

School Integrated Pest Management Plan
for the
South Amboy School District

School Year
Starting July 1, 2022 and
Ending June 30, 2023



SCHOOL IPM

Plan prepared by Thomas Bikowski

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Annual Integrated Pest Management Notice For School Year 2022/2023

Dear Parent, Guardian, or Staff Member:

This notice is being distributed to comply with the New Jersey School Integrated Pest Management Act. South Amboy City School District has adopted an Integrated Pest Management (IPM) Policy and has implemented an IPM Plan to comply with this law. IPM is a holistic, preventive approach to managing pests that is explained further in the school's IPM Policy included with this notice.

All schools in New Jersey are required to have an Integrated Pest Management Coordinator (IPM Coordinator) to oversee all activities related to IPM and pesticide use at the school.

The IPM Coordinator for South Amboy Schools is:

The Facilities Supervisor Tom Bikowski

Business Phone number 732-207-7796

Business Address: 240 John Street, South Amboy NJ

The IPM Coordinator maintains the pesticide product label, and the Material Safety Data Sheet (MSDS) (when one is available), of each pesticide product that may be used on school property. The label and the MSDS are available for review by a parent, guardian, staff member, or student attending the school. Also, the IPM Coordinator is available to parents, guardians, and staff members for information and to discuss comments about IPM activities and pesticide use at the school.

As part of a school pest management plan, South Amboy Schools may use pesticides to control pests. The United States Environmental Protection Agency (EPA) and the New Jersey Department of Environmental Protection (DEP) register pesticides to determine that the use of a pesticide in accordance with instructions printed on the label does not pose an unreasonable risk to human health and the environment. Nevertheless, the EPA and the DEP cannot guarantee that registered pesticides do not pose any risk to human health, thus unnecessary exposure to pesticides should be avoided. The EPA has issued the statement that where possible, persons who are potentially sensitive, such as pregnant women, infants and children, should avoid unnecessary pesticide exposure. Therefore, the South Amboy schools will be in compliance with the State of New Jersey Integrated Pest Management Act, by abiding by the laws and regulations to keep you and your children safe.

Thank you and have a great year.

Pre-Notification of the Use of Pesticides

(This notice should be received at least 72 hours prior to pesticide use)



Date: _____

To: Parents and Guardians of Students, and Staff of South Amboy Elementary School

From: Tom Bikowski IPM Coordinator Phone Number: 732-207-7796

Subject: Notification of the Use of Non Low Impact Pesticides

This notice is to advise you that the following pesticide(s) will be used at [insert name of school]:

Pesticide Common Name		
Pesticide Trade Name		
EPA Registration Number		

Location of the pesticide application: _____

Reason for the pesticide application: _____

If an indoor application, the date and time it is planned:

DATE _____ TIME _____

If an outdoor application, 3 dates must be listed, in chronological order, on which the outdoor application may take place if the preceding date is canceled.

DATE _____ DATE _____ DATE _____

Description of the possible adverse effects of the pesticide as per the Material Safety Data Sheets for the pesticides to be used, if available:

Pesticide product label instructions and precautions related to Public Safety.

Note: By law, we must advise you that: The Office of Pesticide Programs of the United States Environmental Protection Agency has stated: "Where possible, persons who potentially are sensitive, such as pregnant women, infants, and children, should avoid any unnecessary pesticide exposure.,,"

1. General school information:

School name: South Amboy Middle/HS

Address: 200 Governor Hoffman Plaza

City: South Amboy NJ 08879

Phone: 732-316-7669

School name: South Amboy Elementary School

Address: 249 John St.

City: South Amboy

County: Middlesex District: South Amboy City School District Zip Code: 08879

Phone: 732-525-2118

School IPM Coordinator: The Facilities Manager Tom Bikowski

Phone: 732-207-7796

2. Integrated Pest Management Statement

Integrated Pest Management (IPM) on school property is a long-term approach to maintaining healthy landscapes & facilities that minimizes risks to people and the environment. The South Amboy Schools will use: site assessment, monitoring, and pest prevention in combination with a variety of pest management tactics to keep pests within acceptable limits. Instead of routine chemical applications, cultural, mechanical, physical, and biological controls will be employed with selective use of pesticides when needed. Educational strategies are used to enhance pest prevention, and to build support for the IPM program

