


**School Integrated Pest Management Plan
for the
Riverside Township High School**

**Starting January 13, 2022, and
Ending January 13, 2023**



A plan prepared by Robert Karmade I.P.M. coordinator
Todd Pae School principal
Date prep 1/13/2022

A handwritten signature in black ink, appearing to read "R. Karmade", with a large "X" to its left. The signature is written over a horizontal line.

Robert Karmade
IPM coordinator

A handwritten signature in black ink, appearing to read "Todd Pae", with a large "X" to its left. The signature is written over a horizontal line.

Todd Pae
High School Principal

**School Integrated Pest Management Plan
for the
Riverside Township Middle School**

**Starting January 13, 2022, and
Ending January 13, 2023**



The Plan prepared by Robert Karmade, the I.P.M. coordinator
Elizabeth Follis School principal
Date prep 1/13/2022

A handwritten signature in black ink, appearing to read "Robert Karmade", is written over a horizontal line.

Robert Karmade
IPM coordinator

A handwritten signature in blue ink, appearing to read "Elizabeth Follis", is written over a horizontal line.

Elizabeth Follis
Middle school Principal

**School Integrated Pest Management Plan
for the
Riverside Township Elementary School**

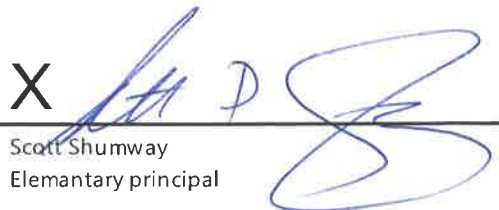
**Starting January 13, 2022, and
Ending January 13, 2023**



The plan prepared by Robert Karmade, the I.P.M. coordinator
Scott Shumway School principal
Date prep 1/13/2022

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Robert Karmade
IPM coordinator

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Scott Shumway
Elementary principal

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1. **General school information:**

School name: Riverside Township Elementary School

Address: 112 East Washington Street City: Riverside Township NJ

County: Burlington

District: Riverside Township

Zip Code: 08075 **Phone:** (856) 461-1255 **E-mail:** riverside.k12.nj.us

School I.P.M. Coordinator: Robert Karmade

Email: Rkarmade@riverside.K12.NJ.US **Phone:** (856)461-1255 Ext; 1118

2. **Integrated Pest Management Statement**

Integrated Pest Management (I.P.M.) on school property is a long-term approach to maintaining healthy landscapes & facilities that minimize risks to people and the environment. Riverside Township Public schools will use site assessment, monitoring, and pest prevention in combination with various 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 pesticides when needed. Educational strategies used to enhance pest prevention and to build support for the I.P.M. program

3. **School I.P.M. Policy** see Appendices

4. **School I.P.M. Plan Goals:**

- a. The roles, responsibilities, and training of all members of the school community (school administration, School I.P.M. Coordinator, Pest Management Professional, School Nurse, cafe staff, maintenance staff, teaching staff, students, parents or guardians of all students enrolled in the school, and vendor/contractors) regarding I.P.M. at the School are clearly defined.
- b. Pest identification: Initially, define indoor and outdoor pests for the school by historical account and direct monitoring. Establish monitoring types and schedules and recordkeeping.
- c. Pest prevention and control to maintain a healthy school environment: Outline nonchemical controls routinely practiced at the school. Establish threshold levels for all anticipated pests. Define the prescribed use of low impact versus non-low impact pesticides for identified problems. Maintain records of all pesticide applications.
- d. Keep the school community informed: Maintain I.P.M. records and make them available for public inspection—annual issue notice of School I.P.M. program status. Establish pre-notification procedures for non-low impact pesticide use. Adopt notification procedures for emergency use of non-low impact pesticides. Establish posting procedures for indoor and outdoor areas that are treated with non-low impact pesticides.
- e. Evaluate and revise the School I.P.M. Plan annually.

