



## Cedar Grove Public Schools

Michael DeVita, Business Administrator

520 Pompton Ave. Cedar Grove, New Jersey 07009

(973) 239-1550 devita.michael@cgschools.org

August, 2024

### Annual Notification of the School Integrated Pest Management ("IPM") Program

Dear Parent/Guardian:

The Cedar Grove School District uses an Integrated Pest Management ("IPM") approach to managing pests. The goal of IPM is to protect every student from pesticide exposure by using an IPM approach to pest management. The IPM approach focuses on making the school buildings and grounds an unfavorable habitat for these pests by removing food and water sources and eliminating their hiding and breeding places. We accomplish this through routine cleaning and maintenance. We regularly monitor the school buildings and grounds to detect any pests that are present, as well as any conditions that are conducive to future pest problems.

The pest monitoring team consists of our building maintenance, office and teaching staff. Pest sightings, if any, are reported to our IPM Coordinator and recorded in pest sighting logbooks. The IPM Coordinator evaluates the "pest problem" and determines the appropriate pest management techniques to eradicate the problem. The techniques can include increased sanitation, modifying storage practices, sealing entry points, physically removing the pest, etc.

As part of a school pest management program, the Cedar Grove School District may use pesticides to control pests. The United States Environmental Protection Agency ("EPA") and the New Jersey Department of Environmental Protection ("DEP") register pesticides to determine that the use of a pesticide in accordance with instructions printed on the label does not pose an unreasonable risk to human health and the environment. Nevertheless, the EPA and DEP cannot guarantee that registered pesticides do not pose any risk to human health, thus unnecessary exposure to pesticides should be avoided. The EPA has issued the statement that where possible, persons who are potentially sensitive, such as pregnant women, infants and children, should avoid unnecessary exposure.

A pesticide will only be used when necessary, and will not be routinely applied. When a pesticide is necessary, the school will try to use the least toxic product that is effective. Applications will be made only when persons other than the Pest Management Professional will not be occupying the area(s) being treated. Notices will be posted in these areas 72 hours prior and will remain posted 72 hours after the pesticide application. Also, a notice will be effectuated to all parties as required by the School IPM Act (parents/guardians, faculty, etc.) **72 hours prior** to the application. The only exception will be when a pest problem is considered emergent; the notification will be effectuated 24 hours prior to the pesticide application.

An IPM informational binder, upgraded to include site specific protocols for each individual school, has been placed in the main office at each school, which includes all the necessary reporting forms and Material Safety Data Sheets ("MSDS") for all pesticides that have and/or may be used throughout the year. Each year, the school district is required to notify all parent(s)/guardian(s), staff members and students attending the school, of any pesticide applications that have been made in the past 12 months. In addition, the IPM Coordinator maintains the product label and MSDS, when available, of each pesticide used on school property. This information is available for review by any parent/guardian, staff member and student attending the school.

To view the school specific IPM plans, please visit our website at [www.cgschools.org](http://www.cgschools.org)

If you have any questions, please contact the IPM Coordinator:

Mr. John Bannon, Supervisor of Buildings and Grounds.

Phone: 973-239-1550 Fax: 973-239-2994

E-Mail: [bannonj@cgschools.org](mailto:bannonj@cgschools.org)

Address: 520 Pompton Avenue, Cedar Grove, NJ 07009

Sincerely,

*Michael DeVita*

Michael DeVita  
Business Administrator/Board Secretary

# Annual Integrated Pest Management Notice

## For School Year 2023 - 2024

Dear Parent, Guardian, or Staff Member:

This notice is being distributed to comply with the New Jersey School Integrated Pest Management Act. The Cedar Grove School District has adopted an Integrated Pest Management (IPM) Policy and has implemented an IPM Plan to comply with this law. IPM is a holistic, preventive approach to managing pests that is explained further in the school's IPM Policy included with this notice.

All schools in New Jersey are required to have an Integrated Pest Management Coordinator (IPM Coordinator) to oversee all activities related to IPM and pesticide use at the school.

The IPM Coordinator for Cedar Grove School District is: John Bannon

Name of IPM Coordinator: John Bannon

Business Phone number: 973-239-1550

Business Address: 520 Pompton Avenue Cedar Grove, NJ 07009

The IPM Coordinator maintains the pesticide product label, and the Material Safety Data Sheet (MSDS) (when one is available), of each pesticide product that may be used on school property. The label and the MSDS are available for review by a parent, guardian, staff member, or student attending the school. Also, the IPM Coordinator is available to parents, guardians, and staff members for information and to discuss comments about IPM activities and pesticide use at the school.

As part of a school pest management plan Cedar Grove High School may use pesticides to control pests. The United States Environmental Protection Agency (EPA) and the New Jersey Department of Environmental Protection (DEP) register pesticides to determine that the use of a pesticide in accordance with instructions printed on the label does not pose an unreasonable risk to human health and the environment. Nevertheless, the EPA and the DEP cannot guarantee that registered pesticides do not pose any risk to human health, thus unnecessary exposure to pesticides should be avoided. The EPA has issued the statement that where possible, persons who are potentially sensitive, such as pregnant women, infants and children, should avoid unnecessary pesticide exposure.

