

City of Novi
Facilities & Parks Management
Integrated Pest Management Policy

The Natural Resources and Environmental Protection Act, Act 451, Part 83, Pesticide Control and Regulation 637, Pesticide Use has certain requirements when making a pesticide application in schools, day care centers, public buildings, or health care facilities. Those requirements include, but are not limited to:

- A verifiable Integrated Pest Management (IPM) program shall be in place prior to making a pesticide application in schools, day care centers, public buildings, or health care facilities. Each building that is treated with a pesticide must have a verifiable IPM program. Note that the Michigan Department of Agriculture and Rural Development (MDARD) interprets the Act to require that a verifiable copy of the IPM program be located at the school, day care center, public building, or health care facility, whether a physical or electronic copy. The idea is that it is available for use and review by staff or MDARD as needed or requested. All pesticide applicators must be IPM trained. Training can be completed via two methods:
 - a) Using the MDARD self-study manual with the training verified by the applicator's immediate supervisor sending a signed form to MDARD.
 - b) Through an MDARD-approved training program. MDARD will issue a certificate of IPM training after receiving verification of training.
- All pesticide applicators employed by a firm required to be licensed must hold a valid commercial pesticide applicator certification credential. Facility employees may be required to be certified too, depending on the type of pesticide applied.

Introduction

Integrated Pest Management (IPM) is a pest management system that utilizes all suitable techniques to prevent pests from reaching unacceptable levels or to reduce an existing population to an acceptable level. An emphasis is placed on manipulation of the pest environment to the point that it will not support a pest population.

Two Michigan Laws, the Natural Resource and Environmental Protection Act, Public Act 451 of 1994, Part 83, Pesticide Control and Regulation 637, Pesticide Use require that certain conditions must be met prior to making a pesticide application (other than sanitizers, germicides, disinfectants, or anti-microbial agents) in schools, day care facilities, public buildings, or health care facilities. These conditions include:

1. The pesticide applicator must have been trained under an approved IPM program.
2. There must be a verifiable IPM program in place for the building.

ONLY QUALIFIED INDIVIDUALS MAY APPLY PESTICIDES AT THIS FACILITY OR ON THE GROUNDS.

This IPM program is intended to help reduce the incidence of pest infestation and to reduce the need for chemical pesticide applications. It is intended to satisfy the regulatory requirement of having an IPM

program in place for the building. Note: in a situation where there are multiple buildings, the program will include a site description and evaluation for EACH building. In accordance with The Natural Resources and Environmental Protection Act, Act 451 of 1994, Part 83, Section 8316(1), a person shall not apply a pesticide in a school or day care center unless the school or day care center has an integrated pest management program in place for the building. MDARD interprets the Act to require that a verifiable copy of the IPM program be located at the school, day care center, public building, or health care facility, whether a physical or electronic copy. The program must be available for use and review by facility staff, parents/guardians, or MDARD as needed or requested.

Administration

- **Scope and Application:** This IPM policy applies to all pest control activities and pesticide use in public buildings and related facilities including grounds. Recipients of this policy include administration and staff, or any employees monitoring or treating pest problems including any contractors who monitor and/or treat pest problems. Each recipient is required to follow this policy.
- **Purpose:** The goal of this IPM policy is to provide a safe and healthy environment that is relatively pest-free with the least possible use of pesticides. To achieve this goal, it is the policy of the City to develop, implement, and maintain an IPM program for the control of pests and minimize pesticide exposure to residents, visitors, and staff. This policy is consistent with the State of Michigan's Act 451, Part 83 that encourages public facilities to adopt an IPM strategy. Sanitizers, germicides, disinfectants, or antimicrobials are exempt from the IPM /notification requirements. This policy adheres to the principles of IPM and is conducted in accordance with all federal and state laws and regulations and local ordinances.

Pests are controlled to protect the health and safety of visitors and staff, to maintain a productive environment, and to maintain the integrity of City owned buildings and grounds. IPM is a pest management system that uses all suitable techniques in a total management system to prevent pests from reaching unacceptable levels or to reduce existing pest populations to acceptable levels while balancing the risk of the pest with the potential risk of the management technique.

- **Development of IPM Program:** The City's IPM program written under this policy will state the goals regarding the management of pests and the use of pesticides. It will reflect Novi's site-specific needs and includes the following elements as required by law:
 - a. Site evaluation, including site description, inspection, and monitoring and the concept of threshold levels.
 - b. Consideration of the relationship between pest biology and pest management methods.
 - c. Consideration of all available pest management methods, including population reduction techniques, such as mechanical, biological, and chemical techniques and pest prevention techniques, such as habitat modification.
 - d. Pest control methods selection, including consideration of the impact on human health, especially for children, and the environment.
 - e. Continual evaluation of the IPM program.

