

Using Pesticides Safely & Legally In Washington State's Public Schools

Licensing, Notification, Posting, Records, Application, Storage



The information contained in these slides is based on inspections conducted by the WSDA in Washington public schools from 2004 to 2015. Highland School House, 1905

Elements of a WSDA Inspection

1. Who uses pesticides at school?
2. Notifications
3. Posting
4. Recordkeeping
5. Pesticide storage
6. Application equipment



There are six general areas included in school inspections.

Elements of a WSDA Inspection

1. Who uses pesticides at school?

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The first step in an inspection is determining who uses pesticides.

Do you use pesticides?

- Groundskeeper
- Horticulture/Agriculture/Science teachers & students
- Custodians
- Coaches & student athletes/trainers
- Volunteers
- Commercial applicators

Typically the inspection starts with the groundskeeper(s).

Do you use pesticides?

- What kind of spray equipment is used?
 - If a powered (motorized) apparatus is used, does the applicator have a license?



- Supervision – voice & visual contact at all times

If non-motorized equipment is used and only General Use pesticides are applied, then school employees do not need a WSDA pesticide license. If motorized apparatus are used or if Restricted Use Pesticides are applied, then the applicator must be licensed. Any sprayer with a motor (electric or gas) or any spray equipment that it is towed by a motorized vehicle is considered to be a powered apparatus. A school employee needs a pesticide license if using a drop spreader that is towed by a lawnmower to apply weed and feed. An unlicensed school district employee can use a powered apparatus or a Restricted Use Pesticide as long as that person is under the direct supervision of a licensed employee of the same school district. Direct supervision at a school means the unlicensed applicator can be seen and heard by the licensed employee at all times.

Do you use pesticides?

- What pesticides are applied?

- General Use



- Federal Restricted Use?



General Use Pesticides can be applied by an unlicensed person using a manual sprayer such as a backpack sprayer. If a General Use Pesticide is applied with a powered sprayer, a license is required. Using any type of equipment to apply a Federal Restricted Use Pesticide requires a license.

State Restricted Use Pesticides

- Described in WAC 16-228-1231
- Strychnine – all products
- Aquatic use – such as lakes, rivers, & ponds
- Clopyralid – cannot be applied to lawns & turf at school

In the state of Washington, WAC 16-228-1231 details what pesticides are declared state restricted use. Included are all pesticides containing the active ingredient strychnine, pesticides labeled for aquatic uses (excludes pesticides intended for sites such as swimming pools, wholly impounded ornamental pools, etc.), and pesticides containing clopyralid.

Phenoxy-Hormone Type Herbicides

- Larger than 1 gal = Use Restricted in all counties east of the crest of the Cascades.
- For example, a license is required to purchase a 2.5-gal container of Banvel or two or more 1-gal containers of 2,4-D at the same time.



2.5 gal.



2 x 1.0 gal.

WAC 16-228-1231 also declares phenoxy-hormone type herbicides (e.g. 2,4-D, 2,4-DB, 2,4 DP, MCPA, MCPB, MCPP) and dicamba as state restricted use. A WSDA pesticide license is needed to purchase or apply phenoxy-hormone type herbicides and dicamba in quantities larger than one gallon. Ready-to-use liquid formulations in quantities of 5 gallons or less are exempted from this restriction.

State RUPs - Groundwater

Atrazine*	Metolachlor
Bromacil	Metribuzin
DCPA	Picloram*
Disulfoton*	Prometon
Diuron	Simazine
Hexazinone	Tebuthiuron



* Federal Restricted Use Pesticide

WAC 16-228-1231 also includes pesticides that have been declared Restricted Use due to their ability to contaminate groundwater. Most state restricted use pesticides are not federal restricted use pesticides. The list on this slide includes all active ingredients that have been declared Washington state Restricted Use Pesticides due to groundwater concerns.

License Categories for Schools

- Turf & Ornamental Weed – weeds & moss in ornamental and turf situations, vacant lots, and open, noncrop waste areas
- Ornamental Insect & Disease - insects and diseases in ornamental, turf, and rights of way situations
- PCO General - insects, spiders, birds, rodents, and animal pests in and around public buildings and grounds
- PCO Structural - structurally destructive pests (fungus, termites, carpenter ants, carpenter bees, and wood-boring beetles)
- Public Health Control – mosquitoes
- Structural & Turf Demossing – control of moss on structures and turf

The license a public school employee is required to hold when using a powered apparatus or when using Restricted Use Pesticides is a Public Operator license. In addition to the Public Operator license, an employee must have the category of all areas in which pesticides are applied. For example, Turf & Ornamental Weeds is needed for herbicide applications to turf at school with a powered apparatus or with a Restricted Use Pesticide. A Pest Control Operator (PCO) category is needed when using a powered apparatus to apply an insecticide to control yellow jackets on playground equipment or building eaves.

Are commercial applicators used?

- If so, do you know when they will be at the school?
- Is notification provided?
- Is the site posted?
- Do they leave an application record?



If commercial applicators are used, it is important to know when they will be at the school to make applications. If the applications are made when students are present or will be present within 48 hours of the application, notification is needed. If the school district depends on the commercial applicator to post applications sites, does anyone follow up with the applicator to make sure the sites are posted? It is also a good idea to put in the contract with the commercial applicator the requirement to leave a copy of the application record with the school before leaving. Immediate access to the record will enable the school to provide the information to an emergency medical provider in case anyone complains of illness due to the application.

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There are two notifications that a school must use. One is the annual notification and the other is the 48-hour pre-notification.

Annual Notification

- This notification is a statement of a school's pest control policies & methods; it must describe notification & posting requirements.
- It no longer has to be sent home every year; it must only be provided to interested parents & employees.
- However, parents & employees should be told that it is available & how to obtain it.

The annual notification describes how a school district manages pests. It should mention commonly used pesticides, who applies them, and how people will be notified before and after applications. Parents and employees no longer have to be provided a written annual notification every year. School districts only need to tell people that it is available and how to obtain it.

48-hr Pre-Notification

- Groundskeepers
- Custodians (anti-microbial pesticides are exempt)
- Horticulture/Agriculture/Science teachers
- Commercial applications
- Coaches
- Volunteers

The second notice that a school is required to provide is the 48-hour pre-notification. This notification is required for applications made by any of the people on this slide if students or employees will occupy the school within 48 hours of the application.

48-hr Pre-Notification

- Main office
- Exact verbiage
- At least 48-hrs in advance
- 2 days to complete

NOTICE: PESTICIDE APPLICATION

Product(s) Name: Raid Ant and Roach Killer

Date and Time of Application: September 27, 2002
6 PM

Location: Under sink in Classroom 104
Baseboards in gym and kitchen

Pest(s) to be controlled: Cockroaches

Contact Person: Bob Smith
District 5 Maintenance Director
509-333-2121

The notification must be posted in the main office. Many schools also post it in on building entry doors. An application can be made up to 48 hours after the date and time indicated on the notice. For example, if an application is intended to be made on Monday at 8 a.m. and adverse weather prevents the application, the application can be made on Tuesday or before 8 a.m. on Wednesday without having to provide notification again. If the application can't be made within 48 hours of the stated time on the notice, then another 48-hour pre-notification must be provided before the application can be made.

48-hr Pre-Notification Exemptions

- No students or employees at the school for 48 consecutive hours
- Entry into the treated area can be prevented (e.g. locked building)
- Insect or rodent baits placed out of the reach of children (e.g. gels or crack & crevice treatments behind the stove)

RCW 17.415, the notification and posting law, was intended to protect both students and employees, so if staff will be at the school within 48 hours of the application, advance notification is needed. If entry into a treated area can be prevented for 48 hours, then advance notification is not needed. For example if an application is made to a sports field inside of a fenced and locked stadium, then notification is not needed. If a teacher applies a pesticide inside of a greenhouse and the greenhouse is locked afterwards, advance notification may still be needed since multiple people, such as other teachers, custodians, maintenance personnel, and administrators may still have keys and the need to enter the greenhouse.

WSDA Sensitive Persons Registry

- Certified applicators making a landscape application or right-of-way application must provide notification at least 2 hr prior to the application.
- In writing, in person, or by telephone.
- If absent or inaccessible, written notice at time of application.
- Lists sent annually to certified applicators.