The following pesticides have been used at this location in the past 12 months:

Trade Name	Common Name	EPA Registration #
EcoVia EC	Thyme Oil, 2-Phenethyl Propionate, Rosemary Oil	ECO V #381
Eco Exempt D	Hexa-Hydroxyl	ECO #177
EcoVia WD	Thyme Oil, 2-Phenethyl Propionate	ECO WD #644
Final All Weather Blox	Brodifacoum	FB #160
Vendetta Nitro Cockroach Bait	Clothianidin .5%, Pyriproxyfen .5%	VNB #614
Nibor-D Insecticide	Disodium Octaborate Tetrahydrate	NIB #393
Maxforce FC Roach Bait Gel	Fipronil	MAX #30

Nature-Cide Pest Management X2 Cedarwood Oil, Cinnamon Oil, Lecithins NPMX2 #609		
Residex XP Adjuvent	Proprietary	XPA #511
Advion Cockroach Gel Bait	Indoxacarb	ARG #334
Maxforce Fleet Ant Gel	Fipronil	MAX #610
Niban Granular Bait	Orthoboric Acid	NIB #145
Suspend SC	Deltamethrin	SUS #143

**School Integrated Pest Management Plan  
for  
Cedar Grove High School**

**for the School Year  
Starting July 1, 2024  
Ending June 30, 2025**



Plan prepared by: John Bannon & Jody Inglis      Date prepared: July 25th, 2024

## Table of Contents



- 1) General School Information
- 2) Integrated Pest Management Statement
- 3) School IPM Policy
- 4) School IPM Plan Goals
- 5) Roles, Responsibilities, and Training
  - a) School Administration
  - b) School IPM Coordinator
  - c) Pest Management Professional (staff or contractor)
  - d) School Nurse
  - e) Kitchen Staff
  - f) Maintenance Staff
  - g) Staff, Teachers, and Students
  - h) Parents or Guardians of All Students Enrolled in the School
  - i) Vendors and Contractors
- 6) Pest Identification: Site Assessment and Ongoing Monitoring
- 7) Pest Prevention and Control
- 8) Pesticide Use: Notification, Posting, and Re-Entry
- 9) Record Keeping and Evaluation

## Appendices

- Cedar Grove School District IPM Policy # 7422
- Annual School IPM Program Notification Letter to Parents & Staff\*
- SAMPLE: Pre-Notification of the Use of Pesticides (72 hour pre-notification)\*
- SAMPLE: Emergency Pesticide Use Notification\*
- SAMPLE: Posting Sign (for indoors & outdoors) 'Notice of Pesticide Application'\*

*\* Use of this form meets minimum compliance requirements of NJ School IPM Act*

1. **General school information:**

**School name:** Cedar Grove High School

**Address:** 90 Rugby Road      **City:** Cedar Grove

**County:** Essex      **District:** Cedar Grove Township      **Zip Code:** 07009

**Phone:** 973-239-6400      **E-mail:** [inglis.jody@cgschools.org](mailto:inglis.jody@cgschools.org)

**School IPM Coordinator:** John Bannon

**Email:** [bannonj@cgschools.org](mailto:bannonj@cgschools.org)      **Phone:** 973-239-1550 Ext 6221

2. **Integrated Pest Management Statement**

Integrated Pest Management (IPM) on school property is a long-term approach to maintaining healthy landscapes & facilities that minimizes risks to people and the environment. Cedar Grove High School will use: site assessment, monitoring, and pest prevention in combination with a variety of pest management tactics to keep pests within acceptable limits. Instead of routine chemical applications, cultural, mechanical, physical, and biological controls will be employed with selective use of pesticides when needed. Educational strategies are used to enhance pest prevention, and to build support for the IPM program

3. **School IPM Policy:** *(see attached)*

4. **School IPM Plan Goals:**

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

5. **School IPM Roles & Responsibilities:** For an IPM program to be successful, all members of the school community must be made aware of the school's policies on pest control and their respective roles in the overall pest management plan. The roles, responsibilities, and training for this school regarding pest management are outlined below:

a. **School Administrators:**

Specific duties of New Jersey School Administrators **required by the School IPM Act and proposed regulations:**

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

**Other duties required by law of the school administration but that may be delegated** to specific individuals, such as the School IPM Coordinator (see next section) are:

5. Coordinate pre- and post-notification of parents and staff of non low impact pesticide applications according to the school's notification procedure. [See Appendix for sample 'Pre-Notification of the Use of Pesticides' (72 hour pre-notification) form and 'Emergency Pesticide Use Notification' form].
6. Prepare and post signs as required in areas where non low impact pesticides are to be applied. (See Appendix for sample 'Notice of Pesticide Application' sign for indoor and outdoor applications).
7. Obtain and maintain all pesticide application records for a minimum of 3 years; in the case of termiticides, maintain records a minimum of 5 years.
8. Prepare and send out 'Annual School IPM Program Notification Letter to Parents & Staff'. (See Appendix for sample letter to parents & staff).
9. For contracted services, the school administration will develop bid specifications, contracts, and contract addendums in accordance with the School IPM Policy and Plan.'

b. **School IPM Coordinator:**

The School IPM Coordinator, **by law**, is jointly responsible with the school administration for the implementation of this School IPM Plan.

