

SUNY Geneseo Pesticide Application Policy

General

All applications of pesticides on the SUNY Geneseo Campus will be in accordance with 6 NYCRR Part 325, *et. seq.* Pesticides must be used only as specified on the label.

Typical applications of pesticides on the campus may include:

<u>Pesticide</u>	<u>Target Pest</u>
Bait Boxes	Ants, Mice
Wasp or Hornet Spray	Stinging Insects
Boric Acid, Pyrethum	Ants, Cockroaches
Specific insecticides and fungicide applications	Greenhouse pests
Specific herbicides including: 2,4-D, Round-Up and Surflan	Weeds

While not generally considered ‘pesticides’, antimicrobials, including antibacterial or antifungal agents are, by regulation, EPA registered pesticides. 6 NYCRR Part 321.17(3) exempts the use of antimicrobials from the regulations requiring certified applicators. The NYSDEC is determining whether antimicrobials must be included on the annual report required by 6 NYCRR Part 325.25.

No restricted use pesticides are applied on the SUNY Geneseo campus. A list of restricted use pesticides is contained in 6 NYCRR Part 326.

Integrated Pest Management

The use of pesticides on the SUNY Geneseo campus is an element of the campus Integrated Pest Management (IPM) Program. Alternative methods of pest reduction or elimination are used to minimize the amount of pesticides used when and where possible. For lawn care, these include the extensive use of ground cover vegetation, targeted maintenance practices and decorative plantings. Within building structures, including greenhouses, pesticides are only used when a specific target pest has been visually identified. Cultural practices are also used to minimize greenhouse pesticide use. Any pesticide used in the greenhouse is specific to the pest and applied in as small an area as possible. Water cooling tower applications are minimized through flowrate, seasonal management practices or other measures.

While pesticide applications are minimized and targeted at specific pests, the applications of pesticides are necessary to the success of the IPM Program. When pesticides are applied on the SUNY Geneseo campus, they will be applied in accordance with applicable regulations and following procedures outlined in this document.

Applicators

SUNY Geneseo maintains a Certified Pesticide Business License in accordance with 6 NYCRR Part 325.23. Campus staff members are certified as Commercial Applicators of Pesticides in accordance with 6 NYCRR Part 325.16. Certifications are maintained in Structural (7A), Ornamental and turf (3A), and Cooling Towers (7G).

Contracted pesticide applications may also occur at SUNY Geneseo. These may be contracted directly by the campus or through the State University Construction Fund or through the Dormitory Authority of New York in association with a building or renovation project being conducted on the campus. The Department of Environmental Health and Safety will convey campus pesticide application procedures to these contractors.

Certification Categories

The NYSDEC Commercial Pesticide applicator certifications include:

1. Commercial Pesticide Apprentice

An individual who has met the requirements of 6 NYCRR 325.10, is at least 16 years of age, and works under the direct supervision of a certified commercial pesticide applicator.

2. Certified Commercial Pesticide Technician

An individual who is at least 17 years of age and is certified to engage in the following:

- (1) commercial use of any general use or unclassified pesticide without supervision; or
- (2) use of any pesticide when working under the direct supervision of a certified commercial pesticide applicator.

3. Certified Pesticide Applicator or "Fully Certified Applicator"

A commercial pesticide applicator who is certified by the department to use, supervise the use of, or train another individual in the use of any pesticide in any category of use covered by the individual's certification or any individual who is certified to sell restricted use pesticides as described in 6 NYCRR 325.16(l).

Application Restrictions

Pesticides may not be applied by campus personnel other than those meeting the requirements specified above.

Applications are not made by campus personnel at the Holcomb Building.

Certified Applicator Certification Renewal Procedures

Renewal/Recertification:

The NYSDEC will provide a non-forwardable notice to each applicator 2 months prior to certification renewal or expiration. This notice should be brought to the Department of EHS for processing as soon as possible after receipt, preferably within two weeks.

Certifications are *renewed* every three years. Forms from NYSDEC are completed and submitted at that time. The campus will pay any required fees for renewal.