3. School IPM Policy: (School IPM Policy see Appendix)

4. School IPM Plan Goals:

- a. The roles, responsibilities, and training of all members of the school community [school administration, School IPM. Coordinator, Pest Management Professional (includes staff or contractors, if used), School Nurse, kitchen staff, maintenance staff, staff, teachers, students, parents or guardians of all students enrolled in the school, and vendor/contractors] regarding IPM at the school are clearly defined.
- b. Pest identification: Initially, define indoor and outdoor pests for the school by historical account and/or by direct monitoring. Establish monitoring types and schedules, and recordkeeping.
- c. Pest prevention and control to maintain a healthy school environment: Outline non-chemical controls that will be routinely practiced at the school. Establish threshold levels for all anticipated pests. Define prescribed use of low impact versus non low impact pesticides for identified pests. Maintain records of all pesticide applications.
- d. Keep the school community informed: Maintain IPM records and make available for public inspection. Issue annual notice of school IPM program status. Establish pre-notification procedures for non-low impact pesticide use. Adopt notification procedures for emergency use of non-low

impact pesticides. Establish posting procedures for indoor and outdoor areas that are treated with non-low impact pesticides.

e. Evaluate and revise the School I.PM Plan annually.

5. School IPM Roles & Responsibilities: For an IPM program to be successful, all members of the school community must be made aware of the school's policies on pest control and their respective roles in the overall pest management plan. The roles, responsibilities, and training for this school regarding pest management are outlined below:

a. School Administrators:

Specific duties of New Jersey School Administrators required by the School IPM Act and proposed regulations:

1. Adopt and implement a school IPM_ policy for the school property; the Model Policy (see Appendix) that was developed by the NJDEP prescribes that the school administrators will adopt and implement a School IPM Plan for the school property.
2. Implement IPM procedures to control pests and minimize exposure of children, faculty, and staff to pesticides.
3. Designate a School IPM Coordinator (see next section). The I.PM Coordinator should be someone who is familiar with the school buildings and grounds, such as the buildings and grounds maintenance staff.
4. Report effectiveness and recommend improvements to the School I.PM Plan annually to local school or governing boards.

Other duties required by law of the school administration but that may be delegated to specific individuals, such as the School IPM Coordinator (see next section) are:

5. Coordinate pre- and post-notification of parents and staff of non-low impact pesticide applications according to the school's notification procedure. [See Appendix for sample 'PreNotification of the Use of Pesticides' (72-hour pre-notification) form and 'Emergency Pesticide Use Notification' form].
6. Prepare and post signs as required in areas where non low impact pesticides are to be applied. (See Appendix for sample 'Notice of Pesticide Application' sign for indoor and outdoor applications).
7. Obtain and maintain all pesticide application records for a minimum of 3 years; in the case of termiticides, maintain records a minimum of 5 years.
8. Prepare and send out 'Annual School IPM Program Notification Letter to Parents & Staff'. (See Appendix for sample letter to parents & staff),

b. School IPM Coordinator:

The School IPM Coordinator, by law, is jointly responsible with the school administration for the implementation of this School IPM Plan.

Role: The IPM Coordinator is the individual within the facility who is in charge of pest control activities for the school. This individual has the authority and backing of the school administration or management. The School IPM Coordinator has the primary responsibility for ensuring the IPM plan is carried out, and is the primary contact for the school community and public. Ultimately, this person is directly responsible for the integration of all IPM activities through the coordination of all

parties including custodial, building, food service, outside vendors, Pest Management Professionals, grounds staff, students, parents, staff, and teachers.

Specific duties of a New Jersey School IPM Coordinator required by law or regulation:

1. Implement the School IPM Policy and Plan.
2. Maintain information about the IPM Policy and Plan in place at the school.
3. 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.
4. Maintain records of any pest monitoring and non-pesticide controls implemented. (See 'IPM Pest Activity Monitoring and Control Log' for sample log).
5. Provide access to the above information for public review.
6. Respond to inquiries and providing information to students, staff, and parents or guardians regarding IPM.
7. Provide training in IPM practices to the school community as described in the individual 'Roles, Responsibilities, and Training' sections of the School IPM Plan.
8. Provides a signature on the 'School Integrated Pest Management Act Compliance Certification' Form when requested (see Appendix for sample form) by pesticide applicators.
9. Ensure that all persons conducting pesticide applications have all NJDEP-required training, certification, and licensing. Also ensure that they follow the School IPM Policy and Plan, as well as all NJDEP School IPM regulations and the precautions of the pesticide label.
10. Obtain training sufficient to implement the Policy and Plan (i.e., NJDEP-approved training).
11. Submit required information to the NJDEP.

