Creswell School District
Integrated Pest Management Plan

ORS 634.700 - 634.750

Contents:

Introduction:

Structural, landscape pests can pose significant problems in schools. The term pests as used in this document should also be understood to mean unwanted vegetation, such as weeds where herbicides are used for eradication. Pests such as mice and cockroaches can trigger asthma. Mice and rats are carriers of disease. Many people and most importantly children are allergic to yellow jacket stings. The pesticides used to remediate these and other pests can also pose health risks to people, animals, and the environment. These same pesticides may cause special health risks to children simply due to their still developing organ system. **Because Creswell School District (CSD) considers the health and safety of our students, staff and patrons our number one priority, and a prerequisite to learning, it is the policy of Creswell School District to approach pest management with the least possible risk to all people that visit our campuses.** Senate Bill 634-700 through 634-750, passed in 2009, requires that all school districts adopt an integrated pest management plan. For this reason, the Creswell School District 40 Board of Directors adopts this integrated pest management plan for use on the campuses of our district.

The **Integrated Pest Management (IPM) Coordinator** for Creswell School District 40 is **Joel Higdon**, Director of Facilities. The district's **core IPM team** works collaboratively with the Coordinator to ensure the effective implementation of the IPM plan. This team consists of:

- **Joel Higdon** (IPM Coordinator, Director of Facilities)
- **Gilbert Castro** (Facilities Manager/Project Manager)
- **Jose Nunez Iniguez** (Facilities Grounds and Maintenance)

What is Integrated Pest Management?:

Integrated Pest Management, also known as IPM, means a proactive strategy that focuses on long term practices that will protect the health and safety of our students, staff, campus visitors and patrons while creating a positive learning environment, protecting structures and grounds in an environmentally sound way through a wide variety of tactics. The focus of which is to prevent pests from becoming a problem by working to address or eliminate conditions that foster their establishing a presence, feeding, breeding and proliferation of any invasive, unwanted species.

Since IPM focuses on remediation of the fundamental reasons why pests are here, the goal is to use pesticides only when necessary and after other deterrents have failed to produce the desired effect.

I. IPM Basics:

A. Education and Communication:

An essential part of any IPM plan is effective communication and education. We must identify and understand the conditions and environment that contribute to the problems associated with pests. Identification of pests, monitoring of pests, conditions that support their existence including their biology must be understood before we can begin to manage pests effectively. There must be a protocol for reporting pests, pest conducive conditions and a record of the pest's behavior with the specified action taken reduced to writing.

B. Cultural and Sanitation:

Understanding and identifying how human behavior supports pest in our buildings and grounds is essential to the success we achieve in this area. Changes in the habits of persons working in and visiting our buildings can have a significant impact on our susceptibility to pests. Cleaning under kitchen counters, food preparation and serving line counters every day is essential. Identifying unnecessary clutter in areas of the classroom, staff room, custodial closet and storage areas are crucial. Creating a place for the dumpster as far away from the back door of the kitchen as practical. Managing the amount and type of discarded waste in and around athletic stadiums, in addition to establishing comprehensive irrigation, over-seeding, fertilizing, mulching, aerating and other best practice turf maintenance.

C. Physical and Mechanical:

1. Traps for rodents, sticky traps to monitor crawling and flying insects to determine density, door sweeps on external doors, sealing cracks in all structures, caulking holes under sinks, provide proper mulching and drainage for shrubs and where possible keep landscape plants twenty-four to thirty-six inches away from all buildings.

D. Pesticides:

1. IPM focuses on practices to prevent an infestation to be present in a building or an invasion of invasive plants in a landscape. If these practices are successful then the need for pesticides should be the exception rather than the rule and they should only be used after other measures have been considered.

II. What is a Integrated Pest Management Plan?

A. ORS 634-700 defines an IPM plan as a proactive strategy that:

1. Focuses on long-term prevention or suppression of pest problems through economically sound practices.

2. Protects the health and safety of student, staff and faculty.

3. Protects the integrity of campus buildings and grounds.

4. Maintains a productive learning environment.

5. Protects the local ecosystems health.

B. Focus on the Prevention:

1. 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 of pests.

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

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

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

5. Monitors and evaluates the effectiveness of pest control measures.

6. Excludes the application of pesticides for purely aesthetic reasons.

7. Includes school staff education about sanitation, monitoring, inspection, and about pest Creswell School District control measures.

8. Gives preference to the use of non-chemical pest control measures.

9. Allows the use of low-impact pesticides if non-chemical pest control measures are ineffective.

10. 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.

NOTE: The above definition is the basis for Creswell School District's IPM plan. The following process and procedures form the skeletal structure for meeting the goals and implementing the strategies adopted in ORS 634-700 through ORS 634-750.

III. <u>ORS 634.700 Allows Some Pesticide Application:</u>

A. For the routine application of pesticides designed to be consumed by pests. To avoid proliferation of pests and/or unnecessary applications of pesticides several things must be put into place as CSD process and procedure before any applications are performed.

1. Staff must receive training on sanitation, monitoring, and exclusion as the primary means to control pests.

2. An acceptable level for a pest population to exist must be established before application of a pesticide is considered.

3. Sanitations practices, structural remediation, habitat manipulation, mechanical or biological control methods must be incorporated into the management strategy for the pest.

4. Establish documentation protocols to record the steps that were taken and the results of those practices.

5. The label and MSDS must be in the possession of the applicator and are considered to be the law for applying the selected chemical with all requirements and cautions strictly enforced under the direction of CSD Superintendent the IPM Plan Coordinator. Coordination is key to success for the IPM plan. The IPM Coordinator will have full authority to implement all phases of the IPM plan. He/She will develop procedures to accomplish the following:

1. The IPM Coordinator will be responsible for attending six hours of IPM training each year. The training shall include at least a general review of IPM principles and the requirements of 634-700 – 634-750.

2. The IPM Coordinator shall provide outreach to the school district community including all aspects of support services, teachers, administrators and DSC staff.