Recertification is required every six years. Prior to certification expiring, proof of required number of credits must be submitted. Applicators should maintain a file containing copies of all recertification credits. Original recertification certificates are maintained in the EHS Department.

As an alternative to recertification credits, an applicator desiring to recertify may retake the certification exam.

Related Programs

Respiratory Protection:

Pesticide Applicators who may have the opportunity to apply pesticides recommending the use of respirators are required to comply with the requirements of 29 CFR 1910.134, the OSHA Respiratory Protection Program. In accordance with these regulations, SUNY Geneseo has a written Respirator Protection Program. This program requires annual physicals, fit-tests and training of all campus respirator wearers.

Personnel Protective Equipment:

In addition to respirators, OSHA regulations require a review of the hazards associated with tasks performed by employees. Personnel Protective Equipment (PPE), appropriate for the identified hazards, should then be made available to the employees. Gloves, protective overwear, boots, goggles and faceshields, as well as respirators, were identified as PPE for working with certain types of pesticides.

Spill Response:

In compliance with the various federal and NYSDEC Spill Reporting Requirements (oil and hazardous materials), SUNY Geneseo developed a Spill Response and Reporting procedure and form. Spills of pesticides must adhere to procedures outlined in those documents which are available in the EHS Department.

Application Procedures:

The following sections address general procedures for pesticide applications on the SUNY Geneseo campus.

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A. Grounds Applications: *These guidelines apply to both campus and contracted pesticide applications. The certified applicator MUST be on the grounds of the campus during applications made by those working under their supervision. The certified applicator is responsible for ensuring applications made by technicians and apprentices persons under his or her direction are compliant with applicable regulations, safety precautions and all other applicable procedures.*

I. Prior to Applications:

1. Prior to the initiation of seasonal grounds applications, a general notification must be made to all campus personnel indicating such applications will be occurring within the next month. Applications should be scheduled to minimize disruption to building occupants and use.
2. Occupants of buildings near locations where grounds pesticides will be applied are to be notified of applications in writing or by email not less than two days prior to the intended date of weather-dependent applications. This notification should also be forwarded to Department of Facilities Services to ensure air intakes are shut-down during any applications that might be drawn into the buildings.
3. All motorized equipment used for the transportation or application of pesticides must be labeled with the Registered Pesticide Business label (6 NYCRR Part 325.26(a)) and a copy of the application posting with emergency contacts.
5. Copy of pesticide labels must be available during all applications.

II. Day of Application:

1. Wind speed and expected weather conditions should be verified prior to initiating application. Applications should not occur in winds of greater than 10 mph. (NOTE: Windspeeds are typically lowest early morning or late day). Rains immediately following application can lessen the effectiveness, requiring a repeat application. If heavy rains are expected within 12 hours of the intended date of application, the pesticide application should be postponed. (6 NYCRR Part 325.2(a)).
2. Department of Facilities Services should be contacted the morning of the application to verify the shutdown of all air intakes in the area of applications.
3. Applicators must select appropriate personal protective equipment to wear during application. Labels and SDSs of pesticides must be read to determine what equipment is required for that particular chemical or mixture of chemicals. This equipment may include: respirators (with pesticide cartridges), gloves, boots, face shield, goggles, apron, etc.
4. Mixtures of pesticides must be made safely. Respirators, goggles, gloves, disposable jackets and boots are to be worn during mixing in accordance with guidance on SDSs. All water must come from hoses or faucets equipped with anti-siphoning devices (6 NYCRR Part 325.2(c.)). Tanks and all other pesticide containers must be labeled as to their contents.

5. Postings should be made just prior to initiating pesticide applications. This will assist in eliminating unwary persons from entering an area where pesticides are being sprayed. Postings will consist of Grounds Department signs located conspicuously around the perimeter of the application area, including all walkways. Postings must clearly identify the certification number of the applicator, the date and time of the application and emergency contacts.

