

This is an excerpt from the May 1, 2004 Draft Pesticide Plan for the Sacramento Stormwater Management Program

Permittee Pest Control

The Permittees use pesticides in the process of providing municipal services. The extent and nature of pesticide use varies considerably among them, and may include uses for rights of way, structures, landscapes and parks, sewers, and drainage facilities.

When using pesticides, the Permittees are subject to State and Federal pesticide regulations, which are separate from the MS4 Permit, and include requirements for training, licensing, pesticide use, record keeping, and reporting. The NPDES Permit includes some pesticide use requirements that are the same or consistent with state and federal requirements. It also requires the Permittees to conduct additional reporting and training and to use integrated pest management (IPM). Therefore, meeting the NPDES Permit requirements will require additional effort by the Permittees. As appropriate, the existing pesticide requirements will be incorporated into the IPM programs established as part of this plan.

Action Item 1. Develop and establish authority to implement Pesticide Plan.

Each Permittee will establish a policy, ordinance, or similar instrument that requires all pesticide management activities by its staff and contractors to be in compliance with the NPDES Permit requirements, the Pesticide Plan and the Permittee's internal pesticide use policies, including IPM.

Action Item 2. Develop a "tool box" for the Pesticide Plan.

The Permittees will jointly conduct background research--including a review of basic IPM information and of other municipal IPM programs--to develop a tool box of resources to help the Permittees develop and implement the Pesticide Plan and IPM. The tool box might include:

- Model policies and ordinances
- Model PCO contract language
- Pest management decision tools
- Pesticide evaluation methods and tools
- Reporting and documentation forms and software
- IPM fact sheets for common pests
- IPM books and other documents
- Other IPM resources such as websites
- Training materials and opportunities
- Model IPM contract language
- Lists of IPM consultants and PCOs

Pesticide Use Inventories

The NPDES Permit requires the Permittees to inventory their pesticide uses. By meeting this requirement, the Permittees will ensure they have an accurate, up-to-date understanding and documentation of their pesticide use. To the extent practical, this inventory will build on existing State Pesticide Use Reporting (PUR) requirements. Most pesticide applications by the Permittees are probably subject to the PUR requirements.

PUR requirements apply to the following Permittee actions:

- Application of any restricted material
- Application of any agricultural chemical
- Outdoor application of chemicals with the potential to pollute groundwater
- Pesticide applications to parks, golf courses, roadside ditches, and creeks and channels

PUR requirements also apply to any applications made by PCO vendors, including pest control services provided to the Permittees.

The PUR requirements may not apply to all pesticide applications by Permittee staff on Permittee property. For example, an application of a non-restricted pesticide by staff for structural purposes, such as cockroach control, would not be subject to PUR requirements.

The plan includes the following action to meet the NPDES Permit pesticide use inventory requirements:

Action Item 3. Document and report pesticide use.

By March 1, 2005 each Permittee will complete its pesticide use inventory, covering a representative time frame. Each year, beginning in 2006, the Permittees will complete pesticide use inventories for the previous calendar year. Completion of the inventory will include:

- a. Survey internal departments to identify all pesticide applications made by Permittee staff, on Permittee property, or on behalf of the Permittees by vendors
- b. Compile pesticide use reports for pesticide applications made by Permittee staff
- c. Compile pesticide use reports for pesticide applications made by PCOs or vector control districts on Permittee property or on behalf of the Permittees
- d. Collect information on pesticide applications made by Permittee staff that is not subject to PUR requirements
- e. Combine all PUR and non-PUR pesticide use information in an appropriate useful format. The Permittees will consider establishing databases that coordinate the PUR requirements with the documentation requirements established by the MS4 Permit. For instance, Santa Clara County has a web-based software application that meets both the PUR and MS4 requirements, streamlines pesticide use reporting and documentation procedures, and provides timely information in a format useful for the IPM Program.

Action Item 4. Review and revise internal policies and procedures to ensure documentation of pesticide use.

The Permittees will conduct the following activities:

- a. Consult with the Agricultural Commissioner to ensure that identified Permittee-associated pesticide uses comply with applicable PUR requirements
- b. Require PCO vendors to provide data directly to Permittees regarding pesticide applications made under contract to the Permittees
- c. For pesticide uses that are not subject to PUR requirements, develop internal policies and procedures as necessary to ensure reporting and documentation in compliance with the MS4 Permit

Pesticide Use Training and Certification

The NPDES Permit certification and training requirements are more stringent than those of the state pesticide regulations. The Permittees will comply through the following two action items:

Action Item 5. Require Oversight by Certified Pesticide Applicator.

The Permittees will require all Permittee pesticide use to be conducted by, or under the supervision of, a person holding a Qualified Applicator License or Qualified Applicator Certificate, in the category appropriate for the application. (State pesticide regulations currently require some but not all of the Permittee's pesticide uses to be supervised by certificate or license holders.)

Action Item 6. Establish/conduct training program for pesticide applicators.