3. The IPM Coordinator will conduct training as defined in this document.

4. The IPM Coordinator will oversee prevention efforts, such as sealing cracks, by support staff and teachers. All teacher communications will be conducted through the administrator at each site and the correction of any violation by teachers or teaching assistants will be implemented at he direction of the Principal.

5. The IPM Coordinator shall establish a decision making process for implementing IPM in the District. The Coordinator will continually assess and improve the pest monitoring, reporting, action protocol and compliance.

6. The IPM Coordinator is responsible for the notification; posting and that record keeping requirements are established and time lines met.

7. The IPM Coordinator will create an approved list of low impact pesticides that can be applied when other methods have failed.

8. The IPM Coordinator will confiscate any unapproved pesticide brought into school buildings, onto school grounds or onto and around athletic fields.

B. The IPMC is responsible for conducting one **"Routine Inspection"** and one **"Annual Inspection"** each year.

1. The Routine inspection is a Level 2 inspection and the Annual Inspection is a Level 3.

2. The IPM Coordinator is responsible for responding to complaints about noncompliance with the plan. Responses to inquiries and complaints will be in writing and kept on record with the original written complaint submitted to the coordinator and the action that was taken.

V. IPM Decision Making Process:

A. IPM Coordinator:

1. The IPM Coordinator will have full authority to implement all phases of the IPM plan. He/She will develop procedures to accomplish the goals and strategies set forth in this document.

B. Custodial Services:

1. Custodians shall attend at least one annual training provided by the IPM Coordinator or his/her designee.

2. Custodians as part of the quarterly safety inspection fill out an addition to that form that deal specifically with IPM and submit it along with their quarterly report.

3. Place and check sticky traps for the monitoring of crawling and flying pests.

4. Report via email to the IPM Coordinator the results from the sticky traps.

5. Report via email clutter and other problem areas in the classroom and other areas of the building.

6. Report by district work order to the IPM Coordinator any cracks, holes or voids that need to be filled to elevate any pest conducive conditions in the building.

7. Respond to any requests by building staff to observe pest problems or pest concerns and report them in a work order or to the IPM Coordinator via email.

8. The custodian will notify the IPM Coordinator of any unapproved pesticide (such as aerosol cans) discovered during inspections or regular duties. The IPMC will confiscate the unapproved pesticide and notify the principal, teacher or other staff member of the violation.

C. Food Services:

1. The Employee shall attend at least one annual training provided by the IPM Coordinator or his/her designee.

2. Assure that all food, food components (sugar, flour & etc.) are thoroughly cleaned up every day from all surfaces.

3. Assure that the floor under the serving counter and the preparation tables are thoroughly cleaned each day and are free of food and drink spills.

4. Promptly empty corrugated cardboard materials and remove from building.

5. Keep exterior doors closed.

6. Report by way of work order to the FS Supervisor pest conducive conditions that require maintenance.

7. Locate the main dumpster as far away from the entrance door to the kitchen as far as practical.

8. The Kitchen Manager will forward a work order to the Food Service Supervisor with any concerns regarding pests or pest access to the kitchen.

9. The Food Service Supervisor will evaluate work orders for pest management in the kitchen. The supervisor will forward the request to the IPM Coordinator for action or to complete the record.

D. Maintenance/Grounds Services:

1. Employees shall attend at least one annual training on IPM practices and procedures conducted by the IPM Coordinator or his/her designee.

2. Under the direction of the IPM Coordinator the maintenance/grounds department will address all structural concerns at all buildings and any grounds infestations or other adverse landscape conditions.

3. The members of the maintenance/grounds team will constantly be observant of any conditions that would cause concern and report that concern to the IPM Coordinator where it will be reduced to writing and kept on file in the IPM Coordinator's office.

4. Under the direction of the IPM Coordinator the maintenance/grounds team will develop protocols and provisions for pest avoidance and prevention during construction or renovation projects.

5. The grounds department will continue to take Department of Agriculture required classes and retain their certification as licensed applicators.

6. Where feasible the vegetation surrounding buildings will be kept from between twenty-four (24) inches to thirty-six (36) inches away from all buildings.

7. Under the direction of the IPM Coordinator the Grounds Lead will schedule all applications of pesticides on school district grounds.

8. Following notification by the IPM Coordinator the Grounds Lead will post, record and schedule application.

D. School Faculty: Principals, Teachers, Specialist and Educational Assistants

1. All employees will attend at least one annual training provided by the IPM Coordinator or his/her designee.

2. Teachers and faculty will keep their classrooms and work areas free from clutter.

3. Teachers and faculty will make sure students clean up after themselves whenever food is served in the classroom.

4. Teachers and faculty will report pests and pest conducive conditions to he IPM Coordinator via email with a specific room number or location, type of pest, time space is available for inspection and suggested remedy.

5. Follow first steps protocol for reporting ant management before notifying IPMC.

a. First Response Protocol is performed by the staff person reporting any classroom, kitchen or sink area infestation. Custodial areas excluded. The employee will clean up any food the ants are eating, kill visible ants, wipe down area where ants or other with soapy water, notify IPM Coordinator via email if ants continue to be found after following protocol.

7. Principals will assure that teachers and faculty keep their classrooms free from clutter and that they do not foster a pest conducive environment due to consumption of food or other practices in the classroom.

VI. <u>Monitoring:</u>

A. Monitoring is the most important component of a successful IPM program as defined in ORS 634-700 through 634-750. It could be described as the regular and ongoing inspection of areas where pest problems do or might occur.

1. All information is always written down and filed in the IPM Coordinator office.

2. Staff will be instructed in what to look for in the annual required training for IPM.

3. The monitoring process can take place as the employee goes about their normal duties.

B. The Three Levels of Monitoring:

1. Level One:

a. Is the casual observing/looking with no record keeping which is generally not helpful.

2. Level Two: All Staff

a. Is the casual observing/looking with written observations and can be very useful.

b. Observe, identify and report a conducive environment for pests.

c. Notify custodian of your concerns.

d. Email the IPM Coordinator your concerns and actions taken from the "first steps protocol".

e. The IPMC will conduct one Level 2 inspection per year.