5. **School I.P.M. Roles & Responsibilities:** For an I.P.M. program to be successful, all school community members must be 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 I.P.M. Act and proposed regulations:**

1. Adopt and implement a school I.P.M. policy for the school property; the Model Policy developed by the NJDEP prescribes that the school administrators will adopt and implement a School I.P.M. Plan for the school property.
2. Implement I.P.M. procedures to control pests and minimize exposure of children, faculty, and staff to pesticides.
3. Designate a School I.P.M. Coordinator. The I.P.M. Coordinator should be familiar with the school buildings and grounds, such as the buildings and ground maintenance staff.
4. Report effectiveness and recommend improvements to the School I.P.M. Plan annually to the local school or governing boards.

Other duties **required by the law of the school administration but that may be delegated** to specific individuals, such as the School I.P.M. Coordinator are:

5. 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.
6. Obtain and maintain all pesticide application records for a minimum of 3 years; in the case of termiticides, keep records for a minimum of 5 years.
7. Prepare and send out "Annual School I.P.M. Program Notification Letter to Parents & Staff."
8. The school administration will develop bid specifications, contracts, and contract addendums following the School I.P.M. Policy and Plan for contracted services.

b. **School I.P.M. Coordinator: Robert Karmade**

The School I.P.M. Coordinator, **by law**, is jointly responsible with the school administration to implement this School I.P.M. Plan.

Role: The I.P.M. Coordinator is the individual within the facility who is in charge of pest control activities for the school. This individual has the authority and backing of the school administration or management. The School I.P.M. Coordinator has the primary responsibility for ensuring the I.P.M. plan is carried out and direct contact for the school community and public. Ultimately, this person is directly responsible for integrating all I.P.M. activities through all parties' coordination, including custodial, building, food service, outside vendors, Pest Management Professionals, grounds staff, students, parents, staff, and teachers.

Specific duties of a New Jersey School I.P.M. Coordinator **required by law or regulation:**

1. Implement the School I.P.M. Policy and Plan.
2. Maintain information about the I.P.M. Policy and Plan in place at the school.
3. Maintain information about pesticide applications on school property, including records obtained from the pesticide applicator, Material Safety Data Sheets (MSDS) when available for pesticides used, and labels for all pesticide products used.
4. Maintain records of any pest monitoring and non-pesticide controls implemented.
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 I.P.M.
7. Provide Training in I.P.M. practices to the school community as described in the individual, Roles, Responsibilities, and Training" sections of the School I.P.M. 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 with a #13 endorsement. Also, ensure that they follow the School I.P.M. Policy and Plan and all NJDEP School I.P.M. regulations and the pesticide label's precautions.
10. Obtain training sufficient to implement the Policy and Plan.
11. Submit required information to the NJDEP.

School administration responsibilities by law (see # 5, 6, 7, and 8 of their duties) that must be carried out and maybe delegated as duties of the School I.P.M. 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, keep records for a minimum of 5 years.
- Prepare and send out "Annual School I.P.M. Program Notification Letter to Parents & Staff."

To carry out the duties prescribed above, the School I.P.M. Coordinator will:

- Train school community in using "Pest Problem Report Forms" to be submitted when activity is noticed.
- Train school kitchen staff in the use of "Food Service Report" forms to be submitted weekly.
- Compile all "Pest Problem Report" and "Food Service Report" forms received in "I.P.M. Pest Activity Monitoring and Control Log" and 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), both inside and outside the school.
- Consider all available options (including no action) with the School's Pest Management Professional before determining control(s) to be used.
- Ensure that Pest Management Professional(s) make accurate entries in the "Pesticide Application Log" when these pesticides are applied at the school.
- Work with administrators if contracting for pest control services to ensure that the bid specifications comply with the school I.P.M. policy and plan.
- Serve as the point of contact for contracted pest management services for the school.
- Evaluates the efficacy of I.P.M. practices on school property monthly at a minimum.
- Set up and moderates the annual evaluation of the School I.P.M. Plan. Revises the School I.P.M. Plan accordingly.

Training:

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

c. Pest Management Professional:

Applicators or operators must make all pesticide applications made on school property 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 a contractor as described below.

All indoor applications at this school are made by licensed contractors Pest Management Professional(s).

