



Essential Elements of the Texas School IPM Rules

Janet Hurley, MPA

Extension Program Specialist

Texas AgriLife Extension

Ja-hurley@tamu.edu 877-747-6872

The Top 5 Things TDA Wants

- **IPM Coordinator**
- **IPM Program**
- **Pesticide Applications**
 - Records must be received within 48 hours
- **Record Keeping Details**
 - 2 years plus current
 - 5 years for open records act
- **School Facility Inspections**
 - What to expect



IPM Coordinator

- **Must have plan in place to designate and appoint at least 1 coordinator per district**
- **Must tell TDA within 90 days of appointment**
- **Must have training within 6 months and then recertify every 3 years**
- **Must be able to conduct facility inspections**
 - **How does the IPM Coordinator react when pest complaints come in**

IPM Program

- **IPM Policy kept with Superintendent and IPM Coordinator**
- **Policy Must have**
 - **Definition of IPM (7.114)**
 - **Reference to school IPM rules**
 - **Who can make pesticide applications**
 - **Information about designating, registering and training for the IPM Coordinator (s)**

Integrated Pest Management (IPM)

Rule 7.114

A pest management strategy that relies on accurate identification and scientific knowledge of target pests, reliable monitoring methods to assess pest presence, thresholds to determine when pesticides are needed, and both preventative and corrective control measures. Under IPM, whenever economical and practical, multiple control tactics should be used to achieve best control of pests. These tactics will possibly include, but are not limited to, the judicious use of pesticides.



IPM Program

- **Must have a monitoring program**
 - How do you know you have pests
- **Preferential use of Green Category products and document Non-chemical control measures.**
 - Can you vacuum up the ants, did you fix a door sweep, what corrective actions did you take
- **Recordkeeping**
 - Inspection reports
 - Work orders that are IPM related
 - Pesticide applications
 - Pesticide complaints



IPM Program

- **Plan for educating faculty and staff about the IPM program.**
- **Written guidelines for pest ID and thresholds to determine when a pesticide is necessary**
- **Procedure for notifying parents by first week of school about program**
- **List of people wanting to know about pesticide applications prior to use.**

Pesticide Applications

- **Only EPA labeled products or those that are 25(b) designated by EPA**
 - No home remedies
- **Consumer Information sheets are available to staff and faculty**
- **Posting signs 48 hours prior to all indoor treatments**
- **Posting signs outdoors as applicable for Green, Yellow, and Red Category**

Outdoor Posting Samples



Pesticide Use in School Districts

- **The use of non-pesticide control measures, non-pesticide monitoring tools and mechanical devices**
 - Glue boards, snap traps, yellowjacket traps, ILTs, etc are exempt from posting requirements.
- **Pesticide applications shall not be made to outdoor school grounds if such an application will expose students to physical drift of pesticide spray particles.**
 - Reasonable preventative measures shall be taken to avoid the potential of drift to occur.
 - TDA will verify where pesticides are being mixed and loaded
- **School districts are allowed to apply the following pesticides to control pests, rodents, insects and weeds at school buildings, grounds or other facilities in accordance with the approval for use and restrictions listed for each category:**

Green Category Pesticides

- **Contains a CAUTION signal word on the product label, unless no signal word is required to appear on the product label as determined by EPA, and**
 - **consists of the active ingredient**
 - boric acid; disodium octoborate tetrahydrate or related boron compounds
 - silica gel
 - diatomaceous earth
 - insect growth regulators
 - microbe-based insecticides
 - botanical insecticides containing no more than 5% synergist **(and does not include synthetic pyrethroids)**
 - biological (living) control agents
 - pesticidal soaps; natural or synthetic horticultural oils
 - insect and rodent baits in tamper-resistant containers, **or for crack-and-crevice use only;**

Green Category Pesticides

- **Green Category pesticides may be applied indoors if students are not present and are not expected to be present in the room or treated area at the time of application.**
 - Reentry into the treated area is permitted as soon as the application is complete, the pesticide spray has dried, or the reentry interval specified on the pesticide label has expired, whichever interval is longer.
- **Green Category pesticides may be applied outdoors if students are not present within ten (10) feet of the application site at the time of treatment.**
 - Students are allowed reentry into the treated area as soon as the application is complete, the pesticide spray has dried or the reentry interval specified on the pesticide label has expired, whichever interval is longer.