• **Responsibilities:** The IPM Coordinator, or their designee shall:

- a. Develop guidelines/procedures for the development of this policy.
- b. Ensure that an IPM Program is developed and is compliant with Michigan law, including the required plan components and recordkeeping.
- c. Provide information to administration and staff about potential pest problems and IPM methods used to achieve the pest management objectives.
- d. Ensure that pesticide applicators who apply pesticides inside the facility have received the required IPM training.
- e. Ensure that all pesticide applicators follow state regulations, including licensing requirements, applicator certification/registration requirements, label requirements, and that they comply with the requirements of this policy and the IPM Program.
- f. Ensure that proper notifications occur, including the annual notification and any advance notice is provided before a scheduled pesticide treatment occurs.
- g. Ensure that reentry to a pesticide-treated area does not occur less than 4 hours after application, unless the product label requires a longer reentry period, and ensure that outdoor ornamental and turf applications of liquid spray pesticides are not made on public grounds within 100 feet of an occupied building during normal hours, or when persons are using the treatment area.

Regulations

Laws concerning pesticide use in schools, day care centers, public buildings, and medical care facilities can be found in:

- Public Act 451 of 1994, Part 83, Pesticide Control
- Regulation 636, Pesticide Applicators
- Regulation 637, Pesticide Use

These laws can be downloaded from the MDARD's website at www.Michigan.gov/mdardpest. Type the appropriate Act or Regulation into the search engine and follow the links to get a copy or contact MDARD at 800-292-3939.

Communication

Proper implementation of an IPM program requires careful administration. It is important for the building manager and administrative staff to communicate with the pesticide applicator(s) to ensure full implementation of the program. To meet this goal, recordkeeping data will be used as part of the communication process. In addition, the facility may use a sighting log.

Applicator Credentials

A person who applies a pesticide (other than a sanitizer, germicide, disinfectant, or antimicrobial agent) in schools, public buildings or health care facilities must have completed IPM training using an MDARD-approved training. Approved IPM training includes use of MDARD's self-study manual and/or attendance

at an MDARD-approved IPM training session. IPM training credentials do not expire. The IPM training manual is available online at www.Michigan.gov/IPM.

Outside contractors who conduct pesticide applications, either indoors or outdoors, at this facility, other than use of a sanitizer, germicide, disinfectant, or anti-microbial agent, must be **licensed** and **certified**. Business license information can be found at www.Michigan.gov/MDARDPABL to verify that the commercial applicator holds a valid pesticide applicator business license, or you can contact MDARD at 800-292-3939 to verify a license.

Persons who are employees of this facility and who have obtained their IPM training certificate may use a general-use ready-to-use product (see definitions section) in compliance with State of Michigan regulations without being certified. However, whenever possible, pesticide applications should be conducted by the person responsible for pest control in this facility, or by their designee, or by a licensed and certified professional applicator.

Persons who use a pesticide product at this facility which is NOT ready-to-use, other than a sanitizer, germicide, disinfectant, or antimicrobial agent, must be a commercially certified pesticide applicator. Situations where the applicator must be commercially certified include:

- When pesticides are mixed and applied from a compressed air sprayer such as a hand can or backpack sprayer.
- When pesticides such as weed-and-feed are put into a granular spreader, such as a lawn weed-and-feed spreader, for application.

Pesticide Applications and Personal Protective Equipment

Pesticide applications for non-emergency situations shall only be conducted by an applicator who has obtained their IPM training certificate and shall be made in accordance with this IPM program. Applications must be made in a manner that is consistent with the pesticide label directions, as required by State and Federal law. The applicator shall use personal protective equipment that is appropriate relative to the potential exposure and as required by the pesticide label. Staff who apply pesticides at this facility, other than general-use ready-to-use pesticides are commercial pesticide applicators. Minimum personal protective equipment for commercial pesticide applicators includes long pants, protective footwear, gloves that are impervious to the pesticide being applied (when contact with the hands is likely), and long-sleeve clothing. Shortsleeve clothing may be worn if soap and water is immediately available, and a long-sleeved shirt is not required by the pesticide label.

Pesticide Application Records

Records shall be maintained on forms provided by the building manager or by the licensed and certified professional pesticide applicator. Records shall contain at least the following information:

1. Site address and the location of the areas or room(s) where pesticides are applied.
2. The date of service.
3. The target pest(s).
4. An inspection report, including the number of pests found or reported (this information may be found in the sighting log), and the conditions conducive to pest infestation.