**Role:** The IPM 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 IPM Coordinator has the primary responsibility for ensuring the IPM plan is carried out, and is the primary contact for the school community and public. Ultimately, this person is directly responsible for the integration of all IPM activities through the coordination of all parties including custodial, building, food service, outside vendors, Pest Management Professionals, grounds staff, students, parents, staff, and teachers.



**Specific duties of a New Jersey School IPM Coordinator required by law or regulation:**

1. Implement the School IPM Policy and Plan.
2. Maintain information about the IPM Policy and Plan in place at the school.
3. Maintain information about pesticide applications on school property including records obtained from the pesticide applicator, 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. (See 'IPM Pest Activity Monitoring and Control Log' for sample log).
5. Provide access to the above information for public review.
6. Respond to inquiries and providing information to students, staff, and parents or guardians regarding IPM.
7. Provide training in IPM practices to the school community as described in the individual 'Roles, Responsibilities, and Training' sections of the School IPM Plan.
8. Provides a signature on the 'School Integrated Pest Management Act Compliance Certification' Form when requested (see Appendix for sample form) by pesticide applicators.
9. Ensure that all persons conducting pesticide applications have all NJDEP-required training, certification, and licensing. Also ensure that they follow the School IPM Policy and Plan, as well as all NJDEP School IPM regulations and the precautions of the pesticide label.
10. Obtain training sufficient to implement the Policy and Plan (i.e., NJDEP-approved training).
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 may be delegated as duties of the School IPM Coordinator by this school administration:**

- Coordinate pre- and post-notification of parents and staff of non low impact pesticide applications according to the school's notification procedure. [See Appendix for sample 'Pre-Notification of the Use of Pesticides' (72 hour pre-notification) form and 'Emergency Pesticide Use Notification' form].
- Prepare and post signs as required in areas where non low impact pesticides are to be applied. (See Appendix for sample 'Notice of Pesticide Application' sign for indoor and outdoor applications).
- Obtain and maintain all pesticide application records for a minimum of 3 years; in the case of termiticides, maintain records a minimum of 5 years.
- Prepare and send out 'Annual School IPM Program Notification Letter to Parents & Staff'. (See Appendix for sample letter) to parents & staff).

**In order to carry out the duties prescribed above, the School IPM Coordinator will:**

- Maintain a prioritized list of pest management issues (including key pests, and needed structural/landscape improvements and substandard sanitation practices) which exist both inside and outside the school (see Appendix for a sample form).
- Consider all available options (including no action) with the school's Pest Management Professional prior to determining control(s) to be used.
- Ensure that Pest Management Professional(s) make accurate entries in the 'Pesticide Application Log' (see Appendix) 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 IPM policy and plan.

- Serve as the point of contact for contracted pest management services for the school.
- Evaluates efficacy of IPM practices on school property on a monthly basis at a minimum.
- Sets up and moderates the annual evaluation of the School IPM Plan. Revises the School IPM Plan accordingly.

**Training:**

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

**c. 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 IPM Program:**

- Maintain easy access to Poison Control Center hotline at 1-800-222-1222 in case acute poisoning is suspected.
- Monitor for head lice (a common problem for children between 3 and 10 years old).
- Educate parents and staff about preventing head lice spread when it occurs.
- Submit a 'Pest Problem Report' to School IPM Coordinator whenever pests are detected in the health suite/Nurse's office.

**Training:**

In addition to required professional training,

- Be aware of public health pests of significance that may impact student health; see EPA's *List of Pests of Significant Public Health Importance* at [http://www.epa.gov/oppmsd1/PR\\_Notices/pr2000-draft.htm](http://www.epa.gov/oppmsd1/PR_Notices/pr2000-draft.htm).

**d. 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/or outdoor maintenance. School maintenance staff may make applications of pesticides that are "over-the-counter" disinfectants and antimicrobials such as Lysol® and toilet-bowl cleaner, and use "minimum risk" pesticides published by the federal EPA. If the use of other pesticide is necessary, only a licensed Pest Management Professional may make the application (see 'c' above).

**Other Duties of Maintenance Staff in the School IPM Program:**

- Practice all sanitation and maintenance techniques.
- Provide a 'Pest Problem Report' to School IPM Coordinator whenever pests or signs of pest activity are discovered in the school building, or are a problem on school grounds.
- Recognize and correct conditions that may lead to pest problems such as water leaks, potential pest entryways, and poor sanitation practices (see the 'IPM Priorities' checklist of this Plan for specific actions for school buildings and grounds).

