Procedure Title: **Integrated Pest Management Plan**
Procedure Number: **01-2012-0002**
Board Policy Reference: **IV.H.**

Accountable Administrator: **President**
Position responsible for updating: **Director Facilities & Grounds**
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Purpose
This Administrative Procedure was drawn up with the specific purpose of meeting the requirements of Oregon Revised Statute (ORS) 634.700 through 634.750.

Background/History
On June 24, 2009, the Governor of Oregon signed Senate Bill 637 into law, which was then incorporated into ORS 634.700 to 634.750. This legislation requires school districts and community colleges to adopt an Integrated Pest Management (IPM) policy and an

Integrated Pest Management plan that makes provisions for:

a) Designating an IPM Plan Coordinator;

b) Listing the responsibilities of the IPM Plan Coordinator;

c) Outlining a process for responding to inquiries and complaints;

d) Conducting outreach to the school community about the IPM Plan;

e) Adopting a low-impact pesticide list.

The statute requires the adoption of the IPM policy/plan on or before July 1, 2012.

Table of Contents

BMCC IPM Procedure

On May 23, 2012, the College's Cabinet adopted Administrative Procedure 01-2012-0002: *Integrated Pest Management Plan* in compliance with this legislation. The procedure is provided for reference as follows:

> *To ensure the health and safety concerns of students, staff and community members, the College shall adopt an IPM plan which emphasizes the least possible risk to students, staff and community members and shall adopt a list of low-impact pesticides for use with the IPM plan.*

BMCC IPM Plan

On May 23, 2012, the Cabinet adopted an Integrated Pest Management Plan for the College. The College's Integrated Pest Management Plan, also known as the IPM plan, is a plan intended for the purpose of achieving long term, environmentally sound pest suppression through a systematic approach based on four basic priorities, where the use of pesticides is minimized or eliminated when feasible. These basic priorities are as follows:

1. Safeguarding the health and safety of students, staff and faculty;
2. Maintaining the integrity of campus buildings and grounds;
3. Promoting a productive learning environment;
4. Keeping the local ecosystem healthy.

Roles and Responsibilities

Cabinet

Under ORS 634.705, the Cabinet is responsible for adopting an IPM Plan for the College and adopting provisions for:

a) Designating an IPM Plan Coordinator;

b) Identifying Plan Coordinator responsibilities;

c) Giving notices under ORS 634.740;

d) Retaining pesticide application records under ORS 634.750;

e) Providing a process for responding to inquiries and complaints about non-compliance with the IPM Plan;

f) Conducting outreach to the College community about the College's IPM Plan;

g) Adopting a list of low-impact pesticides for use with the IPM Plan;

h) Adopting IPM Plan revisions intended to reduce the occurrence of pest emergencies.

The Cabinet gives authority to the IPM Plan Coordinator for implementation of the IPM plan and assigns responsibilities to the IPM Plan Coordinator and other parties as described herein:

IPM Plan Coordinator

The responsibilities of the IPM Plan Coordinator shall include the following:

a) Giving notices and posting warning under ORS 634.740;

b) Overseeing pest prevention efforts;

c) Providing a process for responding to inquiries and complaints about non-compliance with IPM Plan;

d) Conducting outreach to the College community about the College's IPM Plan;

e) Providing for the identification and evaluation of pest situations;

f) Determining the means of appropriately managing pest damage that will cause the least possible hazard to people, property, and the environment;

g) Ensuring the proper and lawful performance of pesticide applications;

h) Evaluating pest management results;

i) Keeping records as required by ORS 634.750;

j) Maintaining the list of approved low-impact pesticides;

k) Attending not less than six hours of IPM training each year as required by ORS 634.720(2);

l) Reviewing the IPM Operations Manual periodically and updating when applicable;

m) Exercising the option to contract with a certified pest management professional (PMP).

Exemption for Academic Programs

Adoption of an IPM Plan presents unique challenges to an educational institution which includes pest management related activities within its academic and instructional training programs. By design, these programs serve the community and industry by producing students and graduates capable in the best practices of the industry they will serve, and may include procedures and methods for instructional purposes that do not comply with the IPM Plan.

