

Jean Lafitte National Historical Park and Preserve Integrated Pest Management Guide



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Purpose of This Guidance

This document provides an overview of the National Park Service's (NPS) Integrated Pest Management (IPM) Program, as outlined in the *2001 NPS Management Policies* and *NPS-77 Natural Resources Management Guideline*

Who Should Read This Guidance?

This guidance was written for NPS personnel who may need to manage pests (e.g., insects, rodents, weeds, mold) on NPS property or in NPS buildings . (Pests area population of organisms that interferes with the purposes of the park..) This guidance was written specifically to educate JELA staff on NPS procedures and requirements governing pest management procedures and pesticide use in national parks.

Who Needs an Integrated Pest Management (IPM) Program?

IPM is a decision-making process that coordinates knowledge of pest biology, the environment, and available technology to effectively manage pests. This Guide will help prevent unacceptable levels of pest damage by identifying cost-effective methods or strategies that prevent, reduce, and/or eliminate pest infestations and damage while posing the least possible risk to people, resources, and the environment. Through proper decision-making, the IPM process ensures that effective, low-risk management strategies are adopted and implemented to manage pests.

Current NPS policy (*NPS-77 Natural Resources Management Guideline*) and soon-to-be-released NPS policy (*Director's Order 77-7*) requires that each park develop and implement an IPM

Proposed pesticide use must be reviewed and approved by the NPS IPM Coordinator before being purchased and/or used on

What is Included in an IPM Program?

Communicating with the Park IPM Coordinator

The Park IPM Coordinator will help identify procedures and strategies for pest management, including determining the type, source, and severity of the pest problem, and recommending treatment methods. Treatment may involve non-chemical or chemical options, ongoing monitoring, and evaluations. The Park IPM Coordinator may also consult with public health officials, technical subject matter experts, and Regional or WASO IPM Coordinators that are specifically trained in IPM procedures and hold valid state pesticide applicator licenses.



Pesticide or Bio-control Requests

In parks, preference is given to using effective, low-risk methods to manage or prevent pest invasions. Non-chemical methods are preferred. These include the use of disease-resistant plants, structural modifications (e.g., sealing holes where pests can enter buildings), steam cleaning, and improved storage procedures for food, trash, and other items that attract pests. Chemical methods and release of bio-control agents may be incorporated into the IPM program if it is determined that they are necessary.

All proposed chemical pesticides must **first** be reviewed and approved by the Park IPM Coordinator. **This includes chemicals that may be proposed for use by a pest management contractor hired by the Park.** The pests targeted; pesticide name and corresponding EPA Pesticide Product Registration Number; and type, amount, and location of pesticides used during the calendar year must be reviewed at least on an annual basis by the Park IPM Coordinator.

The annual submittal of this information should cover all pesticide use anticipated by for the upcoming year. Should the Park experience unanticipated pest problems during the year, information for proposed pesticides intended to correct those problems should be submitted at the time the issues arise. The information should be submitted, some of which can be found on pesticide labels and material safety data sheets, using the sample **Pesticide Request Form (Appendix A)** or a comparable document. It is a recommended Best Management Practice (BMP) that non-chemical pest management methods be discussed with the Park IPM Coordinator, although formal requests are not required.

Once the Park IPM Coordinator receives a request and it is determined that chemicals (i.e., pesticides) are needed to prevent or suppress a pest problem, the Park IPM Coordinator is required to obtain prior approval for their use from the Regional IPM Coordinator through the NPS Pesticide Use Proposal System (PUPS). Each pesticide use request is reviewed on a case-by-case basis. Proposals for the following pesticides must be elevated to the Washington Area Support Office (WASO) IPM Coordinator for review:

- Pesticides applied to water.
- Pesticides that may affect threatened and endangered species.
- Restricted use pesticides.
- Aerial application of pesticides.
- Pesticide applications of over 400 contiguous acres.

Urgent pesticide requests can be reviewed via phone by the Regional or WASO IPM Coordinator in emergencies, and are entered into the PUPS database afterwards by the Park IPM Coordinator.

The approved pesticide can then be used within the park for the projects for which use was approved up until the last day of the calendar year.



Purchasing

When purchasing pesticides, the Park should only purchase the amount needed for use during the year of approval. The exception to this rule is when the smallest amount available for purchase is greater than the amount needed.