- Manage specific pest issue(s) as directed by the School IPM Coordinator. This will not include pesticide application unless the individual is a licensed Pest Management Professional (see duties in 'c' above).

**g. Staff, Teachers, and Students:**

Duties of Staff, Teachers, & Students in the School IPM Program:

- The most important responsibility of the students and staff is sanitation. Much of the prevention and reduction of pest infestation at the school site depends on whether or not students and staff clean up food leftovers, food in lockers, gum under desks, paper clutter, etc., or perform proper maintenance.
- Leave pest control and pest management to trained professionals.
- Will not move sticky traps or other pest monitoring devices.
- Report any evidence of pest activity to the School IPM Coordinator using the 'Pest Problem Report' form.

Training:

School staff, teachers, and students will be trained in their roles in the school's pest management system by the School IPM Coordinator.

Other training:

- Staff, teachers, and students will be given a brief overview or updates by the School IPM Coordinator 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 floor, etc. to pest problems.
- Education will be focused to increase people's willingness to share their environment with other organisms so that people are less likely to insist on toxic treatments for harmless organisms.
- They will be instructed in how to log pest complaints using the 'Pest Problem Report' form.
- Pamphlets and fact sheets will be made available at the time of training and/or posted on bulletin boards in specific areas such as the cafeteria and teachers' lounge.

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

Duties of Parents/Guardians in the School IPM Program:

- Learn about IPM 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 IPM 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 school. Review the 'Annual School IPM Program Notification Letter to Parents & Staff' as well as all notices of application of pesticides at the school. For questions or concerns, parents and /or guardians will contact the School IPM Coordinator.

**6. Pest Identification: Preliminary Site Assessment and Ongoing Monitoring**

One of the key principles of School IPM is site assessment to precisely define the presence of pests and the site conditions that contribute to their presence. Indoor and outdoor pests will be defined for the school by historical account, interviews, and by direct monitoring. [See Appendix for the 'Pest Problem Report' form for a listing of common school pests].

When the IPM program is implemented at the School, the IPM Coordinator will perform a thorough inspection of all school buildings and grounds to identify pest activity and conditions that are contributing to any pest problems.

**Indoor site assessment,** Pest Management Professional and/or School IPM Coordinator will compile and map on floor plans of the building.

- Areas that currently have pests or show signs of pest activity.
- Areas that historically have had pests as well as identifying when this occurs during the school year.
- Conditions or behaviors contributing to pest problems that can be corrected.
- If already in use, location of detection and monitoring devices and bait stations.
- Recommendations for sanitation, structural repairs, and habitat modification.

**Outdoor site assessment,** Pest Management Professional and/or School IPM Coordinator will 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 key plants, any pest problems, and horticultural recommendations.

*Note: The Rutgers Cooperative Extension 'IPM Report Card for School Grounds' provides a series of self-assessment tools for schools to measure their adoption of IPM on school grounds. Additionally, each Report Card in the series can be used as a guide to incrementally or completely implement IPM by simply following the practices outlined. IPM practices are precisely outlined for control of common pests of New Jersey school grounds. Report Cards for School Grounds include: General Requirements; Athletic Fields; Turf ; Ornamental Plants; and Landscape Plantings. See @ <http://www.pestmanagement.rutgers.edu/IPM/SchoolIPM/reportcard.html>.*

It is important that the pest(s) be accurately identified in order to gather information about the pest's life cycle and habits. Identification is essential for selecting the combination of strategies which will be most effective as well as knowing when to implement them. If the School IPM Coordinator and the Pest Management Professional are unable to identify the pest(s), the County office of Rutgers Cooperative Extension (RCE) will be consulted and samples will be submitted for identification if needed. [Insert your County contact from the RCE 'commercial clients' phone listings at <http://www.rce.rutgers.edu/mastergardeners/helplines.asp>.

### **Ongoing Monitoring**

Once a pest is correctly identified, monitoring methods and schedules, as well as controls will be determined based on its life cycle, food sources, habitat preferences, and natural enemies.

**Indoor** pests will be monitored via direct inspection, sticky traps, pheromone baits, tracking powder, mechanical traps, and glue boards as necessary. If baits or traps of any kind are used:

- Each bait station or trap is assigned an identification number.
- A map is prepared showing the location and number of each trap or bait placement.
- Each trap or bait station is marked with appropriate warning language.
- Traps will be checked by the Pest Management Professional weekly during the early stages of solving a serious pest infestation, then taper off to monthly, once the pest problem is under control.
- Captured rodent pests will be recorded and disposed of on a daily basis.

**Outdoor** landscape pests will be monitored via direct inspection:

- Landscape plants are scouted at least monthly during the growing season for conditions requiring action (for example, damaged, diseased, dead limbs; soil erosion/compaction; insect, disease, weed pests and damage).
- Scouting usually begins when plants put out new leaves in spring and ends when leaves fall in autumn.
- Plants with annually recurring pest problems will be scouted according to pest appearance timetables.