III. During Application:

1. Appropriate Personal Protective Equipment must be worn. Applicators must have labels and SDS for pesticides being applied. Applicators must familiarize themselves with the information on SDSs, especially first aid and spill response.
2. To minimize drift, application of grounds pesticides should be made within 3" of the ground. Nozzles should be held no more than 4" from the ground surface. If a motorized unit is used for the application, provision must be made to ensure applicator nozzles are not greater than 4" from the ground surface.
3. To prevent spills during transporting application equipment, hoses and sprayers should be properly secured. If a spill should occur, efforts should be made to minimize the extent of the spill by applying speedy-dry or other absorbent material. Spill Reporting is required.
4. Applicators must maintain an awareness of other persons as they are spraying. If students or other campus personnel inadvertently enter an area being sprayed, the applicator should temporarily terminate spraying, inform the persons of the activities in the area and then wait until they are clear prior to starting to spray again. If the persons refuse to leave the area, University Police should be contacted (Contracted applicators are to contact EHS).
5. If the applicator notices any potential problem during application, such as mist being drawn into an air intake, open windows or doors, manhole entry occurring near the application, or a group of students walking through the area, spraying must be immediately stopped. Spraying may not start again in that area until the problem is resolved.
6. If a member of the campus community requires additional information on the grounds pesticide application, they should be directed to call the Grounds Manager or the Director of Environmental Health and Safety.
7. Pesticide containers must be triple-rinsed and disposed of as trash (empty containers are not hazardous waste following triple rinsing). There should be no reuse of pesticide containers for other purposes (6 NYCRR Part 325.5(b)).

IV. Following Application:

1. Applicator should verify postings are legible and visible prior to leaving an area after completion of spraying.
2. Recordkeeping forms should be completed the DAY of application.
3. After application has dried and odor has dissipated (not less than 2 hours) Department of Facilities Services should be contacted to re-activate air intakes for near by buildings.
4. Postings must be removed within 48 hours after completion of spraying.
5. An assessment of the effectiveness of the application should be made within two to three weeks of application.

IV. Recordkeeping:

1. Applicator must maintain accurate records of all applications by campus personnel on forms approved by the New York State Department of Environmental Conservation (NYSDEC). These forms must be reviewed by the Grounds Manager for accuracy and completeness and submitted to the EHS Department monthly. Copies

should be maintained by the certified applicator. EHS will submit the information on these forms to the NYSDEC annually.

2. Grounds Manager will maintain copies of pesticide labels and SDSs applied by campus applicators. Copies of these and labels and SDSs from contracted applicators will be maintained in the EHS files.

B. Greenhouse Applications: *Greenhouse pesticide applications will be made by Certified Pesticide Applicators ONLY. Glue boards for monitoring and control and other “contained pesticides”, such as baited traps, should be used whenever possible to minimize amounts of pesticides used.*

I. Prior to Application:

1. Ventilation from greenhouse must be shutdown.
2. Notify University Police of intended applications to prevent inadvertent entry.
3. Mixtures of pesticides should be made safely. Respirators, goggles, gloves and boots are to be worn during mixing. All water must come from hoses or faucets equipped with anti-siphoning devices.
4. Applicators must select appropriate personal protective equipment to wear during application. Labels and SDSs of pesticides must be read to determine what equipment is required for a greenhouse (limited ventilation) application of a particular chemical or mixture of chemicals. This equipment may include: respirators (with pesticide cartridges), gloves, boots, face shield, goggles, apron, etc.

II. During Application:

1. Applicators must wear the appropriate personal protective equipment selected prior to application.
2. Notification of spraying must be placed at all entrances to the greenhouse noting “Pesticide Application. No Entrance”.
3. Application should be directly to affected plant material. Spray nozzles should be held within 2” of plants to minimize overspray.

III. Following Application:

1. Greenhouse must be locked and posted as “No Entrance until _____ (This blank should have the time two hours later written in). In case of Emergency call _____” (An appropriate number within the Biology Department).
2. After two hours, an assessment of the conditions at the greenhouse are to be made by the certified Applicator that made the applications. Once the pesticide has dried and/or dissipated, the greenhouse may be unlocked, signs removed and ventilating devices re-activated. University Police should be notified.
3. Recordkeeping forms should be completed the DAY of application.
4. Effectiveness of pesticide application should be made as soon as indicators can be identified.

