
INDOOR INTEGRATED PEST MANAGEMENT (IMP) PLAN

GOALS:

Reduce the exposure of building occupants and maintenance personnel to potentially hazardous chemical, biological, and particulate contaminants that adversely affect air quality, human health, building finishes, building systems, and the environment.

SCOPE:

Indoor Integrated Pest Management (IMP) is a process for achieving long term, environmentally sound, pest suppression through the use of a wide variety of technological and management practices. Control techniques in an IPM program extend beyond the application of pesticides to include structural and procedural modifications that reduce the food, water, harborage, and access by pests.

RESPONSIBLE PARTY:

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RESOURCES and IMPLEMENTATION:

Pest Control Plan

Prior to executing a Pest Control Plan, conduct a thorough, initial inspection of each building or site within ten (10) working days after the effective date of the contract. The purpose of the initial inspection is for the IMP Provider to identify problem areas and any equipment, structural features, or management practices that are contributing to pest infestations.

The Pest Control Plan shall consist of four parts:

Proposed methods for control:

- Protocol shall include labels and Material Safety Data Sheets (MSDS), for all pesticides to be used.
- A list of brand names of rodent bait boxes, insect and rodent trapping devices, and pest monitoring devices shall also be included in the program.
- Other control devices or equipment should also be included.

A service schedule for Building 1059:

- Schedule shall indicate the frequency for the specific pest control needs.
- Inspections shall be conducted monthly to determine if treatment is required.

A description of any structural or operational changes that would facilitate the pest control effort.

A copy of the Commercial Pesticide Applicator Certificate or License is required for every contract service provider who will be performing on-site service. At the minimum, the IMP Provider shall submit the certificates of two individuals, one acting as a regular service representative and the other acting as an alternate.

It shall be the IMP Provider's responsibility to carry out work according to the approved Pest Control Plan for building 1059. The IMP Provider shall receive the concurrence of the Complex Facilities Manager prior to implementing any subsequent changes to the approved Pest Control Plan, including additions or replacements to the pesticide list and to on-site service personnel.

Schedule of Notification:

- Routine applications of least toxic pesticide shall be established in a schedule agreed upon by the CFM. The CFM shall be notified by e-mail prior to changes to the schedule.
- Treatments requiring pesticides more than the least toxic shall not be made prior to 72 hour direct notification by telephone to the CFM.
- An emergency application of pesticides may be made with 24 hours notice to CFM and housekeeping and maintenance staffs. Emergency treatments shall be considered:
 - To control swarms of biting or stinging insects
 - Insects/vermin causing immediate damage or infestation to the structure
 - Situations deemed by health officials or other authorities having jurisdiction to be a threat to the health and welfare of building occupants
- The CFM will notify all building occupants of pending treatments by a maintained email notification list.

Pesticide Application:

The IMP Provider shall not apply any pesticide that has not been included in the Pest Control Plan or approved in writing by the CFM.

- Pesticide application shall be according to need and not by schedule. As a general rule, application of pesticides in any area inside or outside the premises shall not occur unless visual inspections or monitoring devices indicate the presence of pests in that specific area.
- Preventative pesticide treatments of areas where inspections indicate a potential insect or rodent infestation are acceptable on a case-by-case basis. Written approval must be granted by the CFM prior to any preventative pesticide application.
- The IMP Provider shall not store any pesticide product on Government property.

Insect Control:

Non-Pesticide Products and Use:

The IMP Provider shall use non-pesticide methods of control wherever possible. For example:

- Portable vacuums, rather than pesticide sprays, shall be used for initial clean-outs of cockroach infestations, for swarming (winged) ants and termites, and for control of spiders wherever appropriate.
- Trapping devices rather than pesticide sprays shall be used for indoor fly control wherever appropriate.
- Sticky traps shall be used to guide and evaluate indoor pest control efforts wherever necessary.

Pesticide Products and Use:

- When it is determined that a pesticide must be used in order to obtain adequate control, the IMP Provider shall employ the least hazardous material, most precise application technique, and minimum quantity of pesticide necessary to achieve control.
- The IMP Provider shall be responsible for application of pesticides according to the label. All pesticides used by the IMP Provider must be registered with the Environmental Protection Agency (EPA), state and/or local jurisdiction. Transport, handling, and use of all pesticides shall be in strict accordance with the manufacturer's label instruction and all applicable Federal, state, and local laws and regulations.
- The IMP Provider shall minimize the use of liquid pesticide applications wherever possible. For example:
 - Containerized and other types of bait formulations rather than sprays shall be used for cockroach and ant controls wherever appropriate. Bait formulations are considered to be the standard for typical office space.
 - As a general rule, liquid, aerosol, or dust formulations rather than sprays shall be applied only as crack and crevice treatments with application devices specifically designed or modified for this purpose. "Crack and crevice treatment" is defined as an application in which the stream of pesticide is never visible.
 - Application of pesticide liquid, aerosol, or dust to exposed surfaces, and pesticide space sprays (including fogs, mists, and ultra-low volume applications), shall be restricted to unique situations where no alternative measures are practical.
- The IMP Provider shall obtain the approval of the CFM prior to any application of pesticide liquid, aerosol, or dust to exposed surfaces, or any space spray treatment.
- The IMP Provider shall take all necessary precautions to ensure tenant and employee safety, and all necessary steps to ensure containment of the pesticide to the site of application. Other than crack and crevice treatments, no liquid, aerosol, or dust applications shall be made while tenant personnel are present.

