



**SAINT MARY SCHOOL**  
**GLOUCESTER CITY, NEW JERSEY**

**INTERGRATED PEST MANAGEMENT PLAN**  
**2008-2009**

**SAINT MARY SCHOOL  
INTEGRATED PEST MANAGEMENT PLAN**

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## GENERAL SCHOOL INFORMATION

School Name: Saint Mary School

Address: 340 Cumberland Street City: Gloucester City Zip: 08030

County: Camden District: Diocese of Camden

Phone: 856-456-0913 Email: stmaryschool@smshop.org

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## INTEGRATED PEST MANAGEMENT STATEMENT

The **Integrated Pest Management Policy of Saint Mary School (SMS)** seeks to resolve conflicts and redirect pest control efforts toward least hazardous practices. As such, any methods used in the management of pests will not exclude the application of pesticide agents, but will minimize their use whenever possible. SMS acknowledges that a safe, sanitary and healthy learning environment is required for students and educators. Therefore, we will concentrate our efforts on developing and implementing long-term pest prevention methods favoring non-chemical control measures and other means posing the least possible threat to persons or the environment. SMS will make every effort to prevent pest infestations through economically feasible methods.

In accordance with applicable NJ State statutes, the goal of our policy is to eliminate or mitigate the economic, health, and aesthetic damage caused by pests at SMS. Additionally, our policy is designed to reduce the volume of pesticides used on school property so as to minimize the potential hazards posed by these agents to human health and the school environment. The procedures to be used will include site or pest inspections, pest population monitoring, an evaluation of the need for pest control, and one or more pest control methods, such as sanitation, structural repair, mechanical and biological controls, and other nonchemical methods. When nonchemical options are ineffective or unreasonable, our policy allows for the use of a pesticide, with a preference towards the use of a low impact pesticide.

## SAINT MARY SCHOOL INTEGRATED PEST MANAGEMENT PLAN GOALS

1. The school principal and/or his/her designee in consultation with the pastor, school board, and school maintenance will serve as the integrated pest management control coordinator. The responsibilities of this individual will be to maintain information about the school's integrated pest management policy

including a record of pesticide applications on the property by personnel or contractors; to act as a contact for inquiries concerning this policy; and to maintain material safety data sheets, when available, and labels for all pesticides used on the property.

2. The Integrated Pest Management (IPM) Coordinator and other designated personnel will attend training workshops in IPM as required by the NJ Department of Environmental Protection.
3. Monitoring methods and schedules will be established whereby the IPM coordinator will keep accurate IPM records. Records will consist of a Pest Activity Monitoring and Control Log. This log will include date/time of monitoring/sighting, & complaints and control measures used. In addition to this, a school pesticide application records form will be maintained. This form will record: place of application, application date, pesticide applied, EPA registration number, and mix of solution applied, application site, applicator named & registration number. These records will be available for public inspection.
4. The school principal will include a notice of the integrated pest management policy in the school handbook, newsletter(s), and/or on the school's website
5. Pre notifications procedures will be established for non-low impact pesticide use. SMS will adopt notification procedures for emergency use of non-low impact pesticides and establish posting procedures for indoor and outdoor areas that are treated with non-low impact pesticides.
6. The Integrated Pest Management (IPM) Plan will be evaluated and revised annually.

## **Roles/Responsibilities and Training**

School Administrator/IPM Coordinator:

The SMS principal will serve in the role of Integrated Pest Management (IMP) Coordinator. He/she will adopt and implement a school IPM policy that required the development of a site-specific IPM plan. The plan will identify procedures to control pests and minimize exposure of students, teachers, and other school staff to pesticides.

The principal/IPM coordinator will attend Integrated Pest Management training as required by the New Jersey Department of Environmental Protection.

Duties performed will include:

- Maintain records of pesticide applications and issue annual notices of IPM policy.
- Maintain information about pesticide applications on school property including records obtained from the pesticide applicator, material safety data sheets (MSDS) when available for pesticides used, and labels for all pesticide products used.
- Permit the use of certain pesticides and providing the notifications required.

