



LONG CREEK SCHOOL DISTRICT # 17

375 E. Main Street – P.O. Box 429

Phone: 541-421-3896

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Del Dykstra
Superintendent

Marsiellette Watson
School Board Chair

Long Creek School District Healthy and Safe Schools

Contact Information

General Plan Information

Del Dykstra -- Superintendent

Long Creek School District #17

375 E. Main Street – PO Box 429

Long Creek, OR 97856

(541) 421-3896 FAX (541) 421-3012

Date: Amended April 11, 2017

Web address of Plan: www.longcreekschool.com

Communication: Long Creek School District will have tests results available to the public within five business days of receiving the results. Results will be shared via the school newsletter, e-mail, school website www.longcreekschool.org and a hardcopy of the results will be available to review in the central office.

The superintendent, and head maintenance director, will be responsible for maintaining and implementing the Healthy and Safe Schools Plan. Records will be kept in the central office. The general public are welcome to view the tests results during regular school hours.

Facility Information – (Facilities used for providing education to students)

Buildings (2)

375 E. Main Street

Long Creek, Oregon 97856

1. Main classroom building
2. Gymnasium and multi-purpose

Radon

General Summary

The district has developed a radon plan as required by ORS 332.167. Long Creek School District will be conducting targeted radon sample testing in all buildings. This testing will occur in January - March 2017 while the heating system is running on a normal basis. The first round of testing will cover most rooms in the building, and the results will be communicated with the community as soon as they are received.

According to the Environmental Protection Agency (EPA) action level radon should not be above 4.0 pCi/L. The Long Creek School District is committed to sampling all occupied rooms by 2021.

Tests results will be e-mailed and published in the school newsletter. A detailed plan is described below.

For more information or any questions please contact the school office at 541-421-3896.



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Students and staff only spend a portion of their time at school, the greatest risk to radon exposure is at the home. Please test your residence if you have not already done so. Test kits are available at retail stores, such as hardware stores, for home use and testing is available through licensed professionals.

Radon Plan

The 2015 Legislature passed House Bill (HB) 2931 so that elevated radon levels in Oregon schools would be known. House Bill 2931 later became Oregon Revised Statute (ORS) 332.166-167. As directed by this statute, all school districts in Oregon must develop a plan to accurately measure school buildings for elevated radon levels. Under the statute, school districts must submit a plan to Oregon Health Authority (OHA) by September 1, 2016. Per ORS 332.166-167, actual testing of schools must be done on or before January 1, 2021 and the testing results sent to OHA and posted on the school or school district's website.

This plan will develop the protocols necessary for compliance. OHA's Testing for Elevated Radon in Oregon Schools, specifically Appendices A and D will be used to guide this effort. Below is the plan developed for the Long Creek School District.

Per ORS 332.166-167, School Radon Measurement Teams (i.e. personnel appointed to measure a school site for elevated radon) must, at a minimum, conduct initial measurements in all frequently occupied rooms in contact with the soil or located above a basement or a crawlspace. Testing will occur in all frequently occupied spaces simultaneously per school site. Examples include: offices, classrooms, conference rooms, gyms, auditoriums, cafeterias & break rooms. A minimum of one detector for every 2000 sq. ft. of open floor space or portion thereof is required. United States Environmental Protection Agency (USEPA) studies indicate that radon levels on upper floors are not likely to exceed the levels found in ground-contact rooms. Testing rooms on the ground-contact floor or above unoccupied basements or crawlspaces is sufficient to determine if radon is a problem in a school. Areas such as rest rooms, hallways, stairwells, elevator shafts, utility closets, kitchens storage closets do not need to be tested.

Initial and follow-up testing, as needed, will use passive test devices. Active devices (electrically powered, continuous radon monitors) may be used in follow-up testing of locations, if needed, where it is important to determine that radon levels vary according to the time of day. Because testing under closed conditions is important to obtain meaningful results from short-term tests, the District will schedule testing during the coldest months of the year. "Closed building conditions" are defined as keeping all windows closed, keeping doors closed except for normal entry and exit, and not operating fans or other machines which bring in air from outside. Fans that are part of a radon-reduction system or small exhaust fans operating for only short periods of time may run during the test. Testing will occur between October and March in any given school year. Short term testing will be used with passive test kits will be used in "closed building conditions". Test Kits will be placed during weekdays with HVAC (heating, ventilation, air conditioning) systems operating as they do normally. The following is a detailed protocol instruction checklist:

1. A Test Kit Placement Log and a Test Kit Location Floor Plan will be prepared for each school in which radon measurements are made. Long Creek School District will use their emergency/fire escape plan as a template. Test kit location will be accurately recorded on both a Log and Floor Plan



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Test kits or testing services must meet the current requirements of the national certifying organizations, National Radon Proficiency Program (NRPP, www.nrpp.info) or the National Radon Safety Board (NRSB, www.nrsb.org). Testing must be done following the directions on the test kit.