Certified applicators making landscape or right-of-way applications are required to notify any person registered with the department as a pesticide-sensitive person when making pesticide applications to the properties adjacent to (for landscape applications) or within one half mile of (for right-of-way applications) properties of pesticide-sensitive people. Every year, the WSDA will provide certified applicators with a Sensitive Persons Information List and an Adjacent Property List. Check the Adjacent Property List to see if your schools are included in the addresses; if so, notification of a pesticide-sensitive person will be required.

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There are two types of posting signs used for school applications. One is for landscape applications and one is for facility applications.

Posting the Application Site

- All sites must be posted, even if school is not in session
- Post at the time of application
- Signs remain for 24 hours
- Exemptions:
 - Antimicrobial pesticides (e.g. disinfectants)
 - Baits placed out of the reach of children



The two types of pesticide applications that do not need to be posted are application of antimicrobial pesticides and baits placed out of the reach of children. All other sites must be posted, even if school is not in session. The sites must be posted at the time of application and must remain posted for at least 24 hours.

Landscape Application

- Pesticide applied to a plant outside
- Minimum: 4" x 5"
- Contrasting color
- Main points of entry
- Commercial applicators must post their own landscape applications



A landscape application refers to a pesticide applied to an exterior landscape area around residential property, commercial properties such as apartments or shopping centers, parks, golf courses, schools including nursery schools and licensed day cares, or cemeteries or similar areas. This definition excludes commercial pesticide applicators making structural applications. The sign must be in contrasting colors and it must be placed at the main points of entry to the treated area. The sign must be worded as shown on the flag in the slide.

Facility Application

- Pesticide applied to a structure
- Minimum: 8 ½" x 11"
- Contrasting color
- At the application site
- School must post all facility applications, including those of a commercial applicator

NOTICE: PESTICIDE APPLICATION

Product(s) Name:	<u>Raid Ant and Roach Killer</u>
Date and Time of Application:	<u>September 27, 2002</u> <u>6 PM</u>
Location:	<u>Under sink in Classroom 104</u> <u>Baseboards in gym and kitchen</u>
Pest(s) to be controlled:	<u>Cockroaches</u>
Contact Person:	<u>Bob Smith</u> <u>District 5 Maintenance Director</u> <u>509-333-2121</u>

A facility application refers to a pesticide applied to a structure. An example is an insecticide applied to the exterior foundation of a building for spider or termite control. The sign must be posted at the application site. Schools are responsible for posting facility applications made by a commercial applicator. Schools can arrange to have a commercial applicator post the required sign; however, the school is ultimately responsible for the posting. The sign must be worded as shown in the slide and include product name, date and time of application, location, pest, and a contact person's name and phone number.

Emergency Applications

- Immediate threat to human health
- Procedure:
 - Post
 - Notify
 - Record
- Bed bugs, non-stinging ants, lice, & poisonous plants are not an emergency



An emergency application is a pesticide applied to a pest that represents an immediate threat to human health. Such pests include stinging pests such as wasps and black widow spiders. Poisonous plants are not an emergency since they remain poisonous after spraying. If poisonous plants really are a safety issue then they should be physically removed from the site. After a pesticide is applied for an emergency situation, the site must be posted, notification must be provided, and licensed applicators must make a record of the application.

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Application Records

- Licensed applicators must keep records of all pesticides they apply & supervise at school (including baits & emergency applications).
- Regardless of license status, records of all landscape applications must be made. Landscape applications include herbicides, insecticides, plant growth regulators, and fungicides applied to exterior landscape plants.

Application Records

- Completed on day of application
- Single record for each location/day
- Kept for 7 years
- No specific form required; however, they must be submitted to the WSDA on an approved or adopted form

Recordkeeping Software

- Tracks pesticide use
- Generates reports:
 - Total pesticides used
 - Applications by site
 - Applications by pest
 - Annual summary
- View all database records

The screenshot displays a web-based form titled "WHO APPLIED THE PESTICIDE?". The form includes several input fields and dropdown menus for recording application details. Key fields include: "Pesticide Applicator" (dropdown), "WSDA License #", "Pest Control Company (if applicable)", "Site/Facility" (dropdown), "Specific Location" (dropdown), "Application Date" (calendar), "Start Time" and "End Time" (time pickers), "Temperature", "Wind Direction", "Wind Speed", and "Pest Treated" (dropdown). There are also fields for "Size of Area Treated" and "Applicator License". A "Comments" text area is provided for additional notes. Below these fields are sections for "Product" (dropdown), "Amount of Product Used", "Concentration Used", "EPA #", "Amount of Mixture Used", and "Pesticide Rate". Navigation buttons at the bottom include "Class Form", "Add Application", and "Delete Application".

- Old version:
<http://agr.wa.gov/PestFert/Pesticides/Schools.aspx>
- New & improved version: <http://schoolipm.wsu.edu/>

Records can be kept in an electronic format and can be submitted to the WSDA as the official record.

State of Washington Department of Agriculture Olympia, Washington 98504		PESTICIDE APPLICATION RECORD (Version 1)	
NOTE: This form must be completed same day as the application and it must be retained for 7 years (Ref. chapter 17.21 RCW)			
1. Date of Application - Year:	2008	Month: April	Day: 24
		Start Time: 8:15	Stop Time: 12:30
2. Name of Person for whom the pesticide was applied:	Anytown School District		
Firm Name (if applicable):			
Street Address:	123 Main St.		
	City: Anytown	State: WA	Zip: 99166
3. Licensed Applicator's Name (if different from #2 above):	Timothy Timber		
	License No 88888		
Firm Name (if applicable):	Same as #2		
Tel. No.:	555-999-0000		
Street Address:	Same as #2		
	City:	State:	Zip:
4. Name of person(s) who applied the pesticide (if different from #3 above):	Oak Wood		
	License No(s), if applicable:		
5. Application Crop or Site:	Parking lots, shrub beds, turf, building exterior		
6. Total Area Treated (acre, sq. ft., etc.):	1 acre (Include units. DO NOT record as only one measurement of linear feet.) or "Spot treatment" if made as a spot treatment and total area is not determined		
7. Was this application made as a result of a WSDA Permit?	<input type="checkbox"/> No <input type="checkbox"/> Yes (if yes, give Permit No.) #		

Information that must be on the record includes:

- Year, month, day, and start and stop time of the application.
- School District's name and address.
- Names of all people making the application, including the supervising licensed applicator if there is one. If a record is made of applications in a greenhouse and students make the application (for example, students may apply a rooting hormone when planting cuttings), the students names must be on the record.
- License number (if applicable) and telephone number of the applicator.
- Crop (poinsettias grown in the greenhouse) or Site (turf, parking lot, sidewalk, shrub bed, swing set).
- Total Area Treated – Record as a measurement of area (e.g. acres or square feet). If the application is made as a spot treatment, then record "Spot Treatment."

a) Full Product Name	b) EPA Reg. No.	c) Total Amount of Pesticide Applied in Area Treated	d) Pesticide Applied/Acre (or other measure)	e) Concentration Applied
Roundup Pro	524-475	32 oz	1 qt / acre	2 oz / gal
			/	
			/	
			/	

9. Address or exact location of application. NOTE: If the application is made to one acre or more of agricultural land, the field location must be shown on the map on page two of this form.
Marble Elementary, 345 1st St., Anytown, WA. Main parking lot and shrub beds (see map).

10. Wind direction and estimated velocity (mph) during the application: **NW, 3-4 mph**

11. Temperature during the application: **65-70 F**

12. Apparatus license plate number (if applicable):

13. Air Ground Chemigation

14. Depth of application / inches of water (chemigation):

15. Miscellaneous information: **Backpack sprayer**

Form AGR 4226 (Rev. 5/03)

- Complete product name. For example Roundup Pro instead of just Roundup. Also include formulation (e.g. Snapshot 2.5TG instead of just Snapshot).
- EPA Registration Number (not the EPA Establishment Number) or state registration number for minimum risk pesticides (such as those containing only citric acid) or adjuvants.
- Total amount of the pesticide applied; this refers to the actual amount of undiluted product, not the total amount of mix applied.
- Rate is the amount of undiluted product applied per unit of area. Examples are pints per acre, fl. ounces per 1000 sq ft., etc. If total area treated is not known, then rate cannot be determined.
- Concentration of the undiluted product in the mix (not the concentration of the active ingredient in the product). It can be recorded as volume to volume (e.g. 2 fl. Oz per gal), weight to volume (e.g.. pounds per 100 gallons), as a percentage, or as volume of mix applied per unit of area (e.g. 20 gallons per acre).
- Address or exact location – must record more than just the school name (e.g. of inadequate information: baseball field at Washington High School) (e.g. of adequate information – baseball field at Washington High School, 2345 S. Cleveland St, Burlington). If using an aerial photograph to show where the application was made, include the address of the site and highlight treated areas.
- Record the direction from which the wind is coming and wind speed in miles per hour. Do not use subjective terms such as “calm” or “no wind”. If there really is no

wind, record wind speed as 0 mph. If wind speed is variable in direction or speed, give the range (e.g. N to NW or 0-2 mph).