5. Pest management recommendations made by the applicator, such as structural or habitat modification.
6. Structural or habitat modifications or other measures initiated as a part of the IPM program.
7. The brand name, EPA registration number, concentration and total amount of pesticide(s) used.
8. The name of the applicator.
9. The method and rate of application.

Posting

When making an application of pesticides a commercial applicator shall place the appropriate signs or markers at the primary point(s) of entry.

Outdoor Turf / Ornamental Applications

Postings shall remain at least 24 hours. Postings will comply with Regulation 637, Rule 11(2). Signs shall be at least 4" high by 5" wide and shall depict a picture of an adult and child walking a dog on a leash. The illustration shall depict, using a diagonal line across the circle, that this action is prohibited. See the rule for additional details on sign requirements. It will look like the sign shown below, with the sign having the same information on both sides of the sign.



Public Buildings or Health Care Facilities:

When making a broadcast, foliar, or space insecticide application to a public building or health care facility, a commercial applicator must post, or instruct the building manager to post, an appropriate sign(s). Postings shall remain for at least 48 hours after the most recent application of insecticide. It is the responsibility of the building manager (or their designated representative) to ensure that the appropriate signs are posted.

Posting signs must comply with Regulation 637, Rule 11(4). Signs shall be at least 2 ½ inches square and shall depict a house surrounded by a cloud. The date shall be placed on the sign. See the rule for additional details on sign requirements. Note: Treatments using a general-use ready-to-use product are exempt from the posting requirement.

IPM Program Evaluation

The IPM program shall be evaluated periodically to determine the program's effectiveness and the need for modification.

Pest Management Strategy & Pest Biology

Strategy

This IPM Program involves the use of various methods or strategies to control pests including sanitation, exclusion, reservoir reduction, harborage reduction and population reduction. These terms are clarified below:

1. Sanitation refers to a reduction of the food and water resources that are attractive to pests. By minimizing the resource of food and water available to the pests, we can greatly reduce the number of pests without the application of pesticides.
2. Exclusion refers to the use of caulk, mortar, screens, or similar materials that can reduce or eliminate the entry of pests into the building.
3. Reservoir reduction refers to techniques that reduce a feature that is attractive to pests. For example, a dumpster could be moved a distance away from the building so that pests attracted to the dumpster are not brought close to the building.
4. Harborage reduction refers to elimination of habitat that provides a home (or harborage) to pests. For example, cleaning old equipment from a storage room will reduce harborage for mice. Mowing grass around a building will reduce the cover and harborage for pests.
5. Population reduction refers to measures such as mechanical traps, use of repellents, or use of toxicants to drive away or kill pests. Chemical or biological pesticides may be utilized to reduce pest populations.

Thresholds

IPM programs utilize the concept of threshold levels for pests. The tolerance for pests may vary for different facilities, or for distinct parts of the same facility. For example, a school may decide not to apply pesticides to control a small ant infestation in a closet but may have a low tolerance for ants in a classroom or lunchroom. The tolerance for ants in a hospital office may be a few, while the tolerance for ants in patient's rooms may be zero. Thresholds are established by the user of the IPM Program. Exact numbers are not required to be identified for these thresholds, but the IPM Program should convey the idea of threshold levels to facility staff and users.

Impact on Human Health & Environment

When considering pest control methods, the building manager shall consider the impact on human health and the environment. The pest control method shall consider the effectiveness of the treatment while striving for the lowest level of adverse impacts on human health and the environment. In the interest of preserving food, pollen, and nectar sources for endangered or threatened species, measures should be maintained to prevent widespread destruction of those sources. Some maintenance, landscaping, mowing, weeding and extensive use of toxic pesticides currently represent further degradation of vital or endangered species and therefore should be minimized or eliminated.

Measures should be taken to preserve endangered habitat and/or work around them where possible or practical, especially in playgrounds, waterways, and dog parks, except where required in City parks and public spaces that are maintained for aesthetic reasons, such as frequently managed turf areas, tree wells, ornamental plant beds and edges.

Pest Biology Information

The method used for pest control shall take into consideration the relationship between pest biology and pest management methods, giving due consideration to the impact on human health and the environment. Chemical controls are sometimes necessary. This program will attempt to use products that are less toxic to human health and the environment, while remaining effective in control of the target pest(s).