2. Per ORS 332.166-167, school radon measurement teams must, at a minimum, conduct initial measurements in all frequently occupied rooms in contact with the soil or located above a basement or a crawlspace. Room examples include offices, classrooms, conference rooms, gyms, auditoriums, cafeterias and break rooms.
3. The number of test kits used to measure radon (detectors) must be determined by counting the number of appropriate rooms. One detector kit is used for each room that is 2000 square feet or less. Additional test kits are needed for larger rooms.
4. Added to this number will be the test kits needed for Quality Assurance purposes.
5. Test kits will be placed in all rooms in contact with the soil or located above a basement or crawlspace that are frequently occupied by students and school staff.
6. Testing will occur during the time that students and teachers are normally present (during weekdays).
7. In addition to placing detectors, additional test kits will be provided to serve as quality assurance measures (duplicate, blank, and spike measurements). Quality Assurance procedures will be conducted as described in OHA's [Testing for Elevated Radon in Oregon Schools](#).
8. All test kits placed in the school site (detectors, duplicates, and blanks) must be noted on the Device Placement Log and Floor Plan by their serial number.
9. Test kits should be placed.
 - a. Where they are least likely to be disturbed or covered up.
 - b. At least three feet from doors, windows to outside or ventilation ducts.
 - c. At least one foot from exterior walls.
 - d. At least 20 inches to six feet from floor.
 - e. About every 2,000 square feet for large spaces (e.g., a 3500 square foot gymnasium would require two test kits)



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Along with the five-item placement protocol above, School Radon Measurement Teams can simply place the test kit on the teacher's desk or up on a bookshelf, out of the way of students. To prevent tampering, kits may be suspended from a wall or ceiling (using string and thumb-tack/tape). If they are suspended, they should be 20 inches to 6 feet above the floor, at least 1 foot below the ceiling.

10. Test kits must **NOT** be placed:
 - a. Near drafts resulting from heating, ventilating vents, air conditioning vents, fans, doors, and windows.
 - b. In direct sunlight.
 - c. In areas of high humidity such as bathrooms, kitchens, laundry rooms, etc.
 - d. Where they may be disturbed at any time during the test
11. Testing with short-term test kits must be used under closed conditions (closed windows/doors except for normal exit/entry).
 - a. Closed conditions: Short-term tests should be made under closed conditions in order to obtain more representative and reproducible results. Open windows and doors permit the movement of outdoor air into a room. When closed conditions in a room are not maintained during testing, the subsequent dilution of radon gas by outdoor air may produce a measurement result that falls below the action level in a room that actually has a potential for an elevated radon level. Schools shall only be tested for radon during periods when the HVAC system is operating as it does normally.
 - b. All external doors should be closed except for normal use – structural and weatherization defects need to be repaired prior to testing.
 - c. Closed conditions must be verified when placing and retrieving test kits.
12. Short-term test kits will be placed during colder months (October through March).
 - a: Colder months: Because testing under closed conditions is important to obtain meaningful results from short-term tests, the District will schedule testing during the coldest months of the year. During these months, windows and exterior doors are more likely to be closed. In addition, the heating system is more likely to be operating. This usually results in the reduced intake of outside air. Moreover, studies of seasonal variations of radon measurements in schools found that short-term measurements may more likely reflect the average radon level in a room for the school year when taken during the winter heating season.
 - b: The District will check and document local weather forecasts prior to placing test kits. Do not conduct short-term measurements (2-5 days) during severe storms or period of high winds. The definition of severe storm by the National Weather Service is one that generates winds of 58 mph and/or ¾ inch diameter hail and may produce tornadoes.
13. Test Kits will be placed during weekdays with HVAC (heating, ventilation, air conditioning) systems operating as they do normally.



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Suggested timeline:

Monday morning – Place kits (detectors/duplicates/blanks) per Test Kit Placement Log created for school. Record data, as needed, on Log.

Thursday morning – Pick up kits, record as needed, ship with (previously requested & received) spiked test kits to Radon Measurement Laboratory.

- a. Air conditioning systems that recycle interior air may be operated.
- b. Window air conditioning units may be operated in a re-circulating mode, but must be greater than 20 feet from the test kit.
- c. Ceiling fans, portable humidifiers, dehumidifiers and air filters must be more than 20 feet from the test kit.
- d. Portable window fans should be removed or sealed in place.
- e. Fireplaces or combustion appliances (except for water heaters/cooking appliances) may not be used unless they are the primary source of heat for the building.
- f. If radon mitigation systems are in place in the school, they should be functioning.

14. The District will not conduct initial measurements under the following conditions:

a. During abnormal weather or barometric conditions (e.g., storms and high winds). If major weather or barometric changes are expected, it is recommended that the 2 to 5-day testing be postponed. USEPA studies show that barometric changes affect indoor radon concentrations. For example, radon concentrations can increase with a sudden drop in barometric pressure associated with storms.

b. During structural changes to a school building and/or the renovation of the building's envelope or replacement of the HVAC system

15. After receiving the results of the initial testing, School Radon Measurement Teams will follow the "Interpreting initial results" section of the OHA's Testing for Elevated Radon in Oregon Schools.

Follow-up Measurements

Follow-up testing (in rooms with initial short-term measurement of 4.0 pCi/L or higher) should start within one month after receiving the initial test results. Follow-up testing must be made in the same location in a room. When conducting follow-up testing using short-term methods will be done in the same conditions as the initial measurement. Follow-up testing using passive short-term test kits should follow the same Quality Assurance procedures and requirements (i.e. percentages of duplicates/blanks/spikes), including quality assurance calculations. Follow directions under Radon Test Placement Strategy and Protocol Checklist and Test Kit Placement again.