The contractor for indoor pest management services at this School is Lethal Abater Bugsout Pest Solutions. Our contact for the company is Chuck Manuele, 1-800-823-4200. The contractor will meet all specifications as contracted by the school per the attached contract P.O. # 101001.

All **outdoor applications** at this school are made by licensed contractor Pest Management Professional(s). The contractor for outdoors pest management services at this School is Outdoor home services holding L.L.C., D.B.A.; Trugreen. Our contact for the company is Katie Krause at 1-856-848-1589 Cell# 1-609-352-8359. The contractor will meet all specifications as contracted by the school per the attached contract P.O. # 101064. If specified in the contract, the contractor will provide horticultural services for landscape and turf management.

Other Specific Duties of Pest Management Professional(s) in the School I.P.M. Program:

- Inspect school premises: (once a month) for pests or signs of pest activity.
- Notify the I.P.M. Coordinator when pests or signs of pest activity are found.
- Make written recommendations to the School I.P.M. Coordinator for corrective actions to be taken by the school to reduce potential pest populations.
- Recommend to School I.P.M. Coordinator appropriate nonchemical 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.
- When approved by the School I.P.M. Coordinator, follow appropriate least-toxic procedures to correct pest problems. Never apply a non-low impact pesticide without first consulting in advance with the I.P.M. Coordinator to allow them to proceed with all required notification and posting of the area to be treated.
- Provide School I.P.M. Coordinator with MSDS (when available) of any pesticide applied on school property.
- Provide application information as specified in the "Non-Low Impact Pesticide Application Log" when applying these pesticides at the school. This log is kept at the maintenance office.
- If a non-low impact pesticide is to be used, provide a "School Integrated Pest Management Act Compliance Certification" Form to the School I.P.M. Coordinator for their signature, ensuring all advance notification and posting has been performed as required. Applicators are not liable for damages resulting from the school's failure to provide the information or posting required by the New Jersey School I.P.M. Act.
- Participate in the annual evaluation of the School I.P.M. Program and Plan. Provide comments regarding any necessary modifications to the School I.P.M. Plan.

Training:

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

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

Rules are being proposed by the NJDEP that would require an additional category (13) for commercial applicators that apply pesticides on school property. If these rules are adopted as final, applicators would be given a grace period during which the new category exam would need to be taken. This I.P.M. in

Schools category would be required in addition to any other variety (such as ornamental & turf, or termite control) required depending on the type of work performed.

d. School Nurse:

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

Other Duties of the School Nurse in the School I.P.M. Program:

Keep copies and review MSDS of all pesticides used on school property.

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

Monitor for head lice as needed.

Educate parents and staff about preventing head lice spread when it occurs.

Submit a "Work Order" to School I.P.M. 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 regions 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 I.P.M. Program:

Practice adequate sanitation of all kitchen and food service areas (clean all surfaces daily)

Michelle Barnabie, Food Service Manager of the kitchen staff, will inspect the kitchen weekly.

Michelle Barnabie, Food Service Manager, will submit a Pest Problem Report to the School I.P.M. Coordinator whenever pests are detected in the kitchen and food service areas.

Manage specific pest problem(s) as directed by the Supervisor/ School I.P.M. Coordinator/other.

Training:

Michelle Barnabie, Food Service Manager, will be responsible for training the kitchen staff in proper sanitation procedures when hired and annually after that. The School I.P.M. Coordinator will train the kitchen staff in the pest detection and monitoring program in the kitchen when hired and annually after that.

f. Maintenance Staff:

Maintenance staff maintains the cleanliness and take care of the school building and grounds. These staff members may be assigned to indoor and 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 E.P.A. If using other pesticides is necessary, only a licensed Pest Management Professional may make the application.

Other Duties of Maintenance Staff in the School I.P.M. Program:

- Practice all sanitation and maintenance techniques.
- 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 Supervisor or School I.P.M. Coordinator. This will not include pesticide application unless the individual is a licensed Pest Management Professional.