- Post sign prior to use of certain pesticides in all required areas.
- Provide the notifications required of the emergency use of certain pesticides.
- Develop contracts, bid specifications, and contract addenda that foster the school's IPM Plan.
- Respond to inquires and provide information to teachers and other school staff, students, and parents or guardians regarding IPM at school
- Provide access to the above information for public reviews.
- Provide training in IPM practices to the school community.
- Develop and maintain a map(s) of the school and school grounds for the purpose of tracking all pest-monitoring activities.
- Maintain a prioritized list of interior and exterior pest management issues, including such items as key pest, needed structural and landscape improvement, poor sanitation practices, leaky pipes etc, for or the school.
- The school principal will include a notice of the integrated pest management policy in the school handbook, newsletter(s), and/or on the school's website

### **School Integrated Pest Management Coordinator Training**

The school IPM Coordinator must receive NJDEP approved training, when it becomes available, that provides an overview of the principles of IPM, legal requirement, and how to implement the IPM Policy and Plan in compliance with rules and regulations adopted by the NJDEP.

### **School Nurse**

The school nurse will consider potential pesticide exposure when evaluating a child's health complaint. The school nurse will have access to the Material Safety Data Sheets (MSDS) for any chemical used on school property (when available) and be aware of any children with asthma or chemical sensitivities.

Responsibilities:

- The school nurse will have access to the poison Control Center hotline at 1-800-222-1222 in case acute poisoning is suspected,
- The school nurse will monitor head lice and contact the parent/guardian and inform them of the school's policy in regard to this pest.
- The school nurse will educate students, teachers, staff and parents/guardians about preventing the spread of head lice if or when they occur.
- The school nurse will report any pest sighting(s) and suspected or actual pest activity to the IPM coordinator.

## **School Nurse Training**

In addition to required professional training, the nurse will be aware of public health pests of significance that may impact on student health.

## **Kitchen Staff**

Food handling, preparation and distribution areas are among the most critical areas for pest management. Kitchen staff will keep all food areas free of crumb and food residues after each use.

Responsibilities:

- A strict practice of good sanitation in all kitchen and food service areas is essential. All areas will be cleaned daily.
- The food manager and/or supervisor will inspect the kitchen and food service areas daily to verify proper sanitary maintenance of food service areas. A record of these daily inspections will be kept in accordance with school policy.
- On monthly bases, the IPM coordinator will inspect kitchen and food service areas, and keep a record of these inspections in an IPM logbook or file.
- Pest sightings or evidence of pest activity in these areas should be reported on a daily bases. Any pest sighting(s) and suspected or actual pest activity will be reported to the IPM coordinator

## **Kitchen Staff Training**

The Nurtirserve Food Management Service, a contracted service, will be responsible to see that all kitchen staff receive training in pest management monitoring and control. Evidence of this training will be submitted to the IPM coordinator.

## **Maintenance and Custodial Staff**

The maintenance and custodial staff (per related duties) will maintain the sanitation and structural needs of the school building and grounds on a day-to-day basis. This will include both interior and exterior maintenance and cleaning. The maintenance and cleaning staff will be diligent in reporting pest sightings or evidence of pests to the IPM coordinator.

Responsibilities:

- Practice all sanitation and maintenance techniques to ensure the a safe and healthy environment
- Recognize, report, and correct conditions that my lead to pest problems such as water leaks, potential pest entryways, and poor sanitation practice, in and around the school.
- Pest sightings or evidence of pest activity in these areas should be reported on a daily bases. Any pest sighting(s) and suspected or actual pest activity will be reported to the IPM coordinator

## **Maintenance/Custodial Staff Training**

The IPM coordinator is responsible for training the maintenance and custodial staff in the following areas:

- Proper sanitation procedures for SMS.
- Test detection and monitoring of devices placed throughout the school
- Pest control products they are allowed to use and the pest control products they are not allowed to use on school property.

## **Students, Teachers, and other School Staff**

The responsibilities of Integrated Pest Management for students, teachers, and school staff will focus on prevention.

Responsibilities:

- All must clean up food leftovers, including but not limited to the following areas: teacher lounge, gum under students desks, paper clutter, classroom snacks, paper mache crafts, and other items attractive to pests.
- Students, teachers, and staff with not remove or move sticky traps or other pest monitoring devices found in or around the school. If a student, teacher or other school staff member thinks a trap or monitoring device has been moved or tampered with they should report it immediately to the IPM coordinator.
- Pest sightings or evidence of pest activity in these areas should be reported on a daily bases. Any pest sighting(s) and suspected or actual pest activity will be reported to the IPM coordinator

## **Training of Students, Teachers, and Staff**

The IPM Coordinator will train students, teachers and other school staff in their role in the school's integrated pest management program. Students, teachers, and staff will be given a brief overview on pest identification and the conditions that they, as building occupants, may create that promote pests. This information will focus on pest reduction strategies connecting people's behavior, such as over watering plants, eating at desks, leaving crumbs on floor, etc. to pest problems.