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Report of Results & Distribution

ORS 332.166-167 requires that school districts make all test results available: to the district's school board; the Oregon Health Authority (to post on its website), and readily available to parents, guardians, students, school employees, school volunteers, administrators and community representatives at the school office, district office or on a website for the school or school district.



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US EPA, OHA Oregon Radon Awareness Program, and numerous non-governmental groups recommend that the school district take action to reduce the radon level in those rooms where the average of the initial and follow-up short-term kit results OR the result of the long-term kit used in follow-up is 4.0 pCi/L or more.

Initial testing will be conducted in accordance with ORS 332.166-167 before January 1, 2021. Because buildings age and ground beneath them settles, radon entry may increase due to cracks in the foundation. For that reason, ORS 332.166-167 requires that schools be tested once every 10 years regardless of initial testing results or whether mitigation was done.

Suggested times, for retesting, in addition to that required under ORS 332.166-167, are as follows:

1. Current national guidelines (ANSI/AARST, 2014) recommend that school buildings be re-tested every five years.
2. If radon mitigation measures have been implemented in a school, retest these systems as a periodic check to ensure that the radon mitigation measures are working. EPA does not provide a specific interval, but OHA recommends that schools with radon mitigation measures retest every 5 years.
3. Retest after major renovations to the structure of a school building or after major alterations to a school's HVAC system. These renovations and alterations may increase radon levels within a school building.
4. If major renovations to the structure of a school building or major alterations to a school's HVAC system are planned, retest the school before initiating the renovation. If elevated radon is present, radon-resistant techniques can be included as part of the renovation.



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Lead

Water Quality Information

General Information

OAR 581-022-2223(5) (d) states that the Healthy and Safe Schools Plan must include a plan to test for and reduce exposure to lead in water used for drinking and food preparation. Long Creek School District has contracted with Box R Water Analysis Laboratory, Pineville, Oregon to conduct District wide water testing. Two different samples were analyzed. First, the drinking fountain, and second, the kitchen faucet which is used for food preparation. Results indicate that both samples were below the 20 parts per billion (ppb) that the EPA sets for schools. Test results and information about the tests will be posted on our website www.longcreekschool.com and published in our monthly newsletter. For a copy of the testing procedure and more detailed information please contact the school office at 541-421-3896.

Plan

1. Identify Sources of lead: Long Creek School District will test all taps used for drinking and food preparation in the building to identify any lead problems. The school district will follow the Environmental Protection Agency's 3 T's Revised Technical Guidance to ensure that samples for lead are collected properly and from the right places. Long Creek School District will use an OHA-accredited drinking water laboratory to analyze samples for lead.
2. Stop access: Long Creek School District will prevent access to water taps that have more than 20 parts per billion (ppb) of lead. This will include shutting off taps, covering water fountains, and providing bottled water to students and staff members.
3. Communicate: Long Creek School District will make results from tests for lead in water available to students, families, and community as quickly as possible.
4. Mitigate and correct: Long Creek School District will replace the sources of lead in building plumbing following the EPA 3T's guidance.
5. The Environmental Protection Agency's 3 T's guidance is available at <https://www.epa.gov/dwreginfo/3ts-reducing-lead-drinking-water-schools-and-child-care-facilities>
6. Long Creek School will plan to test its drinking and food prep water sources at regular intervals and is expecting the frequency to be legislated in the near future. There is no research stating how often school districts should test for lead in water.
 - For outlets that failed the test, a retest after a permanent fix had been implemented



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Lead based paint

ORAR 581-022-2223(5)(e) states that the Healthy and Safe Schools Plan must include a plan to reduce exposure to lead paint. Long Creek School District will only contract with certified lead based paint renovation contractors licensed by the Oregon Construction Contractors Board.

Integrated Pest Management (IPM)

Long Creek School District chooses to manage pests and pesticides in house utilizing most of their facility management staff. The school ensures that their staff are trained and certified in pesticide applicator training and certified by the state if it is required. These same staff also are responsible for implementing the IPM practices including sanitation, exclusion and monitoring of possible pests.

Integrated Pest Management (IPM)

Pest Management Plan

I. INTRODUCTION

Structural and landscape pests can pose significant problems in schools. Pests such as mice and cockroaches can trigger asthma. Mice and rats are vectors of disease. Many children are allergic to yellow jacket stings. The pesticides used to remediate these and other pests can also pose health risks to people, animals, and the environment. These same pesticides may pose special health risks to children due in large part to their still-developing organ systems. Because the health and safety of students and staff is our first priority – and a prerequisite to learning – it is the policy of Long Creek School District to approach pest management with the least possible risk to students and staff. In addition, Senate Bill 637 (incorporated into ORS Chapter 634 upon finalization in 2009) requires all school districts to implement integrated pest management in their schools. For this reason, the *board of directors* adopts this integrated pest management plan for use on the campuses of our district.