- Miscellaneous information - It is not required to indicate the type of equipment used for the application but it is very helpful in trying to interpret a record.

a) Full Product Name	b) EPA Reg. No.	c) Total Amount of Pesticide Applied In Area Treated	d) Pesticide Applied/Acre (or other measure)	e) Concentration Applied
Casoron 4G	400-168	10 lbs	100 lbs / acre	100%
			/	
			/	
			/	

9. Address or exact location of application. NOTE: If the application is made to one acre or more of agricultural land, the field location must be shown on the map on page two of this form.

Marble Elementary, 345 1st St., Anytown, WA. Main parking lot and shrub beds (see map).

10. Wind direction and estimated velocity (mph) during the application: **NW, 3-4 mph**

11. Temperature during the application: **65-70 F**

12. Apparatus license plate number (if applicable):

13. Air Ground Chemigation

14. Depth of application / inches of water (chemigation):

15. Miscellaneous information: **Hand-held shaker**

Form AGR 4226 (Rev. 5/03)

When making a record of a pesticide that is applied undiluted such as a granular herbicide, concentration is always 100%.

a) Full Product Name	b) EPA Reg. No.	c) Total Amount of Pesticide Applied In Area Treated	d) Pesticide Applied/Acre (or other measure)	e) Concentration Applied
Trimec Classic	2217-543	8 pts	4 pts / acre	20 gal/acre
			/	2.5%
			/	4 pts/20 gal
			/	

9. Address or exact location of application. NOTE: If the application is made to one acre or more of agricultural land, the field location must be shown on the map on page two of this form.

Marble Elementary, 345 1st St., Anytown, WA. Soccer fields.

10. Wind direction and estimated velocity (mph) during the application: **NW, 3-4 mph**

11. Temperature during the application: **65-70 F**

12. Apparatus license plate number (if applicable):

13. Air Ground Chemigation

14. Depth of application / inches of water (chemigation):

15. Miscellaneous information: **100-gallon slip tank in pickup with 6-nozzle boom**

Form AGR 4226 (Rev. 5/03)

Concentration can be recorded in different ways.

a) Full Product Name	b) EPA Reg. No.	c) Total Amount of Pesticide Applied in Area Treated	d) Pesticide Applied/Acre (or other measure)	e) Concentration Applied
Enforcer Flying Insect Killer III	40849-4	2 oz	2 oz / 4 ft²	100 %
			/	
			/	
			/	

9. Address or exact location of application. NOTE: If the application is made to one acre or more of agricultural land, the field location must be shown on the map on page two of this form.

Marble Elementary, 345 1st St., Anytown, WA. Swing set in playground.

10. Wind direction and estimated velocity (mph) during the application: **NW to NE, 3-4 mph**

11. Temperature during the application: **65-70 F**

12. Apparatus license plate number (if applicable):

13. Air Ground Chemigation

14. Depth of application / inches of water (chemigation):

15. Miscellaneous information: **Aerosol can**

Form AGR 4226 (Rev. 5/03)

When making a record of an aerosol pesticide application such as a wasp spray, just estimate the amount of product that was applied. Since an aerosol pesticide is applied undiluted, the concentration must be recorded as 100%.

Remember that when completing a record, it is not enough to just fill in all of the blanks; you must make sure that what you record makes sense. Do not leave any room for misinterpretation because that misinterpretation may not go in your favor.

Records - Label Evaluation

- Site
- Rate
- PPE
- Storage
- Disposal



Outdoor
insecticide
used
indoors

It is important to keep accurate records since the information can be used to determine if a pesticide is used according to label directions. Labels include information such as site, rate, personal protective equipment, storage, and disposal. During a school inspection, information on all of these areas is later used to help evaluate an application.

What is allowed on a label?

- Apply at any dosage, concentration, or frequency less than that specified on the label
- Apply against any target pest not specified on the label
- Apply by any method not prohibited by the label
- Mix with another pesticide or a fertilizer unless prohibited by the label

Section 2(ee) of FIFRA and General Pesticide Rule WAC 16-228-1225 allow that a pesticide may be:

- Applied at any dosage, concentration, or frequency less than that specified on the label (unless the label specifically prohibits such an application).
- Applied against any target pest not specified on the label (unless EPA has required that the pesticide may be used only for the specified pests).
- Applied by any method not prohibited by the label (unless the label specifically states the pesticide may be applied only by the methods specified on the label). Examples of methods include aerial, ground and airblast.
- Mixed with another pesticide or a fertilizer (if not prohibited by the label).

What is not allowed on a label?

- Cannot add a crop/site, or expand an existing crop/site
- Cannot increase the dosage, concentration or frequency of application
- Cannot change the timing or type of application. Examples of type of application include indoor versus outdoor and soil incorporated versus foliar.

Section 2(ee) use recommendations are subject to the following restrictions:

- Cannot add a crop/site, or expand an existing crop/site.
- Cannot increase the dosage, concentration or frequency of application.
- Cannot decrease the pre-harvest interval or the interval between applications.
- Cannot change the timing or type of application. Examples of timing of application include pre-bloom versus post-bloom and pre-harvest versus post-harvest. Examples of type of application include indoor versus outdoor and soil incorporated versus foliar.
- Cannot add chemigation as a method of application.
- Cannot allow a lower dosage or concentration than specified on the label for pre-construction termiticide uses (refer to EPA PR Notice 96-7).

Record Evaluation

- Total area is missing
- Incomplete product names
 - Trimec Classic
 - Pennant Magnum
- Rate is missing

Street Address: _____ City: _____ State: _____ Zip: _____

4. Name of person(s) who applied the pesticide (if different than #3 above): _____
License No(s), if applicable: _____

5. Application Crop or Site: Fence Lines, Curbs, Beds

6. Total Area Treated (acre, sq. ft., etc): _____

7. Was this application made as a result of a WSDA Permit? No Yes (if yes, give Permit No.) # _____

8. Pesticide information (please list all information for each pesticide in the table below):

a) Product Name	b) EPA Reg. No.	c) Total Amount of Pesticide Applied in Area Treated	d) Pesticide Application Rate (or other measure)	e) Concentration Applied
<u>Ranger Pro</u>	<u>521-135</u>	<u>6.25</u>	<u>2.16oz</u>	
<u>Trimec</u>	<u>2217-543</u>	<u>6.25</u>	<u>2.16oz</u>	
<u>Pennant</u>	<u>100-950</u>	<u>6.25</u>	<u>2.16oz</u>	

9. Address or exact location of application. NOTE: If the application is made to one acre or more of agricultural land, the field location must be shown on the map on page two of this form.
[Redacted]

10. Wind direction and estimated velocity during the application: 3-4 MPH from the South

11. Temperature during the application: 50°

12. Apparatus license plate number (if applicable): _____

13. Air Ground Chemigation

14. Miscellaneous information: 2.5 gallon sprayer

WSD 6228 (Rev. 1993)

This is an example of a typical pesticide application record obtained from a school applicator. Missing information includes total area treated, complete product names, and rate (concentration was recorded in the rate column).

Record Evaluation

- Trimec Classic applied by concentration while the label refers only to rate (pts/acre or oz/ft²)
- Pennant Magnum (a pre-emergence herbicide) applied by concentration even though the label only describes rate (pts/acre or ml/ft²)
- Pennant Magnum applied to impervious surface (curb), which is not allowed by the label

City: _____ State: _____ Zip: _____

4. Name of person(s) who applied the pesticide (if different than #3 above): _____
(License No(s), if applicable)

5. Application Crop or Site: Fence Lines, Curbs, Beds

6. Total Area Treated (acre, sq ft, etc): _____

7. Was this application made as a result of a WSDA Permit? No Yes (if yes, give Permit No.) # _____

8. Pesticide Information (please list all information for each pesticide in the tank mix):

a) Product Name	b) EPA Reg. No.	c) Total Amount of Pesticide Applied (in Area Treated)	d) Pesticide Applied/Acre (or other measure)	e) Concentration Applied
<u>Ranger Pro</u>	<u>524-475</u>	<u>6.825</u>	<u>6.825</u>	<u>1</u>
<u>Trimec</u>	<u>2271-573</u>	<u>6.825</u>	<u>2.276</u>	<u>1</u>
<u>Pennant</u>	<u>100-950</u>	<u>6.825</u>	<u>2.276</u>	<u>1</u>

9. Address or exact location of application. NOTE: If the application is made to one acre or more of agricultural land, the field location must be shown on the map on page two of this form.