**Monitoring Records:** The Pest Management Professional will maintain and keep records of any pest monitoring, including traps (see Appendix for sample 'IPM Pest Activity Monitoring and Control Log').

## 7. Pest Prevention and Control

Wherever possible, the School will take a preventive approach by identifying and removing, to the degree feasible, the basic causes of the problem rather than merely attacking the symptoms (the pests). This prevention-oriented approach is also best achieved by integrating a number of strategies. It is easier to spot a potential problem when the interior and exterior of the school is clean and uncluttered (see Appendix for a sample 'Integrated Pest Management Priorities' checklist as a resource for many controls).

IPM employs a multi-tactic approach, integrating several strategies to combat a particular pest. Control strategies that remove a pest's food, water, and shelter (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 habits and conditions; fertilization, plant selection (right plant/right place), and sanitation to exclude problematic pests and weeds.
- **Physical control:** for example, pest exclusion; removing pest access to the school building by sealing openings with caulk and copper mesh; repairing leaks and screens; removing pests by hand.
- **Mechanical control:** for example, insect monitors, light traps, rodent traps; till soil prior to planting to disrupt pest life cycles.

- **Biological control:** use of pest's natural enemies. For example, introduce beneficial insects or bacteria to the environment or, if they already exist, provide them with the necessary food and shelter; and avoid using broad-spectrum chemicals that will inadvertently kill beneficials.
- **Least hazardous chemical controls** with preference given to School IPM Act-defined 'low impact pesticides'.

Pesticides will be selected when other control methods are not effective or practical in resolving a pest problem. Pesticides will not be used on School property unless both the pest has been identified and its presence verified. It is neither possible, nor desirable to completely exterminate every pest and potential pest from every population on school property.

The Pest Management Professional will establish injury (also known as tolerance or threshold) levels and action thresholds for each individual pest species before making any chemical treatment. Action Thresholds for pesticide treatment are triggered if all other IPM 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, occurrence of disease-bearing pests); aesthetic evaluations (for example, temporary presence of ants); nuisance problems (for example, stinging insects); and pest visibility [see Appendix for a sample 'Indoor Pest Thresholds' for your modification].

The New Jersey School IPM law **defines** 'low impact pesticides' and necessarily creates the distinction 'non low impact pesticides' for other pesticides not meeting their definition. The law and resulting model policy published by DEP make it clear that when pesticide use is needed, preference should be given to choosing a 'low impact pesticide', if possible. The School will give preference to choosing a 'low impact pesticide', as described below.

A low impact pesticide is a pesticide that is considered to have relatively minimal risk as compared to pesticides in general. The New Jersey School IPM law specifically defines what a low impact pesticide is in two parts. The first part consists of a federal EPA list of pesticides that it considers to be minimal risk and thus do not require formal registration. These pesticides are listed in the federal code at 40 CFR § 152.25. (See <http://www.pestmanagement.rutgers.edu/IPM/SchoolIPM/NJAct/40cfr15225.pdf>). The second part consists of a list of pesticide ingredients (such as boric acid or diatomaceous earth) and formulation types (such as gels or pastes) that are considered low impact. It is important to note that a substance considered "low impact" does not necessarily mean zero risk. All pesticides must be used properly to reduce potential risk from their use.

*See the Rutgers Cooperative Extension School IPM website at <http://www.pestmanagement.rutgers.edu/IPM/SchoolIPM/NJAct/lowimpact.htm> for information on low impact pesticides as it becomes available.*

When it is determined that a non low impact pesticide must be applied to adequately control pests within established thresholds, application guidelines **per the law** will be followed. Specifically, non low impact pesticides will be applied in a school building only when

students are in another area of the building AND only if the area being treated with the pesticide is served by a different air handling system and is separated from the students by smoke or fire doors. Further, applications of non low impact pesticides on school property will be made in advance of when students will be present for instruction or extra-curricular activities, allowing for any label-prescribed entry restrictions; if there is no re-entry interval listed on the label, a minimum of 7 hours will be allowed prior to student re-entry on school property.

**Per the law**, emergency application of a non-low impact pesticide will only be made when the health or safety of a student or staff member is threatened. A "school pest emergency" is defined in the law as "an urgent need to mitigate or eliminate a pest that threatens the health or safety of a student or staff member." One example would be the presence of stinging insects such as ground hornets in an athletic field where events are scheduled. If a pest emergency exists, the school may use pesticides without the normal 72-hour pre-notification to parents and staff, and the advance posting of signs. Rather, the posting must be done at the time of the application, and the notice to parents and staff must be done within 24 hours after the emergency application. The notice that goes to parents and staff must explain what the reason for the emergency was, and if possible, what could be done to prevent such an emergency use next time.

Treatments, whether pesticides or low impact pesticide materials, will only be applied on school property when and where needed. It is rarely necessary to treat an entire building or landscape area to solve a pest problem. Monitoring will be used to pinpoint where pest numbers are beginning to reach the action level and 'spot' treatments' will be confined to those areas.

