying action that should be taken by that facility (e.g.: correct drainage runoff problems) prior to the application of any pesticides. The Director of Maintenance prior to its application will approve Pest control services, which require the introduction of a pesticide, in writing. The chemical to be applied will be indicated by the vendor so that it may be included in the required notification. Principals will be notified of the planned application so that any planned activities causing a conflict may be rescheduled and so that proper notification may be made to registered parties.

Pest control services will be supervised by and performed by certified employees of the responsible contractor. Once IPM program begins, it will involve periodic visits. Subsequent service calls will be performed, as needed depending upon pest pressure. Service calls involve a visual inspection of potential problem areas, with the assistance of monitoring devices where appropriate and application of pesticides where pest populations exceed threshold levels. Records will be completed by the appropriate vendor at the conclusion of each service call and will include written recommendations of corrective measures that need to be made by building maintenance personnel. If no corrective measures are required, it will be so stated.

The responsible contractors will monitor/inspect the grounds of the facility at least once a month. Additional monitoring may be required during peak periods (June-August) to monitor for weeds and diseases.

All pest problem areas and written recommendations for structural, sanitary or procedural modifications will be recorded on "Ornamental and grass Pesticide Application Record Monitoring Report" forms or substantially similar substitute. These forms will be kept on file that will be maintained by the School with a duplicate copy held at the office of the Director of

Maintenance. Any additional records that will be maintained in this file will include a copy of this plan, copies on any soil sample analysis reports, and copies of the pesticide product label information provided at the time of contract by the responsible contractor(s).

**The certified supervisor shall conduct a follow up inspection to confirm the presence of the pest(s) and verify damage level estimated prior to any widespread application of pesticide if the landscape/pest control technician has identified weed, insect and/or disease infestation.*

The landscape/pest control technician at the beginning of each service call will review Pest sighting report logs provided by the Board of Education. The log will be maintained by the School and at the office of the Director of Maintenance and will serve as a tool to facilitate communication between all personnel and the landscape/pest control technician. All pest sightings should be reported in the logs and should include specific information as to the location and type of pest, if known. Whenever possible, a sample will be provided to the landscape/pest control technician for identification purposes.

Service call/monitoring inspections include *specific areas that will be inspected.*

Notification

At the beginning of each school year, a written statement of the Board of Education's policy on pesticide application on school property and a description of any pesticide applications made at the school during the previous school year. This statement shall be provided to the parents or guardian of any child who transfers to a school during the school year. It shall (1) indicate that the staff, parents, or guardians may register for prior notice of pesticide applications at the school, and (2) describe the emergency notification procedures. Notice of any modification of the policy shall be sent to all registered.

Parents or guardians of children in any school and school staff may register for prior notice of pesticide application at their school. Each school shall maintain a registry of persons requesting such notice. Prior to providing for an application for pesticide within any building or on the grounds of any school, the Principal shall provide for the mailing of notice to parents and guardians who have registered for prior notice. Notice shall include:

- The name of the active ingredient of the pesticide.
- The target pest.
- The location on the application of the school property.
- The date of application.
- The name of the school administrator, or a designee, who may be contacted for further information.

Principals must notify the Director of Maintenance whenever a permit for a major event is scheduled between April 1 and December 1, either on the grounds or in the building. Examples of a major event would be dance recitals, or any other event where it is not possible to change the date.

Recordkeeping

All records of inspections, applications, and notifications shall be maintained at the affected school for a period of five years.

Grass Management

Best management practices will be implemented at all times in an effort to maintain grass (turf) health and appearance. Turf will be mowed to a 2-3" height or as high as possible on a weekly/bi-weekly basis. Mowing should be done when the grass is dry to avoid spread of any turf diseases. Mower blades will be maintained with sharp cutting edges to avoid excessive wounding and stress of the turf-grass.

Upon implementation of the IPM program and prior to the application of any fertilizer or pesticides, soil samples may be collected by the landscape/pest control technician and analyzed.

Soil samples will also be collected and analyzed annually to assess soil fertility and pH. Annual sampling will be performed in late fall or early spring after the frost has left the ground. Amendments will be made to the soil as recommended by the analysis reports. Proper soil pH and fertility will help to prevent many turf-grass diseases and promote plant vigor, thereby reducing the occurrence of insect and weed invasion.