Use

Private or commercial pest management companies are responsible for complying with state pesticide laws and regulations regarding pesticide application. Commercial applicators are individually responsible and liable for pesticide application and must be licensed as required by the individual state. All pesticide applications must follow label instructions, including site registrations, safety equipment, and others. The Park must not deviate from these directions since they are legally binding. If approval is obtained to apply **restricted use pesticides** (as defined by the US Environmental Protection Agency), the Park must ensure that it has a state **certified commercial applicator** to apply these chemicals on NPS property as required under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

Storage

If Park pesticide storage facilities are within assigned areas, the facilities must be managed in accordance with NPS 77 (e.g., facilities must be locked, fireproof, ventilated, and have proper warning signs). Pesticides must be stored separately from food (FDA Food Code); and must be stored separately from other substances, such as cleaning chemicals, to minimize the danger of accidents, fires, or other hazardous events.

In addition, labeled pesticides should be stored with their material safety data sheets (MSDSs) in a building separate from other chemicals. This will help avoid the potential reaction of incompatible materials (e.g., flammable dormant oil and reactive organic insecticide) or other adverse reactions (e.g., herbicides should be stored separately away from other pesticides and fertilizers as they can off-gas and chemically contaminate other pesticides or become explosive; baits can absorb other chemicals, adversely affecting their performance).

Exceptions

The following pesticides are exempted from the IPM Program (i.e., do not require prior review or approval before purchase or use):

- **Personal insect repellants** used on oneself.
- **Disinfectants** and cleaning solutions used in restrooms, kitchens and demonstration areas.

Disposal

By limiting the amount of pesticides purchased, there should be few, if any, pesticides that need to be disposed of. If excess chemical pesticides remain, the Park should attempt to use those chemicals as intended and approved until the pesticides are used up. If it is determined that leftover pesticides are unusable, they and the container must be discarded according to label instructions and in compliance with Environmental Protection Agency (EPA) hazardous waste and OSHA hazardous material regulations. There may be an opportunity to dispose of pesticides as a universal waste, which is subject to less stringent regulations (see .Additional Information.).



Recordkeeping and Annual Reporting

The Park IPM Coordinator is required to keep an annual pesticide use log at the end of the calendar year. This pesticide use log (see **Appendix B**) should include all pesticides applied by Park staff and private or commercial pest management companies. Products that are used without approval should also be reported. The pesticide use log should be maintained on a project-by-project basis. (For example, if project number "PARK-01-2004" for boric acid crack and crevice treatment of cockroaches in the employee dining area is approved for use in the calendar year, all use of boric acid for this specific project should be tallied under this same project number.)

The Park IPM Coordinator will include all pesticide use in the park-wide pesticide use log and submit it to the PUPS database. This information is maintained for legal purposes in accordance with NPS Management Policies.

For further information consult the Park's HAZCOM Plan (29 CFR 1910.1200) Which provides a list of hazardous chemicals, material safety data sheets for all hazardous chemicals stored and used onsite, a labeling system for hazardous chemicals not stored in their original container, and records of employee training on the HAZCOM Program.

Remember that pesticides are considered to be hazardous chemicals under the HAZCOM Program!

JELA IMP Coordinator Contact:

Nancy Walters
Natural Resource Management Specialist
419 Decatur Street Headquarters Office, New Orleans, LA 70130
504-589-3882 ext. 119
504-382-4937 (cell) 18510 (direct connect)