IV. Recordkeeping:

1. Applicator must maintain accurate records of all applications on forms approved by the New York State Department of Environmental Conservation (NYSDEC). These forms must be reviewed for accuracy and completeness and submitted to the EHS Department monthly. Copies should be maintained by the certified applicator. EHS will submit the information on these forms to the NYSDEC annually.
2. Biology Department will maintain copies of pesticide labels and SDSs applied by applicators in the Biology Greenhouse. Copies will be maintained in the EHS files.

C. Structural Applications:

These applications should be limited to the greatest extent possible to baited traps, sticky papers, or otherwise “contained” pesticides. The use of sprays should be limited to direct application of stinging insect sprays at nests of wasps and hornets. Honeybee swarms and nests should be dealt with extreme care as stinging insect sprays may not be effective against honeybees. Unless honeybees are threatening occupancy of or passage through an area, they should be left alone.

Technicians may apply these types of pesticides under the direction and consent of a certified applicator. The certified applicator must be contacted by telephone prior to application, and be within a 15-minute travel time to the campus.

I. Prior to Application:

1. The specific pest and specific location of the pests should be identified to the extent possible.
2. Room occupants (if pests are present in an office or residence hall room) should be notified of the pesticides being used and any required precautions. Where possible, they should be allowed to read the labels. Room occupants should be asked to leave during spray applications.
3. The Work Control Center should be informed of the location (building and room number) of any pesticides used.
4. Stinging insect sprays should be applied during the cooler part of the day, prior to insects becoming active. If application is required in an enclosed area, applicator should identify an “escape route”. If the spatial constraints are problematic, and application cannot be done safely, a contracted service may be arranged.
5. Container labels must be read to determine if any personal protective equipment is required, if any evacuation of surrounding areas is necessary, or to determine any other required actions.

II. During Application:

1. “Contained pesticides”, especially those for rodents, should be checked for success daily unless manufacturer specifically recommends otherwise. Unsuccessful traps should be relocated or repositioned. Successful traps should be bagged and disposed of.
2. Stinging insect sprays should be directed at the hive or nest from a safe distance. A bee hood and gloves are available.

III. Following application:

1. The success of the pesticides should be evaluated. Contact with the room occupants should be made to determine if any additional pests have been sighted.
2. Recordkeeping forms should be completed the DAY of application
3. After verification of success of stinging insect spray, visible and accessible hives or nests should be removed. Plastic bags should be placed around the nest and then it should be dislodged. The bag should then be tied tightly shut. This removal should not occur if live stinging insects remain in the area. As the honey in abandoned honeybee nests attracts other insects, removal is necessary. This may require a contractor. For nests located within walls, points of access should be identified and eliminated. Decisions to remove nests within walls will be made on case-by-case basis.
4. If a spray is used, any walls or floors upon which the spray was allowed to congeal should be thoroughly washed.
5. Any traps, baits, or other contained pesticides should be removed for disposal after use (no longer than 1 week in occupied areas, 2 weeks for unoccupied areas).

IV. Recordkeeping:

1. Certified applicators must maintain accurate records of all applications on forms approved by the New York State Department of Environmental Conservation (NYSDEC). These forms must be reviewed for accuracy and completeness and submitted to the EHS Department monthly. Copies should be maintained by the certified applicator. EHS will submit the information on these forms to the NYSDEC annually.
2. The certified applicator will forward copies of pesticide labels and SDSs applied on the campus to the EHS Department.

D. Cooling Tower Applications

Applications of pesticides to cooling towers will be conducted only by individuals certified in Cooling Tower (7G) pesticide applications.

1. Pesticide applications to cooling towers must be in compliance with accepted practices and all applicable regulations.
2. The Work Control Center must be informed of any Cooling Tower pesticide applications prior to the application.
3. Cooling tower water containing pesticides cannot be released to the storm sewer or other surface waters.
4. Recordkeeping forms should be completed the DAY of application and submitted to the EHS Department monthly. Copies should be maintained by the certified applicator. EHS will submit the information on these forms to the NYSDEC annually.
5. The certified applicator will forward copies of pesticide labels and SDSs applied on the campus to the EHS Department.