3. Level Three: IPM Coordinator, Custodian, Maintenance/Grounds

a. Integrated Pest Management Coordinator:

1a. The IPMC shall conduct one Level 3 inspection while accompanied by a building custodian at least once per year while school is in session.

b. Custodian Lead:

1b. Will randomly conduct at least four inspections per year as part of the building inspection and report those findings to the IPMC and the Safety Committee.

2b. Observe and report pest conducive conditions throughout their building including structural deterioration, holes that allow pests to enter and conditions that provides harborage.

3b. Will evaluate and report the level of sanitation in the building as a result of food and food waste sold on site or brought in.

4b. Will evaluate and report the level of cleanliness as a result of use by community events, athletic events (CSD and other), students and patrons.

5b. Will observe and report the amount of pest damage and the number of locations of pest signs (rodent droppings, termite tubes, termite dust, rotted wood) that appear as they conduct their daily routines.

6b. Will observe and report human behaviors that affect or facilitate a pest environment such as working conditions that make it impossible to close doors and screens, food preparations and school activities.

7b. Will conduct and report their own management activities in specific areas of remediation like caulking/sealing, setting sticky traps, treating pests, and the result of those actions.

c. Grounds Lead**:**

1c. Will monitor turf and landscape area.

2c. Will monitor the condition and health of all landscape plants and trees.

3c. Will initiate soil test every three to four years to establish levels of pH, phosphorus and potassium levels in turf soils.

4c. Monitor the kind and abundance of pests including weeds, insects, mites, moles, gophers, ladybugs, spiders, lacewing larvae, syrphid fly larvae, box elder, pigeons, pigeon droppings and etc.

5c. Record any unusually dry hot, wet, or cold weather in the past few weeks or months that may affect growing conditions and the health of the landscape.

6c. Observe and report the need for proper drainage in areas that are flooding the landscape.

7c. Human behaviors that affect the landscape plants or promotes pests such as; foot traffic that compacts soils, physical damage to plants by people, insistence on having plants grow in inappropriate locations and etc..

8c. Record and report management techniques and activities performed by the grounds team such as; pruning, mulching, fertilizing, aeration, treating for pest and weed infestation and etc..

VII. <u>Reporting:</u>

A. "Pests of Concern"

1. A pest of concern is a pest determined to be a public health risk or a significant nuisance pest. They include but are not limited to:

a. Cockroaches which are disease vectors and asthma triggers.

b. Mice, rats and pigeons that are disease vectors and asthma triggers.

c. Yellow jackets and wasps that can sting and cause anaphylactic shock.

d. Cornered nutria, raccoons, cats, dogs, opossums and skunks that can bite and foul playgrounds and athletic fields with their feces.

2. All Creswell School District staff are reporters for the monitoring of pests in their building and have the ability to report their observations to the custodian verbally; the principal in writing; or by emailing the Integrated Pest Management Coordinator.

B. Action:

1. All reports of pest related problems by staff will be faxed or emailed to the IPMC as soon as possible. The best report is the one that comes directly from the observer. A form for reporting an incident can be found in your buildings administrative office.

2. Request can also be submitted on the District work order forms.

3. When requests are received the IPM Coordinator will date the time received and assign a priority for the repair or intervention based on what measures have already been taken, if any, and the severity of the infestation or repair. Anything in kitchen areas are high priority. Small ants on the outside of the building would be a low priority. Unless, observed entering the building via a crack or hole. In that case they would be assigned a priority based on the report and the crack filled.

4. The corrective work will be assigned to a member of the maintenance/grounds team or the school custodian based on the severity of the intervention.

5. A work order will be filled out and upon completion submitted to the IPM Coordinator to be recorded as public record of the corrective work completed. All such records will include receipts for monies spent to manage the pest and will be kept for a minimum of four years.

VIII. Acceptable Population Density:

A. Acceptable Thresholds:

1. How many ants are too many? The IPM Coordinator has discretionary authority in this area to set threshold numbers for pests.

a. Ants, spiders, flies and etc. will depend on the location and the severity of the infestation.

b. Cockroaches, mice, rats, raccoons, opossums, skunk and nutria the tolerance level is zero.

c. Dogs and cats that defecate on school grounds and in landscape areas will be dealt with depending on the severity of the infestation and the impact on the healthy environment of the playground or athletic field. (Service animals will be considered exempt)

d. Signs will be posted at all entry points to playgrounds and athletic fields

IX. Pest Emergencies:

A. If a pest emergencies is declared by the IPM Coordinator the area must be evacuated and cordoned off before taking steps to correct the situation.

1. After consultation with the building administrator the IPM Coordinator may declare an emergency which would require that he/she determined that the presence of a pest or pests immediately threaten the health and safety of students, staff or patrons using the campus, or the structural integrity of campus facilities, he/she have the authority to declare a "Pest Emergency".

a. An example of what may constitute a pest emergency is yellow jackets swarming in areas frequented by children, or a raccoon in an area frequented by children, or a half dozen rats or mice running through occupied areas of the school.

X. Annual IPM Report:

A. The Integrated Pest Management Coordinator will in the month of July of every school year write and submit a yearly report to the Creswell School District Superintendent for her/his review.

XI. Required Training:

A. ORS 634.700 (3) (i) Require staff education; "about sanitation, monitoring and inspection and about pest control measures. All staff shall have at least a general review of IPM principles and the requirements of ORS 634.700 – 634.750" each year.

B. IPM Plan Coordinator Training:

1. ORS 634.720 (2) requires that the IPM Plan Coordinator; "shall complete not less than six hours of training each year. The training shall include at least a general review of the IPM principles and requirements of ORS 634.700-634.750".

2. Training should include but not be limited to the health and economic issues associated with pests in schools, exclusion practices, pest identification and biology of common pests. Common challenges with monitoring/reporting/action protocols, proper use of sticky monitoring traps for insects, and hands-on training and proper inspection techniques shall also be presented.