School administration responsibilities by law (see # 5, 6, 7, and 8 of their duties) that must be carried out and may be delegated as duties of the School IPM Coordinator by this school administration include:

- Coordinate pre- and post-notification of parents and staff of non-low impact pesticide applications according to the school's notification procedure. [See Appendix for sample 'PreNotification of the Use of Pesticides' (72-hour pre-notification) form and 'Emergency Pesticide Use Notification' form].
- Prepare and post signs as required in areas where non low impact pesticides are to be applied. (See Appendix for sample 'Notice of Pesticide Application' sign for indoor and outdoor applications).
- Obtain and maintain all pesticide application records for a minimum of 3 years; in the case of termiticides, maintain records a minimum of 5 years.
- Prepare and send out 'Annual School TPM Program Notification Letter to Parents & Staff. (See Appendix for letter to parents & staff).

In order to carry out the duties prescribed above, the School IPM Coordinator will:

- Distribute and train school community in the use of 'Pest Problem Report Forms' to be submitted when activity is noticed (see Appendix).
- Distribute and train school kitchen staff in the use of 'Food Service Report' forms to be submitted weekly (see Appendix).
- Compile all 'Pest Problem Report' and 'Food Service Report' forms received in 'IPM Pest Activity Monitoring and Control Log' (see Appendix for sample log). Also, write actions taken to remedy pest problems in the log.

- Maintain a prioritized list of pest management issues (including key pests, and needed structural/landscape improvements and substandard sanitation practices) which exist both inside and outside the school (see Appendix).
 - Consider all available options (including no action) with the school's Pest Management Professional prior to determining control(s) to be used.
 - Ensure that Pest Management Professional(s) make accurate entries in the 'Pesticide Application Log' (see Appendix) when these pesticides are applied at the school.
- Serve as the point of contact for contracted. pest management services for the school.
- Sets up and moderates the annual evaluation of the School IPM Plan. Revises the School IPM Plan accordingly.

Training:

The School IPM Coordinator will receive N. JDEP-approved training that provides an overview of the principles of IPM, legal requirements, and how to implement the IPM Policy and Plan at the school per rules to be adopted by the NJDEP in the fall of 2004.

c. Pest Management Professional:

All pesticide applications made on school property must be made by applicators or operators licensed to apply pesticides by the NJDEP PCP per the New Jersey Administrative Code Title 7 Chapter 30; Subchapters I -12. These 'Pest Management Professionals' may either be staff and /or a contractor as described below.

All indoor applications at this school are made by a licensed contractor: Pest Management Professional(s). The contractor for indoor pest management services at this school is E&G Exterminators. Our contact for the company is Edward Gorczynsk 732-721-6368. The contractor will meet all specifications as provided for in this document and accompanying Appendixes.

Outdoor applications are not made at this school.

Other Specific Duties of Pest Management Professional(s) in the School IPM Program:

- Notify the IPM Coordinator when pests or signs of pest activity are found.
- When it is determined that a pesticide must be used, select and recommend necessary pesticides. Preference will always be given to low impact pesticides.
- When approved by the School IPM Coordinator, follow appropriate least-toxic procedures to correct pest problems. Never apply a non-low impact pesticide without first consulting in advance with the IPM Coordinator to allow them to proceed with all required notification and posting of the area to be treated.
- Provide School IPM Coordinator with MSDS (when available) of any pesticide that is applied on school property.
- Provide application information as specified in the 'Non Low Impact Pesticide Application Log' (see Appendix) when they apply these pesticides at the school. This log is kept at the Elementary School Maintenance Office.
- If a non-low impact pesticide is to be used, provide a 'School Integrated Pest Management Act Compliance Certification' Form (see Appendix) to the School IPM Coordinator for their signature ensuring all advance notification and posting has been performed as required. Applicators are not liable for damages resulting from the failure of the school to provide the notification or posting as required by the New Jersey School IPM Act.
- Participate in the annual evaluation of the School IPM Program and Plan. Provide comments regarding any necessary modifications to the School IPM Plan.