Pamphlets and fact sheets will be made available in specific areas such as the cafeteria and teacher's lounge.

## **Parents and Guardians**

An Integrated Pest Management Plan is a collaborative effort. Therefore, parents and guardians need to be involved in its implementation.

### Responsibilities:

- Parents should learn about Integrated Pest Management practice and follow them at home so pests are not carried to school in backpacks, notebooks, lunch boxes, clothing etc.
- Their children should be aware of their role in the IPM program at their school
- Encourage their children to lend a hand in cleaning up.
- Discourage children from keeping food in their lockers and desks for extended periods of time.
- Be aware of the current pest management practice in their child's school.
- Parents may and should express their views regarding pesticide use at their school.

### **Parent and Guardian Training**

The school's IPM coordinator will make parents and guardians of students aware of the SMS IPM Program. An annual IPM Program Notification will be sent home at the beginning of each school year.

### **Vendors and Contractors**

Contractors and Vendors will be required to implement regular maintenance service, cleaning under and behind machines during service visits, and immediate correction of a problem that may foster pests (breakage, leaks, or excessive condensation from machine).

### **Pest Management Professionals**

New Jersey Administrative Code Title 7 Chapter 30; Subchapters 1-13 state that all pesticide applications which are made on school property must be done by applicators or operators licensed to apply pesticides by the New Jersey Department of Environmental Protection Pesticide Control Program

### Responsibilities:

- Inspect the school building and grounds to identify potential problem areas and any structure or management practice, which may contribute to pest problems.
- Notify the IPM Coordinator in writing when pests or signs of pest activity are found
- Make written recommendations to IPM Coordinator detailing corrective actions to be taken to reduce potential pest problem conditions.
- Recommend to the IPM coordinator appropriate non-pesticide procedures to correct pest problems.
- Offer a selection of a low impact pesticide first, when it is determined that a pesticide must be used.

- Provide the Integrated Pest Management coordinator with material safety data sheets (MSDS), when available, and product labels of all pesticides that are applied on school property.
- Provide application information according to NJ regulations.
- If a non-low impact pesticide must be used, request that a “School Integrated Pest Management Act Compliance certification Form be signed by the school’s IPM coordinator, ensuring all advance notification and posting has been performed by the school as required.
- Provide comments in writing regarding any necessary modification to the school’s IPM plan at the time of the annual review.

### **Pest Management Professional Training**

The Pest Management Professional (PMP) should be made aware of the kitchen maintenance routine and the garbage routine, as well as, recycling program, trash locations, and open windows.

### **Pest Identification**

The IPM coordinator will conduct an onsite assessment. Interior and exterior pest will be identified for the school by historic account, interviews, and direct monitoring. In conjunction with the Pest Management Professional, the pest activity and conditions that are contributing to any pest will be identified.

#### **Interior site assessment:**

The IPM coordinator and PMP will conduct a thorough inspection and make a record of the following information:

- Areas that currently have pests or show signs of pest activity
- Areas that historically have had pests and when this occurs during the year.
- Conditions or behaviors contributing to pest problems that can be corrected.
- If already in use, the location of detection and monitoring devices and bait stations.
- Recommendation for sanitation, structural repairs, and habitat modification.

#### **Exterior site assessment:**

The IPM coordinator and PMP will conduct a thorough inspection and make a record of the following information:

- Location of trees, shrubs, and ornamentals
- Assign and divide the landscape into management areas (prayer garden, playground, trees and shrubs along fence)

- Note key plants and any pest problems, either current or historical
- Horticultural recommendations.

### **Pest Identification**

In situations where the IPM coordinator or Pest Management Professional is unable to identify a pest, the county office of Rutgers Cooperative Extension may be consulted. Information is available at: <http://www.rcre.rutgers.edu/extension>.