Moreover, as per ORS 634.730 Section (2), Subsection (a), outdoor pesticide applications carried out by qualified individuals in conjunction with academic instruction in agriculture are exempt from reentry restrictions as outlined in Section (1).

Therefore, the Cabinet, in anticipation of forthcoming legislative amendments, hereby recognizes an exemption for the following academic programs:

- BMCC Agriculture Programs
- _____
- _____

Application of Low-Impact Pesticides
The IPM Plan Coordinator (or designee) may authorize the application of a low-impact pesticide when non-chemical pest control measures have been ineffective subject to ORS 634.730. All pesticide applications must be made by a licensed commercial or public pesticide applicator licensed through the Oregon Department of Agriculture with a public applicator's license.

Notification and Posting for Non-Emergencies
When prevention or management of pests through other measures proves to be ineffective, the use of a low-risk pesticide is permissible. Documentation of these measures is a prerequisite to the approval of any application of a low-risk pesticide. This documentation will remain on file with the IPM Plan Coordinator.

a) The IPM Plan Coordinator (or designee) will give written notice of a proposed pesticide application (via the method most likely to reach the intended recipients) at least 24 hours before the application occurs.

b) The notice must identify the name, trademark or type of pesticide product, the EPA registration number of the product, the expected area of the application, the expected date of application and the reason for the application.

c) The IPM Plan Coordinator (or designee) shall place warning signs around pesticide application areas beginning no later than 24 hours before the application occurs and ending no earlier than 72 hours after the application occurs.

d) A warning sign must bear the words "Warning: pesticide-treated area", and give the expected or actual date and time for the application, the expected or actual re-entry time (specified on product label), and provide the telephone number of a contact person (the person who is making the application and/or the IPM Plan Coordinator or designee).

Notification and Posting for Emergencies
The IPM Plan Coordinator, after consultation with administration, may declare the existence of a pest emergency.

a) If a pesticide is applied at the campus due to a pest emergency, the IPM Plan Coordinator shall review the IPM Plan to determine whether modification of the plan might prevent future pest emergencies;

b) If a pest emergency is declared, the area must be evacuated and cordoned off before taking any other steps. If a pest emergency makes it impracticable to give a pesticide application notice at least 24 hours before the pesticide application occurs, the IPM Plan Coordinator shall send the notice no later than 24 hours after the application occurs;

c) The IPM Plan Coordinator (or designee) shall place notification signs around the area as soon as practicable, but no later than at the time the application occurs.

Note: ORS 634.700 also allows the application of a non-low-impact pesticide "by, or at the direction or order of, a public health official". If this occurs, every effort must be made to comply with notification and posting requirements above.

Inquiries and Complaints

Any member of the college community may submit an inquiry or complaint as follows by calling:

- The IPM Plan Coordinator at (541) 278-5904

The IPM Plan Coordinator will respond to all inquiries and complaints in a timely fashion.

Record Keeping of Pesticide Applications

The IPM Plan Coordinator (or designee) shall keep a copy of the following pesticide product information on file with:

a) A copy of the label;

b) A copy of the MSDS;

c) The brand name and USEPA registration number of the product;

d) The approximate amount and concentration of product applied;

e) The location of the application;

f) The pest condition that prompted the application;

g) The type of application and whether the application proved effective;

h) The pesticide applicator's license numbers and pesticide trainee or certificate numbers of the person applying the pesticide;

i) The name(s) of the person(s) applying the pesticide;

j) The dates on which notices of the application were given;

k) The dates and times for the placement and removal of warning signs; and

l) Copies of all required notices given, including the dates the IPM Plan Coordinator gave the notices.

The above records must be kept on file for at least four years following the application date.

Approved List of Low-Impact Pesticides
Note: All pesticides used must be used in strict accordance with label instructions.