Additional Information

Name	Description	Source
NPS Biological Resources Management Division Integrated Pest Management Program	Provides technical assistance on IPM.	Carol DiSalvo, 202/513-7183 www.nature.nps.gov/biology/ipm/index.htm
NPS IPM Coordinators	Listing of all NPS IPM Coordinators and contact information.	See Appendix C of this document
The National Park Service Integrated Pest Management Manual	Provides a description of the biology and management of 21 species or categories of pests.	NPS, www.nature.nps.gov/wv/ipm/manual.htm
IPM Management in the National Park Service	A basic fact sheet on the IPM in the National Park Service.	NPS, www.nature.nps.gov/facts/fipm.htm
NPS Rodent Exclusion Manual	Provides technical information on rodent-proofing NPS structures.	NPS, www.nps.gov/public_health/inter/info/general/rpmanual.pdf
Bio Integral Resource Center	Nonprofit organization dedicated to finding non-toxic and least-toxic integrated pest management (IPM) solutions.	Bio Integral Resource Center, www.birc.org
International Urban IPM Association	Links to a number of different IPM products.	International Urban IPM Association, www.urbanipm.org/ipmlinks.htm
The IPM Institute of North America	Nonprofit organization that fosters recognition and rewards in the marketplace for goods and service providers who practice IPM.	The IPM Institute of North America , www.ipminstitute.org/school_biblio.htm
NPS-77 Natural Resources Management Guideline	Information on the NPS IPM.	NPS Concession Environmental Management Program, <i>GreenLine</i> Number 303/987-6913
Natural Resource Management Reference Manual #77 (not yet developed)	Information on the NPS IPM.	NPS, www.nature.nps.gov/rm77
NPS 2001 Management Policies	States pest management policy pertaining to concessions operations on pages 37-38.	NPS, www.nps.gov/policy/mp/policies.pdf
EnviroFacts Sheet: Waste Pesticide Management	Two-page document used by parks and concessioners to understand environmental issues.	NPS Concession Environmental Management Program, <i>GreenLine</i> Number 303/987-6913
EnviroCheck Sheet: Pesticide Management	Multi-page document used as a tool during NPS environmental audits.	NPS Concession Environmental Management Program, <i>GreenLine</i> Number 303/987-6913
Guidance for Managing Universal Waste	Guidance for understanding the Universal Waste Rule. Some hazardous wastes, called universal wastes (i.e., fluorescent bulbs, pesticides, mercury thermostats, some batteries), are subject to less stringent regulatory standards.	NPS Concession Environmental Management Program, <i>GreenLine</i> Number 303/987-6913



Pesticide Request Form
to be Submitted to the Park IPM Coordinator
for the Calendar Year Of 20_____

[illegible]

Pesticide Use Log

For the Calendar Year Of 20____

[illegible]

APPENDIX C: National Park Service IPM Coordinators

REGIONAL OFFICES

ALASKA
 Pat Owen
 Denali National Park
 P.O. Box 9
 McKinley Park, AK 99755
 907-683-9547
 Fax 907-683-9639
 Pat_owen@nps.gov

MIDWEST REGION
 Mike Gallagher
 National Park Service
 1709 Jackson St.
 Omaha, NE 68102
 402-221-3418
 Fax 402-221-3480
 Mike_Gallagher@nps.gov

NATIONAL CAPITAL REGION
 Jil Swearingen
 Center For Urban Ecology
 National Park Service
 4598 MacArthur Blvd., NW
 Washington, DC 20007
 202-342-1443X218
 Fax 202-282-1031
 www.nps.gov/plants/alien
 jil_swearingen@nps.gov

NORTHEAST REGION

Wayne Millington
 209a Ferguson Building
 University Park, PA 16802
 814-863-8352
 Fax 814-865-1649
 npspests.cas.psu.edu/orl
 Wayne_Millington@nps.gov
 Chris Furqueron
 National Park Service
 1924 Building
 100 Alabama St., SW
 Atlanta, GA 30303
 404-562-3113x540
 Cell 404-569-6687
 Fax 404-562-3201

SOUTHEAST REGIONAL OFFICE

CLUSTERS

COLORADO PLATEAU CLUSTER
 Craig Hauke
 Canyonlands National Park
 2282 S. West Resource Blvd.
 Moab, UT 84532-2995
 435-259-2132
 Fax 435-719-2300
 Craig_Hauke@nps.gov

COLUMBIA CASCADE & PACIFIC GREAT BASIN CLUSTERS
 Erv Gasser
 National Park Service
 909 First Ave.
 Seattle, WA 98104
 206-220-4263
 Fax 206-220-4160
 Erv_Gasser@nps.gov

PACIFIC ISLAND CLUSTER

Stephen J. Anderson
 Haleakala National Park
 P.O. Box 369
 Makawao, HI 96768
 808-572-4480
 Fax 808-572-4498
 Hale_veg_mgt@nps.gov
 Stephen_J_Anderson@nps.gov
 Jerry Mc Crea
 National Park Service
 Intermountain Regional Office
 P.O. Box 728 (DNR)
 Santa Fe, NM 87504
 505-988-6024
 Fax 505-988-6025
 Gerald_Mccrea@nps.gov

ROCKY MOUNTAIN & SOUTHWEST CLUSTERS

WASHINGTON AREA SUPPORT OFFICE

WASHINGTON OFFICE
 Carol DiSalvo
 National Park Service
 IPM Program Lead
 Room 2423
 1849 C ST., NW
 Washington, DC 20242-0001
 Carol_Disalvo@nps.gov
 202-513-7183
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