Vendors and Contractors specific language in their bid specifications and contracts:

- Contracts will specify a regular maintenance service.
- Other: Once a month, the contractor will inspect all the schools. If needed, place glue boards and

ant traps. Notify the I.P.M. Coordinator of any concerns. Do not apply any pesticides without the I.P.M. Coordinator's approval.

Duties of vendors and contractors in the School I.P.M. Program to be prescribed in training:

- Robert Karmade, the I.P.M. Coordinator, will be responsible for training the Maintenance Staff in proper sanitation procedures and schedules when hired and annually after that.
- The School I.P.M. Coordinator must train the Maintenance Staff in the pest detection and monitoring program and devices throughout the school when hired and annually after that.
- If their duties require landscaping or turf maintenance, maintenance staff will be trained in accepted horticultural practices grounded in I.P.M.

g Staff, Teachers, and Students:

Duties of Staff, Teachers, & Students in the Schools I.P.M. Program: The student's and staff's most critical responsibility is sanitation. Much of the prevention and reduction of pest infestation at the school site depends on whether students and staff clean up food leftovers, food in lockers, gum under desks, paper clutter, etc., 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 I.P.M. Coordinator using the Work Orders form.

- Training: School staff, teachers, and students will be trained in their roles in the school's pest management system by a person approved by the administration.
- Other Training: Staff, teachers, and students will be given a brief overview or updates by a person approved by the administration on pest identification and the conditions that they may create that promote pests. This information will focus on pest reduction strategies connecting people's behavior, such as eating at desks, leaving crumbs on the floor, etc., to pest problems.
- Education will be focused on increasing people's willingness to share their environment with other organisms so that people are less likely to insist on toxic treatments for harmless microorganisms.
- They will be instructed on how to log pest complaints using the Work Order form.

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

Duties of Parents/Guardians in the School I.P.M. Program:

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

Training:

- A person approved by the school administration will educate parents and guardians of all students enrolled at the School I.P.M. Program.

6. Pest Identification: Preliminary Site Assessment and Ongoing Monitoring

One of School I.P.M.'s fundamental principles is site assessment to precisely define pests' presence and the site conditions contributing to their company. Indoor and outdoor problems will be determined by historical accounts, interviews, and direct monitoring.

When the I.P.M. program is implemented at the School, Robert Karmade will perform a thorough inspection of all school buildings and grounds to identify pest activity and conditions contributing to any pest problems.

- **Indoor site assessment**, Robert Karmade can compile and map on floor plans of the building as needed. Areas that currently have pests or show signs of pest activity as noted in the pest activity log. Areas that historically have had pests as well as identifying when this occurs during the school year. Conditions or behaviors were contributing to pest problems that can be corrected. If already in use, location of detection and monitoring devices and base stations. Recommendations for sanitation, structural repairs, and habitat modification.
- **Outdoor site assessment**, Robert Karmade can map the school grounds: Show locations of trees, shrubs, and ornamentals. Assign & divide the landscape into management units (for example, football field turf versus playground). Note essential plants, any pest problems as noted in the pest activity log, and horticultural recommendations.

The pest(s) must be accurately identified to gather information about the pest's life cycle and habits. Identification is essential for selecting the combination of strategies that will be most effective and knowing when to implement them. Suppose the School I.P.M. Coordinator and the Pest Management Professional cannot identify the pest(s). In that case, the County office of Rutgers Cooperative Extension (R.C.E.) will be consulted, and samples will be submitted for identification if needed. Rutgers Cooperative Extension's phone number is 609-265-5050.

Ongoing Monitoring

Once a pest is correctly identified, monitoring methods and schedules, and 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 maintenance department staff daily during the early stages of solving a severe pest infestation, then taper off to weekly or monthly once the pest problem is under control.

Captured rodent pests will be disposed of daily.

Outdoor skunks and opossums have been noted previously on the property; occasionally, ammonia will be used as a deterrent to prevent the animals from lingering on the school property.

Monitoring Records: Robert Karmade will maintain and keep records of any pest monitoring.