II. WHAT IS INTEGRATED PEST MANAGEMENT?



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Integrated Pest Management, also known as IPM, is a process for achieving long-term, environmentally sound pest suppression through a wide variety of tactics. Control strategies in an IPM program include structural and procedural improvements to reduce the food, water, shelter, and access used by pests. Since IPM focuses on remediation of the fundamental reasons why pests are here, pesticides are rarely used and only when necessary.

IPM Basics

Education and Communication: The foundation for an effective IPM program is education and communication. We need to know what conditions can cause pest problems, why and how to monitor for pests, proper identification, pest behavior and biology before we can begin to manage pests effectively. Communication about pest issues is essential. *A protocol for reporting pests or pest-conducive conditions and a record of what action was taken is the most important part of an effective IPM program.*

Cultural & Sanitation: Knowing how human behavior encourages pests helps you prevent them from becoming a problem. Small changes in cultural or sanitation practices can have significant effects on reducing pest populations. Cleaning under kitchen serving counters, reducing clutter in classrooms, putting dumpsters further from kitchen door/loading dock, proper irrigation scheduling, and over-seeding of turf areas are all examples of cultural and sanitation practices that can be employed to reduce pests.

Physical & Mechanical: Rodent traps, sticky monitoring traps for insects, door sweeps on external doors, sealing holes under sinks, proper drainage and mulching of landscapes, and keeping vegetation at least 24 inches from buildings are all examples of physical and mechanical control.

Pesticides: IPM focuses on remediation of the fundamental reasons why pests are here; pesticides should be rarely used and only when necessary.



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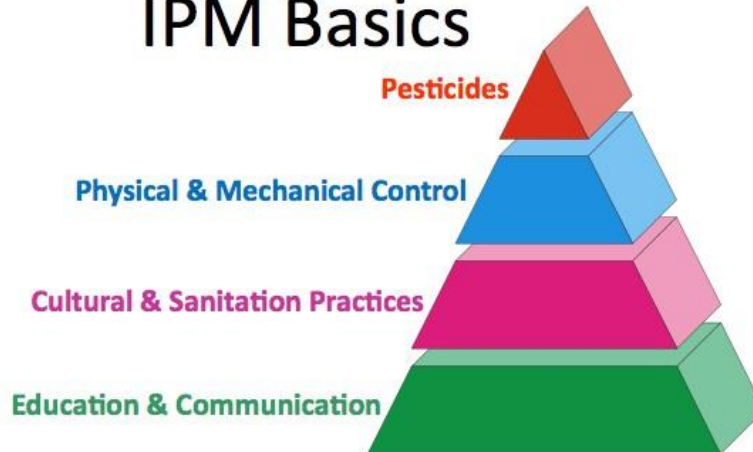
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IPM Basics



III. WHAT IS AN INTEGRATED PEST MANAGEMENT PLAN?

ORS 634.700 defines an IPM plan as a proactive strategy that:

(A) Focuses on the long-term prevention or suppression of pest problems through economically sound measures that:

- a) Protect the health and safety of students, staff and faculty;
- b) Protect the integrity of campus buildings and grounds;
- c) Maintain a productive learning environment; and
- d) Protect local ecosystem health;

(B) Focuses on the prevention of pest problems by working to reduce or eliminate conditions of property construction, operation and maintenance that promote or allow for the establishment, feeding, breeding and proliferation of pest populations or other conditions that are conducive to pests or that create harborage for pests;

(C) Incorporates the use of sanitation, structural remediation or habitat manipulation or of mechanical, biological and chemical pest control measures that present a reduced risk or have a low impact and, for the purpose of mitigating a declared pest emergency, the application of pesticides that are not low-impact pesticides;

(D) Includes regular monitoring and inspections to detect pests, pest damage and unsanctioned pesticide usage;

(E) Evaluates the need for pest control by identifying acceptable pest population density levels;



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- (F) Monitors and evaluates the effectiveness of pest control measures;
- (G) Excludes the application of pesticides on a routine schedule for purely preventive purposes, other than applications of pesticides designed to attract or be consumed by pests;
- (H) Excludes the application of pesticides for purely aesthetic purposes;
- (I) Includes school staff education about sanitation, monitoring and inspection and about pest control measures;
- (J) Gives preference to the use of nonchemical pest control measures;
- (K) Allows the use of low-impact pesticides if nonchemical pest control measures are ineffective; and
- (L) Allows the application of a pesticide that is not a low-impact pesticide only to mitigate a declared pest emergency or if the application is by, or at the direction or order of, a public health official.

The above definition is the basis for Long Creek School District's IPM plan. This plan fleshes out the required strategy from ORS 634.700 – 634.750 for Long Creek School District.

Note: As mentioned above, ORS 634.700 allows for the routine application of pesticides designed to be consumed by pests. To avoid a proliferation of pests and/or unnecessary applications of pesticides, we will not set out any ant or cockroach baits until first:

- 1) Informing staff in the area where the pests are that sanitation and exclusion are the primary means to control the pest.
- 2) Establishing an acceptable pest population density
- 3) Cleaning up any food debris in the area.
- 4) Sealing up any cracks or crevices where we know the pests are coming from.
- 5) Setting out sticky insect monitoring traps in the area using the sticky insect monitoring trap protocol.



