

Town of Los Gatos

Pest Management Performance Standards

STANDARD OPERATING PROCEDURES

A. Implementation of BMPs:

Determining a method of prevention/suppression for managing pest problems

Goal: Choose least-toxic practicable method of pest management on all Town-owned or Town-managed property

Relevant Staff: Parks, Facilities, & Public Works Divisions

1. Prevention: every effort will be taken to design sites, and choose plantings, with less-toxic pest management goals in mind (example: select new plantings from lists of pest resistant plants compatible with local planting zones).
2. Town staff will consult with appropriate supervisor prior to undertaking pest management activities.
3. Follow the Town's IPM Policy and Pest Specific IPM Plans, to the maximum extent practicable (MAP) when controlling pests, or contracting with a service to control pests. (See attached Town IPM Plan/Policy)
4. Staff member responsible for pest management method will investigate least-toxic alternatives prior to selecting least-toxic practicable pest control method.
5. If it is necessary to use a restricted pesticide (such as to ensure public safety), staff will implement application techniques that will prevent contamination of irrigation runoff, stormwater and creeks. The same holds true for pesticides that are to be avoided, per MAP, based upon the NPDES Stormwater Permit regulations. Pesticides listed in the NPDES Stormwater Permit are shown in **Appendix A**.
6. Any staff or contractor who finds it necessary to use a pesticide listed in Appendix A, must first obtain written authorization from the relevant department Supervisor. Authorizations will be kept on file, within the department.
7. If a pesticide listed in Appendix A must be used, justification for its use, along with details on date, location, and quantity, must be forwarded to WVCWP for NPDES reporting requirements.

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B. Implementation of BMPs: Pesticide preparation and application

Goal: Avoid pesticide exposure to people, animals and the environment to the maximum extent practicable when using pesticides on all Town-owned or Town-managed property. Minimize amount of pesticides applied.

Relevant Staff: Parks, Facilities, & Public Works Divisions

1. Town staff will consult with appropriate supervisor prior to preparing and applying pesticides.
2. If it has been determined that pesticides must be applied to a site:
 - a. *Avoid contamination of water:* Avoid application and preparation of pesticides near areas with potential for chemicals to reach water bodies through runoff or drift (i.e. stormdrains, creeks, drainage ditches, etc.).
 - b. *Proper conditions:* Ensure pesticide will be used in proper conditions (i.e. make sure plants are in the proper growth stage for pesticide application, make sure weather is appropriate for application).
 - c. *Preparation:* Only Town-authorized pest management staff are to prepare and apply pesticides. Mix and apply only the amount of pesticide necessary for treatment, in accordance with label
 - d. *Application Equipment:* Periodically check equipment for possible leaks. Do not use leaking equipment until it is fully repaired. Keep equipment clean, fully operational and properly calibrated.
 - e. *Personal Safety Equipment:* Applicators must use the appropriate safety equipment (i.e., boots, gloves, respiratory equipment, protective clothing, eye protection, and headwear) as required for pesticide category.
 - f. *Site Safety:* Make sure necessary supplies are on hand to contain spills or leaks. (e.g., absorbent materials, cleaning supplies, holding containers) Also, make sure that clean water, soap, and single use towels are on site for emergency decontamination.
 - g. *Safety Notifications:* Make sure that appropriate notifications are made and/or postings placed at the application site. Prevent public access to the area during applications.

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C. Storage and Disposal of Pesticides

Goal: Maintain safe practices for storage of pesticides on all Town-owned or Town-managed property; ensure proper disposal of pesticides when necessary

Relevant Staff: Parks, Facilities, & Public Works Divisions

1. Inventory: Conduct an annual inventory of pesticides stored on Town-owned or Town-managed property.
 - a. Ensure that all products have legible labels securely attached.
 - b. Review all products to determine whether any are no longer legal for use, or are discouraged from use by Town policy. Dispose of any such products according to regulations (see # 3).
 - c. Identify older stock and prioritize to use before newer containers are opened; minimize the number of open containers of the same product.
2. Pesticide Storage Areas: Conduct annual inspections of any related storage areas.
 - a. Ensure that the storage area can be securely locked, and related locks and doors are in good working order. Provide clearly visible signs.
 - b. Inspect storage areas for any leaks or potential for flooding. Ensure that all pesticides will be kept dry and that there is no danger of contaminated runoff from the storage site.
 - c. Ensure that storage facilities/activities meet requirements set forth by the Santa Clara County Agricultural Commissioner.
 - d. Inspect safety equipment and spill kits in storage areas; make sure all equipment/supplies are in good working order.
3. Disposal of pesticides: Dispose of any pesticides found in the annual inventory that are no longer legal or appropriate for application.
 - a. Check Federal, State, County and Town regulations and policies for latest information on phase-out of pesticides.
 - b. Follow State, Federal, and County Agricultural Commissioner regulations for safe pesticide disposal.
 - c. Ensure that all employees are aware of specialized requirements for pesticide disposal and that untrained employees will contact appropriate staff for disposal information.