When practicable, organic fertilizers may be used, otherwise, fertilizer with 50% slow release nitrogen shall be utilized. Fertilizer should be applied no later than October 15. Late fall applications of lime will be avoided if possible to reduce the risk of *snow mold*. Over-fertilization may result in the increase of some plant diseases, more frequent mowing, increased thatch layer and risk of leachate into groundwater in some circumstances.

Proper management of grass clippings is an important part of maintaining the lawn. Grass clippings will remain on the lawn and allowed to degrade, returning 50% of available nitrogen back to the lawn. This will help to increase the soil organic matter and promote beneficial earthworm activity.

Watering may be done once a week to a depth of 6" between the hours of 5:00 a.m. and 8:00 a.m. The second best time to water is late evening or early morning after the dew has fallen. Watering in the evening is not recommended on hot, humid nights because it may increase the occurrence of diseases. Keeping the upper soil layers moist may prevent necrotic ring spot and summer patch.

A thatch layer up to 1/2-3/4 inches thick is beneficial. An excessive layer is undesirable because it will block moisture, fertilizers and/or pesticides from reaching the root zone of the turf. Over-development of thatch can be prevented by reducing fertilizer applications and maintaining proper soil pH. If de-thatching is necessary, it will be done mechanically during the spring or late summer (September) when grasses are actively growing and can recover faster.

Fertilizer applications should be performed when grasses are actively growing, usually late May/early June and late August/early September. Fertilizer applications will not exceed 2-21/2 pounds of nitrogen per 1,000 square feet per year unless soil sample analysis reports indicate a necessity to further amend the soil.

Grass (turf) Insects

Visual inspection of the turf areas will be done monthly, April through September by the responsible contractor to monitor for evidence of chinch bug, sod webworm, billbug and/or other destructive turf pests. Additional sampling may be performed to confirm the presence of these pests and/or White Grubs.

Applications of insecticide to turf areas will be limited in an effort to preserve populations of beneficial insects and nematodes. Pesticide application will be considered if monitoring indicates elevated pest populations or up to 20% damage can be anticipated.

Weed Control

A lawn area that is properly managed should produce dense, thick turf-grass, which ideally will help to prevent invasive weed species from getting established. Some weed growth should be anticipated, and tolerated to some degree. Widespread applications of broadleaf herbicides will not be performed unless weed species have invaded greater than 25% of the entire grass area. Spot applications will be performed to small areas on an as needed basis.

Over seeding the area in late summer/early fall with improved turf-grass and raising the mower height during the growing season will help to prevent crabgrass encroachment. This will prevent problems with soil erosion in areas where the crabgrass has been killed off.

A complete re-evaluation of any area requiring a broad application of pesticide will be performed by the responsible contractor to assess and re-implement proper cultural practices to maintain turf density and vigor.

Disease Management

Pesticide application for control of turf diseases will be performed only if evidence of disease has been found and significant areas (10-15% of the total turf area) of permanent damage can be anticipated and all proper cultural practices have been employed. The responsible contractor will discuss pest control options with the City in order to determine the appropriate course of action.

Flower Beds & Formal Landscaping

Best management practices will also be followed for the care and management of all flowerbeds and ornamental plantings. Insect and disease resistant plant varieties will be selected for planting in any flowerbeds and/or formal landscaping areas whenever possible. The landscaping/pest control technician will visually inspect plants for insect and/or disease infestation prior to planting. Plants found to have any infestation will be rejected in an effort to eliminate damage on a large scale. Plants will be planted at the proper depth to avoid plant stress. Mulch will be placed in all garden areas and around individual trees and shrubs. Mulch materials will be placed at sufficient depth to reduce weed growth and help to retain moisture. Mulch placement will also

be placed to provide a buffer area to eliminate mechanical damage, which may result from use of string trimmers or mechanical edgers.

Foundation plantings and vines will be trimmed at least 12" away from the building to eliminate rodent harborage and access to the buildings and allow for monitoring of rodent activity.

The landscape/pest control technician will remove and dispose of dead and dying vegetation from plants and plant beds (*monthly*) to prevent spread of disease. Leaves will also be raked away to prevent accumulation and development of rodent harborage. Branches and plant material will be properly disposed of at the end of each day that work has been performed.