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IV. SCHOOL DISTRICT IPM PLAN COORDINATOR

The Board of Directors designates Fred Drake as the IPM Plan Coordinator. The Coordinator is key to successful IPM implementation in Long Creek School District, and is given the authority for overall implementation and evaluation of this plan. The Coordinator is responsible for:

A. Attending not less than six hours of IPM training each year

The training will include a general review of IPM principles and the requirements of ORS 634.700 – 634.750. It will also include hands-on training on updated exclusion practices, monitoring & inspection techniques, and management strategies for common pests.

Note: ORS 634.720 requires IPM plan coordinators to complete six hours of training each year. Contact your property and liability insurance provider, your Education Service District, or the OSU School IPM Program for information on IPM coordinator training courses that cover the above.

B. Conducting outreach to the school community (custodians, maintenance, construction, grounds, faculty, and kitchen staff) about the school's IPM plan;

The IPM Coordinator (or designee) will provide training as outlined in Section V below.

C. Overseeing pest prevention efforts;

The Coordinator will work with administration, custodian/maintenance, teachers and staff to reduce clutter and food in the classrooms, and seal up pest entry points.

D. Assuring that the decision-making process for implementing IPM in the district (section VI) is followed;

The Coordinator will continually assess and improve the pest monitoring/reporting/action protocol.

E. Assuring that all notification, posting, and record-keeping requirements in section VII are met when the decision to make a pesticide application is made;

F. Maintaining the approved pesticides list as per section VIII;

G. Responding to inquiries and complaints about noncompliance with the plan; Responses to inquiries and complaints will be in writing and kept on record with the Coordinator.

H. Placing and checking sticky insect monitoring traps around facility;



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I. Keeping records of pest complaints using pest logs located in the school office.

J. Developing protocols and provisions for pest avoidance and prevention during construction and renovation projects. The Coordinator will be involved in drafting any bids, and will have the authority to halt construction projects if protocols and provisions for pest avoidance and prevention are not being met.

V. RESPONSIBILITIES + TRAINING/EDUCATION of SCHOOL EMPLOYEES

Note: ORS 634.700 (3) (i) requires staff education “about sanitation, monitoring and inspection and about pest control measures”. All staff should have at least a general review of IPM principles and strategy as outlined in Sections II and III.

A. IPM Plan Coordinator

- 1. Training (see section IV above)**
- 2. Responsibilities (see section IV above)**

B. Custodial / Maintenance Staff

1. Training/Education

Custodial - The IPM Plan Coordinator will train custodial staff at least annually on sanitation, monitoring, inspection, and reporting, and their responsibilities as outlined below.

Maintenance - The IPM Plan Coordinator will train maintenance staff at least annually on identifying pest-conducive conditions and mechanical control methods (such as door sweeps on external doors and sealing holes under sinks), and their responsibilities as outlined below.

2. Responsibilities

- 1) Attending annual IPM training provided by the IPM Coordinator (or designee).
- 2) Continually monitoring for pest-conducive conditions during daily work, and sealing small holes and cracks when noticed (if this can be done in a short amount of time)
- 3) Reporting pest problems and pest-conducive conditions that he/she cannot resolve in a short amount of time to the IPM Coordinator.



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- 4) Reporting teachers to IPM Coordinator who repeatedly refuse to or need assistance to reduce clutter and other pest-conducive conditions in their classrooms.
- 5) Confiscating - reporting any unapproved pesticides (such as aerosol spray cans) discovered in their regular duties or during an inspection and delivering them – reporting them to the IPM Coordinator.
- 6) Assisting IPM Coordinator with resolving issues found in annual inspection report.
- 7) Working with the IPM Coordinator to develop a protocol and priority list with deadlines for sealing holes, installing external door sweeps, and other pest exclusion needs which cannot be done in a short period of time.

C. Grounds Department

1. Training/Education

The head of grounds staff (or designee) will train grounds staff at least once per year. Each year before the training, the head of grounds staff will meet with the IPM Coordinator to review the annual report of pesticide applications and plan training for all grounds staff. The annual training will review this IPM Plan (especially grounds department responsibilities outlined below) and data from the annual report related to pesticide applications by grounds crew. It will also review the OSU turf management publications EC 1521, EC 1278, EC 1550, EC 1638-E, and PNW 299 (available free online at <http://extension.oregonstate.edu/catalog/>). Grounds staff will also be trained in basic monitoring for common pests on grounds.

2. Responsibilities

Grounds crews are responsible for:

- 1) Attending annual IPM training provided by the IPM Coordinator (or designee).
- 2) Working with the IPM Coordinator to reduce conditions conducive to weeds, gophers, moles, yellow jackets, and other outdoor pests
- 3) Keeping vegetation (including tree branches and bushes) at least 18 inches from building surfaces.
- 4) Proper mulching in landscaped areas to reduce weeds.
- 5) Proper fertilization, over-seeding, mowing height, edging, drainage, aeration, and



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irrigation scheduling in turf areas to reduce weeds.

6) When the decision is made to apply a pesticide, following notification, posting, record-keeping and reporting protocols in Section VII.