C. IPM Training for Building Staff:

1. At the beginning of the 2012-2013 school year the Integrated Pest Management Coordinator will meet with each staff by building or combined buildings to outline the overall plan, specific goals and procedures of the CSD adopted IPM plan.

2. In subsequent years the IPMC in conjunction with the building administrator will provide written information to every staff member and will make himself/herself available as a requested presenter for at least one staff meeting per year.

3. The IPMC will respond to all staff questions and concerns and will be the primary contact for any clarification of requested information about the Creswell School District (CSD) IPM plan.

D. IPM Training for Food Service, Custodial and Maintenance:

1. The IPMC will conduct yearly trainings for each group in an effort to maintain a high level of awareness with these three groups.

2. After the initial all staff training of September 2012 the IPM Coordinator may assign a designee to perform the yearly trainings as schedules allow for each group.

3. The Grounds Lead and staff will meet with the IPM Coordinator more than one time per year to review practices and procedures. Those meetings will include but not be limited to the review of practices, the approved product application list, application schedules, staff interaction, any written complaints submitted in writing and etc.

E. Other Training:

1. Basic training on the principles of IPM and the main points of this IPM plan should also be provided to school nurses, administrative staff, superintendents, coaches and any other group deemed essential by Creswell School District.

2. Coaches who use athletic fields should be given an overview of the IPM plan and how use of the natural surface can be affected by the way the field is used. They should also be made aware that these new practices will change the look of the surface they are used to playing on.

XII. Pesticide Applications:

A. Required Notification:

1. Any pesticide application (this includes weed control products, ant baits and all other professional **or over the counter products**) on school property must be made by a public pesticide applicator.

2. In the month of July of every year a list of potential pesticide products that may be used in the event that other pest control measures have failed will be posted on the CSD website. In addition to the approved list will be the CSD IPM Plan for public review by all administrators, faculty, students, parents, citizens at large, and the process for contacting the IPM Coordinator with inquiries about the program.

3. The IPM Coordinator will send a notice via email to each school administrator and office manager before any application of a pesticide at their site. It is incumbent upon the school to forward the email to all faculty, parent club, site council, students, parents and other interested parties the administration deems part of the school community.

B. Notification and Posting for Non-emergencies

1. 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 a low-risk pesticide. This documentation will remain on file with the IPMC.

2. Non emergency pesticide applications will occur only on non-student days where possible. If an application cannot wait it will take place after 4:00pm and preferably on a Friday. The IPM Coordinator will make the call and document the factors leading up to the decision.

3. The label is the law in all cases when it comes to re-entry times. A pesticide cannot, never, be applied when school is in session and students may be exposed to the application before the approved re-entry time.

4. The IPM Coordinator or his/her designee will give written notice of a proposed pesticide application posting on the district website and the school website as well as signage at the application site with all pertinent information no less than twenty-four (24) hours before the application takes place.

5. The notice shall include but not be limited to the name of the product being applied, trademark or type of pesticide, the EPA registration number, the expected area of the application, the expected date (all applications may be postponed and rescheduled due to weather) and the reason for the application.

6. The IPM Coordinator or his/her designee shall place warning signs around pesticide application areas beginning no later than twenty-four (24) hours before the application and remaining for no less than seventy-two (72) hours after application occurs.

7. A warning sign must bear the words “Warning: pesticide treated area”, display the proposed date of application, the expected or actual reentry time, and provide the telephone number of a contact person.

8. If a pest emergency occurs and it is impracticable to place warning signs at least twenty-four (24) hours before the pesticide is applied, the IPM Coordinator or designee shall place the signs on the location as soon as possible but before the application occurs.

<u>Note:</u> Failure to give notice or post warnings as required by this section does not create a cause of action for damages and may not be asserted as the basis for a per se negligence claim (ORS 634.740, (5), [2009c.501 7].

C. Notification and Posting for Emergencies

1. The IPMC may declare a pest emergency after consultation with school faculty and administration

2. If necessary a pesticide other than a low impact pesticide may be used to mitigate a declared pest emergency.

3. If a pest emergency is declared the IPM Coordinator will review the IPM plan and see if there are modifications that can be made to the plan that might prevent the future declaration of a pest emergency.

4. After declaration of a pest emergency the area affected must be evacuated and cordoned off before taking any other steps.

5. By definition an emergency can not be planned for so the twenty-four (24) hour notice before application can not occur but signs must be placed outside for the cordoned off area before application begins.

6. ORS 634.700 also allows the application of a non-low pesticide "by, or at the direction or order of, a public health officer.

D. Record Keeping of Pesticide Applications:

1. The IPM Coordinator or his/her designee shall keep a copy of the following pesticide product information on file and a copy in each building where pesticide applications may occur.

a. A copy of the label

b. A copy of the MSDS

c. The brand name or trademark of the pesticide product.

d. The United States Environmental Protection Agency registration number assigned to the pesticide product.

e. The pest condition that prompted the application.

f. Description of the area on campus where the application occurred.

g. The approximate amount and concentrations of the pesticide product applied.

h. The type of application and whether the application proved effective.

i. The pesticide applicator or public applicator license numbers and the pesticide trainee or public trainee certificate numbers of the persons applying pesticide.

j. The names of the persons applying the pesticide.

k. The dates on which the plan coordinator gave any notices required by ORS 634-740.

l. The dates and times of the placement and removal of warning signs under ORS 634.740.

m. Pesticide application records must include copies of all notices given under ORS 634.740.

n. The district IPM Coordinator shall retain pesticide application records required by this section for at least four (4) years following the application date. [2009 c501 8]

E. Annual Report on Pesticide Applications:

1. The IPM Coordinator will be responsible for an annual report on pesticide applications to be completed no later than the last day of August of each year. A copy will be kept in the IPM Coordinator office with other documentation relevant to the IPM Plan and one copy will be presented to the Superintendent for her/his review.