Training:

Training for either a new commercial applicator or operator is to include BOTH a PCP-approved basic pesticide training course, and 40 hours of on-the-job training to competently perform the functions associated with any applications in which they are expected to perform. Additionally, within the 40 hours of training, the candidate must perform or witness a minimum number of applications for each of the categories that they will be licensed.

In order to maintain valid Pesticide Applicator Certification in the state of New Jersey, pesticide applicators must earn a minimum of 24 recertification credits by attending continuing education courses. Commercial Pesticide Applicators must accumulate 8 Core credits and 16 category credits (per each category certified).

Rules are being proposed by the NJDEP that would require an additional category ("IPM in Schools") for commercial applicators that apply pesticides on school property. If these rules are adopted as final, applicators would be given a grace period during which the new category exam would need to be taken. This IPM in Schools category would be required in addition to any other category (such as ornamental & turf, or termite control) required depending on the type of work performed.

d. School Nurse:

The school nurse will consider potential pesticide exposure when evaluating a child's health complaint. The school nurse should have access to MSDS sheets for any chemical used on school property and be aware of any children with asthma or chemical sensitivities.

Other Duties of the School Nurse in the School IPM Program:

- Keep copies and review MSDS of all pesticides used on school property.
- Maintain easy access to Poison Control Center hotline at 1-800-222-1222 in case acute poisoning is suspected.
- Monitor for head lice (a common problem for children between 3 and 10 years old).
- Educate parents and staff about preventing head lice spread when it occurs.
- Submit a 'Pest Problem Report' to School IPM Coordinator whenever pests are detected in the health suite/Nurse's office.

Training:

In addition to required professional training,

- Be aware of public health pests of significance that may impact student health; see EPA's List of Pests of Significant Public Health Importance at:
http://www.epa.gov/opppmsdl/PR_Notices/pr2000-draft.htm.
- Obtain copies of selected pesticide resources on poisoning which may include: Recognition and Management of Pesticide Poisonings, Routt Reigart and James Roberts, 5th edition, U.S. Environmental Protection Agency, March 1999; available online at <http://www.epa.gov/oppfeadl/safety/healthcare/handbook/handbook.htm>.

e. Kitchen Staff:

Food handling and preparation areas are among the most critical areas for pest management. Kitchen staff must keep all food areas free of crumbs and food residue after use.

Other Duties of Kitchen Staff in the School IPM:

- Practice good sanitation of all kitchen and food service areas (clean all surfaces daily).
- The Food Service Manager, of the kitchen staff will inspect the kitchen daily at 1 pm.
- The Food Service Manager, will submit a. Pest Problem Report to School I.PM Coordinator whenever pests are detected in the kitchen and food service areas (see the Appendix for the two types of reports).
- Manage specific pest problem(s) as directed by School IPM Coordinator

Training:

The Food Service Manager, will be responsible for training the kitchen staff in proper sanitation procedures when hired and annually thereafter. The School IPM Coordinator will train the kitchen

staff in the pest detection and monitoring program in place in the kitchen when hired and annually thereafter.

f. Maintenance Staff:

Maintenance staff maintains the cleanliness and take care of the school building and grounds. These staff members may be assigned to indoor and/or outdoor maintenance. School maintenance staff may make applications of pesticides that are "over-the-counter" disinfectants and antimicrobials such as Lysol® and toilet-bowl cleaner, and use "minimum risk" pesticides published by the federal EPA. If the use of other pesticide is necessary, only a licensed Pest Management Professional may make the application (see 'c' above).

Other Duties of Maintenance Staff in the School IPM Program:

- Provide a 'Pest Problem Report' to School IPM Coordinator whenever pests or signs of pest activity are discovered in the school building, or are a problem on school grounds.
- Recognize and correct conditions that may lead to pest problems such as water leaks, potential pest entryways, and poor sanitation practices (see the 'IPM Priorities' checklist of this Plan for specific actions for school buildings and grounds).
- Manage specific pest issue(s) as directed by the Supervisor. This will not include pesticide application unless the individual is a licensed Pest Management Professional (see duties in 'c' above).