Some common pests and pest control measures are described below. **It is important to identify the pest prior to determining a method of control.** For example, pest control measures to control one type of cockroach or ant may be ineffective for another species of cockroach or ant. Some actions taken for ant control can even promote the spread of the ants if the ant species is not properly identified. Pest identification should be confirmed by a reliable source, such as use of keys in pest identification manuals (found on the Internet or in reference books), by consultation with a professional pesticide applicator, or by using a service such as the Michigan State University Extension Service.

information can be found using pest identification books, the Internet, referencing the MSU General Pest Management Certification Study Manual, or consulting a pest professional.

Use of Pesticides

All pesticides available for use within City grounds must first be placed upon an IPM Coordinator approved list after examining the characteristics of the individual products and whether it would be an appropriate addition within this Policy.

Principle: Utilize non-chemical management options whenever feasible.

Goal: To implement a phased in approach that will reduce the use of synthetic pesticides in parks and other City properties to the extent that acceptable conditioning levels can be maintained.

The expectation is that volunteers will be engaged to participate whenever possible.

Synthetic chemical pesticide applications are used only after other IPM strategies have first been explored with particular care given to sensitive areas such as playgrounds, waterways, and dog parks.

The City recognizes that circumstances may arise in which cultural, biological, and physical IPM practices may not be practical in which case the IPM Coordinator can approve the immediate use of a synthetic pesticide to achieve satisfactory levels of control.

The use of occasional wasp or hornet sprays by employees or contractors who may otherwise be at risk of insect stings shall not be covered by this section, except that reports of such use shall be made to the IPM Coordinator.

It is important that pesticide actions undertaken with the guidance of this Policy should take great care to limit such actions in consideration of vital species such as common pollinators and non-target (not intended) species. Pollinators, being essential to the health of environments and agricultural interests, should warrant special care and be encouraged and invited into our community.

Site Specific Needs – Facilities & Parks

Customer & Residential Areas

- All areas will be inspected each month. Although these areas do not usually involve food (unless packaged), they are important because of the intensive people traffic in these areas.
- Packaged goods, such as candy, can through deliveries cause pest problems. Depending on the amount and location of these products, preventive treatment along with comprehensive inspections to ensure that cockroaches and ants do not become a problem may be performed.

Storage Rooms & Warehouses

- All storage rooms and warehouses (if applicable) will be inspected, and pest activity monitoring Report Cards will be utilized to determine if and what kind of treatment may be necessary.
- Due to the type and proximity of other businesses, rodent problems (particularly mice) may be a potential hazard. We will need to address this threat through repairs to holes and cracks that would allow rodents and other pests access to the storage areas.
- As we identify pest activity we will utilize the appropriate treatment, whether it is traps, baits, or chemical application to eliminate the problem.

Restrooms

- All restroom facilities will be inspected each month.
- All pest problems discovered during scheduled inspections will be immediately treated, and the technician may schedule a 7-day follow-up if needed.
- Due to the heat and humidity present in these areas, the technician may execute a preventive treatment program. Ground level restrooms and the more publicly used facilities are likely candidates for preventative action.
- Special care will be given to inform administration of needed repairs, (i.e., cracked tile, leaking pipes) that could contribute to a pest problem and, of course, be unsightly for users.
- Where applicable, we may use industrial caulk and pest exclusion foam to seal potential entry and harborage points around pipes, stalls, mirrors, and other fixtures.

Office & Employee Areas

- All offices will be inspected, and the appropriate treatments rendered during each visit.
- All pest problems discovered during scheduled inspections will be immediately and appropriately treated. Depending on the size and type of problem involved, the technician may wish to schedule a 7-day follow-up to reinspect the area or inspect the areas on the next scheduled monthly visit.
- Employee breakrooms, coffee areas, and lounges where food products are introduced on a continuous basis will receive preventive treatment during the regular office inspection. These are areas most likely to have problems within tile private offices.

Exterior Perimeter

- One of the best ways to prevent pest problems inside is to prevent them from coming from the outside. Long-term residuals for insect control outside and rodent control stations (if applicable) in critical areas will be applied on the perimeter of the structure.

Athletic Fields and Common Areas

- Grass is to be mowed on a routine basis with grass clippings mulched in.
- Fertilizer may be applied with controlled release synthetic or organic options.
- Irrigation applications must be fully functioning and setup with proper time and programming.

Landscaped Areas

- Mulch routinely with woodchips, bark, or other appropriate materials.
- Borders and edges must be mowed or trimmed where possible.
- Fertilizer may be applied in these areas with controlled release synthetic or organic fertilizer.
- Any irrigation in these areas must be functional and on a proper time cycle.

Right of Ways

- Any downed branches or limbs must be removed from maintained areas.
- Where possible, the area must be mowed, and string trimmed.