2. The report will contain the following for each application;

a. The brand name and USEPA registration number of the product applied

b. The approximate amount and concentration of product applied

c. The location of the application

d. The prevention or management steps taken that proved to be ineffective and led to the decision to make a pesticide application.

e. The type of application and whether the application proved effective.

F. Approved List of Low-Impact Pesticides:

1. With all pesticide application the pesticide label is the law. Review the entire label to ensure that it can be used as desired (correct use site, application method, etc.). For assistance with label interpretation, contact the Oregon Department of Agriculture Pesticides Program.

2. ORS 634.705 (5) mandates that a governing body shall adopt a list of low-impact pesticides for use with the integrated pest management plan. The governing body 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 Agency 1986 Guidelines for Carcinogen Risk Assessment.

c. Contain a pesticide product classified as a carcinogen to humans or likely be to humans under the United States Environmental Protection Agency 2003 Draft Final Guidelines for Carcinogen Risk Assessment. [2009 c.501 3]

Approved List of Low Impact Pesticides:

Oregon law requires pesticide applicators to use only low-impact pesticide products in and around schools. ORS 634.705 (5) explains that a governing body shall adopt a list of low-impact pesticides for use with their IPM plan and explains which products may not be included on the list they adopt. This list of products is based solely on the requirements of ORS 634.705 (5), which were evaluated by the OSU School IPM Program.

The products listed in this "Low-Impact Pesticide List" were evaluated in November 2024 to determine whether they met the requirements of ORS 634.705 (5) for use in and around Oregon schools, following this ODA Guidance Document.

Pesticide products must be registered for sale and/or distribution in the state of Oregon each year. Current product registration can be verified using this ODA Search Tool.

List of Appendices:

Low-Impact Pesticides List

The products listed in this "Low-Impact Pesticide List" were evaluated in November 2024 to determine whether they met the requirements of ORS 634.705 (5) for use in and around Oregon schools, following this ODA Guidance Document.

Low-Impact Pesticides: Guidance for Schools

This guidance document is intended to help school governing bodies and Integrated Pest Management (IPM) coordinators determine what pesticide products qualify as a low-impact pesticide under ORS 634.700(4).

"Low-Impact Pesticides List"

Oregon law requires pesticide applicators to use only low-impact pesticide products in and around schools. ORS 634.705 (5) explains that a **governing body shall adopt a list of low-impact pesticides for use with their IPM plan** and explains which products may not be included on the list they adopt.

This is NOT a list of products that the OSU School IPM Program recommends. It is a list of products based solely on the requirements of ORS 634.705 (5), which were evaluated at the request of school IPM plan coordinators.

Governing bodies can ignore, add or subtract from this "Low-Impact Pesticide List" based on their local situation, as long as the products they choose meet the requirements of ORS 634.705 (5).

The pesticide label is the law. Review the entire label to ensure that it can be used as desired (correct use site, application method, etc.). “Non-crop areas” do NOT include ornamental sites, turf, or sports fields. For assistance with label interpretation, contact the Oregon Department of Agriculture Pesticides Program.

The products listed in this "Low-Impact Pesticide List" were evaluated in November 2024 to determine whether they met the requirements of ORS 634.705 (5) for use in and around Oregon schools, following this ODA Guidance Document.

Pesticide products must be registered for sale and/or distribution in the state of Oregon each year. Current product registration can be verified using this ODA Search Tool.

This list is a tool, provided free-of-charge, but it is not a substitute for the ODA Guidance Document and ODA Search Tool identified above. If you are unsure whether a product you are considering using is still registered for use in the state of Oregon and still meets the requirements of ORS 634.705 (5), please contact the Oregon Department of Agriculture Pesticides Program.

Every effort has been made to provide accurate and current information. Nevertheless, updates to product information or inadvertent errors in information may occur, product registration and labeling may change, and products may no longer meet the requirements of the law. **You accept all responsibility for information updates or errors, changes in products, and compliance with laws.** To the maximum extent permitted by law, OSU disclaims all warranties, including without limitation, any implied warranties of merchantability, fitness for a particular purpose, accuracy, and non-infringement. Before using any specific product on this list, you should always follow the ODA Guidance Document, and check to see if it is currently registered for sale in the state of Oregon.

Last updated November 2024. Before using any product on this list, check the ODA Guidance Document

Use the EPA Registration number to match products on the list. **The same product name can be used for different products, so matching the product name(s) below to products on the shelf is not sufficient.** If there is no EPA RegistrationNumber, match the product name ***and*** the manufacturer/distributor name when comparing the list to products on the shelf.