Training:

- The Maintenance Supervisor will be responsible for training the indoor Maintenance Staff in proper sanitation procedures and schedules when hired and annually thereafter.
- The School I.PM Coordinator must train the indoor Maintenance Staff in the pest detection and monitoring program and devices in place throughout the school when hired and annually thereafter.

g. Staff, Teachers, and Students:

Duties of Staff, Teachers, & Students in the School IPM Program:

- The most important responsibility of the students and staff is sanitation. Much of the prevention and reduction of pest infestation at the school site depends on whether or not students and staff clean up food leftovers, food in lockers, gum under desks, paper clutter, etc., or perform proper maintenance.
- Leave pest control and pest management to trained professionals.
- Will not move sticky traps or other pest monitoring devices.
- Report any evidence of pest activity to the School IPM Coordinator using the 'Pest Problem Report' form.

Training:

School staff, teachers, and students will be trained in their roles in the school's pest management system by the School IPM Coordinator.

Other training:

- Staff, teachers, and students will be given a brief overview or updates by the School Principal on pest identification and the conditions that they may create that promote pests. This information

will focus on pest reduction strategies connecting people's behavior such as eating at desks, leaving crumbs on floor, etc. to pest problems.

- Education will be focused to increase people's willingness to share their environment with other organisms so that people are less likely to insist on toxic treatments for harmless organisms.
- They will be instructed in how to log pest complaints using the 'Pest Problem Report' form.

- Pamphlets and fact sheets will be made available at the time of training and/or posted on bulletin boards in specific areas such as the cafeteria and teachers' lounge.

h. Parents or Guardians of All Students Enrolled in the School:

Duties of Parents/Guardians in the School IPM Program:

- Learn about IPM practices and follow them at home so that pests are not carried to school in notebooks, lunch boxes, backpacks, clothing, or the children's hair.
- Make their children aware of their role in the School IPM Program at the school.
- Encourage children to lend a hand in cleaning up.
- Discourage children from keeping food in their lockers and desks.
- Be aware of the current pest management practices in their children's school. Review the 'Annual School IPM Program Notification Letter to Parents & Staff' as well as all notices of application of pesticides at the school. For questions or concerns, parents and /or guardians will contact the School IPM Coordinator.

Training:

- Pamphlets and fact sheets will be made available upon request (see Appendix for 'Summary of Key Requirements of NJ School IPM Act' Fact Sheet).

i. Vendors and Contractors

Duties of vendors and contractors in the School IPM Program to be prescribed in specific language in their bid specifications and contracts:

- Contracts will specify regular maintenance service, cleaning under and behind machines during service visits, and immediate correction of problems which may foster pests (for example, breakage, leaks, or excessive condensation from machinery).

6. Pest Identification: Preliminary Site Assessment and Ongoing Monitoring

One of the key principles of School IPM is site assessment to precisely define the presence of pests and the site conditions that contribute to their presence. Indoor and outdoor pests will be defined for the school by historical account, interviews, and by direct monitoring. [See Appendix for the 'Pest Problem Report' form for a listing of common school pests].

When the IPM program is implemented at the School, the Pest Management Professional(s) will perform a thorough inspection of all school buildings and grounds to identify pest activity and conditions that are contributing to any pest problems.

Indoor site assessment, Pest Management Professional will compile:

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

Outdoor site assessment

Outdoor applications are not made at this school.

Ongoing Monitoring

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Once a pest is correctly identified, monitoring methods and schedules, as well as controls will be determined based on its life cycle, food sources, habitat preferences, and natural enemies.

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:

- Each trap or bait station is marked with appropriate warning language.
- Traps will be checked by the Pest Management Professional 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.

Outdoor applications are not made at this school.

Monitoring Records: Pest Management Professional will maintain and keep records of any pest monitoring, including traps (see Appendix for IPM Pest Activity Monitoring and Control Log).

7. 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 (see Appendix for an Integrated Pest Management Priorities checklist as a resource for many controls).

IPM 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: for example, 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 beneficials.
- Least hazardous chemical controls with preference given to School IPM Act-defined 'low impact pesticides'.

Pesticides will be selected when other control methods are not effective or practical in resolving a pest problem. Pesticides will not be used on School property unless both the pest has been identified and its

presence verified. It is neither possible, nor desirable to completely exterminate every pest and potential pest from every population on school property.

E&G Exterminators will establish injury (also known as tolerance or threshold) levels and action thresholds for each individual pest species before making any chemical treatment.