The School IPM Coordinator and Pest Management Professional(s) will meet monthly/as scheduled to cover monitoring reports and determine corrective action. The Pest Management Professional should make recommendations for corrective actions to the School IPM 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. Easiest 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 (see Appendix for a sample 'IPM Priorities' checklist as a resource for many preventative and corrective measures). School IPM Coordinator will assign and contact the appropriate staff to carry out individual tasks on the checklist.

All controls that are actually implemented should be documented in the log by the Pest Management Professional/other (see Appendix for sample 'IPM Pest Activity Monitoring and Control Log').

## 8. **Notification, Posting, and Re-Entry**

It is important to keep the school community informed of the school's implementation of the School IPM Plan. Accordingly, this section outlines the:

- annual notification of School IPM program status.
- pre-notification of planned use and notification of emergency use of non low impact pesticides.
- posting requirements for areas inside and out that are treated with pesticides.
- re-entry requirements for areas inside and out that are treated with pesticides.

### **Annual Notification**

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

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

1. a copy of the School IPM 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 data sheet is available for review by a parent, guardian, staff member, or student attending the school; and
  - (c) the integrated pest management coordinator is available 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, (insert school name) may use pesticides to control pests. The United States Environmental Protection Agency (EPA) and the New*



*Jersey Department of Environmental Protection (DEP) register pesticides to determine that the use of a pesticide in accordance with instructions printed on the label does not pose an unreasonable risk to human health and the environment. Nevertheless, the EPA and DEP cannot guarantee that registered pesticides do not pose any risk to human health, thus unnecessary exposure to pesticides should be avoided. The EPA has issued the statement that where possible, persons who are potentially sensitive, such as pregnant women, infants and children, should avoid unnecessary pesticide exposure."*

## **Notification and Posting of Non Low Impact Pesticide Use**

There are two situations when non low impact pesticides may be used on school property; when it is pre-planned and when it is an emergency.

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

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

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

When an emergency application of pesticides is required, the School IPM Coordinator will issue notice of emergency use of non low impact pesticides used to all staff, and parents or guardians of each student enrolled at the school within 24 hours after the application or on the morning of the next school day, whichever is earlier. The reason for the emergency and any measures that will be taken so that emergency pesticide use may be avoided in the future may be included. The area where the pesticide is applied will be posted at the time of application, and will remain posted for 72 hours following the application.

In either situation, the school is **required by law to make NJDEP-prescribed notification and posting** 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** content of both notification and posting as follows:

- common name of pesticide,
- EPA registration number,
- EPA statement on sensitive persons: "*Where possible, persons who potentially are sensitive, such as pregnant women, infants, and children, should avoid any unnecessary pesticide exposure*"

- location description, date, and time of application (one date for indoor application; three dates for outdoor applications in case of cancellation),
- potential adverse effects of product,
- reasons for the application,
- contact information for the IPM Coordinator of the school or school district, and
- further label information or precautions for public safety.

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

- posting on District Website
- email

**Where:** In either planned or emergency applications of non low impact pesticides, **per New Jersey law**, the School IPM Coordinator will post signs:

- prominently in or adjacent to the area where the pesticide is to be applied.
- at each entrance to the building or school ground where the pesticide is to be applied.
- that are at least 8.5" by 11".

### **Re-Entry**

If there is application of a low impact pesticide on school property, it will be made so that adequate settling or drying occurs in advance of when students will be present for instruction or extra-curricular activities.

Students cannot enter a pesticide treated area for at least seven hours after the application of a non low impact pesticide, unless the pesticide label states a specific numerical re-entry time that is different than this. The use of low impact pesticides does not require an automatic seven-hour wait; students can re-enter after the pesticide application has dried or settled, or longer if the pesticide label specifies.

## **9. Record Keeping and Evaluation**

### **Record Keeping**

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

The following records will be maintained in the IPM Log binder kept in Main Office.

- Pest Problem Reports
- Food Services Areas Reports
- IPM Pest Activity Monitoring and Control Log
- Indoor Pest Thresholds
- IPM Priority Checklists

- Pesticide Application Log
- Annual School IPM Program Notification Letters to Parents & Staff
- Pre-Notification of the Use of Pesticides (72 hour pre-notification)
- Emergency Pesticide Use Notifications
- School Integrated Pest Management Act Compliance Certification Forms
- Posting Sign (for indoors & outdoors) 'Notice of Pesticide Application'
- School IPM Report Cards
- Specific service reports will also be placed in the log binder that document particular actions taken by the pest management contractor'.

### **Evaluation**

At least annually, the School IPM Plan and School IPM Program of the Cedar Grove High School will be evaluated. This necessarily includes review of all records in the IPM log binder. Program evaluation involves reviewing monitoring data, actions taken, treatment impacts and effectiveness, and any other relevant observations. These records will provide information on previous and current pest populations and which strategies were applied. Comparing data will clearly indicate which pest management strategies were most effective for the amount of time and money spent. IPM practices and procedures will be modified, if necessary, based on past experience, results, and gained knowledge.