Herbicides		
Active Ingredient(s)	**Product Name**	**EPA Reg. No.**
2,4-D (diethylamine salt), quinclorac, dicamba	*Lesco Momentum Q Herbicide*	228-531
2,4-D (diethylamine salt), quinclorac, dicamba	*Qunincept Herbicide*	228-531
2,4-D ester	Barrage HF Low Volatile Herbicide	5905-529
2,4-D ethylhexyl ester	*The Andersons Professional Turf Products Fertilizer with Surge 16-0-9*	2217-882-9198
2,4-D ethylhexyl ester, 2,4-DP, dicamba	*Gordon's Agricultural Products Brushmaster Herbicide*	2217-774
2,4-D ethylhexyl ester, mecoprop-p, dicamba, carfentrazone ethyl	*Gordon's Proform Professional Formulations Speed Zone Broadleaf Herbicide for Turf*	2217-833
2,4-D ethylhexyl ester, mecoprop-p, dicamba, carfentrazone-ehtyl	*Gordon's Proform Professional Formulations Speed Zone*	2217-835
2,4-D, ethylhexyl ester	*Drexel De-ester LV6*	19713-655
2,4-D, isopropylamine salt, and glyphosate, isopropylamine salt	*Landmaster BW*	42750-62
2,4-D, mecoprop, dicamba	*Lilly Miller Ultra Green Phosphorus Free Weed & Feed*	2217-559-33116
carfentrazone-ethyl	*Quicksilver T+O Herbicide*	279-3265
clethodim	*Envoy Plus Herbicide*	59639-132
clethodim	*Select Max Herbicide*	59639-132
clethodim	*Select Max Herbicide with Inside Technology*	59639-132
dicamba, 2,4-D (2- ethylhexyl ester), sulfentrazone, and triclopyr, butoxyethyl ester	*Gordon's ProForm Professional Formulations T Zone Broadleaf Herbicide*	2217-920
dichlobenil	*Casoron 4G*	400-168
dichlobenil	*Casoron 4G*	400-168-59807
diquat dibromide, indaziflam, glyphosate isopropylamine salt	*Esplanade EZ*	432-1528
dithiopyr	*Dimension 270-G Turf & Landscape Ornamental*	7001-375
dithiopyr	*The Andersons Professional Turf Products Dimension 0.25g With Agpro*	9198-213
d-Limonene	*Moss Melt Concentrate*	92967-1-91094
ethofumesate	*Poa Constrictor*	70506-107
ferrous (iron) sulfate monohydrate	*Lilly-Miller Moss Out! plus Fertilizer*	802-543
flumioxazin	*Broadstar Herbicide*	59639-128
flumioxazin	*Payload Herbicide*	59639-120
flumioxazin	*SureGuard SC Herbicide*	71368-114
glyphosate	*EZ-Ject Diamondback Herbicide Shells*	83220-1
glyphosate	*Razor Herbicide Primera Razor Pro*	228-366
glyphosate	*Razor Pro Herbicide*	228-366

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glyphosate isopropylamine salt	*Cornerstone Plus - Agrisolutions*	1381-192
glyphosate, diquat dibromide	*Quikpro Herbicide*	524-535
glyphosate, diquat dibromide	*Roundup QuikPro Herbicide*	524-535
glyphosate, isopropylamine salt	*Aquamaster Herbicide*	524-343
glyphosate, isopropylamine salt	*Aquapro Herbicide*	62719-324-67690
glyphosate, isopropylamine salt	*Four Power Plus*	34704-890
glyphosate, isopropylamine salt	*Gly Star Plus*	42750-61
glyphosate, isopropylamine salt	*Gly-Star Original Agristar*	42750-60
glyphosate, isopropylamine salt	*Hi-Yield Super Concentrate Kill-Zall II*	42750-61-7401
glyphosate, isopropylamine salt	*Kleenup Pro*	34704-890
glyphosate, isopropylamine salt	*Mad Dog Plus*	34704-890
glyphosate, isopropylamine salt	*Makaze*	34704-890
glyphosate, isopropylamine salt	*Ranger PRO Herbicide*	524-517
glyphosate, isopropylamine salt	*Roundup Custom for Aquatic & Terrestrial Uses*	524-343
glyphosate, isopropylamine salt	*RoundUp Pro Concentrate*	524-529
glyphosate, potassium salt	*Roundup Promax Herbicide*	524-579
halosulfuron-methyl	*Nufarm Prosedge*	228-711
halosulfuron-methyl	*Sedgehammer+ Turf Herbicide*	81880-24-10163
halosulfuron-methyl	*Sedgehammer Turf Herbicide*	81880-1-10163
imazapic, ammonium salt	*Plateau Herbicide*	241-365
Indaziflam	*Esplande 200 SC*	432-1516
indaziflam	*Marengo*	432-1518-59807
indaziflam	*Marengo G*	432-1523-59807
indaziflam	*Specticle Flo*	432-1518
indaziflam	*Specticle G*	432-1523
iron HEDTA	*Fiesta Turf Weed Killer*	67702-26
mesotrione	*Tenacity*	100-1267
pendimethalin	*Lesco Pre-M Aqua Cap Herbicide*	241-416-10404
pendimethalin	*Pendulum AquaCap Herbicide*	241-416
quinclorac, 2,4-D, dicamba, sulfentrazone	*Gordon's ProForm Professional Formulations Q4 Plus Turf Herbicide for Grassy & Broadleaf Weeds*	2217-930
simazine	*Drexel Simazine 4L*	19713-60
simazine	*Simazine*	19713-252
triclopyr butoxyethyl ester, sulfentrazone, 2,4- D	*T Zone SE*	2217-976

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Insecticides		
Active Ingredient(s)	**Product Name**	**EPA Reg. No.**
azadirachtin	*AzaSol*	81899-4-74578
Bacillus thuringiensis subspecies *israelensis*	*Mosquito Dunks Biological Mosquito Control*	6218-47
Bacillus thuringiensis subspecies *israelensis*	*Summit B.t.i. Briquets Floating Sustained-Release Larvicide*	6218-47
beta-cyfluthrin	*Tempo SC Ultra Insecticide*	432-1363
boric acid	*Boractin Insecticide Powder*	73079-4
boric acid	*MotherEarth Granular Scatter Bait*	499-515
boric acid	*Revenge Granular Ant Bait NiBan Granualr Bait*	64405-2
boric acid	*Terro Multi-Purpose Insect Bait*	64405-2-149
chlorantraniliprole	*22-0-7 Fertilizer with Acelepryn Insecticide*	9198-247
chlorantraniliprole	*Acelepryn G*	100-1500
chlorfenapyr	*Phantom Termiticide- Insecticide*	241-392
clove oil, lemongrass oil, rosemary oil, cinnamon oil	*NatureLine Plus Professional Grade Botanical Insecticide*	None - 25(b)
clove oil, lemongrass oil, rosemary oil, cinnamon oil	*NatureLine PRO Power Residual Oil*	None - 25(b)
cyfluthrin	*Tempo 1% Dust Insecticide Ready to use*	432-1373
cypermethrin, prallethrin	*Raid Wasp & Hornet Killer 33*	4822-553
deltamethrin	*Delta Dust Insecticide*	432-772
disodium octaborate tetrahydrate (basically boric acid)	*Green Way Liquid Ant Killing Bait*	73766-2
disodium octaborate tetrahydrate (basically boric acid)	*Revenge Pre-Filled Liquid Ant Baits*	73766-2-4
d-limonene	*Orange Guard*	61887-1
esfenvalerate, prallethrin, piperonyl butoxide	*Onslaught FastCap Spider & Scorpion Insecticide*	1021-2574
fipronil	*Maxforce FC Ant Killer Bait Gel*	432-1264
fipronil	*Maxforce FC Professional Insect Control Roach Killer Bait Gel*	432-1259
fipronil	*Maxforce FC Select Professional Insect Control Roach Killer Bait Gel*	432-1259
fipronil	*Taurus SC*	53883-279
fipronil	*Termidor SC*	7969-210
heptyl butyrate	*10-Week Yellowjacket Trap Cartridge*	84565-5-49407
heptyl butyrate	*Rescue Yellowjacket Attractant Cartridge*	84565-5-49407
heptyl butyrate, acetic acid, 2-methyl-1-butanol	*Reusable WHY Trap*	84565-3-49407
heptyl butyrate, acetic acid, 2-methyl-1-butanol	*WHY Attractant Kit*	84565-3-49407