D. Kitchen Staff

1. Training/Education

The IPM Coordinator will train kitchen staff at least once per year on the basic principles of IPM and their responsibilities as outlined below.

2. Responsibilities

Kitchen Staff are responsible for:

- 1) Attending annual IPM training provided by the IPM Coordinator.
- 2) Assuring floor under serving counters and movable equipment is kept free of food and drink debris.
- 3) Avoiding long-term storage or use of cardboard boxes.
- 4) Removing recycle products daily.
- 5) Keeping outside doors closed at all times (except during deliveries and emptying trash).
- 6) Keeping all food items in sealed containers.
- 7) Immediately reporting any sightings of rodents or rodent droppings to the IPM Coordinator, and following up with an email to the Coordinator (for records).
- 8) Reporting to the Coordinator any pest-conducive conditions that require maintenance (e.g., leaky faucets, dumpster too near building, drains need scrubbing, build-up of floor grease requiring spray-washing, etc.)

E. Faculty

1. Training/Education

The IPM Plan Coordinator will train faculty and principals at least once per year on the basic principles of IPM and their responsibilities as outlined below. These short (15 – 20 minutes) training are arranged by the Coordinator with individual principals when



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openings in their school Faculty Meeting schedules permit. During the training, the Coordinator will review the following with Faculty:

- 1) What pest-conducive conditions are (clutter, food debris, moisture, cracks, holes, etc.), and the importance of reporting these in a timely manner.
- 2) The importance of keeping their classrooms and work areas free of clutter.
- 3) The importance of having students clean up after themselves when food or drink is consumed in the classroom.

2. Responsibilities

Faculty are responsible for:

- 1) Attending annual basic IPM training provided by the IPM Coordinator.
- 2) Keeping their classrooms and work areas free of clutter.
- 3) Making sure students clean up after themselves when food or drink is consumed in the classroom.
- 4) Reporting pests and pest-conducive conditions to the IPM Coordinator, in-person - by email - by letter. In emergency situations, by phone.

F. School Principal

1. Training/Education

(Same training/education as Faculty)

2. Responsibilities

The School Principal is responsible for:

- 1) Scheduling time for teachers to receive annual training provided by the IPM Coordinator (or designee).
- 2) Attending annual IPM training for teachers.
- 3) Assuring that teachers keep their rooms clean and free of clutter in accordance with the IPM Coordinator's instructions.
- 4) Assuring that all faculty, administrators, staff, students and parents receive the



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annual notice (provided by the IPM Coordinator) of potential pesticide products that could be used on school property as per Section VII.

5) Working with the IPM Coordinator to make sure all notifications of pesticide applications reach all faculty, administrators, staff, students and parents through posting in the front office and the e-mail system. Announcements will also be made in the school newsletter.

G. Other

1. Training/Education

Basic training on the principles of IPM and the main points of this IPM Plan should also be provided to school nurses, administrative staff, the superintendent, and students. Coaches who use athletic fields should be given an overview and updates of basic monitoring and IPM practices for turf so they understand key pest problems to look out for and when to report them.

2. Responsibilities

All other staff are responsible for keep their work areas free of clutter, and reporting pests and pest-conducive conditions to the IPM Coordinator. Students are responsible for reporting pests to their teachers.

VI. IPM PROCESS

A. Monitoring – Reporting – Action Protocol

Monitoring is the most important requirement of ORS 634.700 – 634.750. It is the backbone of Long Creek School District's IPM Program. It provides recent and accurate information to make intelligent and effective pest management decisions. It can be defined as the regular and ongoing inspection of areas where pest problems do or might occur. Information gathered from these inspections is always written down.

As much as possible, monitoring should be incorporated into the daily activities of school staff. Staff training on monitoring should include what to look for and how to record and report the information.

1. Monitoring & Reporting – All Staff

After a brief (15 – 20 minute) training by the IPM Coordinator on pests and pest-conducive conditions, staff will be expected to report pests or pest-conducive conditions they observe during the normal course of their daily work. Reporting will be done either orally, or by e-mail, using Pest Logs, or written letter to the Coordinator. .



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2. Monitoring & Reporting – Coordinator and Custodial/Maintenance Staff

During the normal course of their daily work, the IPM Coordinator and custodial/maintenance staff will monitor structures and building perimeters for:

- 1) Pest-conducive conditions inside and outside the building (structural deterioration, holes that allow pests to enter, conditions that provide pest harborage).
- 2) The level of sanitation inside and out (waste disposal procedures, level of cleanliness inside and out, conditions that supply food and water to pests)
- 3) The amount of pest damage and the number and location of pest signs (rodent droppings, termite shelter tubes, cockroaches caught in sticky traps, etc.)
- 4) Human behaviors that affect the pests (food preparation procedures, concessions procedures, classroom food, etc.)
- 5) Their own management activities (caulking/sealing, cleaning, setting out traps, treating pests, etc.) and their effects on the pest population.
- 6) Any pests or pest-conducive conditions will be reported to the IPM Coordinator either orally, or by e-mail, using Pest Logs, or written letter to the Coordinator.