7. Pest Prevention and Control

Wherever possible, the school will take a preventive approach by identifying and removing, to the degree feasible, the primary causes of the problem rather than merely attacking the symptoms (the pests). This prevention-oriented approach is also best achieved by integrating several strategies. It is easier to spot a

potential problem when the interior and exterior of the school are clean.

I.P.M. employs a multi-tactic approach, integrating several strategies to combat a particular pest. Control strategies that remove a pest's food, water, and shelter (harborage) and limit its access into and throughout buildings and on school grounds will be employed as follows:

- **Cultural control**: for example, improve sanitation; reducing clutter; people change habits like leaving food in the classroom; maintain plant health by taking care of the practices and conditions; fertilization, plant selection (right plant/right place), and sanitation to exclude problematic pests and weeds.
- **Physical control**: 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.
- **Least hazardous chemical controls** with preference are given to School I.P.M. Act-defined "low impact pesticides."

Pesticides will be selected when other control methods are not useful 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 school property population.

Riverside Township Public Schools will establish injury (also known as tolerance or threshold) levels and action thresholds for each pest species before making any chemical treatment. Action Thresholds for pesticide treatment are triggered if all other I.P.M. tactics have not been able to control pest populations to an acceptable level. Appropriate injury levels will be set and may take into consideration economic losses (for example, amount of foodstuffs contaminated by pantry pests); health risks (for example, the occurrence of disease-bearing pests); aesthetic evaluations (for example, temporary presence of ants); nuisance problems (for example, stinging insects); and pest visibility.

The New Jersey School I.P.M. 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 D.E.P. 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 priority to selecting a "low impact pesticide," as described below.

A low impact pesticide is a pesticide that is considered to have relatively minimal risk compared to pesticides in general. The New Jersey School I.P.M. law defines explicitly what a low impact pesticide is in two parts. The first part consists of a federal E.P.A. list of pesticides that considers minimal risk and does not require formal registration. These pesticides are listed in the federal code at 40 C.F.R. § 152.25. The second part consists of a list of pesticide ingredients (such as boric acid or diatomaceous earth) and formulation types (such as gels or pastes) that are considered low impact. It is important to note that a substance considered "low impact" does not necessarily mean zero risks. All pesticides must be appropriately used to reduce the potential risk of their use.

When it is determined that a non-low impact pesticide must be applied to control pests within established thresholds adequately, application guidelines **per the law** will be followed. Specifically, non-low impact pesticides will be involved in a school building only when students are in another building area. 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 permitted before student re-entry on school property.

Per the law, emergency application of a non-low impact pesticide will only be made when a student or staff member's health or safety 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 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. Instead, 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 message that goes to parents and staff must explain the reason for the emergency, and if possible, what could be done to prevent such an emergency use next time.

Whether pesticides or low impact pesticide materials, treatments 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.

The School I.P.M. Coordinator and Pest Management Professional(s) will meet monthly to cover monitoring reports and determine corrective action. The Pest Management Professional should make recommendations for disciplinary actions to the School I.P.M. Coordinator. They will consider all options, including no control, and look at pest activity levels versus thresholds.

They will consider EPA-defined criteria for selecting a treatment strategy:

1. Least hazardous to human health
2. Least disruptive of natural controls
3. Least toxic to non-target organisms
4. Most likely to be permanent
5. Most comfortable to carry out safely and effectively
6. Most cost-effective
7. Most site-appropriate

They will generate a pest management priority list to optimize a plan of corrective actions. I.P.M. Coordinator will assign and contact the appropriate staff to carry out individual tasks on the checklist. All implemented controls should be documented in the log located in the maintenance office by the I.P.M. Coordinator Robert Karmade.

8. Notification, Posting, and Re-Entry

It is essential to keep the school community informed of the school's implementation of the School I.P.M. Plan. Accordingly, this section outlines the:

- Annual notification of School I.P.M. program status.
- Pre-notification of planned use and notification of emergency use of non-low impact pesticides.
- Posting requirements for areas inside and out that are treated with pesticides.
- Re-entry requirements for areas inside and out that are treated with pesticides.

