

STRUCTURAL PEST CONTROL BUSINESS PRACTICES

- 2003 Revision -

BACKGROUND

Early in the 1960's, concern over widespread pesticide misuse and the publication of Rachel Carson's *Silent Spring* launched the environmental movement. Pesticides are still relatively unique as toxic contaminants in that they are intentionally put into the environment to accomplish their purpose. Therefore, all pest control programs have a special responsibility to fully consider the impact of these chemicals and to prioritize the use of least toxic alternatives.

INTEGRATED PEST MANAGEMENT (IPM)

Modern, responsible pest control is often termed "Integrated Pest Management." IPM can be defined as: A coordinated system of technological and management practices to control pests in a safe, environmentally sound, and economical manner. It is a process for minimizing pesticide use and risk while maximizing the control of pests that affect public health, impede operations, or damage property. IPM has been mandated on Federal property since 1996 by Section 136r-1 of Title 7, United States Code, and is cited in Title 41 of the Code of Federal Regulations (102-74.35) as a required service for agencies subject to the authority of the General Services Administration.

An IPM program for buildings emphasizes three fundamental elements:

- <u>Prevention</u>. IPM strives for "built-in" control solutions by concentrating on the resources that pests need to enter or live in a particular area. *It is a preventive maintenance process* that seeks to identify and eliminate potential pest access, shelter, and nourishment. It also continually monitors for pests themselves, so that small infestations don't become large ones.
- <u>Least-Toxic Methods</u>. *Pesticides are essential to control pests in many situations*. However, IPM aims to minimize both pesticide use and risk through alternate control techniques and by favoring compounds, formulations, and application methods that present the lowest potential hazard to humans and the environment.
- Systems Approach. *IPM is not just a pest control contract*. This contract must be effectively coordinated with all other relevant programs that operate in and around a building. Plans and procedures involving design and construction, repairs and alterations, cleaning, waste management, food service, and many other activities, should incorporate a pest control perspective whenever possible.

PESTICIDE ISSUES FOR PUBLIC BUILDINGS

Following are the three most important pesticide issues for public buildings. All pertain to pesticide products that are difficult or impossible to apply precisely, or that can readily drift away from the immediate application site. Just because a pesticide product is used legally does not necessarily mean it is appropriate for a public building!

- <u>Indoor Air Quality</u>. Pesticide fumes or particles may linger for days or weeks as air or surface pollutants. *Therefore, the old-fashioned "spraying" that once characterized indoor pest control should no longer be permitted on a routine basis inside public buildings*. Insecticides approved for normal use should be limited to nonvolatile bait formulations that are either applied to cracks and crevices or concealed inside protective containers. Since baits are generally more effective, spray has become obsolete as the standard exterminator's tool.
- <u>Health and Safety in Child Care Space</u>. Children are particularly sensitive to pesticide residues, so the elimination of these chemicals from the air they breathe and the surfaces they touch is of critical importance.
- <u>Americans With Disabilities Act (ADA) Compliance</u>. Building occupants who claim sensitivity to pesticides and other chemicals may request that employers make "reasonable accommodations" under the ADA to allow the employees to perform their jobs. In the case of chemical sensitivity, this means the elimination of volatile, sprayed pesticides in the workplace.

GUIDANCE DOCUMENTS

The following 10 guidelines summarize pest control standards that have been mandatory since 1989 for Federal buildings operated by GSA's National Capital Region (NCR). They have since been widely adopted throughout the public sector.

The NCR Regional Entomologist is GSA's national point of contact for pest control issues, and can provide a wide range of additional guidance, including contract specifications and information on the latest control technologies. Please contact:

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GUIDELINES FOR STRUCTURAL PEST CONTROL OPERATIONS

- 1997 Revision -

(These standards have been mandatory since 1989 for Federal buildings operated by the U.S. General Services Administration, National Capital Region)

- **1.** All on-site pest control contractor personnel should be Certified Pesticide Applicators. Persons "working under the supervision" of a Certified Applicator do not meet this standard. Pesticides should never be applied by Government employees.
- **2.** Pesticide application should be according to need, when pests are actually present, rather than by schedule. Pesticides should be used only if adequate control cannot be achieved with nonchemical methods.
- **3.** Pesticide use should always consist of the least hazardous material, most precise application technique, and minimum quantity of material necessary to achieve control.
- **4.** The contractor should provide labels and material safety data sheets for every pesticide used on the premises to the contracting officer or representative.
- **5.** Pesticides should not be stored on the premises.
- **6.** Pesticides applied to the air or to exposed surfaces should never be used for routine treatment inside buildings. If their use is essential for a special circumstance, tenant personnel must not be present during treatment. As a general rule, pesticides should be applied only as containerized or crack and crevice treatments in which the applied material is never visible.
- **7.** As a general rule, insecticides should be applied only as baits formulated as solids, pastes, or gels. Spray or dust formulations should be selected only as a last resort or when solids, pastes, or gels are not practical.
- **8.** Bait formulations, traps, vacuuming, sanitation, and exclusion techniques should be emphasized for insect control inside buildings.
- **9.** Traps, sanitation, and exclusion techniques should be emphasized for rodent control.
- **10.** Exclusion techniques should be emphasized for bird control.

THE GSA INTEGRATED PEST MANAGEMENT PROGRAM

- 2005 Revision -

I. Program Functions

A. Develops and directs National Capital Region (NCR) IPM effort

- Contract administration for about 100 sites (30 million gsf).
- Technical coordination and client liaison.

B. GSA nationwide point of contact for pest control issues

- Onsite program audits, guidance, and training.
- Outreach and consultative services on IPM technology, program implementation, and procurement strategies.

II. Program Achievements

A. GSA is lead Federal agency for providing structural IPM guidance

- Since 1989, guidance provided to over 70 Federal agencies, two foreign governments, and about 50 public agencies in 17 states.
- Nearly every major Federal agency has adopted GSA specifications and/or other program guidance.

B. Documented client satisfaction and pesticide reduction

- 90% reduction in pest control service requests (1st 10 years of program).
- 96% decrease in insecticide applied (1st 10 years of program).
- Published technical results in peer-reviewed journal. (Greene, A. and N. L. Breisch. 2002. *Measuring Integrated Pest Management Programs for Public Buildings*. J. Econ. Entomol. 95:1-13.)

C. Recognition

- Praised by Consumers Union, 1996 ("striking success"; "model that should be emulated").
- White House Closing the Circle Award for environmental program excellence, 1999.