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D. Staff Training in Pest Management

Goal: Ensure that appropriate staff receive training in safe practices for: pesticide mixing and application; handling, storage and disposal of pesticides; documentation and reporting of pesticide use; least-toxic pest management options.

Relevant Staff: Parks, Facilities, & Public Works Divisions

1. Employees involved in pest management activities will receive training and information on Integrated Pest Management and Least Toxic Pest Management techniques and policies. All Town staff involved in maintenance and pest management will:
 - a. receive training regarding the latest IPM technology information and IPM application methods.
 - b. receive training on the Town's Integrated Pest Management Plan/Policy and Pest Specific IPM Plans.
2. Training in Pesticide Use: Make sure that all employees who apply pesticides receive training in safe and environmentally sensitive methods of application.
 - a. Provide pesticide safety training on an annual basis that meets the requirements established by the California Department of Pesticide Regulations (DPR) and the Federal EPA.
 - 1) All employees that apply pesticides must have training on the DPR Pesticide Safety Training Series N-1 to N-10.
 - b. All PCA, QAL, QAC, and Structural Pest Control Operators (Branch I, II, or III) employed by the Town will take the required Continuing Education Credits for renewal of their licenses by DPR or the Structural Pest Control Board. Training must cover special information specified by the product label for mixing or applying pesticides in order to minimize adverse effects on the environment, human health, or public safety.
 - c. All staff that work within the pesticide storage area will receive training on safe storage of pesticides (see SOP C.2) and will review necessary procedures in case of an accidental spill.
3. Training Recordkeeping and Reporting: Head of Department will track all employee training for reporting purposes.
 - a. Maintain records of all employee training as required by Federal, State, and Local regulations. Include information on:
 - topics covered,
 - attendees (including job title)

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- date of the training

- b. Provide information from 2.a to the Town's Stormwater representative or directly to WVCWP. Records are required for the NPDES Stormwater Permit Annual Report.

E. Pest Management Contractors

Goal: Ensure that contractors engaging in pest control (whether using insecticides or herbicides) are either certified in IPM/less-toxic pest management techniques, or, are regulated by contract to use IPM techniques to the maximum extent practicable.

Relevant Staff: Supervisory Staff in Parks, Facilities, & Public Works Divisions

1. Contractors involved in pest management activities will receive, read, and sign written acknowledgment of the Town's IPM Plan/Policy and these Standard Operating Procedures.
 - a. Department Supervisors will ensure that contractors are following the IPM Plan/Policy and SOPs, via at least one of the following methods:
 - review of listing of pesticides and active ingredients used,
 - meetings with contractors to review pest control plans
 - requiring contractors to obtain Town Supervisory staff approval before using pesticides

F. Evaluation of Effectiveness of BMPs and SOPs

Goal: Continually evaluate BMPs and SOPs for effectiveness and ensure that they are being followed properly; make revisions as necessary.

Relevant Staff: Parks, Facilities, & Public Works Divisions

1. Review IPM Policy, Pest Management Plans and the Standard Operating Procedures. Determine whether BMPs and SOPs continue to be effective. Identify any changes needed in those sections, especially in relation to changes in any Federal, State and County pesticide regulations.
2. Inform Town's Stormwater representative (or WVCWP), in writing, of any need for changes and improvements to the BMPs, SOPs or the Performance Standards. Reporting of changes is necessary for the NPDES Permit Annual Report.

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APPENDIX A

Pesticides of Urban Water Quality Concern:

These chemicals are to be used only when no equivalent, less-toxic alternative exists, or an alternative has been tried and failed, or when immediate pest control is necessary due to public safety concerns.

As stated in the Municipal Regional Stormwater (NPDES) Permit, the pesticides listed below are Urban-use pesticides of concern to water quality, and their use should be avoided to the maximum extent practicable.

- Organophosphates
(diazinon, chlorpyrifos, malathion and similar)
- Carbamates
(Carbaryl)
- Fipronil
- Pyrethroids
(bifenthrin, cyfluthrin, beta-cyfluthrin, cypermethrin, deltamethrin, esfenvalerate, lambda-cyhalothrin, tralomethrin, and similar)
- Indoxacarb
- Diuron
- Diamides