Yellow Category Pesticides

- **Contains a CAUTION signal word on the product label, unless no signal word is required to appear on the product label as determined by EPA; and**
 - **it does not meet the criteria to be designated as a Green Category pesticide**
- **Yellow Category pesticides may be applied indoors if students are not present or not expected to be present in the room or treated area within the next four (4) hours following the application,**
 - **or until the reentry interval specified on the pesticide label has expired, whichever interval is longer.**
- **Yellow Category pesticides may be applied outdoors if students are not present or not expected to be present within ten (10) feet of application site**
 - **and the area is secured and reentry is in accordance with these rules for no less than four (4) hours, or until the reentry interval specified on the pesticide label has expired, whichever interval is longer.**

Red Category Pesticides

- **Contains a WARNING or DANGER signal word on the product label; and**
 - it contains an active ingredient that has been designated as a restricted use pesticide, a state-limited-use pesticide or a regulated herbicide;.
- **Approval for Use: Prior to the application, licensees must provide written justification to the IPM Coordinator for the use of the red category pesticide and must obtain signed approval for the application from the IPM Coordinator.**

Red Category Pesticides

- **Red Category pesticides may be applied indoors if students are not present and are not expected to be present in the room or treated area**
 - within eight (8) hours following the application, or until the reentry interval specified on the pesticide label has expired, whichever interval is longer.
- **Red Category pesticides may be applied outdoors if students are not present within twenty five (25) feet of the application site, the area is secured in accordance with these rules, and**
 - reentry by students is prohibited for no less than eight (8) hours, or until the reentry interval specified on the pesticide label has expired, whichever interval is longer.

Pesticide Applications

● Justification Forms

– Green Category

- Normal documentation – indicate threshold

– Yellow

- Justification form completed by CA
- Good for 6 months or 6 applications per site
- Must be received by Coordinator within 48 hours

– Red

- Conversation between IPM coordinator and Applicator PRIOR to use
- Justification form completed by CA
- Good for 3 months or 3 applications per site
- Must be received by Coordinator at time of discussion

Incidental Use For Schools

- **The Incidental Use For Schools Fact Sheet must be provided during pesticide instruction and training by the IPM Coordinator to each employee of the school district whose primary duty is not pest control, and whose work may include tasks subject to the exception.**
 - **The IPM Coordinator must keep records of all the training conducted annually.**
- **Primary duty is defined as a job duty that is part of a written job description or is a regularly assigned task of the employee.**
- **Pest control use records must be kept by IPM Coordinator for all incidental pesticide use applications including reason for application and justification for emergency for two (2) years.**
- **Incidental pesticide use in school districts is limited to insecticides that are Green and Yellow Category pesticides**



Pesticide Storage

- **Does the district make any type of pesticide applications**
 - Does your grounds dept do some of this
 - What about custodial
 - Coaches, teachers, others
- **Proper Pesticide Storage Facility**
 - Do you have old chemicals
 - Spill containment kit
- **Proper container storage and disposal**



Record Keeping

Pest Control Use Records

The records must include, but are not limited to:

- **Routine operational data, name and address of the customer**
 - This is generally district information
- **Name of pesticides or devices used or EPA registration number;**
- **Total amounts of each pesticide applied where the percentage of active ingredient was not changed;**
 - Granular, aerosol, bait stations, “pre-made”
- **Device used and total number of each device;**
 - For example – placed out 25 Trapper Sticky Cards



Record Keeping

Pest Control Use Records

- **Formulations that are mixed with water or other material, the mixing rate and total amount of material applied or the percent of active ingredient(s) and total amount of material applied;**
 - What is the percent of water to chemical
- **Purpose/Reason for which the pesticides or devices were used or target pest**
 - Why did PMP chose this product – what pest was found during your monitoring
- **Date the pesticides or devices were used;**
 - Includes date, time
- **Service address where the pesticides and devices were used,**
 - if inside a building the exact room number, or where you placed device
- **Name, and license number of the person applying pesticides or using devices**

Remembering the 4 Steps of IPM

- **Inspect**
- **Identify**
- **Take Action**
 - Sanitation/Cultural
 - Physical Mechanical
 - Biological
 - Chemical
- **Evaluate**





Facility Inspections

- **Review if a campus or building is following IPM Principles**
- **Look at what is conducive for pests**
- **IPM coordinators should have documentation on building inspections**
- **Evidence of monitoring on campus**
- **Evidence of posting and notification**
- **Consumer Info sheets available**
- **Notebooks for the public**



Questions