Ornamental Insect Control

Visual inspections will be conducted during routine maintenance activities and pest monitoring traps will be utilized, where appropriate, to indicate the presence of harmful pests. Wherever pest activity is found and if practicable, infested plant(s) or branches will be washed off using a strong stream of water or removed and properly disposed of.

In an effort to preserve beneficial and predatory insects, pesticides will be applied only on an as needed basis. Application of pesticide may be considered if it is anticipated that pest activity will result in unacceptable levels of damage to ornamental plants. For this policy, up to 15% damage or defoliation to ornamental plants will be considered acceptable.

Pesticide application will be limited to only the infested area(s). General applications of pesticides will not be done. Bio-insecticides, insecticidal soaps, dormant oil or summer oil will be utilized if possible. The timing of each application will be based first on whether the pest is present and causing damage, the pest life cycle and at what stage the pest is most vulnerable to pesticides.

Preventive pesticide applications may be performed only to areas where the previous year's monitoring has shown evidence of insect pests that may over-winter on ornamental plants.

Weed Control

Pre-emergent weed control may also be used in perennial flower gardens where pesticide labeling allows. Where practicable, hand weeding will be performed in flower gardens and the areas of ornamental plantings on a limited basis due to labor expenses. Borders and walkways will be edged using a string trimmer or mechanical edger.

Disease Management

Pesticide applications for control of ornamental diseases will be performed if evidence of diseases has been found and significant areas (15% or greater) of permanent damage can be anticipated and all proper cultural practices have been employed.

Preventive pesticide applications may only be performed when the previous year's monitoring has indicated a likelihood of disease or if certain plant species, prone to disease problems, are present. Preventive applications should be made only to specific problem areas.

The responsible contractor will discuss pest control options with the Director of Maintenance to determine the appropriate course of action.

*****Pesticide applications will be performed after regular business hours or the weekend when the building is unoccupied. *****

Pesticide Plan

Pesticides may be applied if pest populations exceed an acceptable level. Applications will be performed *after regular business hours or on the weekend* when the building is unoccupied. Priority is given to those pesticides having the lowest toxicity, taking into consideration the method and frequency of application and the risk of exposure to building occupants. Whenever practicable, biological pest control such as predatory insects, beneficial nematodes or microbial pesticides will be utilized.

An appraisal of this IPM program will be conducted bi-monthly by the City in consultation with the responsible contractors. A determination will be made as to the effectiveness of the program and revisions will be made to correct potential problems.

→ *Is this the way it will be done here?*

**Bridgeport
Board of Education
Integrated Pest Management (IPM)
Policy Plan**

The renewal of an IPM program to all Bridgeport Schools must be adopted annually with the understanding that any and all pesticide treatments must follow guidelines set forth by the Department of Environmental Protection agency. Attached is an IPM program that has been modified to utilize the least toxic methods available in today's industry. Some treatments used today in Bridgeport Schools do not even require oversight from the DEP because no pesticides are being used to control such pests as bed bugs.

It is recommended that this policy be placed in the parent handbook so that any concerns by the parent/guardian of the child can be addressed. Any emergency treatments required for the health and safety of the child/teacher or visitor may be immediately addressed without any notification to the parent/guardian of the child. (i.e. stinging insects ,bees, rodents, bed bugs, wildlife) Pest Control Company will be available at the beginning of every school year to answer any questions by school staff, parent/guardian of child.

Application Plan

Date of Application: prior to or after school hours (unless in case of emergency situations, or weather related delays)

Choice of Pesticide: See IPM Model designed by DEP and Pest Control Company.

Location of Treatment: Food service areas, loading dock, locked closets, slop sinks, storage rooms and any non-public areas required. All classrooms will be addressed during non-school hours; vacations, after school or any holiday children are absent from school.

No Pesticides will be stored on school property, by pest control company, teacher or custodian.

Any exterior treatments must be posted containing; date of application, pesticide used and re-entry time to area. (Please note this regulation of posting is mostly for lawn and tree companies)

Approved by
School/District
Administraor: _____ Date _____

School
Nurse: _____ Date _____

Custodian: _____ Date: _____