Rodent Control:

Non-Pesticide Products and Use:

- As a general rule, rodent control inside occupied building shall be accomplished with trapping devices only.
- All such devices shall be concealed out of the general view and in protected areas so as to not be affected by routine cleaning and other operations.
- Trapping devices shall be checked on a schedule approved by the CFM. Trapping shall not be performed during periods when maintenance will be delayed by holidays, weekends, etc.
- The IMP Provider shall be responsible for disposing of all trapped rodents and all rodent carcasses in an appropriate manner.

Pesticide Products and Use:

- In exceptional circumstances, when rodenticides are deemed essential for adequate rodent control inside occupied buildings, the IMP Provider shall obtain the approval of the CFM prior to making any interior rodenticide treatment.
- All rodenticides, regardless of packaging, shall be placed either in locations not accessible to children, pets, wildlife, and domestic animals, or in EPA-approved tamper-resistant bait boxes.
- Frequency of bait box servicing shall depend upon the level of rodent infestation. All bait boxes shall be maintained in accordance with EPA regulations, with an emphasis on the safety of non-target organisms. The IMP Provider shall adhere to the following:
 - All bait boxes shall be placed out of the general view, and in locations where they will not be disturbed by routine operations, and should be monitored for signs of a pest problem.
 - The lids of all bait boxes shall be securely locked or fastened shut.
 - All bait boxes shall be securely attached or anchored to the floor, ground, wall, or other surface, so that the box cannot be picked up or moved.
 - Bait shall be solid blocks and shall be placed in the baffle-protected feeding chamber of the box, and never in the runway of the box.
 - All bait boxes shall be labeled with the IMP Provider's business name and address, and dated at the time of installation and servicing.
 - As a general rule, rodenticide application outside buildings shall emphasize the direct treatment of rodent burrows wherever feasible. The IMP Provider shall be responsible for notifying the CFM about the location of all rodent burrows on the premises that must be filled.
- No second generation rodenticides shall be used.

PERFORMANCE MEASUREMENT:

The Complex Facilities Manager will continually evaluate the progress of this IPM in terms of effectiveness and safety, and will implement such changes as are necessary. The vendor will adjust practices to adhere to IPM policies.

- The Complex Facilities Manager shall require that all vendors and parties who apply pesticides comply with all of the IPM specifications in this policy.
- Pesticide applicators must be educated and trained in the principles and practices of IPM.
- Use pesticides as approved by the Complex Facilities Manager.
- Furnish all supervision, labor, materials, and equipment necessary to accomplish the monitoring, trapping, pesticide application, and pest removal components of the IPM program. Provide detailed, site-specific recommendations for structural and procedural modifications to aid in pest prevention.
- Records will be kept on the number of pests or other indicators of pest populations both before and after any treatments.
- The Complex Facilities Manager shall tour the premises quarterly with the pest control vendor and review inspection logs to determine if any modifications to the plan should be made. Vendor shall provide a log of each visit indicating observations of pest activities and actions taken. The log shall provide the following information:
 - Species and numbers of each trapped
 - Rodent feeding activities
 - Damages caused by pests
 - Treatments deployed
- Refer to Exterior Integration Pest Management Plan and coordinate efforts for pest control.

QUALITY ASSURANCE and CONTROL PROCESSES:

Record Keeping:

The IMP Provider shall be responsible for maintaining a pest control logbook or file for each building or site specified in this contract. These records shall be kept on Government property and maintained on each visit by the IMP Provider. Each logbook or file shall contain at least the following items:

- A copy of the Pest Control Plan for the building or site, including labels and MSDS information for all pesticides used in the building, and the IMP Provider's service schedule for the building.
- The CSC copies of GSA Form 3638, Pest Control Work and Inspection Report, or an equivalent. These forms will be supplied to the IMP Provider by the CFM, and will be used to advise the IMP Provider of routine service requests and to document the performance of all work, including emergency work. Upon completion of a service visit to the building, the IMP Provider's representative performing the service shall complete, sign, and date the Form 3638, and return it to the logbook or file on the same or succeeding day of the services rendered.

- The IMP Provider's Service Report Form, documenting all information on pesticide application is required by statute in the jurisdiction where service is actually performed. These forms shall not be mandatory if all required information on pesticide application is included on the Government's Pest Control Work and Inspection Report.

REFERENCES:

Bio-Integral Resource Center:
www.birc.org

San Francisco Pest Management Program:
www.sfenvironment.org/our_programs
www.up3project.org/documents/2007rpplbyaicomplete.pdf

National Pesticide Information Center
<http://npic.orst.edu/>

Integrated Pest Management in Schools: EPA
www.epa.gov/pesticides/ipm

Green Shield Certified Pest Management
www.greenshieldcertified.org