

## **Integrated Pest Management Procedures**

### *IPM Control Techniques:*

Vendor will use the following four techniques in Watt Plaza facilities as appropriate:

1. Environmental Controls: the intentional manipulation of the environment in order to reduce pests' accessibility to food, water and shelter. Such control is attributed to the building occupants' conscientiousness regarding a tidy and sanitary working environment. Sanitation is crucial to pest prevention; if an environment is sanitary the pest does not have the crucial means for survival, pests are thus vulnerable and will either die or leave. While environmental control is a powerful prevention technique, if an area is already infested, other techniques may be needed to rid the area of the pests
  - a. Techniques:
    - i. Basic housekeeping
    - ii. Storing food in insect-proof containers
    - iii. Ensuring water drainage to eliminate where mosquitoes might flourish
    - iv. Frequent waste collection at both interior and exterior building collection locations and/or waste hauler location zones
    - v. Proper maintenance or inspection of indoor plants
2. Mechanical Controls: without the use of chemicals, these controls are directed at destroying a pest and/or its habitat. This IPM specifies the proper use of such techniques.
  - a. Techniques:
    - i. Traps- rat, mouse, insect, etc.
    - ii. Removal of nests and/or webs
    - iii. Sealing off cracks or crevices where insects and/or rodents may enter
3. Organic Controls: controls that are derived from an organic compound such as tree bark or flowers and comes in the form of oils or dusts and can be highly effective in pest control.
4. Chemical Controls: In general, chemical controls refer to pesticides that are used to kill infesting pests. Chemical control is the last resort for pest control in Watt Plaza. This IPM specifies the handling, use and application of chemical controls.

### *Rodent Control*

1. Trapping Devices: As a general rule, rodent control inside Watt Plaza's facilities will be accomplished with trapping devices only. All trapping devices will be in protected areas and concealed from plain view so as not to be affected by routine cleaning and other operations. Trapping devices shall be logged in a vendor log. The vendor is responsible for disposing of all trapped rodents and rodent carcasses in an appropriate manner.

2. Rodenticides: When vendor deem rodenticides as necessary means for adequate rodent control inside the building, the vendor will obtain Watt Plaza approval prior to applying any interior rodenticide treatment. All rodenticides, regardless of packaging, will be placed in an EPA approved tamper-resistant bait box or a secure location; a secure location is inaccessible to children, pets, wildlife and domestic animals.

3. Bait Boxes: All bait boxes will be maintained in accordance with EPA regulations, with an emphasis on the safety of non-target organisms. The vendor will take care concerning the following:

- a. All bait boxes are placed out of the general view, in locations where they will not be disturbed by routine operations
- b. The lids of all bait boxes are securely locked or fastened shut
- c. All bait boxes are securely attached or anchored to floor, ground, wall, or other immovable surface
- d. Bait is secured in the feeding chamber of the box instead of the runway or entryways of the box
- e. All bait boxes are labeled on the inside with the vendor's business name and address, and dated at the time of installation and each servicing

#### *Insect Control*

1. Non-Pesticide Methods: The Vendor will employ non-chemical methods of control wherever possible. Such methods may include: The use of trapping devices and vacuums rather than pesticide sprays as a means to cleanout cockroach, ant or other insect infestations.

2. Monitoring: Sticky traps will be used to monitor and evaluate indoor insect control.

3. Cracks and Crevices: As a general rule, the Vendor will apply all insecticides as "crack and crevice" treatments only, meaning the insecticide is not visible to a bystander during or after the application process because it is concentrated and applied to the cracks and crevices only.

4. Bait Methods: Application of baits is Watt Plaza's standard pesticide technology for cockroach and ant control. Vendor will use bait as a method of insect control in all cases unless some circumstance calls for alternative forms of control in which Watt Plaza approval is required.

5. Application of Insecticides to Exposed Surfaces: Application of insecticides to exposed surfaces or as sprays is, in general an unacceptable method of treatment. If the Vendor deems it necessary to employ such a technique, Watt Plaza must approve the treatment. No surface application or space spray will be made while tenants or occupants are in the building. In the case of such an application, the Vendor and Watt Plaza will take all necessary precautions to ensure tenant and employee safety, and the containment of the pesticide to the site application.