### **Ongoing Pest Monitoring**

Once a pest is correctly identified monitoring methods and schedules, as well as pest control strategies will be determined based on the pest's life, food sources, habitat preferences, water needs and natural enemies.

#### **Pests:**

Interior: Indoor pests will be monitored via direct inspection, sticky traps, pheromone baits, tracking powder, mechanical traps, and glue boards as necessary. If baits or traps of any kind are used, the following will apply where applicable.

- Each bait station or trap is assigned an identification number.
- A map is prepared showing the location and number of each trap or bait placement.
- Each trap or bait station is marked with appropriate warning language.
- The Pest Management Professional will check traps weekly during the early stages of solving a serious pest infestation, then taper off to monthly, once the pest problem is under control.
- Captured rodent pests will be recorded and disposed of on a daily basis.

Exterior: Outdoor landscape pests will be monitored via direct inspection. The following will apply where applicable:

- Landscape plants are scouted at least monthly during the growing season for conditions requiring action (for example, damaged, diseased, dead limbs; soil erosion/compaction; insects, disease, weed pests and damage).
- Scouting usually begins when plants put out new leaves in spring and ends when leaves fall in autumn.
- Plants with annually recurring pest problems will be scouted according to pest appearance timetables.

### **Pest Prevention and Control**

Wherever possible, the School will take a preventive approach by identifying and removing, to the degree feasible, the basic causes of the problem rather than merely attacking the symptoms (the pests). This prevention-oriented approach is also best achieved by integrating a number of strategies. It is easier to spot a potential problem when the interior and exterior of the school is clean and uncluttered.

Integrated Pest Management employs a multi-tactic approach, integrating several strategies to combat a particular pest. Control strategies that remove a pest's food,

water, and shelter (harborage), and limit its access into and throughout buildings and on school grounds will be employed as follows:

Cultural control: Cultural control includes, improve sanitation; reducing clutter; people change habits like leaving food in the classroom; maintain plant health by taking care of the habits and conditions; fertilization, plant selection (right plant/right place), and sanitation to exclude problematic pests and weeds.

Physical control: for example, pest exclusion; removing pest access to the school building by sealing openings with caulk and copper mesh; repairing leaks and screens; removing pests by hand.

Mechanical control: for example, insect monitors, light traps, rodent traps; till soil prior to planting to disrupt pest life cycles.

Biological control: use of pest's natural enemies. For example, introduce beneficial insects or bacteria to the environment or, if they already exist, provide them with the necessary food and shelter; and avoid using broad-spectrum chemicals that will inadvertently kill beneficial.

Least hazardous chemical controls with preference given to School IPM Act-defined 'low impact pesticides'.

## **State Law**

The New Jersey School IPM law defines 'low impact pesticides' and necessarily creates the distinction 'non low impact pesticides' for other pesticides not meeting their definition. The law and resulting model policy published by DEP make it clear that when pesticide use is needed, preference should be given to choosing a 'low impact pesticide', if possible. The School will give preference to choosing a 'low impact pesticide', as described below.

A low impact pesticide is a pesticide that is considered to have relatively minimal risk as compared to pesticides in general. The New Jersey School IPM law specifically defines what a low impact pesticide is in two parts. The first part consists of a federal EPA list of pesticides that it considers to be minimal risk and thus do not require formal registration. These pesticides are listed in the federal code at 40 CFR § 152.25. (See <http://www.pestmanagement.rutgers.edu/IPM/SchoolIPM/NJAct/40cfr15225.pdf>). The second part consists of a list of pesticide ingredients (such as boric acid or diatomaceous earth) and formulation types (such as gels or pastes) that are considered low impact. It is important to note that a substance considered "low impact" does not necessarily mean zero risk. All pesticides must be used properly to reduce potential risk from their use.

**Per the law**, emergency application of a non-low impact pesticide will only be made when the health or safety of a student or staff member is threatened. A "school pest emergency" is defined in the law as "an urgent need to mitigate or eliminate a pest that threatens the health or safety of a student or staff member." One example would be the presence of stinging insects such as ground hornets in an athletic field where events

are scheduled. If a pest emergency exists, the school may use pesticides without the normal 72-hour pre-notification to parents and staff, and the advance posting of signs. Rather, the posting must be done at the time of the application, and the notice to parents and staff must be done within 24 hours after the emergency application. The notice that goes to parents and staff must explain what the reason for the emergency was, and if possible, what could be done to prevent such an emergency use next time.