10. Wind direction and estimated velocity during the application: 2-4 MPH from the South

11. Temperature during the application: 50°

12. Apparatus license plate number (if applicable): _____

13. Air Ground Classification

14. Miscellaneous Information: 2.5 gallon Sprayer

Records are evaluated not only for completeness but to see if the pesticide was applied according to label directions.

- The Ranger Pro label does allow applications to be made on a concentration basis and 2 oz/gal is within the range allowed by the label.
- Trimec Classic was applied on a concentration basis even though the label describes the amount to apply only by rate (e.g. pts/acre or oz/1000 ft²).
- Pennant Magnum also describes the amount to apply in terms of rate (e.g. pts/acre or ml/1000 ft²). Typically, pre-emergence herbicides are all applied by rate and not by concentration.
- Pennant Magnum was also applied to curbs, even though the label prohibits applications to impervious surfaces.

Pesticide manufactures specify how to apply pesticides not only to maximize efficacy but also to protect non-target plants. If applying a pesticide that specifies rate and not concentration, it is important to determine the amount of area to be treated so that the proper amount of product can be mixed in the tank.

Use At Schools Allowed?

- Use at schools not allowed
- Indoor household / residential use only
- Avoid home & garden use only

Indoor Fogger₅
NEBULIZADOR PARA ESPACIOS INTERIORES₅
One Can Treats 2,000 cu ft of Unobstructed Area
(approximately 15.5 ft x 16 ft x 8 ft ceiling)

ESPAÑOL: Para instrucciones y advertencias en español, vea dentro de la caja.
Si no tiene una caja, llame al 1-800-897-8524.

For indoor household/residential use only.
Solo para uso doméstico/residencial en espacio interiores.

Active Ingredient:
Cypermethrin 0.515%
Other Ingredients ... 99.485%

Net Wt 2 oz (56 g)

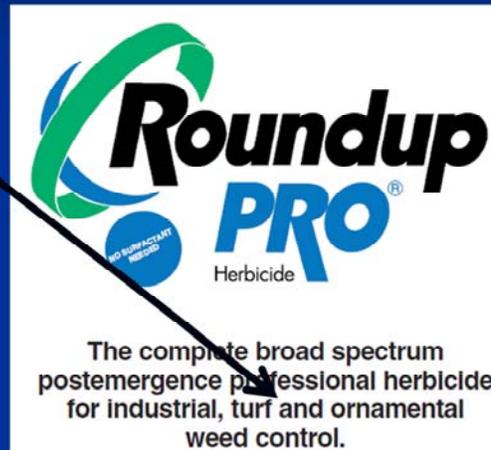
KEEP OUT OF REACH OF CHILDREN
CAUTION See back for additional
precautionary statements.

MANTÉNGASE FUERA DEL ALCANCE DE LOS NIÑOS
PRECAUCIÓN Consulte dentro de la caja para conocer
las declaraciones preventivas adicionales.

It is important to read the fine print on a label. This is a label of an insecticide formulated as a fogger that was being used in a greenhouse at school. The label states for "...household/residential use only," which means that it cannot be used at school.

Use at Schools Allowed?

- The first page of the label seems to indicate that it can be used at school
- But don't stop reading the label on the first page



Some labels are easier to interpret than others; however, the entire label should be read to make sure that all pertinent information is understood.

Use at Schools Allowed?

Page 5 of Roundup Pro's label shows that it can be used at school.

8.2 General Noncrop Areas and Industrial Sites

Use in areas such as airports, apartment complexes, Christmas tree farms, ditch banks, dry ditches, dry canals, fencerows, golf courses, industrial sites, lumberyards, manufacturing sites, office complexes, ornamental nurseries, parks, parking areas, petroleum tank farms and pumping installations, railroads, recreational areas, residential areas, roadsides, sod or turf seed farms, **schools**, storage areas, utility substations, warehouse areas, other public areas, and similar industrial and noncrop sites.

This label leaves little doubt where it can be used.

Use at Schools Allowed?

- The first page of the label shows that it can be used to control weeds in Washington
- But don't stop reading the label on the first page



So you go to the dealer and they don't have Roundup Pro but they do have Roundup UltraMax. The dealer says it works the same as Roundup Pro. The first page of the label shows that it controls annual and perennial weeds and Washington is one of the states listed.

Use at School Allowed?

- Roundup Ultra Max label, page 15
- Farmstead use only; not schools
- These directions include similar sites as might be found at schools; however, since it is a subsection of 12.0, the description refers to farmsteads

12.0 NONCROP USES AROUND THE FARMSTEAD

TYPES OF APPLICATIONS: General Non-Selective Weed Control, Trim-and-Edge, Greenhouse/Shadehouse, Chemical Mowing, Cut Stumps, Habitat Management

12.1 General Weed Control and Trim-and-Edge

USE INSTRUCTIONS: This product may be used to control annual weeds, perennial weeds and woody brush which are found in any part of the farmstead, including building foundations, along and in fences, in dry ditches and canals, along ditchbanks, farm roads, shelterbelts, prior to landscape plantings and equipment storage areas.

TANK MIXTURES: This product may be tank-mixed with the following products. Refer to these product labels for approved farmstead sites and application rates. For annual weeds, use 26 fluid ounces per acre of this product when weeds are less than 6 inches tall, 40 fluid ounces per acre when weeds are 6 to 12 inches tall and 52 fluid ounces per

However, the only mention of noncrop weed control is on page 15 of the label, with the statement “Noncrop uses around the farmstead.” This means that it cannot be used at school.

Consult PICOL

WASHINGTON STATE UNIVERSITY

World Class, Face to Face. CAMPUSES WSU HOME WSU SEARCH myWSU

Pesticide Information Center On-Line

Welcome to Washington State University's Label and Tolerance Databases. These databases are operated by WSU with funding from the Washington State Department of Agriculture, the Oregon Department of Agriculture, Oregon State University, and WSU. This web site requires version IE 4+ or Netscape 4+.

Labels Database

This database contains information on Oregon and Washington pesticide labels*, 24(c)'s, and federal supplemental labels. It does not contain any information on Section 18's and EUPs. Section 18 information may be found on the PNN Web site at ext.wsu.edu/pnn. Information in the PICOL label database is updated daily.

Tolerance Database

This database contains information on tolerances relevant to agricultural commodities in the Pacific Northwest. PICOL tolerance information is updated monthly. Please advise Catherine Daniels (cdaniels@tricity.wsu.edu) of any errors in either database.

* The PICOL label database is not a substitute for obtaining and reading pesticide labels. PICOL label information has no legal status, whereas the label is a legal document.

<http://cru66.cahe.wsu.edu/LabelTolerance.html>

Labels can be difficult to understand. Washington State University maintains a searchable labels database that can be used to find pesticides labeled for use at school. A tutorial video is available at <http://www.youtube.com/watch?v=-DEw1Qzk82Q>.

PICOL: A Place to Start

- A PICOL search for Alligare Diuron 4L results in site descriptions that may fit schools:

ALLIGARE DIURON 4L [51]	DIURON	NONCROP AGRICULTURAL AREA
ALLIGARE DIURON 4L [51]	DIURON	NONCROP NON-AGRICULTURAL AREA
ALLIGARE DIURON 4L [51]	DIURON	OAT
ALLIGARE DIURON 4L [51]	DIURON	OLALLIEBERRY
ALLIGARE DIURON 4L [51]	DIURON	ORNAMENTAL

- However, the label specifies that ornamentals are grown as a crop and the noncrop non-agricultural areas described may or may not fit schools.

Be careful that you do not base your use of a pesticide on PICOL only.

Read the Label

- If you purchase & use your pesticides based on the recommendation of a pesticide dealer or salesperson at a hardware store, and the recommendation was in error, you as the applicator will be held responsible for use contrary to the label.
- The WSDA will follow up with the dealer or salesperson as needed.
- The applicator is responsible for reading, understanding, and complying with the label.
- Ask if you have any questions.

Ask if you have any questions on labels. The WSDA would much rather prevent a problem than have to investigate a pesticide misuse.

