

# **Hampshire College Structural Pesticide Use Policy**

## **I. Objectives**

The College is committed to using Integrated Pest Management programs and procedures for control of structural pests across all areas of campus.

Integrated Pest Management (IPM) is an effective and sustainable approach to managing structural pests. IPM uses comprehensive information on the life cycles of pests and their interaction with the environment to manage pest damage with the least hazard to people, property, and the environment.

The objectives of structural pest management on campus include:

- Safeguard individual and community health
- Protect college facilities from structural damage
- Communicate with the community regarding pesticide use on campus

Pest control at the Children's Center must comply with the IPM Plan specific to that facility.

## **II. IPM Control Methods**

Integrated Pest Management (IPM) emphasizes prevention and elimination of pest conditions. In the IPM process, monitoring and interpretation of data collected provides estimates of pest populations in a given area. Monitoring allows accurate decisions to be made about what type of intervention measures may be needed and when is the optimum time to apply them.

When chemical pesticides are necessary, a preference is given to materials and methods that maximize public safety and reduce environmental risk.

IPM pest controls include cultural, physical, biological, and chemical methods.

1. Cultural – avoidance of situations that create favorable conditions for pests (e.g., types of foundation plantings)
2. Physical – removal of insects at various stages when numbers permit
3. Biological – use of beneficial insects, nematodes, fungal and bacterial agents that feed on, control or inhibit growth/spread/development of various pests.
4. Chemical – use of synthetic pesticides, and may include organic, natural or inorganic materials applied as sprays, powders, granules, etc.

The above list is prioritized from first defense to last resort, realizing that there may not be options within each of the above approaches in dealing with each pest.

Additional methods for IPM Control of Structural Pests include:

1. Building design and maintenance – preventing pest entrance through placement and maintenance of structural barriers and eliminating harborage areas.
2. Building operations – preventing pest entrance through open doors or windows and the introduction of pests on materials brought into the building, and maintaining sanitation levels to avoid conditions attractive to pests.

### **III. Structural IPM Implementation**

All reports of interior or exterior building pests are referred to the Manager of Custodial Services.

The Manager of Custodial Services will engage the services of a licensed pest control contractor with experience in IPM controls to conduct inspections, identify the pests, monitor the population, make recommendations and implement control practices in accordance with IPM principles.

Should chemical control be necessary, the contractor will consult with the Manager of Custodial Services providing the coordinator with:

- treatment recommendations
- a Material Safety Data Sheet (MSDS) for the proposed product(s)
- a plan for communicating the treatment with potentially affected community members

The Manager of Custodial Services will provide the MSDS to the Director of Environmental Health & Safety and consult with her/him prior to approving treatment. For residential areas, the Director of Housing Operations will also be provided the MSDS and consulted. Certain routine applications may receive preapproval.

#### **A. Notification and Recordkeeping**

The following requirements will be followed regarding notification of occupants of the spaces to be treated and recordkeeping.

##### **Residential Areas**

All residents will be pre-notified between seven days and 48 hours before treatment in residential area (includes common areas). Pre-notification will be made in writing to Housing Operations who will distribute it to all residents of the affected area. Housing Operations will post notices on room, mod or building doors.

The notification provided by the contractor and passed on to residents by Housing Operations must include:

- the contractor name and phone number
- proposed date and time of the application
- locations to be treated
- product name

- EPA registration number and active ingredients
- purpose of the application
- preparation procedures to protect items such as food and utensils
- a state approved Consumer Information Bulletin
- requirements for isolation (not entering the space) of the after treatment

Housing Operations will provide a copy of the notice and the date on which it was posted to the Manager of Custodial Services. The contractor will not proceed with treatment until provided a copy of the notification to residents or a signed statement by the College that the notification has occurred.

The contractor will leave the notices posted after application. Housing Operations will remove the notices after 24 hours or the isolation period whichever is longer.

Any resident concerns and requests to reschedule the application should be made to Housing Operations within 24 hours of posting of the notice. The Director of Housing Operations will bring those concerns to the Manager of Custodial Services and Director of Environmental Health & Safety for resolution. While the College will attempt to accommodate such requests, it reserves the right to treat areas to protect community health and building integrity.

### **Non-Residential Area**

The Manager of Custodial Services will post signs on the entrances to any non-residential areas to be treated at least 24 hours prior to treatment with the information described about under Residential Areas. A community member may request notice of 48 hours to seven days for a particular area that contains their office or which they frequent by submitting a written request to the Manager of Custodial Services.

The contractor will not proceed with treatment until provided a copy of the notification to residents or a signed statement by the College that the notification has occurred.

### **Emergency Applications**

Pre-notification may be waived when there is an immediate threat to public safety or health as determined jointly by the Director of Environmental Health & Safety and Director of Facilities Management with notification to the Director of Housing Operations and Dean of Students for all residential areas.

### **Recordkeeping**

For all chemical control applications, a log book of all control activities on campus is kept at Facilities & Grounds. Log book entries will include: name and company phone number, name and license of applicator, target pest, name and EPA registration number of the pesticide product. The log book will be divided into sections by residential area and non-residential.

### **Exempt Applications**

Applications of disinfectants, algaecides, antimicrobials, paints, stains, wood preservatives and insecticidal baits in tamper-resistant bait stations or in generally inaccessible locations such as wall and floor voids do not require the notification procedures described above. Record-keeping procedures will continue to apply.

#### **IV. Over-the-Counter Pesticides**

No over-the-counter pesticides will be stored or used in campus structures without permission of the Manager of Custodial Services with the exception of mosquito/tick repellants. Applications of EPA registered pesticides will only be done by a licensed applicator. Use of non-toxic products such as carbon dioxide hornet sprays, antimicrobials (disinfectants), and physical pest control devices (e.g., mouse traps) are not restricted by this Plan.

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