Treatments, whether pesticides or low impact pesticide materials, will only be applied on school property when and where needed. It is rarely necessary to treat an entire building or landscape area to solve a pest problem. Monitoring will be used to pinpoint where pest numbers are beginning to reach the action level and 'spot' treatments' will be confined to those areas.

The School IPM Coordinator and Pest Management Professional(s) will meet monthly to cover monitoring reports and determine corrective action. The Pest Management Professional should make recommendations for corrective actions to the School IPM Coordinator. They will consider all options, including no control, and look at pest activity levels versus thresholds.

They will consider EPA-defined criteria for selecting a treatment strategy:

1. Least hazardous to human health
2. Least disruptive of natural controls
3. Least toxic to non-target organisms
4. Most likely to be permanent
5. Easiest to carry out safely and effectively
6. Most cost-effective
7. Most site-appropriate
8. A pest management priority list to optimize a plan of corrective actions will be generated.

### **Notification of Pesticide Use**

Whenever the IPM coordinator or PMP determines that an agent, other than a low impact pesticide, must be used on school property, the parents/guardians of each student and every staff member will be notified at least 72 hours in advance of the application of the pesticide. If the date of the application of the pesticide must be extended beyond the period required, the notice will be reissued for the new date of application.

The notice will include:

- (a) the common name, trade name, and Federal Environmental Protection Agency registration number of the pesticide;
- (b) a description of the location of the application of the pesticide;
- (c) a description of the date and time of application plus alternate dates in the case of outdoor treatments;
- (d) a statement from The Office of Pesticide Programs of the United States Environmental Protection Agency that, "Where possible, persons who potentially are sensitive, such as pregnant women, infants, and children, should avoid any unnecessary pesticide exposure";

- (e) a description of potential adverse effects of the pesticide based on the material safety data sheet, if available, for the pesticide;
- (f) a description of the reasons for the application of the pesticide;
- (g) the name and telephone number of the integrated pest management coordinator for the school; and
- (h) any additional label instruction and precautions related to public safety.

Additionally, a sign of at least 8 inches x 11 inches will be posted 72 hours in advance and following the application that provides notice of the application of the pesticide in or adjacent to the location to be treated and at each entrance to the buildings. In the case of outdoor pesticide applications, each sign will include three dates, in chronological order, on which the outdoor pesticide application may take place if the preceding date is canceled due to weather.

(5) A pesticide, other than a low impact pesticide, may be applied on school property in response to an emergency, without complying with the above aforementioned procedure. Within 24 hours after the application of a pesticide or on the morning of the next school day, whichever is earlier, the IPM coordinator will provide each parent/guardian and staff members notice of the application of the pesticide for emergency pest control. The notice will include all components previously delineated plus a description of the problem and the factors that qualified the problem as an emergency that threatened the health or safety of a student or staff member and if necessary, a description of the steps that will be taken in the future to avoid emergency application of a pesticide. A sign warning of the pesticide application at the time of the application will be posted as described herein.

(6) A pesticide, other than a low impact pesticide, will not be applied on school property where students are expected to be present for academic instruction or for organized extra-curricular activities prior to the time prescribed for re-entry to the application site by the United State Environmental Protection Agency on the pesticide label, except that where no specific numerical re-entry time is prescribed on the label. Such a pesticide, other than a low impact pesticide, will not be applied on school property where students are expected to be present for academic instruction or for organized extra-curricular activities within seven hours of the application.

(7) A pesticide, other than a low impact pesticide, will not be applied in the school buildings when students are present. Students will not be present in an untreated portion of the school buildings unless the area being treated with a pesticide, other than a low impact pesticide, is served by a separate ventilation system and is separated from the untreated area by smoke or fire doors.

(8) A low impact pesticide may be applied in areas of the school buildings where students will not contact treated areas until sufficient time is allowed for the substance to dry or settle, or after the period of time prescribed for re-entry or for ventilation requirements on the pesticide label has elapsed accordingly. This provision will not apply to public health officials during the normal course of their duties.

(9) A commercial pesticide contractor will not be liable to any person for damages resulting from the application of a pesticide at Saint Mary School if the damages are solely due to our failure.

**\* A copy of reporting forms are available upon request.**