3. Monitoring & Reporting – Grounds Staff

During normal daily activities, grounds staff will monitor for invasive weeds, gophers, moles, yellow jackets, and other outdoor pests. These will be reported to the IPM Coordinator orally, or by e-mail, using Pest Logs, or written letter to the Coordinator.

4. Sticky monitoring traps for insects

Sticky traps are neither a substitute for pesticides nor an alternative for reducing pest populations, but rather a diagnostic tool to aid in identifying a pest's presence, their reproductive stage, the likely direction pests are coming from, and the number of pests.

All staff will be made aware of the traps and their purpose so they don't disturb them. The IPM Coordinator and/or Custodial/maintenance staff (after proper training by Coordinator) will be responsible for setting them out and checking them once per month, and replacing them once every four months.

Sticky monitoring traps will be placed in the kitchen and any other "pest-vulnerable areas" the Coordinator deems necessary.



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Kitchen sticky insect traps will be checked monthly (primarily for drain flies, ants, and cockroaches).

5. Monitoring for Mice

In addition to monitoring for signs of mice (droppings, gnawing, hair, etc.), snap traps will be placed in the kitchen (and any other area the IPM Coordinator deems necessary), and checked monthly by the Coordinator.

6. Reporting (pests, signs of pests, and conducive conditions)

When staff observe pests or pest-conducive conditions they should tell, e-mail, jot down on Pest Logs, call the IPM Coordinator.

7. Reporting “Pests of Concern”

“A pest of concern” is a pest determined to be a public health risk or a significant nuisance pest. These include cockroaches (disease vectors, asthma triggers), mice & rats (disease vectors, asthma triggers), yellow jackets (sting can cause anaphylactic shock), cornered nutria, raccoons, cats, dogs, opossums, skunks (they can bite), and bed bugs (significant nuisance pest).

When pests of concern (or their droppings, nests, etc.) are observed, staff should contact the IPM Plan Coordinator immediately.

8. Action!

a) Structural

Any items (such as sealing up holes) that custodial/maintenance staff observe that they can resolve should be taken care of and reported to IPM Coordinator. The Coordinator will keep records of these actions using Pest Logs.

If the actions needed are not something that can be accomplished alone with minimal time, the Coordinator will meet with them to develop a plan of action with a proposed deadline for completion based on the severity of the risk or nuisance.

The Coordinator will inform the superintendent of actions being taken/work performed, and monitor the completion of all work. The Coordinator will keep records of actions taken/work performed using Pest Logs.

The Coordinator will keep records of time and money spent to manage pests.



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b) Grounds

When pests on grounds reach a threshold established by the IPM Coordinator, action will be taken as per guidelines developed by the Coordinator. The Coordinator will keep records of actions, time, and money spent to manage pests on grounds.

9. Acceptable Thresholds

A threshold is the number of pests that can be tolerated before taking action. The acceptable threshold for cockroaches, mice, rats, raccoons, cats, dogs, opossums, skunks, and nutria is 0.

Acceptable thresholds for other pests will be determined by the IPM Coordinator and the superintendent.

B. Inspections

The IPM Plan Coordinator will conduct an annual inspection using the annual IPM inspection form. During the inspection he or she will also inspect or review:

- 1) Human behaviors that affect the pests (working conditions that encourage or support pests, food preparation procedures that provide food for pests, etc.)
- 2) Management activities (caulking/sealing, cleaning, setting out traps, treating pests, etc.) and their effects on the pest population.

C. Pest Emergencies (see also Section VII. B. below)

IMPORTANT: If a pest emergency is declared, the area must be evacuated and cordoned off before taking any other steps. When the IPM Plan Coordinator, after consultation with school faculty and administration, determines that the presence of a pest or pests immediately threatens the health or safety of students, staff, faculty members or members of the public using the campus, or the structural integrity of campus facilities, he or she may declare a pest emergency. Examples include (but are not limited to) yellow jackets swarming in areas frequented by children, a nutria in an area frequented by children, a half a dozen mice or rats running through occupied areas of a school building. The Coordinator will keep records of actions taken using Pest Logs.

D. Annual IPM Report (completed by IPM Plan Coordinator)

In January of each year, the IPM Plan Coordinator will provide the school board an annual IPM report. The report will include a summary of data gathered from Pest Logs, e-mails, or Coordinator notes, as well as costs for PMPs and pesticides (including turf and landscape pesticides). Costs for items such as sealants, fixing screens, door



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sweeps and other items that would not normally be considered part of pest control will not be recorded.

Prevention and management steps taken that proved to be ineffective and led to the decision to make a pesticide application will be copied and pasted or incorporated into the annual report of pesticide applications (see section VII. D)

VII. PESTICIDE APPLICATIONS: REQUIRED NOTIFICATION, POSTING, RECORD KEEPING, AND REPORTING

Any pesticide application (this includes weed control products, ant baits, and all professional and over-the-counter products) on school property must be made by a licensed commercial or public pesticide applicator. At the beginning of each school year, all faculty, administrators, staff, adult students and parents will be given a list of potential pesticide products that could be used in the event that other pest management measures are ineffective. They will also be informed of the procedures for notification and posting of individual applications, including those for pest emergencies. This information will be provided to all the above via e-mail as well as announced in the school newsletters to adult students and parents.