Annual Summary* of Pesticide Use

Pesticide	Active ingredient	Amount	Locations
Hillyard Quick & Clean Wasp & Hornet Spray	Tetramethrin, permethrin	Five 13.5-oz cans	Gause Elementary, Bus Garage
Roundup ProDry Herbicide	Glyphosate	30 lb	La Center High School, District office
Enforcer Roach Bait Stations with Sulfluramid	Sulfluramid	20 stations	Canyon Creek Elementary

***Summarize by pesticide product, not by site or date**

Schools are required to produce a summary of pesticide use every year. Prepare the summary at the end of your spray season or whenever you choose. The WSDA recommends that the summary include the pesticide name, active ingredient, amount used, and the general locations where it was applied.

Annual Summary of Pesticide Use

- Must include every pesticide applied at a school for which there is a record.
 - All records from licensed school employees (herbicides, emergency applications, rodenticides, etc.).
 - All applications by commercial applicators.
 - If an unlicensed school employee keeps a record (such as a horticulture teacher that keeps records of applications in the greenhouse), that record must be incorporated into the summary.
- One summary for the entire school district; it does not have to be sent anywhere, just kept on file so that it is available for interested persons.

Rodent Management

- Who does it?
- Where are problem areas?
- Methods?
 - Rodenticides
 - Traps
 - Other
- Does use of rodenticides comply?



Rodenticide Use

- Bait placement: prevent unauthorized access, locked boxes for outdoor aboveground locations, no endangerment, no loose bait above floor levels except in attic.
- Bait boxes: sturdy, labeled correctly.



Food containers are not acceptable bait boxes



- Detection baits without pesticides, labeled correctly.
- Safe handling when filling containers.
- Proper disposal upon completion.
- Tracking powders used safely.

Elements of a WSDA Inspection

1. Who uses pesticides at school?
2. Notifications
3. Posting
4. Recordkeeping
- 5. Pesticide storage**
6. Application equipment



Issues encountered during inspections of pesticide storage areas include waste pesticides, cleaning and disposal of empty containers, housekeeping, and security.

What is a Waste Pesticide?

- Any formulation that can't be used according to label directions – missing or deteriorated label
- A product whose federal or state registration was canceled or suspended
- A pesticide not stored in its original container
- A pesticide in a deteriorated container



From a high school greenhouse

What is a Waste Pesticide?

- Product not stored in original container
- From a classroom greenhouse



- A product whose federal or state registration was canceled or suspended
- From a school district's maintenance shop

What is a Waste Pesticide?

- Found in a school district's maintenance shop
- Missing label
- Deteriorated container
- To dispose of a waste pesticide contact your local hazardous waste facility or contact the WSDA at http://agr.wa.gov/PestFert/Pesticides/WastePesticide_apply.aspx



Pesticides with deteriorated and/or illegible labels cannot be used safely or legally.

Rinsate & Empty Containers

- Rinse containers immediately after emptying them to avoid dried, difficult to clean, residues.
- Triple rinse:
 - Fill container $\frac{1}{4}$ full of water, replace cap, shake for 10 seconds to rinse all inside surfaces.
 - Pour rinsate into sprayer.
 - Repeat two more times.
- Spray rinsate on site allowed by the label.
- Do not dump rinsate down a drain.



Many pesticide labels now specifically prohibit reuse of the empty container.

Pesticide Storage

- Pesticides must be stored without endangering humans, environment, food, feed, or any other pesticides.
- Pesticides stored with good, generally accepted, housekeeping practices.
- Follow label requirements & MSDS recommendations.
- Proper sign on storage area.



Danger/Poison Pesticides

- A sign similar to the one shown must be on the storage area only if pesticides with the signal words "Danger/Poison" that includes a skull and crossbones are stored within.



- Applies to all pesticides (herbicides, insecticides, fungicides, rodenticides, disinfectants such as toilet bowl cleaners, etc.)

If no danger/poison pesticides are stored, then no sign is required; however, it is a safe practice to put a sign on the storage area indicating that pesticides are stored within.

Posting for Danger/Poison Pesticides

- A sign is required on each exterior wall and each exit & entry of the storage unit.
- If the storage unit is within a larger multipurpose building:
 - Place a sign on each exterior wall and each exit & entry of the storage unit.
 - A sign must also be on the main entry of the multipurpose building.
 - Signs must also be on each exterior wall of the multipurpose building that is within 30' of the pesticide storage unit.

So if a Danger/Poison toilet bowl disinfectant is stored in a custodian's storage room that is located within a school, then a sign is needed on the entry door to the custodian's room, the main entry to the school building, and each exterior wall of the main school building that is within 30 ft of the custodian's storage room.



During an inspection storage areas will be checked for safety and good housekeeping. Good housekeeping means not having excessive residues on the outside of containers as is shown in this slide.



Good housekeeping also means no excessive residues on the shelves of storage cabinets. These pesticides are stored in such a manner that they endanger people and other pesticides. For example, liquid pesticides should not be stored above dry formulated pesticides.

Store in Original Container Only

Do not store in food container as was done by some school maintenance personnel:



Roundup label added & original food label left attached



Tempo handwritten on milk jug

Pesticides not stored in their original container are considered to be a waste pesticide and should be disposed of properly. Pesticides stored in food containers endangers other people.

Storing Prepared Mixtures

- A prepared mixture when stored in other than an apparatus (spray equipment) must be identified:
 - Label identifying the contents as a pesticide
 - Name of the active ingredient on the container
 - Appropriate restrictions and precautions
- A photocopy of the original label attached to the container will suffice.

A pesticide such as gopher bait is not a prepared mixture; it is meant to be applied undiluted and must be stored in its original container.

Storing Prepared Mixtures

- Prepared mixtures stored in an apparatus are not required to be identified.
- However, for temporary storage, common sense dictates that some kind of label identifying the contents should be attached.
- Example of a prepared mixture in a spray apparatus with an adequate description of the contents (ECO – Oil):



Storing Prepared Mixtures

- Examples of prepared mixtures stored at schools in spray equipment with inadequate (but legal) labels:



Unknown insecticide or concentration



Unknown "Broad Leaf Spray"



Unknown granular pesticide

Spill Kits

- No specific law requires you to have a spill kit.
- However, a spill kit can change a potentially harmful incident into a manageable incident.
- Keep a spill kit wherever you store &/or transport pesticides (shop, vehicle, etc.)



No specific law requires a spill kit; however, if a spill and consequent damage or endangerment occurs and there is no spill kit available to prevent spread/damage, then a violation could be charged.



The kit has Tyvek coveralls and boot coverings, nitrile gloves, dust mask, respirator with proper canisters, plastic bags, cat litter, water, bleach, absorbent pads and disposable wipes.

There is also a portable eye flush, soap, sanitizer and a first aid kit in the vehicle.

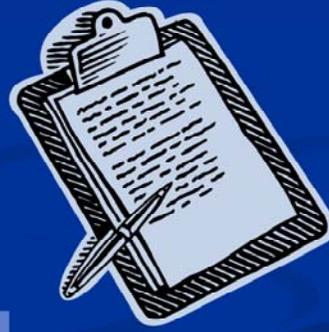
Material Safety Data Sheet

- Certified applicators making a landscape or right of way application must carry the MSDS of every pesticide they are applying.
 - Must provide to interested persons if requested in writing but advisable to share if asked.
 - The WSDA Pesticide Compliance program is interpreting "carry" to mean the MSDS is within a "reasonable" distance of the application site.
- The MSDS often has more detailed information than the label on symptoms of exposure, first aid, and storage.

Many schools keep a notebook of Material Safety Data Sheets where the pesticides will be stored such as the maintenance shop, a groundskeeper's truck, and the custodians chemical storage area in each school. Chemical dealers usually can provide the Material Safety Data Sheet for the pesticides they sell. The Material Safety Data Sheet for off-the-shelf pesticides such as are purchased at local hardware stores can be obtained via the phone number or website often included on the pesticide container.

Elements of a WSDA Inspection

1. Who uses pesticides at school?
2. Notifications
3. Posting
4. Recordkeeping
5. Pesticide storage
- 6. Application equipment**



The condition and signage of application equipment is inspected next.



All powered sprayers belonging to a school are required to have the sign described in this slide. If a personally owned powered sprayer is used to apply pesticides at school, then it must be equipped with a temporary sign that includes the school district's name and telephone number as described on this slide; this includes a powered sprayer that belongs to a private citizen that has volunteered to make the application. Commercial applicators are required to have their own sign that will include their company name.