The Permittees will:

- a. Establish a written training program for all staff that apply pesticides
- b. Conduct the pesticide applicator training at least annually
- c. Ensure training is consistent with and coordinated with the pesticide worker training requirements and NPDES Permit requirements. The training will include:
 - Worker and public safety
 - Proper use and disposal of pesticides
 - Pesticide related surface water toxicity
 - Less toxic methods of pest prevention and control
 - Integrated pest management policy and procedures

Permittee Integrated Pest Management

A number of the NPDES Permit requirements are appropriate to address through IPM. Each Permittee will adopt IPM policies and procedures that apply to all of its pest management activities, including those conducted on its behalf by contractors. Each Permittee is responsible for its own IPM implementation, but the Permittees plan to work together to conduct background research, and to develop the basic framework and information resources for jurisdiction-specific IPM. They may also choose to combine resources for certain activities such as training, data management, and IPM consultant services.

Specifically, the Permittees will:

Action Item 7. Develop and adopt Permittee-specific IPM policies, procedures, and ordinances.

By May 1, 2006, each Permittee will adopt in-house IPM policies, procedures, or ordinances specific to its own operations, in coordination with Action Item 1. The Permittees will draw on joint background research (see Action Item 2), and, as necessary, IPM experts will be consulted to develop, review, refine, or implement IPM Program elements.

The success of integrated pest management depends on the awareness and support of various stakeholders. Depending on the needs of their internal organization, the Permittees may find it advantageous to conduct stakeholder processes to develop their internal IPM policies, procedures, or ordinances. Potential stakeholders include PCO service providers, staff and management involved in pest management, internal and external customers, other urban pesticide users such as vector control districts, and the general public.

Permittee IPM activities will include the following elements. As appropriate, these may be coordinated with related activities included in other sections of the Pesticide Plan:

- a. **Authority.** In coordination with Action Item 1, each Permittee will establish written policies, procedures, or ordinances to support implementation of IPM.
- b. **Definition of IPM.** Each Permittee will establish an in-house definition of IPM that is consistent with generally accepted standards of Integrated Pest Management.
- c. **Pest management decision and documentation procedures.** Each Permittee will develop written guidance and procedures for making and documenting pest management decisions, including selection and use of pesticides.

- d. **Requirements for pest management vendors.** PCO and Pest Control Advisor vendors will be required to implement IPM while providing services to Permittees, using the following mechanisms:
 - Internal mechanisms such as purchasing policies or standard contract provisions that require IPM implementation by PCOs and PCAs while performing work under contract with the Permittees
 - Requirements for IPM certification of vendors once a practical and bona fide certification system becomes available in the Sacramento Region
- e. **Written IPM training plan.** In coordination with Action Item 3, each Permittee will establish a written training plan to ensure that staff has the necessary knowledge to implement IPM. At a minimum, the training plan will identify training requirements for all staff involved in pest management, set an annual training schedule, and establish a mechanism to ensure that training requirements are met. Staff to be trained includes pesticide applicators, field supervisors, project managers (fiscal managers), facility managers, and IPM coordinators (if any). The training provided may vary depending on specific roles, responsibilities, and activities.

As participants in a PRISM Grant entitled “Making IPM Mainstream”, once a contract is established and funding is secure, the Permittees will benefit from IPM training for appropriate managers and staff, as described in Task 6 of the grant. In addition, the Permittees will benefit from the establishment of an regional infrastructure for providing ongoing IPM training for public agency staff, as described in Tasks 4 and 5 of the grant.
- f. **Inter-agency agreements for sharing IPM responsibilities.** The IPM Program will document agreements, if any, made among Permittees for joint implementation of all or portions of the IPM Program.
- g. **Coordination with the Agricultural Commissioner.** Representatives of the Permittees and the Agricultural Commissioner will meet on a periodic basis to share information on integrated pest management activities, and coordinate their activities as appropriate.

Action Item 8. Ensure coverage under Aquatic Pesticide Permit.

The Permittees will determine if any of their pesticide applications are subject to the State General Permit for Aquatic Pesticides, and obtain coverage as necessary. Compliance with this permit is consistent with integrated pest management principles.

Action Item 9. Coordinate with Sacramento-Yolo Mosquito and Vector Control District

The Sacramento-Yolo Mosquito and Vector Control District (District) is a separate special district that provides control of mosquitoes and other vectors throughout Sacramento and Yolo County, including all the territory within the jurisdiction of the Permittees. The District is committed to reducing the need to use pesticides and other resources for mosquito control, using the principles of integrated pest management. The District has a policy of working with its customers, which includes the Permittees, to reduce standing water that generates mosquitoes. The District provides free consultation to evaluate drainage facilities and will make recommendations to the Permittees as necessary for improving operation, maintenance, and design to reduce mosquito populations and the need to use pesticides. Especially in light of the arrival of West Nile Virus in California, the Permittees will work with the District to adequately control mosquitoes in drainage facilities using water management techniques applied to drainage operation and maintenance procedures, where practical. This may reduce the chances of the District applying pesticides that could impact receiving waters.