According to ORS 634.705 (5), the Cabinet shall adopt a list of low-impact pesticides for use with their IPM Plan. The Cabinet or the IPM Plan Coordinator may include any product on the list except products that:

a) Contain a pesticide product or active ingredient that has the signal words "warning" or "danger" on the label;

b) Contain a pesticide product classified as a human carcinogen or probable human carcinogen under the United States Environmental Protection

c) Agency 1986 Guidelines for Carcinogen Risk Assessment; or

d) Contain a pesticide product classified as carcinogenic to humans or likely to be carcinogenic to humans under the United State Environmental Protection Agency 2003 Draft Final Guidelines for Carcinogen Risk Assessment.

As a part of pesticide registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) and re-registration required by the Food Quality Protection Act (FQPA), EPA Office of Pesticide Programs (OPP) classifies pesticide active ingredients (a.i.) with regards to their potential to cause cancer in humans. Depending on when a pesticide active ingredient was last evaluated the classification system used may differ as described above.

Appendices

- IPM Plan Definitions
- BMCC IPM Plan Low-Impact Pesticides List

A. APPENDIX 1: IPM Plan Definitions

Note: These definitions were derived directly from Oregon Revised Statute (ORS) 634.700 through 634.750

1. **Campus:** the buildings, other structures, playgrounds, athletic fields and parking lots of a school and any other areas on the school property that are accessed by students on a regular basis.

2. **Governing Body:** a board of directors, agency or other body or person having policymaking and general oversight responsibility for a community college district, education service district, school district, and/or other unit of education governance, private school or other educational entity.

3. **Integrated Pest Management Plan:** a proactive strategy that accomplishes the following:

    a. Focuses on the long-term prevention or suppression of pest problems through economically sound measures that:

        i. Protect the health and safety of students, staff, and faculty;

        ii. Protect the integrity of campus buildings and grounds;

        iii. Maintain a productive learning environment; and

        iv. Protect local ecosystem health;

    b. Focuses on the prevention of pest problems by working to reduce or eliminate conditions of property construction, operation, and maintenance that promote or allow for the establishment, feeding, breeding, and proliferation of pest populations or other conditions that are conducive to pests or that create harborage for pests;

    c. Incorporates the use of sanitation, structural remediation or habitat manipulation or of mechanical, biological and chemical pest control measures that present a reduced risk or have a low impact and, for the purpose of mitigating a declared pest emergency, the application of pesticides that are not low-impact pesticides;

    d. Includes regular monitoring and inspections to detect pests, pest damage and unsanctioned pesticide usage;

    e. Evaluates the need for pest control by identifying acceptable pest population density levels;

    f. Monitors and evaluates the effectiveness of pest control measures;

g. Excludes the application of pesticides on a routine schedule for purely preventive purposes, other than applications of pesticides designed to attract or be consumed by pests;

h. Excludes the application of pesticides for purely aesthetic purposes;

i. Gives preference to the use of nonchemical pest control measures;

j. Allows the application of a pesticide that is not a low-impact pesticide only to mitigate a declared pest emergency or if the application is by, or at the direction or order of, a public health official.

4. **Low-Impact Pesticide:** a product that does not contain a pesticide product or active ingredient described in ORS 634.705 (5).

5. **Pest:**

   a. An insect or other arthropod;

   b. A weed, moss, slime or mildew or a plant disease caused by a fungus, bacterium or virus;

   c. A nematode, snail, slug, rodent or predatory animal;

   d. A bacteria, spore, virus, fungus or other microorganism that is harmful to human health; or

   e. Other forms of plant or animal life that may infest or be detrimental to vegetation, humans, animals, structures, managed landscapes or other human environments.

6. **Pest Emergency:** an urgent need to eliminate or mitigate a pest situation that threatens:

   a. The health or safety of students, staff, faculty members or members of the public using the campus; or

   b. The structural integrity of campus facilities.

7. **Registration Number:** the pesticide registration number assigned by the United States Environmental Protection Agency.