Action Thresholds for pesticide treatment are triggered if all other IPM tactics have not been able to

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control pest populations to an acceptable level. Appropriate injury levels will be set, and may take into consideration economic losses (for example, amount of foodstuffs contaminated by pantry pests); health risks (for example, occurrence of disease-bearing pests); aesthetic evaluations (for example, temporary presence of ants); nuisance problems (for example, stinging insects); and pest visibility.

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.

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.

When it is determined that a non-low impact pesticide must be applied to adequately control pests within established thresholds, application guidelines per the law will be followed. Specifically, non-low impact pesticides will be applied in a school building only when students are in another area of the building AND only if the area being treated with the pesticide is served by a different air handling system and is separated from the students by smoke or fire doors. Further, applications of non-low impact pesticides on school property will be made in advance of when students will be present for instruction or extra-curricular activities, allowing for any label-prescribed entry restrictions; if there is no re-entry interval listed on the label, a minimum of 7 hours will be allowed prior to student re-entry on school property.

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 it is 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.

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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

They will generate a pest management priority list to optimize a plan of corrective actions (see Appendix for PM Priorities). The School IPM Coordinator will assign and contact the appropriate staff to carry out individual tasks on the checklist.

All controls that are actually implemented should be documented in the log by the Pest Management Professional (see Appendix for IPM Pest Activity Monitoring and Control Logs).

8. Notification, Posting, and Re-Entry

It is important to keep the school community informed of the school's implementation of the School IPM Plan. Accordingly, this section outlines the:

- annual notification of School IPM program status.
- pre-notification of planned use and notification of emergency use of non-low impact pesticides.
- posting requirements for areas inside and out that are treated with pesticides. • re-entry requirements for areas inside and out that are treated with pesticides.

Annual Notification

The School IPM Coordinator will prepare and send an annual notice of school IPM program status to parents or guardians of each student enrolled at the school, and all staff members at the beginning of each school year. Once the annual notice has been sent, the Principal will also give this information to new staff or the parents/guardians of new students upon their arrival.

The Appendix has a 'Annual School IPM Program Notification Letter to Parents & Staff'. New Jersey law requires that this notice shall include:

1. a copy of the School IPM policy
2. the name, address, and telephone number of the integrated pest management coordinator of the school or school district

3. a list of pesticide that is in use or has been used within the last 12 months on school property
4. a statement that:
 - (a) the integrated pest management coordinator maintains the product label and material safety data sheet, when available, of each pesticide that may be used on school property;
 - (b) the label and data sheet is available for review by a parent, guardian, staff member, or student attending the school; and

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- (c) the integrated pest management coordinator is available to parents, guardians, and staff members for information and comment;
5. the time and place of any meetings that will be held to adopt the school integrated pest management policy; and
6. the following statement:

"As part of a school pest management plan, the South Amboy Elementary School may use pesticides to control pests. The United States Environmental Protection Agency (EPA) and the New Jersey Department of Environmental Protection (DEP) register pesticides to determine that the use of a pesticide in accordance with instructions printed on the label does not pose an unreasonable risk to human health and the environment. Nevertheless, the EPA and DEP cannot guarantee that registered pesticides do not pose any risk to human health, thus unnecessary exposure to pesticides should be avoided. The EPA has issued the statement that where possible, persons who are potentially sensitive, such as pregnant women, infants and children, should avoid unnecessary pesticide exposure."

Notification and Posting of Non Low Impact Pesticide Use

There are two situations when non low impact pesticides may be used on school property; when it is pre-planned and when it is an emergency.

1. Pre-Notification and Posting of Planned Non Low Impact Pesticide Use:

At any time of the year when children may be present, the school will issue prior notification of all non-low impact pesticides to be used. Specifically, the School IPM Coordinator will issue notice to all staff, and parents/guardians of each student enrolled at the school. The area where the pesticide will be applied will be posted at least 72 hours prior and 72 hours following the application.

2. Emergency Use Notification and Posting for Non low Impact Pesticide Use:

When an emergency application of pesticides is required, the School IPM Coordinator will issue notice of emergency use of non-low impact pesticides used to all staff, and parents or guardians of each student enrolled at the school within 24 hours after the application or on the morning of the next school day, whichever is earlier. The reason for the emergency and any measures that will be taken so that emergency pesticide use may be avoided in the future may be included. The area where the pesticide is applied will be posted at the time of application, and will remain posted for 72 hours following the application.