This evaluation will be coordinated by John Bannon, Supervisor of Buildings and Grounds. The participants in the evaluation will be: Jody Inglis, HS Principal. A written evaluation is to be completed by John Bannon and Jody Inglis. If the school is using a contractor, the School IPM Coordinator will meet with the pest control contractor to evaluate the success or failure of this IPM Plan.

The following issues will be addressed during the evaluation of the School IPM Plan and Program:

- adequacy of pest control indoor and outdoor
- areas of concern
- sanitation issues
- building maintenance issues
- new less toxic pest control tactics
- adequate support by all members of the community
- adequacy of thresholds
- revise integrated pest management priorities

Following evaluation, the School IPM Plan will be revised by John Bannon, Supervisor of Buildings and Grounds accordingly.

**On July 25th, 2024 John Bannon and Jody Inglis evaluated the current plan and felt no changes were needed to revise the 2024-2025 Cedar Grove High School IPM plan.**

## APPENDICES

**\*\*\*SAMPLE IPM POLICY\*\*\***

## **A Model Integrated Pest Management Policy for New Jersey Schools**

The New Jersey School Integrated Pest Management Act of 2002 requires schools to implement a school integrated pest management policy.

The law requires the superintendent of the school district, for each school in the district, the board of trustees of a charter school, and the principal or lead administrator of a private school, as appropriate, to implement Integrated Pest Management (IPM) procedures to control pests and minimize exposure of children, faculty, and staff to pesticides. \_\_\_\_\_ (Insert school name) shall therefore develop and maintain an IPM plan as part of the school's policy.

### **Integrated pest management procedures in schools**

Implementation of IPM procedures will determine when to control pests and whether to use mechanical, physical, cultural, biological or chemical methods. Applying IPM principles prevents unacceptable levels of pest damage by the most economical means and with the least possible hazard to people, property, and the environment.

Each school shall consider the full range of management options, including no action at all. Non-pesticide pest management methods are to be used whenever possible. The choice of using a pesticide shall be based on a review of all other available options and a determination that these options are not effective or not reasonable. When it is determined that a pesticide must be used, low impact pesticides and methods are preferred and shall be considered for use first.

### **Development of IPM plans**

The school IPM plan is a blueprint of how \_\_\_\_\_ (Insert school name) will manage pests through IPM methods. The school IPM plan states the school's goals regarding the management of pests and the use of pesticides. It reflects the school's site-specific needs. The IPM plan shall provide a description of how each component of the school IPM policy will be implemented at the school. For Public schools, the Local School Board, in collaboration with the school building administrator (principal), shall be responsible for the development of the IPM plan for this school. For Charter schools and non-public schools, the development of the IPM plan shall be the responsibility of the Board of Trustees or the Principal or Lead Administrator.

### **IPM Coordinator**

The \_\_\_\_\_ (Insert as appropriate, either local school board, board of trustees, Principal or Lead Administrator) shall designate an integrated pest management coordinator, who is responsible for the implementation of the school integrated pest management policy.

### **Education /Training**

The school community will be educated about potential pest problems and IPM methods used to achieve the pest management objectives.

The IPM Coordinator, other school staff and pesticide applicators involved with implementation of the school IPM policy will be trained in appropriate components of IPM as it pertains to the school environment.

Students, parents/guardians will be provided information on this policy and instructed on how they can contribute to the success of the IPM program.

\*\*\*ANNUAL NOTICE SAMPLE\*\*\*

## Annual Integrated Pest Management Notice For School Year 200X - 200X



Dear Parent, Guardian, or Staff Member:

This notice is being distributed to comply with the New Jersey School Integrated Pest Management Act. *[insert name of school or school district]* \_\_\_\_\_ has adopted an Integrated Pest Management (IPM) Policy and has implemented an IPM Plan to comply with this law. IPM is a holistic, preventive approach to managing pests that is explained further in the school's IPM Policy included with this notice.

All schools in New Jersey are required to have an Integrated Pest Management Coordinator (IPM Coordinator) to oversee all activities related to IPM and pesticide use at the school.

The IPM Coordinator for *[insert name of school]* \_\_\_\_\_ is:

Name of IPM Coordinator: \_\_\_\_\_

Business Phone number: \_\_\_\_\_

Business Address: \_\_\_\_\_

The IPM Coordinator maintains the pesticide product label, and the Material Safety Data Sheet (MSDS) (when one is available), of each pesticide product that may be used on school property. The label and the MSDS are available for review by a parent, guardian, staff member, or student attending the school. Also, the IPM Coordinator is available to parents, guardians, and staff members for information and to discuss comments about IPM activities and pesticide use at the school.