8. **School:**

   a. A facility operating in Oregon prekindergarten or a federal Head Start program;

b. A public or private educational institution offering education in all or part of kindergarten through grade 12;

c. An education service district as defined in ORS 334.003;

d. A community college as defined in ORS 341.005;

e. The Oregon School for the Blind;

f. The Oregon School for the Deaf; and

g. A regional residential academy operated by the Oregon Youth Authority. [2009 c.501 §2]

Note: The Oregon School for the Blind was closed in 2009 pursuant to section 1, chapter 562, Oregon Laws 2009. The text of 634.700 was not amended by enactment of the Legislative Assembly to reflect the school's closure. Editorial adjustment of 634.700 for the school's closure has not been made.

B. APPENDIX 2: BMCC IPM Plan Low-Impact Pesticide List

The following is a list of “low-impact pesticides” that meet the requirements of ORS 634.700 – 634.750.

Product Name	Formulation	EPA Registration #	Active Ingredient
Advion Ant Gel	Bait Gel	352-746	Indoxacarb
Advion Cockroach Gel Bait	Bait Gel	352-652	Indoxacarb
Agrisolutions Diuron 4L Herbicide	White liquid emulsion with no odor	34704-854	Diuron (3-(3,4-Dichlorophenyl)-1 1-dimethylurea)
Aquamaster	Liquid	524-343(-ZF)	Glyphosate, isopropylamine salt
Banvel Herbicide	Amber liquid with mild amine odor	66330-276	Dimethylamine Salt of Dicamba, Dimethylamine Salt of related acids
Bee Bopper II, ARI Wasp and Hornet Killer	Pressurized liquid	7754-44	Tetremethrin d-Phenothrin
Casoron 4G	Granular	400-168	Dichlobenil
Crossbow	Emulsifiable Concentrate	62719-260-5905	2, 4-D, butoxyethyl ester Triclopyr, butoxyethyl ester
K-Orthine Dust	Dust	432-772	Deltamethrin
Delta Dust	Dust	28293-322	Deltamethrin
Demand G Insecticide	Granular	100-1240	Lambda-cyhalothrin
Detonate Herbicide	Soluble Concentrate	7969-137-55467	Diglycolamine salt
The Andersons 0.25% Granular Dithiopyr Herbicide	Granular	9198-213	Dithiopyr
DuPont Oust XP	Granular	352-601	Sulfometuron methyl

Herbicide			
EcoEXEMPT G Granular Insecticide	Granular	Exempt	Eugenol (clove oil) Thyme oil
Diuron 4L	Diuron Liquid Flowable	66222-54	Diuron (3-(3,4-Dichlorophenyl)-1 1-Dimethylurea
ExoEXEMPT IC-2 Insecticide Concentrate	Concentrate	Exempt	Rosemary Oil
EcoPCO WP-X Wettable Powder Insecticide	Wettable Powder	67425-25-655	Pyrethrins 2-Phenylethyl propionate Oil of Thyme
Envoy Plus	Emulsifiable Concentrate	59639-132	Cleothodim
Gordon's BRUSHMASTER Herbicide	Liquid Mixture; ester odor	2217-774	2,4-D, 2-ethylhexyl ester 2,4-DP-p, 2-ethylhexyl ester 3,6-Dichloro-o-anisic acid (Dicamba)
Gordon's MECOMEC 4 Turf Herbicide	Brown liquid; phenolic odor	2217-674	Potassium Salt of R(+)2-(2-Methyl-4-chlorophenoxy) propionic acid (MCPP)
Generation mini blocks	Pellets/tablets	7173-218	Difethialone
Gourmet Liquid Ant Bait	Impregnated Materials	73766-2	Disodium Octaborate Tetrahydrate
Grant's Ant Control A bait stations	Impregnated Materials	1663-33	Hydramethylnon
Gly Star Plus	Soluble Concentrate	42750-61	Glyphosate Potassium Salt