Equipment must be in good repair and capable of performing all functions necessary to ensure a proper and thorough application.



The white residue around the pump diaphragm indicates the seal is leaking resulting in endangerment of the applicator.

Spray Equipment Calibrated?

- Student & staff safety; economics; environmental safety.
- Label:
 - Roundup Pro: “APPLY THESE SPRAY SOLUTIONS IN PROPERLY MAINTAINED AND CALIBRATED EQUIPMENT CAPABLE OF DELIVERING DESIRED VOLUMES.”
 - Surflan AS Specialty Herbicide: “Use only a properly calibrated, low-pressure, herbicide sprayer that will apply the spray uniformly.”

Calibration means determining how much spray solution is applied in a given area. Once equipment is calibrated, the appropriate amount of pesticide can be mixed in the sprayer so that the application can be made at label-specified rates. Pesticides applied on a rate basis rather than a concentration basis are more likely to be applied in quantities that are safe for students and staff. Lower quantities of pesticides are also usually used when applied by rate compared to concentration resulting in reduced cost and increased environmental safety.

Some labels require that sprayers be calibrated before application. Failure to calibrate is a violation of the label.

Examples from Washington school application records illustrate the importance of calibration.

One record indicated that Ranger Pro was applied at 12.5 qt/acre. The label gives the maximum rate for perennial weeds as 5 qt/acre and for small, annual weeds, the rate is 1.5 qt/acre. Ranger Pro costs about \$34/gallon. Cost per acre at 12.5, 5, and 1.5 qt/acre is \$106.25, \$42.50, and \$12.75, respectively.

Another record from a Washington school applicator showed that a one-quarter acre baseball field was sprayed with a backpack sprayer at 200 gallons of spray mix per acre. It took the applicator 3.5 hours to spray the field. Using a 4-gallon backpack sprayer, the applicator would have had to refill his tank 13 times. If the backpack had been calibrated to

deliver 20 gallons per acre, the applicator would have had to refill only once. Calibration saves money both in product used and in reduced labor. Calibrating a backpack sprayer to deliver 15 to 25 gallons per acre gives sufficient coverage for most situations encountered at schools.

For more on calibration see:

<http://pep.wsu.edu/pdf/UPEST%20Weeds/UPEST%20Weeds/Weeds%20UPEST%20publish/index.htm>

Personal Protective Equipment

- Waterproof gloves
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical resistant headgear for overhead exposure
- Chemical-resistant apron when cleaning equipment, mixing, or loading



PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear coveralls over short-sleeved shirt and short pants, waterproof gloves, chemical-resistant footwear plus socks, protective eyewear, chemical-resistant headgear for overhead exposure, and chemical-resistant apron when cleaning equipment, mixing, or loading.

If this container contains over 1 gallon and less than 3 gallons, mixers and loaders who do not use a mechanical system (sucker and pump) to transfer the contents of this container must wear coveralls or a chemical-resistant apron in addition to the other required PPE.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. After each day of use, clothing or PPE must not be reused until it has been cleaned.

During an inspection questions will be asked about what Personal Protective Equipment (PPE) is available and what is used when applying specific pesticides. Often times, school applicators are unaware of the need to wear specific PPE for the various pesticides they use. Protective eyewear and a chemical-resistant apron when using 2,4-D are among the most frequently neglected items.

Protective Eyewear – must be splash proof



2,4-D Amine 4

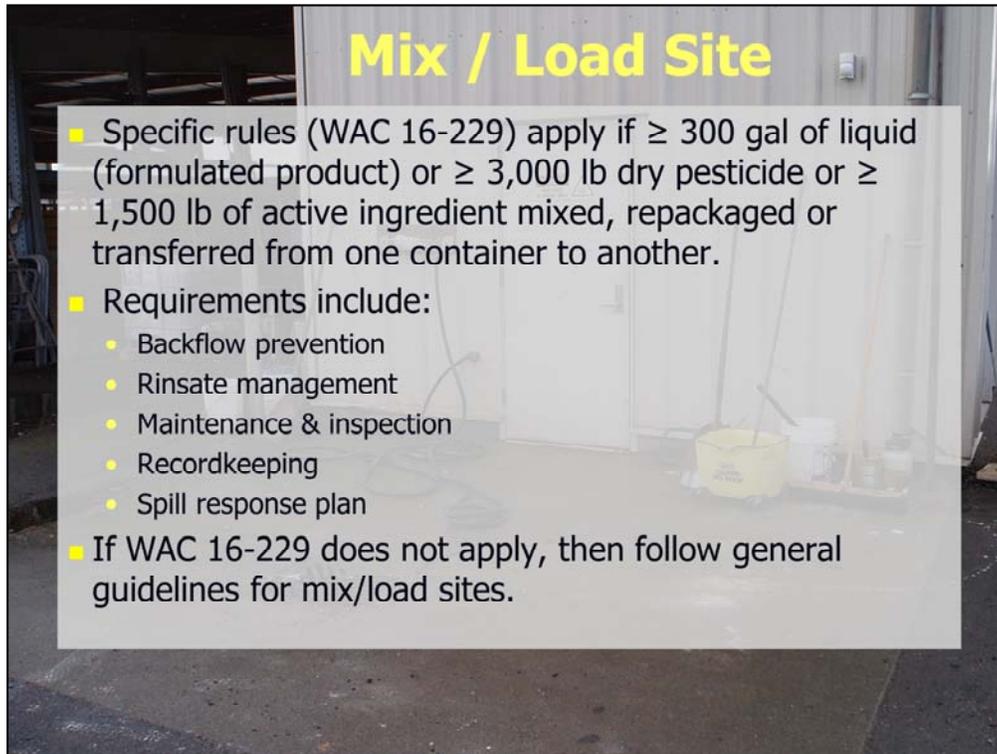


Personal Protective Equipment:

Applicators and other handlers must wear:

- Coveralls over short-sleeved shirt and short pants.
- Waterproof gloves.
- Chemical-resistant footwear and socks.
- Protective eye wear.
- Chemical-resistant headgear for overhead exposure.
- Chemical-resistant apron when cleaning equipment, mixing, or loading.

When a label calls for protective eyewear, the intent is to protect the user's eyes from the pesticide. Splash-proof eyewear has temple and brow extensions that will prevent liquid pesticides from contacting the eyes. Fashionable sunglasses or even safety glasses without the temple and brow extensions do not qualify as protective eyewear. Failure to use the required protective equipment is considered a violation of the label.

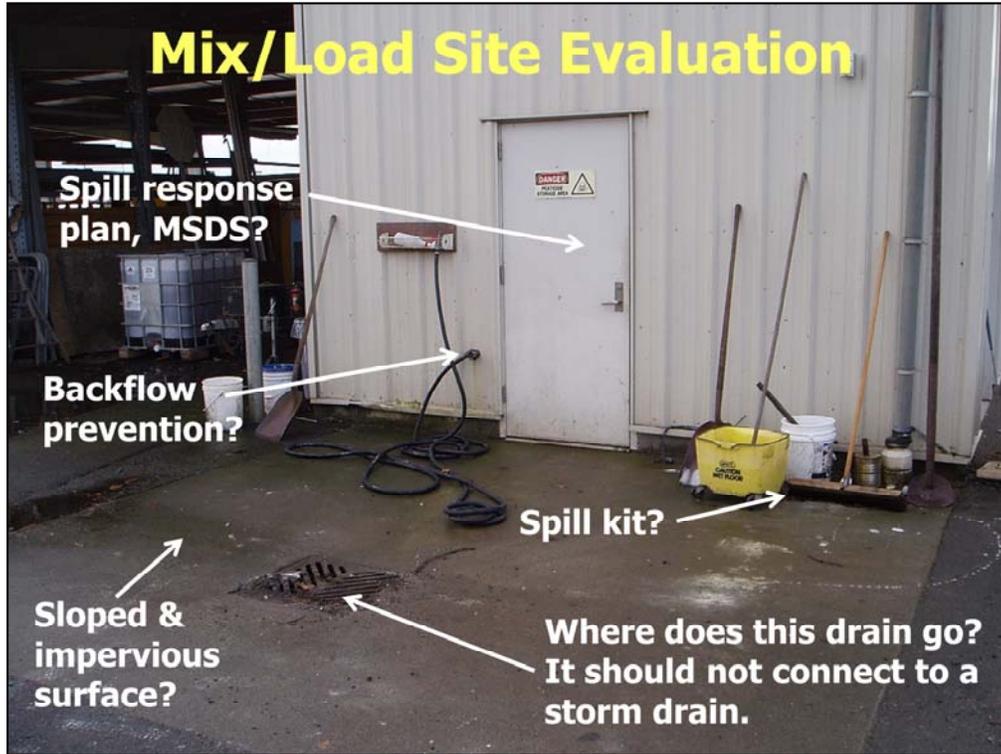


There are specific rules for pesticide mix/load sites that must be followed if designated quantities of pesticides are handled. The requirements are designed to prevent accidental release of the pesticide to the environment. Mix/load sites that do see the designated quantities of pesticides just need to use common sense precautions and practices.

