

# **Mill Pond Elementary School**

## **Integrated Pest Management Plan**

**September 2024 - August 2025**



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## **1. General School Information:**

**School name:** Mill Pond Elementary School

Address: 210 Western Blvd. City: Lanoka Harbor

County: Ocean District: Lacey Zip Code: 08734

Phone: 609-971-2070 E-mail: jdonohue@laceyschools.org

**School IPM Coordinator:** John Smith, District IPM Coordinator

Email: jsmith@laceyschools.org Phone: 609-971-2000 ext. 1050

**Nurse information:** TBD Phone: ext. 4007

## **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. Mill Pond School 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:** (Attached)

## **4. School IPM Plan Goals:**

- a. The roles, responsibilities, and training of all members of the school community 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 nonchemical 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 IPM 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 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. The IPM 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 IPM 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 are:

1. Coordinate pre- and post-notification of parents and staff of non-low impact pesticide applications according to the school's notification procedure.
2. Prepare and post signs as required in areas where non low impact pesticides are to be applied.
3. 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.
4. Prepare and send out 'Annual School IPM Program Notification 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.

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, Safety Data Sheets (SDS) when available for pesticides used, and labels for all pesticide products used.
4. Maintain records of any pest monitoring and non-pesticide controls implemented.
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 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.
11. Submit required information to the NJDEP.

School administration responsibilities by law 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.
- Prepare and post signs as required in areas where non low impact pesticides are to be applied.
- 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 IPM Program Notification Letter to Parents & Staff.

In order to carry out the duties prescribed above, our head custodian will:

- Compile all 'Pest Problem Report' and 'Food Service Report' forms received in 'IPM Pest Activity Monitoring and Control 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.
- 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'.
- 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.

**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 1-12. These 'Pest Management Professionals' may either be staff and /or a contractor as described below.

All **indoor applications** at this school are made by licensed contractor. The contractor for indoor pest management services at this school is Alliance Pest Services.

All **outdoor applications** at this school are made by a licensed vendor.

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

- Inspect school premises for the presence of pests or signs of pest activity.
- Notify the IPM Coordinator when pests or signs of pest activity are found.
- Recommend to School IPM Coordinator appropriate non-chemical procedures to correct pest problems.

- When it is determined that a pesticide must be used, select and recommend necessary pesticides. Preference will always be given to low impact pesticides.
- Provide School IPM Coordinator with SDS (when available) of any pesticide that is applied on school property.
- Provide application information as specified in the 'Non Low Impact Pesticide Application Log' when they apply these pesticides at the school. This log is kept in the Head Custodian's office.
- If a non-low impact pesticide is to be used, provide a 'School Integrated Pest Management Act Compliance Certification' Form 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.

- 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 SDS 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 (*check all that apply*):

- Maintain easy access to Poison Control Center hotline at 1-800-222-1222 in case acute poisoning is suspected.
- Monitor for head lice.
- 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.

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 Program:

- Practice good sanitation of all kitchen and food service areas.
- Cafeteria Lead of the kitchen staff will inspect the kitchen.

f. **Maintenance Staff:**

Maintenance staff maintains the cleanliness and takes 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.

Other Duties of Maintenance Staff in the School IPM Program:

- Practice all sanitation and maintenance techniques.
- 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.
- Manage specific pest issue(s) as directed by the district IPM coordinator. This will not include pesticide application unless the individual is a licensed Pest Management Professional.

**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 school dude.

Training:

School staff, teachers, and students will be trained in their roles in the school's pest management system by Eric LaPelusa, Head Custodian.

Other training:

- Staff will be given a brief overview or updates by the Head Custodian.

## **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. When the IPM program is implemented at the School, the Head Custodian 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**, the Head Custodian will compile:

- Areas that currently have pests or show signs of pest activity.
- 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**, the District Facility Manager, will map the school grounds:

- Note key plants, any pest problems, and horticultural recommendations.

## **Ongoing Monitoring**

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:

- Traps will be checked by the Pest Management Professional weekly during the early stages of solving a serious pest infestation, and 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** landscape pests will be monitored via direct inspection:

- Plants with annually recurring pest problems will be scouted according to pest appearance timetables.

## **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.

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, 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 beneficial's.
- 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.



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.

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.

The 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.

## 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 District Facility Manager 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.

**New Jersey law requires** that this notice shall include:

- a copy of the School IPM policy
- the name, address, and telephone number of the integrated pest management coordinator of the school or school district
- a list of any pesticide that is in use or has been used within the last 12 months on school property
- the following statement:

*"As part of a school pest management plan, Mill Pond 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 District 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 District 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** with 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,
- 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 District IPM Coordinator will advise the parents and guardians and staff of the school of pesticide applications by the following method of notification: written note that the students take home (see Appendix for sample notice)

**Where:** In either planned or emergency applications of non-low impact pesticides, per New Jersey law, the District 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" by 11".

### **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 Head Custodian will maintain records as listed in their outlined role and responsibility for School IPM. An initial meeting will be held between the District IPM Coordinator and Head Custodian.

The following records will be maintained in the IPM Log binder kept in the Head Custodian Office:

- Pest Problem Reports
- IPM Pest Activity Monitoring and Control Log
- 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
- Posting Sign (for indoors & outdoors) 'Notice of Pesticide Application'

### **Evaluation**

At least annually, the School IPM Plan and School IPM Program of the Mill Pond 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 by: Joanie Donohue, Principal

The participants in the evaluation will be: Eric LaPelusa, Head Custodian

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
- revise integrated pest management priorities

Following evaluation, the School IPM Plan will be revised accordingly by:  
Joanie Donohue, Principal