#### *Use of Pesticides*

The Vendor is responsible for applying all pesticides according to the product instructions. All pesticides used by the Vendor must be registered with the U.S. Environmental Protective Agency (EPA), state and/or local jurisdiction. The Vendor will adhere to the following rules for pesticide use:

1. Approved Products: The Vendor will only use products approved, in writing, by Watt Plaza.
2. Pesticide Storage: The Vendor will not store any pesticide product in Watt Plaza owned and/or managed buildings without Watt Plaza's consent or instruction.
3. Application as Needed: Pesticide application will be in an as needed basis instead of by schedule. As a general rule, application of pesticides in any area should not occur unless the Vendor has already monitored and inspected that area and found a reasonable need for chemical treatment. Written approval must be granted by Watt Plaza prior to any pesticide application as a preventative measure.
4. Minimization of Risk: When pesticide use is necessary, the Vendor will apply the least hazardous material and use precise application techniques in order to use a minimal quantity of product.
5. Universal Notification: Under normal conditions, Vendor will notify Watt Plaza and all building occupants no less than 72 hours prior to applying pesticides. In the case of an emergency application, no less than 24 hours notice will be given. Federal, state, and local safety and health requirements must be observed at all times. Where there is a conflict between applicable regulations, the most stringent will apply.
6. Pesticide Handling: Transport, handling and use of all pesticides will be in strict accordance with the manufacturer's label instructions and all applicable Federal, state and local laws and regulations.

#### *Cautionary Labeling for Pesticides*

Law requires that precautionary statements and signal words be included on all pesticide labels. This does not apply to non-toxic "natural" pest management solutions. If none of these warnings are provided, do not use the pesticide.

DANGER- A taste to a teaspoon taken by mouth could kill an average-sized adult.

WARNING- A teaspoon to an ounce taken by mouth could kill an average-sized adult.

CAUTION- An ounce to over a pint taken by mouth could kill an average-sized adult.

#### **Implementation**

To meet this objective, a Pest Management Contractor will be contractually required to comply with the following pest management policy, as follows:

1. **The Pest Management Contractor shall use an Integrated Pest Management (IPM) methodology.** IPM is ecology based holistic approach to solving pest problems. IPM programs rely on effective, economic, environmentally sensitive, and scientifically proven techniques to minimize and eliminate pest problems. Pest management decisions are based on pertinent information about pests and their interactions with the natural or man-made environment. This information is used along with careful selection of suitable management techniques to eliminate the

causes of pest outbreaks, or to otherwise manage pests in cost effective ways that represent the lowest possible hazard to people, property and the environment.

2. **The plan shall promote safer alternatives to chemical pesticides while preventing economic and health damage caused by pests.** The plan shall implement the use of IPM techniques to reduce the need for reliance on chemical pesticides. When pesticides may be necessary, the plan shall ensure that clear and accurate notification concerning the use of pesticides be made available so that measures may be taken to prevent and address pest problems effectively, without endangering occupants, janitorial workers or visitors.
3. **The implemented IPM program shall have the following characteristics and or components.**
  - Thorough site inspections
  - Pest monitoring and identification
  - Habitat modification, including structural repairs and sanitation
  - Physical and mechanical controls
  - Biological controls
  - Chemical controls
  - Record Keeping
  - Communication with building management and occupants
4. **Objective of Pest Control Treatment Options:**
  - Least toxic to human health and non-target organisms
  - Appropriate to the site and maintenance system
  - Most likely to prevent recurrence of the problem
  - Most cost-effective in the short and long-term
  - Easiest to carry out safely and effectively
  - Least disruptive to natural enemies (for landscape situations)
5. **Additional Responsibilities of the Pest Management Contractor:**
  - Maintain a list of needed structural and landscape requirements to more effectively manage pests
  - Identify required and recommended training of in-house personnel
  - Provide appropriate notification to building staff and occupants prior to pesticide applications, in accordance with established communication plan
  - Maintain record of pest problems, activities and related complaints
  - Maintain files of pesticide application records, pesticide labels, and MSDS sheets
6. **Requirements of a communication plan: The IPM Plan MUST have the following components:**
  - A clearly written communication plan
  - Posting/Notice which contains the following:
    - Description of the IPM system

- List of all pesticides, including any least toxic pesticides that may be used
- Name, address and telephone number of a contact person
- Statement indicating that product labels and MSDS sheets are being maintained, and are available for review upon request.
- Notification process/strategy for occupants, requiring 72 hour notification before any pesticide (other than a non-toxic pesticide) is applied to the building or surrounding grounds which the building maintains.
- Describe circumstances which might require the 72 hour notification to be waived. Regardless, a 24 hour notification must be maintained for occupants and maintenance personnel.

## **Reporting**

1. **Pest Management Contractor must provide an annual statement of compliance with the requirements of the IPM plan.** Documentation must be maintained, and available upon request, illustrating that the requirements of the IPM plan have been followed during the previous year.