General Guidelines for Mix/Load Site

- Mix on a surface that does not absorb pesticides; ideally, an impervious curbed area designed to capture & contain spills, leaks, & wash water.
- Use backflow prevention.
- Keep a spill kit in close proximity to the site.
- Have a spill response plan:
 - Emergency contacts (names, phone numbers, agencies)
 - Label & MSDS for all pesticides on hand
 - Procedures to control, contain, & cleanup the spill
 - Procedures to use or dispose of spilled materials
 - Training in spill response

Mix/Load Site Evaluation



Do you use pesticides?

- Groundskeeper
- Horticulture/Agriculture/Science teachers & students
- Custodians
- Coaches & student athletes/trainers
- Volunteers
- Commercial applicators

After finishing with the maintenance department, pesticide use in the greenhouse is next on the agenda.

School Greenhouses

- Pesticide use in a greenhouse (regardless of size) must comply with all of the rules (and sometimes more) that apply to pesticide use by school groundskeepers (notification, posting, etc.).



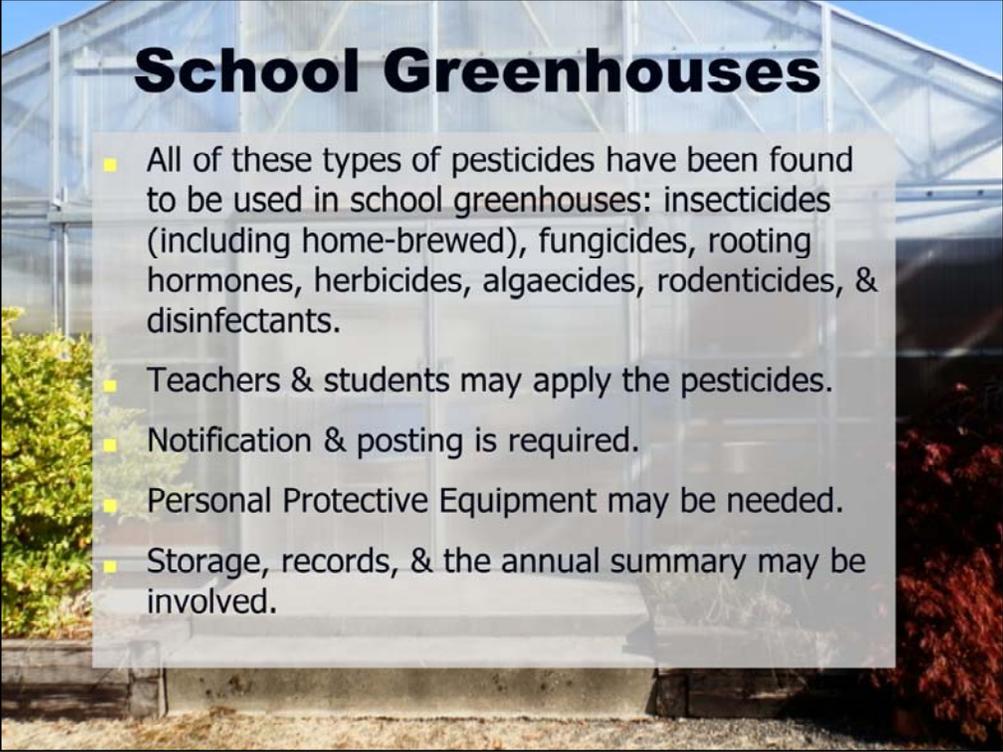
This may not be a free-standing greenhouse but teachers do use pesticides in these window greenhouses.

Defunct* Greenhouses



An out of use school greenhouse with burst & leaking pesticide containers.

*If your school district has non-operational greenhouses they should be inspected to make sure there are no potential problems.



School Greenhouses

- All of these types of pesticides have been found to be used in school greenhouses: insecticides (including home-brewed), fungicides, rooting hormones, herbicides, algaecides, rodenticides, & disinfectants.
- Teachers & students may apply the pesticides.
- Notification & posting is required.
- Personal Protective Equipment may be needed.
- Storage, records, & the annual summary may be involved.

School Greenhouses

- In Washington, if plants grown in the greenhouse are sold, the label of any pesticide used in the greenhouse must specifically state that it can be used in a greenhouse.
- If Agricultural Use pesticides are used in the greenhouse, Worker Protection Standards must be provided to the teacher & students, as well as school employees that maintain the greenhouse.

Agricultural Use Pesticides

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry (REI) of 12 hours.

EXCEPTION: If the product is soil injected or soil incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is:

Coveralls • Waterproof gloves • Shoes plus Socks • Protective eyewear.

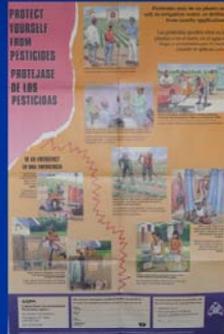
The statement above will be found on all agricultural use pesticides. This statement describes the Restricted Entry Interval, special notification requirements, & Personal Protective Equipment.

Agricultural use pesticides can be identified by the box entitled “Agricultural Use Requirements” that is included in the pesticide label. The requirements described in this box for restricted entry interval, notification, and personal protective equipment are part of federal Worker Protection Standards, which the state of Washington has adopted and does enforce. If an agricultural use pesticide is used on plants grown in the greenhouse and students receive any compensation for the work they do to produce those plants such as proceeds of plant sales or even grades for participating in greenhouse projects, then Worker Protection Standards must be provided.

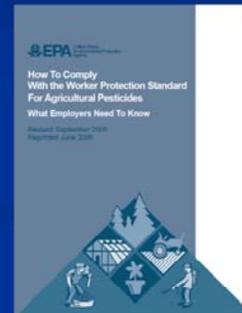
Some Components of WPS



WPS Warning Sign



WPS Safety Poster



EPA Manual, 128 pp.

The provisions of Worker Protection Standards are described in the EPA's 128-page manual and include such things as a warning sign that must be posted at the application site that is in addition to the sign required for school facility applications. Also described in the manual is a safety poster that has emergency medical contact information.

Typical WPS Violations

- No central posting with records of applications, pesticide safety poster, or emergency medical contact information
- No pesticide safety training for the teacher, students, or school maintenance employees
- Personal Protective Equipment not provided
- No decontamination supplies
- Failed to post WPS-required warning signs
- Failed to notify maintenance employees of the application



School districts that have not instituted Worker Protection Standards and which are using agricultural use pesticides in the greenhouse usually have not met the provisions described in this slide plus others not mentioned. Schools that do not use agricultural use pesticides in the greenhouse contend with fewer regulations.

Common Problems in School Greenhouses

Poor housekeeping & endangerment



Pesticides stored in food containers



Label violations: a Danger level disinfectant and an insecticide not stored out of the reach of children; insecticide used indoors but labeled for outdoor use only

Greenhouses can be excellent teaching tools; however, extra diligence is required when pesticides are used. A successful greenhouse program will be a collaborative effort between the teachers, the teacher's administrators, and the maintenance department.

Common Problems in School Greenhouses

Poor housekeeping & endangerment



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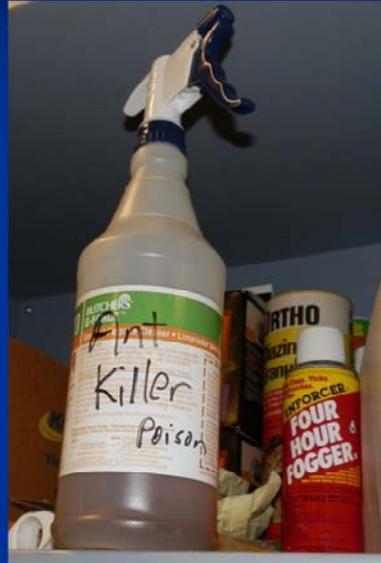
Do you use pesticides?