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heptyl butyrate, acetic acid, 2-methyl-1-butanol	*WHY Trap Refill*	84565-3-49407
hydramethylnon	*Amdro Kills Ants Ant Killing Bait*	1663-33-73342
hydramethylnon	*Maxforce Professional Insect Control Roach Killer Bait Gel*	432-1254
indoxacarb	*Advion Ant Gel*	100-1498
indoxacarb	*Advion Cockroach Gel Bait*	100-1484
indoxacarb	*Arilon Insecticide*	100-1501
lambda- cyhalothrin	*Cyzmic CS*	53883-261
lambda-cyhalothrin	*Demand CS Patrol*	100-1066
lambda-cyhalothrin	*Demand G Insecticide*	100-1240
lambda-cyhalothrin	*Grenade ER Insecticide*	100-1066-773
Mineral Oil	*Monterey Horticultural Oil*	48813-1-54705
phenothrin, piperonyl butoxide	*Anvil 10+10 ULV*	1021-1688-8329
prallethrin	*PT Wasp-Freeze II*	499-550
prallethrin, lambda- cyhalothrin	*Eliminator Wasp & Hornet Killer3*	9688-190-8845
prallethrin, lambda- cyhalothrin	*Hot Shot Wasp and Hornet Killer 3*	9688-190-8845
prallethrin, lambda- cyhalothrin	*Spectracide Wasp and Hornet Killer 3*	9688-190-8845
rosemary oil, geraniol, peppermint oil (Other: oil of wintergreen, white mineral oil, vanillin, polyglyceryl oleate)	*Essentria IC-3 Insecticide Concentrate from Envincio/Prentiss LLC*	None - 25(b)
sodium chloride (salt)	*NatureLine NGB Professional Grade Insecticidal Concentrate*	None - 25(b)
sodium tetraborate decahydrate	*InTice Gelamino Ant Bait*	73079-8
sodium tetraborate decahydrate	*InTice Liquid Ant Bait*	73079-7
sodium tetraborate decahydrate	*Terro Ant Killer II Liquid Ant Baits/Killer*	149-8
sodium tetraborate decahydrate	*Terro Outdoor Liquid Ant Bait Stakes*	149-8
sodium tetraborate decahydrate	*Terro Outdoor Liquid Ant Baits Pre-Filled RTU*	149-8
spinosad	*Conserve SC Turf & Ornamental*	62719-291
tetramethrin, d- phenothrin	*ARI Wasp and Hornet Killer Bee Bopper II*	7754-44

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Molluscicides		
Active Ingredient(s)	**Product Name**	**EPA Reg. No.**
iron phosphate	*Garden Safe Slug & Snail Bait*	67702-3-39609
iron phosphate	*Sluggo*	67702-3-54705

Use the EPA Registration number to match products on the list. **The same product name can be used for different products, so matching the product name(s) below to products on the shelf is not sufficient.** If there is no EPA RegistrationNumber, match the product name ***and*** the manufacturer/distributor name when comparing the list to products on the shelf.

Fungicides		
Active Ingredient(s)	**Product Name**	**EPA Reg. No.**
mineral oil	*Monterey Horticultural Oil*	48813-1-54705
azoxystrobin, propiconazole	*Headway (not Highway)*	100-1216

Low-Impact Pesticides: Guidance for Schools

This guidance document is intended to help school governing bodies and Integrated Pest Management (IPM) coordinators determine what pesticide products qualify as a low-impact pesticide under ORS 634.700(4). Please note that each school governing body can adopt a school IPM plan that places additional restrictions on what pesticides can be used on their own school campus (ORS 634.710).

What is a "low-impact pesticide" under the school IPM law?

ORS 634.700(4) *"Low-impact pesticide" means a product that does not contain a pesticide product or active ingredient described in ORS 634.705(5).*

ORS 634.705(5) *A governing body shall adopt a list of low-impact pesticides for use with the integrated pest management plan. The governing body may include any product on the list except products that:*