A. Notification and Posting for Non-emergencies

When prevention or management of pests through other measures proves to be ineffective, the use of a low-risk pesticide is permissible. *Documentation of these measures is a pre-requisite to the approval of any application of a low-risk pesticide. This documentation will remain on file with the IPM Plan Coordinator.*

Non-emergency pesticide applications may occur in or around a school after 4:00 pm while school is in session, unless the IPM Plan Coordinator authorizes an exception. If the labeling of a pesticide product specifies a reentry time, a pesticide may not be applied to an area of campus where the school expects students to be present before expiration of that reentry time. If the labeling does not specify a reentry time, a pesticide may not be applied to an area of a campus where the school expects students to be present before expiration of a reentry time that the IPM Plan Coordinator determines to be appropriate based on the times at which students would normally be expected to be in the area, area ventilation and whether the area will be cleaned before students are present.

The IPM Plan Coordinator will give written notice of a proposed pesticide application via e-mail at least 24 hours before the application occurs.



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The notice must identify the name, trademark or type of pesticide product, the EPA registration number of the product, the expected area of the application, the expected date of application and the reason for the application.

The IPM Plan Coordinator (or a designee of the Coordinator) shall place warning signs around pesticide application areas beginning no later than 24 hours before the application occurs and ending no earlier than 72 hours after the application occurs.

A warning sign must bear the words “Warning: pesticide-treated area”, and give the expected or actual date and time for the application, the expected or actual reentry time, and provide the telephone number of a contact person (the person who is to make the application and/or the IPM Plan Coordinator).

B. Notification and Posting for Emergencies

Important Notes:

- 1) *The IPM Plan Coordinator may not declare the existence of a pest emergency until after consultation with school faculty and administration.*
- 2) *If a pesticide is applied at a campus due to a pest emergency, the Coordinator shall review the IPM plan to determine whether modification of the plan might prevent future pest emergencies, and provide a written report of such to the superintendent.*
- 3) *The school board shall review and take formal action on any recommendations in the report.*

The declaration of the existence of a pest emergency is the only time a non low-impact pesticide may be applied.

If a pest emergency is declared, the area must be evacuated and cordoned off before taking any other steps.

If a pest emergency makes it impracticable to give a pesticide application notice no later than 24 hours before the pesticide application occurs, the IPM Plan Coordinator shall send the notice no later than 24 hours after the application occurs.

The Coordinator or designee shall place notification signs around the area as soon as practicable but no later than at the time the application occurs.

Note: ORS 634.700 also allows the application of a non-low-impact pesticide “by, or at the direction or order of, a public health official”. If this occurs, every effort must be made to comply with notification and posting requirements above.



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C. Record Keeping of Pesticide Applications

The IPM Plan Coordinator shall keep a copy of the following pesticide product information on file at the head of maintenance's office at the school where the application occurred, and at the office of the IPM Plan Coordinator:

- A copy of the label
- A copy of the MSDS
- The brand name and USEPA registration number of the product
- The approximate amount and concentration of product applied
- The location of the application
- The pest condition that prompted the application
- The type of application and whether the application proved effective
- The pesticide applicator's license numbers and pesticide trainee or certificate numbers of the person applying the pesticide
- The name(s) of the person(s) applying the pesticide
- The dates on which notices of the application were given
- The dates and times for the placement and removal of warning signs
- Copies of all required notices given, including the dates the IPM Plan Coordinator gave the notices

The above records must be kept on file at the head maintenance's office at the school where the application occurred, and at the office of the IPM Plan Coordinator, for at least four years following the application date.

D. Annual Report of Pesticide Applications

In January of each year, the IPM Plan Coordinator will provide the school board and the OSU School IPM Program Coordinator an annual report of all pesticide applications made the previous year. The report will contain the following for each application:

- The brand name and USEPA registration number of the product applied
- The approximate amount and concentration of product applied
- The location of the application
- The prevention or management steps taken that proved to be ineffective and led to the decision to make a pesticide application
- The type of application and whether the application proved effective



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VIII. APPROVED LIST OF LOW-IMPACT PESTICIDES

Note: All pesticides used must be used in strict accordance with label instructions.

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

- (a) Contain a pesticide product or active ingredient that has the signal words “warning” or “danger” on the label;
- (b) Contain a pesticide product classified as a human carcinogen or probable human carcinogen under the United States Environmental Protection Agency 1986 Guidelines for Carcinogen Risk Assessment; or
- (c) Contain a pesticide product classified as carcinogenic to humans or likely to be carcinogenic to humans under the United States Environmental Protection Agency 2003 Draft Final Guidelines for Carcinogen Risk Assessment.

As a part of pesticide registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) and re-registration required by the Food Quality Protection Act (FQPA), EPA Office of Pesticide Programs (OPP) classifies pesticide active ingredients (a.i.) with regards to their potential to cause cancer in humans. Depending on when a pesticide active ingredient was last evaluated the classification system used may differ as described above.

The National Pesticide Information Center (<http://npic.orst.edu/>) can be contacted at 1.800.858.7378 or npic@ace.orst.edu for assistance in determining a pesticide a.i. cancer classification.

The most current list of approved low-impact pesticides is available in the central office.