Hi-Yield Super Concentrate Kill-Zall II	Soluble Concentrate	42750-61-7401	Glyphosate, isopropylamine salt
InTice Thiquid ant bait	Soluble Concentrate	73079-7	Sodium Tetraborate Decahydrate
Landmaster BW	Soluble Concentrate	42750-62	2, 4-D, isopropylamine salt Glyphosate, isopropylamine salt
Maxforce FC Professional Insect Control Roach Killer Bait Gel	Bait Gel	432-1259	Fipronil
Maxforce Professional Insect Control Roach Killer Bait Gel	Bait Gel	432-1254	Hydramethylnon
Mecomec 4 Turf Herbicide	Soluble Concentrate	2217-674	Potassium Salt
Milestone VM Plus	Emulsifiable Concentrate	62719-572	Aminopyralid, triisopropanolamine salt Triclopyr, triethylamine
MotherEarth D Pest Control Dust	Dust	499-509	Diatomaceous Earth (amorphous silica)
MotherEarth Granular Scatter Bait	Granular	499-515	Boric Acid
MotherEarth Wasp & Hornet	Pressurized Liquid	499-519	d-Limonene
Nufarm Polaris® Herbicide	Blue liquid with faint ammonia-like odor	228-534	Isopropylamine salt of Imazapyr
Optigard Ant Gel Bait	Ready-to-Use Solution	100-1260	Thiamethaxom

Orange Guard	Ready-to-Use Solution	61887-1-AA	D-Limonene
Patrol Insecticide	Emulsifiable Concentrate	100-1066	Lambda-cyhalothrin
Phantom Temiticide-Insecticide	Emulsifiable Concentrate	241-392	Chlorfenapyr
Polaris	Steralant Isoproylamine Salt	228-534	
Quick Silver Herbicide	Emulsifiable Concentrate	279-3301	Carfentrazone-ethyl
QuickSilver T&O Herbicide	Off-white liquid with an aromatic solvent odor	379-3265	Carfentrazone-ethyl
Raid wasp and hornet spray	Pressurized Liquid	4822-553	Cypermethrin Prallethrin
Rescue W H Y spray for wasp, hornet, & yellowjacket nests	Pressurized Liquid	Exempt	Lemongrass oil, Clove oil (eugenol), Rosemary oil, Geranium oil
Rodeo	Soluble Concentrate	62719-324	Glyphosate, isopropylamine salt
Round Up Pro Max	Soluble Concentrate	524-579	Glyphosate, potassium salt
Safari 20 SG Insecticide	Emulsifiable Concentrate	33657-16-59639	Dinotefuran
Safer Brand Wasp and Hornet Killer	Liquid Aerosol	36488-47	d-Limonene Pyrethrine Potassium Salts of Fatty Acids Indian Palmarosa Oil
Snapshot 2.5 TG	Granular	62719-175	Trifluralin Isoxaben
Solitare WSL		279-3470	Sulfentrazone

Herbicide			Quinclorac
SPEED ZONE Broadleaf Herbicide for Turf	Amber liquid, ester odor	2217-833	Carfentrazone-ethyl; 2,4-D, 2-ethylexyl ester; Mecoprop-p acid; Dicamba acid
SURFLAN A.S. Pre-Emergent Herbicide	Bright orange opaque liquid, slight aromatic odor	70506-43 70506-44	Oryzalin: 3,5-dinitro-N^4N^4-dipropylsulfanilamide
Talstar P Professional Insecticide	Emulsifiable Concentrate	279-3206	Bifenthrin
Temprid SC Insecticide	Soluble Concentrate	432-1483	Imidacloprid beta-Cyfluthrin
Termidor SC	Soluble Concentrate	7969-210	Fipronil
Terro Liquid Ant Baits	Ready-to-Use Solution	149-8	Sodium Tetraborate Decahydrate
Turf Products Fertilizer with 0.86% ProPendi TM Herbicide 20-0-4	Granular	9198-173	Pendimethain 0.868%
TZone	Emulsifiable Concentrate	2217-920	Dicamba 2, 4-D, 2-ethylhexyl ester Triclopyr, butoxyethyl ester Sulfentrazone
Whitmire PT 515 Wasp Freeze	Pressurized Liquid	499-362	d-trans Allethrin d-Phenothrin

2 International Agency for Research on Cancer (IARC) found that there is inadequate evidence to link amorphous silica with cancer effects in humans or test animals. (http://www.epa.gov/oppsrrd1/REDs/factsheets/4081fact.pdf).