In either situation, the school is required by law to make NJDEP-prescribed notification and posting as described below. The Appendix contains written notification forms, 'Pre-Notification of the Use of Pesticides' (72-hour pre-notification) and 'Emergency Pesticide Use Notification', and a sample posting sign (for indoors & outdoors) 'Notice of Pesticide Application'. The specific 'what', 'how' and 'where' requirements of the law that will be followed on School property on posting and notification follows:

What: In either planned or emergency applications of non-low impact pesticides, New Jersey law requires content of both notification and posting as follows: ● common name of pesticide, ● EPA registration number,

● EPA statement on sensitive persons: " Where possible, persons who potentially are sensitive, such as pregnant women, infants, and children, should avoid any unnecessary pesticide exposure' ● location description, date, and time of application (one date for indoor application; three dates for outdoor applications in case of cancellation), ● potential adverse effects of product, ● reasons for the application,

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- contact information for the IPM Coordinator of the school or school district, and
- further label information or precautions for public safety.

How: In either planned or emergency applications of non-low impact pesticides, the Superintendent will advise the parents and guardians and staff of the school of pesticide applications by the following method of notification:

- telephone call

Where: In either planned or emergency applications of non-low impact pesticides, per New Jersey law, the School IPM Coordinator will post signs:

- prominently in or adjacent to the area where the pesticide is to be applied.
- at each entrance to the building or school ground where the pesticide is to be applied.
- that are at least 8 .5 ¹¹ by 1 1".

Re-Entry

If there is application of a low impact pesticide on school property, it will be made so that adequate settling or drying occurs in advance of when students will be present for instruction or extra-curricular activities.

Students cannot enter a pesticide treated area for at least seven hours after the application of a non-low impact pesticide, unless the pesticide label states a specific numerical re-entry time that is different than this. The use of low impact pesticides does not require an automatic seven-hour wait; students can re-enter after the pesticide application has dried or settled, or longer if the pesticide label specifies.

9. Record Keeping and Evaluation

Record Keeping

The School IPM Coordinator will maintain records as listed in their outlined role and responsibility for school IPM. An initial meeting will be held between the School IPM Coordinator and Pest Management Professional(s) on September 5, 2011 to establish an IPM Log binder for these records.

The following records will be maintained in the IPM Log binder kept in the Elementary School Maintenance Office:

- Pest Problem Reports
- {PM Pest Activity Monitoring and Control Log
- IPM Priority Checklists
- Pesticide Application Log

- Annual School IPM Program Notification Letters to Parents & Staff
- Pre-Notification of the Use of Pesticides (72-hour pre-notification)
- Emergency Pesticide Use Notifications
- School Integrated Pest Management Act Compliance Certification Forms
- Posting Sign (for indoors & outdoors) 'Notice of Pesticide Application'
- School IPM Cards
- Specific service reports will also be placed in the log binder that document particular actions taken by the pest management contractor.

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Evaluation

At least annually, the School IPM Plan and School IPM Program of the South Amboy Elementary School will be evaluated. This necessarily includes review of all records in the IPM log binder. Program evaluation involves reviewing monitoring data, actions taken, treatment impacts and effectiveness, and any other relevant observations. These records will provide information on previous and current pest populations and which strategies were applied. Comparing data will clearly indicate which pest management strategies were most effective for the amount of time and money spent. IPM practices and procedures will be modified, if necessary, based on past experience, results, and gained knowledge.

This evaluation will be coordinated Sheri Kemprowski, IPM Coordinator. The participants in the evaluation will be: IPM Coordinator/Supervisor and a representative of E&G Exterminators. A written evaluation is to be completed by August 2013. If the school is using a contractor, the School IPM Coordinator will meet with the pest control contractor to evaluate the success or failure of this IPM Plan.

The following issues will be addressed during the evaluation of the School IPM Plan and Program: ●
adequacy of pest control indoor and outdoor

- areas of concern ● sanitation issues ● building maintenance issues ● new less toxic pest control tactics
- adequate support by all members of the community ● adequacy of thresholds ● revise integrated pest management priorities

Following evaluation, the School IPM Plan will be revised by the IPM Coordinator/Supervisor accordingly.

APPENDICES