- Groundskeeper
- Horticulture/Agriculture/Science teachers & students
- Custodians
- Coaches & student athletes/trainers
- Volunteers
- Commercial applicators

Custodians are a key component of a school district's pest management program. At the very least, custodians deal with a district's smallest pests but may also be called on to assist with insects, rodents, and even weeds. The more people that school district's delegate pest management tasks to, the more difficult it is to ensure compliance with the pertinent laws and rules.

Custodians

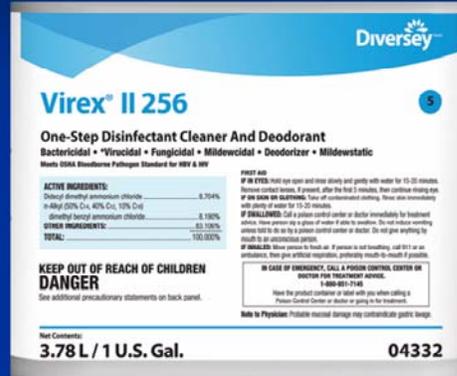
- Storage – secure, clean?
- Anything other than disinfectants used?
- If so – posting, notification?
- Read the label?
- PPE?



Just as with groundskeepers, custodians must store pesticides securely and with good housekeeping. Custodians commonly use disinfectants, which are pesticides, but may also use insecticides, rodenticides, and herbicides. Use of any pesticide by a custodian must be in compliance with posting and notification requirements. Custodians that use pesticides will be expected to have read the label and should know what personal protective equipment, if any, they are required to use.

Custodians

- Antimicrobial pesticides are exempt from notification, posting, and recordkeeping.
- Disinfectants = pesticides.
- Read the label?
- Storage – secure, clean?
- Personal Protective Equipment?



Some disinfectants cause permanent eye damage & their labels require the use of protective eyewear even when cleaning with the diluted use-solution.

Posting and notification is not required for antimicrobial pesticides such as disinfectants but since they are pesticides, their labels must be followed. A frequent problem found in schools that use disinfectants is failure to wear protective eyewear that is required by the label. A common misconception is that personal protective equipment specified on the label only applies to the undiluted (i.e. the concentrated) product; however, unless a label (not the Material Safety Data Sheet) specifically states that no personal protective equipment is needed for the diluted product, then all PPE required for the concentrated product is required for the diluted use-solution.

Custodians

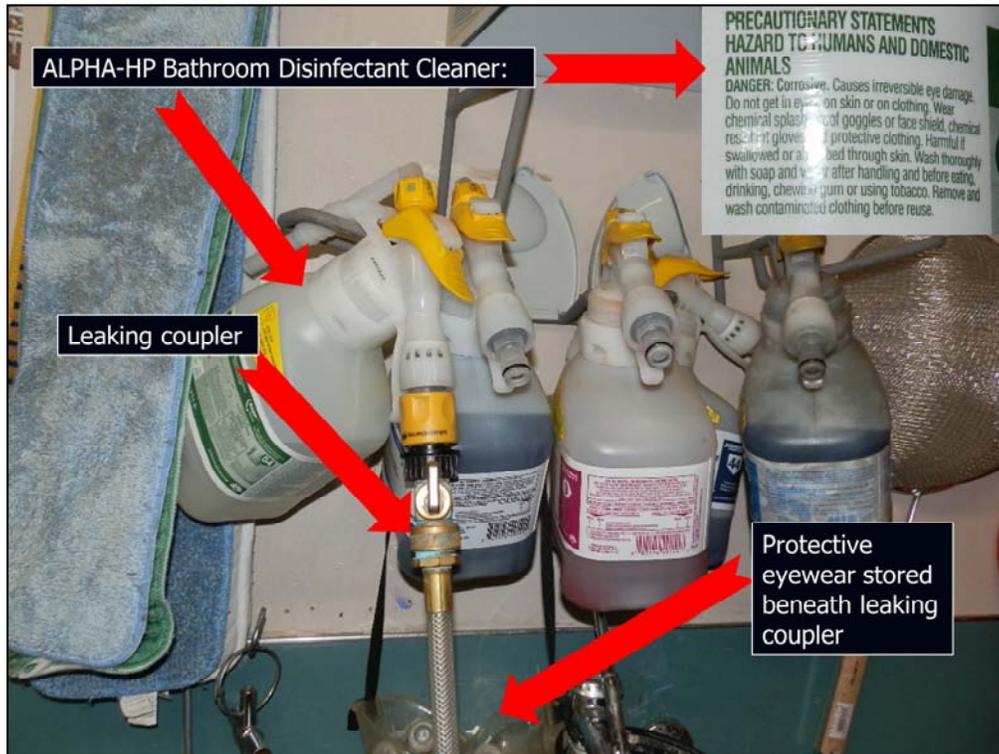


PRECAUTIONARY STATEMENTS Hazard to Humans and Domestic Animals

DANGER

Corrosive. Causes irreversible eye damage or skin burns. Harmful if swallowed or absorbed through skin or inhaled. Do not get in eyes, on skin or on clothing. Avoid breathing vapor or spray mist. Wear coveralls over long-sleeved shirt and long pants, socks and chemical-resistant footwear, goggles or face shield, and chemical resistant gloves (such as barrier laminate or butyl) rubber, nitrile rubber, neoprene rubber, PVC or viton). Wash hands before eating, drinking, chewing gum, using tobacco

This is an example of a Danger level disinfectant that requires the use of more Personal Protective Equipment than is required for many other pesticides.



When inspecting custodial storage areas, the WSDA will check to see that disinfectants are stored and dispensed safely. The storage area should be locked at all times that it is unoccupied. Some manufacturers provide dispensing units in which disinfectants and cleaners can be securely locked within; however, these locking units still allow access to the disinfectants and cleaners and should be mounted only where authorized people have access to them. The quick coupler shown in this custodial storage area was leaking and could potentially contaminate the protective eyewear hung below the disinfectants.

Do you use pesticides?

- Groundskeeper
- Horticulture/Agriculture/Science teachers & students
- Custodians
- Coaches & student athletes/trainers
- Volunteers
- Commercial applicators

School maintenance departments must sometimes cope with coaches and volunteers that take athletic field maintenance into their own hands. When this occurs they must be made aware that any pesticide use must be in compliance with posting, notification, and recordkeeping requirements. The most common pesticide use by coaches, however, is use of disinfectants to clean athletic equipment, including wrestling mats.

Coaches

- Do coaches “help” out on the athletic fields? Post? Notify? Records?
- Do coaches and student athletes clean wrestling mats?

Both of these mat cleaners are corrosive & require the use of protective eyewear, gloves, & long sleeved shirt & pants.



Coaches may not have any training and/or awareness of the hazards and safe handling practices needed when using disinfectants. Unsafe handling of disinfectants can be particularly risky considering the high toxicity of products that are needed to properly disinfect wrestling mats, athletic equipment, and athletic facilities.

School Gardens



Gardens are becoming increasingly popular on many Washington school campuses. Community volunteers often run the gardens. If pesticides are used in the gardens, posting and notification requirements must be met. A school district employee should monitor chemical usage in the garden. Only pesticides and fertilizers approved by the school should be used in the garden. Just as with greenhouses, if agricultural use pesticides are used, Worker Protection Standards must be provided.

Factors that Contribute to Success

- Not using pesticides
- Licensed applicators
- Meticulous recordkeeping
- Following the label
- No greenhouse

Pesticides cannot be completely eliminated from pest management practices in schools; however, using techniques such as Integrated Pest Management can reduce pesticide use. Less frequent pesticide use, means fewer opportunities for mistakes in posting, notification, and recordkeeping. School districts with licensed pesticide applicators have better compliance with notification and posting requirements as well as general pesticide handling compared to school districts with no licensed applicators. Proper attention to recordkeeping means recording all required information and making sure that the information recorded makes sense. Keeping good records can reduce pesticide use as applicators and managers can more easily track usage and effectiveness. Labels can be difficult to understand so it is important to spend the time and effort needed to insure that a pesticide is used correctly. Managers and applicators need to read, understand, and follow labels, including groundskeepers applying herbicides or custodians using disinfectants. The most successful school districts regarding compliance with posting and notification requirements are those without active greenhouses. School districts with horticulture/agriculture/science programs that use a greenhouse should establish cooperation between the maintenance department and the academic department involved with the greenhouse so that pesticides are used in the greenhouse in accordance with school district policy and state laws and rules. Encourage the use of Integrated Pest Management in greenhouses to reduce the need for pesticides.

Questions:

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