As part of a school pest management plan *[insert name of school]* \_\_\_\_\_ may use pesticides to control pests. The United States Environmental Protection Agency (EPA) and the New Jersey Department of Environmental Protection (DEP) register pesticides to determine that the use of a pesticide in accordance with instructions printed on the label does not pose an unreasonable risk to human health and the environment. Nevertheless, the EPA and the DEP cannot guarantee that registered pesticides do not pose any risk to human health, thus unnecessary exposure to pesticides should be avoided. The EPA has issued the statement that where possible, persons who are potentially sensitive, such as pregnant women, infants and children, should avoid unnecessary pesticide exposure.

### **The following items must be included with this annual notice:**

- o A copy of the school or school district's IPM policy.

- o The date, time and place of any meeting if one is to be held for the purpose of adopting or modifying the school integrated pest management policy or plan.
- o A list of pesticides that are in use or that have been used in the past 12 months on school property.

**\*\*72 HOUR NOTIFICATION SAMPLE\*\***

# Pre-Notification of the Use of Pesticides

(This notice should be received at least 72 hours prior to pesticide use)



**Date:** \_\_\_\_\_

**To:** Parents and guardians of students, and staff of [insert name of school] \_\_\_\_\_

**From:** IPM Coordinator \_\_\_\_\_ Phone Number: \_\_\_\_\_

**Subject:** Notification of the Use of Non Low Impact Pesticides

This notice is to advise you that the following pesticide(s) will be used at [insert name of school]:

Pesticide Common Name		
Pesticide Trade Name		
EPA Registration Number		

**Location of the pesticide application:** \_\_\_\_\_

**Reason for the pesticide application:** \_\_\_\_\_

**If an indoor application, the date and time it is planned:**

DATE \_\_\_\_\_ TIME \_\_\_\_\_

**If an outdoor application, 3 dates must be listed, in chronological order, on which the outdoor application may take place if the preceding date is canceled.**

DATE \_\_\_\_\_ DATE \_\_\_\_\_ DATE \_\_\_\_\_

**Description of the possible adverse effects of the pesticide as per the Material Safety Data Sheets for the pesticides to be used, if available:**

\_\_\_\_\_  
\_\_\_\_\_

**Pesticide product label instructions and precautions related to Public Safety.**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Note: By law, we must advise you that: *The Office of Pesticide Programs of the United States Environmental Protection Agency has stated: "Where possible, persons who potentially are sensitive, such as pregnant women, infants, and children, should avoid any unnecessary pesticide exposure."***



\*\*\*EMERGENCY NOTICE SAMPLE\*\*\*

# EMERGENCY PESTICIDE USE



**To:** Parents or guardians of students and staff of *[insert name of school]*: \_\_\_\_\_

**From:** IPM Coordinator: \_\_\_\_\_ **Phone Number:** \_\_\_\_\_

**Subject: Emergency Pesticide Use Notification**

This notice is to advise you that the following non low impact pesticide(s) were used at *[insert name of school]* \_\_\_\_\_:

Pesticide common name		
Pesticide trade name		
EPA registration number		

**Location of the pesticide application:** \_\_\_\_\_

**The date and time the indoor or outdoor application took place:** \_\_\_\_\_

**Reason for the pesticide application:** \_\_\_\_\_

**Description of the problem and the factors that qualified the problem as an emergency that threatened the health or safety of a student or staff member:**

---

---

---

**If applicable, description of steps to be taken to avoid emergency use of pesticides for this problem in the future:**

---

---

**Description of the possible adverse effects of the pesticide(s) as per the Material Safety Data Sheets for the pesticide(s) to be used, if available:**

---

---

---

**Pesticide product label instructions and precautions related to Public Safety:**

---

**Note: As required by law, we must advise you:** *“The Office of Pesticide Programs of the United States Environmental Protection Agency has stated: “Where possible, persons who potentially are sensitive, such as pregnant women, infants, and children, should avoid any unnecessary pesticide exposure.”*

# NOTICE OF PESTICIDE APPLICATION

For further information regarding this notice please contact the School IPM Coordinator:

\_\_\_\_\_ Phone Number: \_\_\_\_\_  
Name

The following pesticides will be used at [*insert name of school*]: \_\_\_\_\_

Pesticide Common Name	Pesticide Trade Name	EPA Registration Number
Pesticide Common Name	Pesticide Trade Name	EPA Registration Number

The Office of Pesticide Programs of the United States Environmental Protection Agency has stated: "Where possible, persons who potentially are sensitive, such as pregnant women, infants, and children, should avoid any unnecessary pesticide exposure."

**Location of the pesticide application:** \_\_\_\_\_

**Reason for the pesticide application:** \_\_\_\_\_

**If an indoor application the date and time it is planned:**

DATE \_\_\_\_\_ TIME \_\_\_\_\_

**In the case of an outdoor application, 3 dates must be listed, in chronological order, on which the outdoor application may take place if the preceding date is canceled.**

DATE \_\_\_\_\_ DATE \_\_\_\_\_ DATE \_\_\_\_\_

**Description of the possible adverse effects of the pesticides as per the Material Safety Data Sheets for the pesticides to be used, if available:**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Pesticide(s) product-label instructions and precautions related to Public Safety:**

\_\_\_\_\_