Annual Notification

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

The Appendix has a sample "Annual School I.P.M. Program Notification Letter to Parents & Staff." **New Jersey law requires** that this notice shall include:

1. a copy of the School I.P.M. policy
2. the name, address, and telephone number of the integrated pest management coordinator of the school or school district
3. a list of any pesticide that is in use or has been used within the last 12 months on school property
4. a statement that:
 - (a) the integrated pest management coordinator maintains the product label and material safety data sheet, when available, of each pesticide that may be used on school property;
 - (b) the label and datasheet is available for review by a parent, guardian, staff member, or student attending the school; and
 - (c) the integrated pest management coordinator is open to parents, guardians, and staff members for information and comment;
5. the time and place of any meetings that will be held to adopt the school integrated pest management policy; and
6. the following statement:

"As part of a school pest management plan, Riverside Township Public Schools may use pesticides to control pests. The United States Environmental Protection Agency (E.P.A.) and the New Jersey Department of Environmental Protection (D.E.P.) register pesticides to determine that using a pesticide following instructions printed on the label does not pose an unreasonable risk to human health and the environment. Nevertheless, the E.P.A. and D.E.P. cannot guarantee that registered pesticides do not pose any risk to human health; thus, unnecessary exposure to pesticides should be avoided. The E.P.A. has stated that where possible, potentially sensitive persons, 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: pre-planned and emergency.

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

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

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

When an emergency application of pesticides is required, the School I.P.M. Coordinator will issue a 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 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.

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

What: In either planned or emergency applications of non-low impact pesticides, **New Jersey law requires the** content of both message and posting as follows:

- The common name of the pesticide.
- E.P.A. registration number,
- E.P.A. 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 a product, Reasons for the application,
- Contact information for the I.P.M. Coordinator of the School or school district.
- Any further label information or precautions for public safety.

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

1. Written note that the students take home, "annual."
2. School website.
3. Entrance postings.

Where: In either planned or emergency applications of non-low impact pesticides, **per New Jersey law**, the pesticide contractor 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. Those are at least 8.5" by 11".

Re-Entry

Suppose there is the application of a low impact pesticide on school property. In that case, 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 applying a non-low impact pesticide unless the pesticide label states a specific numerical re-entry time that is different from this. The use of low impact pesticides does not require an automatic seven-hour wait; students can re-enter after the pesticide application has dried or settled, or longer if the pesticide label specifies.

9. Record Keeping and Evaluation

Record Keeping

The School I.P.M. Coordinator will maintain records as listed in their outlined role and responsibility for School I.P.M. An initial meeting will be held between the School I.P.M. Coordinator and Pest Management Professional(s) to establish an I.P.M. Log binder for these records.

The following records will be maintained in the I.P.M. Log binder kept in the maintenance office:

- Pest Problem Reports
- I.P.M. Pest Activity Monitoring and Control Log
- Pesticide Application Log
- Annual School I.P.M. 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."
- "Specific service reports will also be placed in the log binder that particular document actions taken by the pest management contractor."

Evaluation

At least annually, the School I.P.M. Plan and School I.P.M. Program of the Riverside Township Public Schools will be evaluated. This necessarily includes a review of all records in the I.P.M. 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 indicate which pest management strategies were most effective for the amount of time and money spent. I.P.M. practices and procedures will be modified, if necessary, based on experience, results, and gained knowledge.

Robert Karmade, the I.P.M. Coordinator, will coordinate this evaluation. The evaluation participants will be **Katie Krause at Outdoor home services holding L.L.C., D.B.A.; Trugreen and Chuck Manuele jr. manager for Lethal Abater Bugsout Pest Solutions.** A written evaluation is to be completed once a year. If the school is using a contractor, the School I.P.M. Coordinator will meet with the pest control contractor to evaluate the success or failure of this I.P.M. Plan.

The following issues will be addressed during the evaluation of the School I.P.M. Plan and Program:

- adequacy of pest control indoor and outdoor
- areas of concern
- sanitation issues
- building maintenance issues
- adequate support by all members of the community

Following the evaluation, the School I.P.M. Plan will be revised by Robert Karmade, the I.P.M. Coordinator, accordingly.