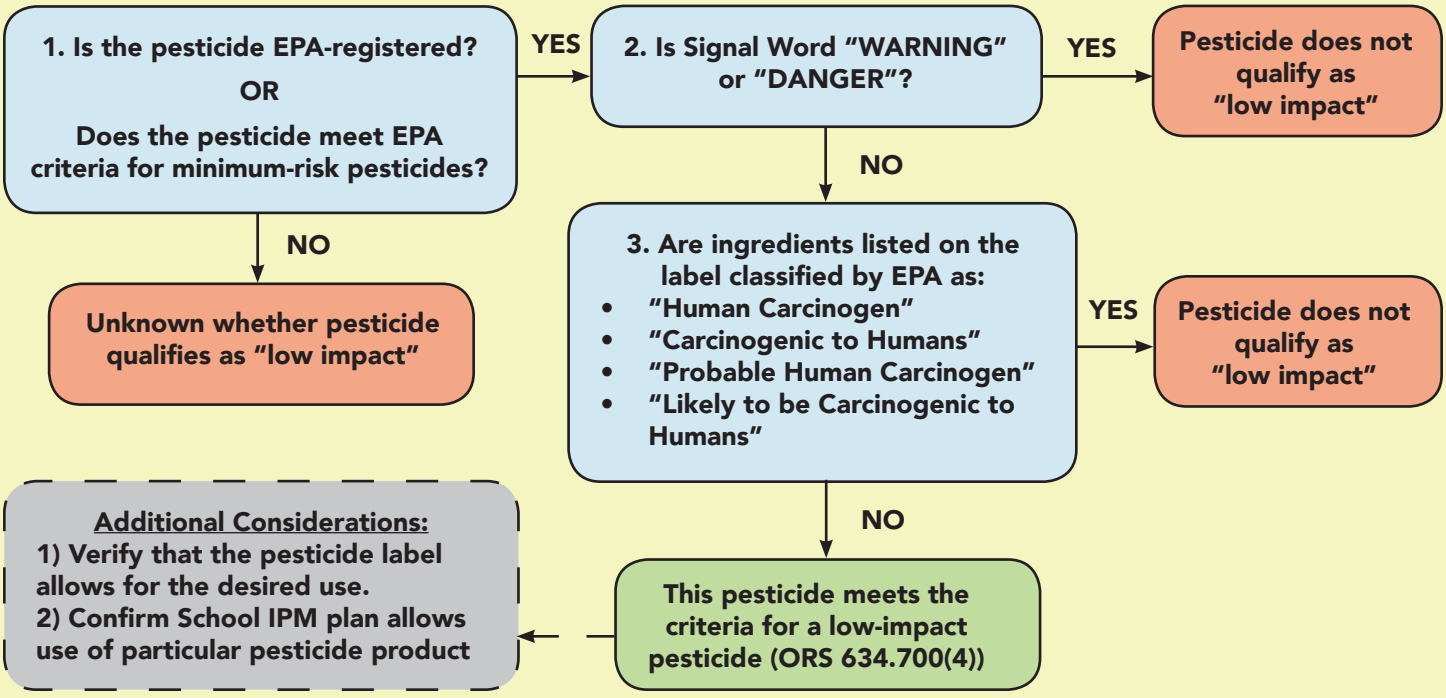
(a) Contain a pesticide product or active ingredient that has the signal words "warning" or "danger" on the label;

(b) Contain a pesticide product classified as a human carcinogen or probable human carcinogen under the United States Environmental Protection Agency 1986 Guidelines for Carcinogen Risk Assessment; or

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

How can I determine whether a pesticide is a "low-impact pesticide"?

A flowchart of the overall process is provided below. More detailed information and resources are provided on the next page.



☐ **Step 1: Has the pesticide been evaluated for a signal word by the Environmental Protection Agency?**

To qualify as a "low-impact pesticide" the pesticide product must have been evaluated for a signal word (i.e. registered) by the Environmental Protection Agency (EPA), or it must meet the EPA criteria for minimum risk pesticides under FIFRA Section 25(b). If at least one of these criteria are not met, the product cannot be evaluated to determine whether it may meet the criteria for low-impact pesticides.

Example: A product that is marketed as a glass cleaner has not been evaluated as a pesticide by the EPA, and therefore is unable to be designated as a "low-impact pesticide."

Oregon-registered pesticide products are either EPA-registered or classified as minimum risk pesticides by EPA. Therefore, if the product is registered in Oregon move on to Step 2 below. Oregon-registered products can be found at http://oda.direct/PesticideProducts.

For more information about minimum risk pesticides, see https://oda.fyi/MinimumRiskPesticides.

☐ **Step 2: Determine the Signal Word.**

On the front panel of any pesticide label, the signal word will be displayed adjacent to the statement "KEEP OUT OF REACH OF CHILDREN". If the signal word is DANGER or WARNING, the product does not meet the criteria for low-impact pesticides. If the signal word is CAUTION or is not listed, move on to Step 3 below.

For more information about signal words, see https://oda.fyi/SignalWords

☐ **Step 3: Determine the EPA cancer classification.**

The EPA evaluates pesticides for their potential to cause cancer and classifies them according to the weight of evidence. The cancer classification for a pesticide can change as new scientific evidence becomes available, so it's best to verify the current classification of a particular pesticide by confirming with an expert.

1. Check the EPA cancer classification for each ingredient listed on the label using the following EPA resource: https://oda.fyi/EvaluatedChemicals.
2. Contact the National Pesticide Information Center to confirm that there have been no changes since the last update of the above resource. NPIC can be reached at 1-800-858-7378 or npic@ace.orst.edu.

If any ingredient listed on the pesticide label has the following classifications, the product does not qualify to be a low-impact pesticide:

- "Human Carcinogen" or "Carcinogenic to Humans"
- "Probable Human Carcinogen" or "Likely to be Carcinogenic to Humans"

If the pesticide was not excluded in Steps 1-3, then it is a "low-impact" pesticide.

Additional Considerations:

☐ **Label:** The pesticide label is the law. Review the entire label to ensure that it can be used as desired (correct use site, application method, etc). Please note that "non-crop areas" do not include ornamental sites, turf, or sports fields. For assistance with label interpretation, please contact the Oregon Department of Agriculture at (503) 986-4635.

☐ **School IPM Plan:** Review the school IPM plan adopted by your school's governing body to ensure that use of the pesticide is compliant with that plan.

☐ **Other School IPM Requirements:** Please see the school staff checklist for a review of several additional requirements of the school IPM law. http://oda.direct/IPMSchools

OSU School IPM Program
For information on school pests, sample IPM forms and other resources, visit http://blogs.oregonstate.edu/schoolipm

National Pesticide Information Center
For general questions about pesticides, including the potential risk to humans, pets, or the environment, call (800) 858-7378.

ODA Pesticides Program
635 Capitol St. NE, Salem, OR 97301
Web: oda.direct/IPMSchools
Phone: (503) 986-4635

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