

National Park Service
US Department of the Interior

Commercial Services Program
Denver, Colorado



Understanding the National Park Service's Integrated Pest Management Program

Version 3.0



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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 *2006 NPS Management Policies* and *NPS-77 Natural Resources Management Guideline*, and corresponding concessioner requirements under this Program.

Who Should Read This Guidance?

This guidance was written for NPS concessioners who may need to manage pests (e.g., insects, rodents, weeds, mold) on NPS property or in NPS buildings assigned to them under their Concession Contract. (Pests are “a population of organisms that interferes with the purposes of the park.”) This guidance was written specifically to educate concessioners on NPS procedures and requirements governing pest management procedures and pesticide use in national parks.

Who Needs an IPM Program?

IPM is a decision-making process that coordinates knowledge of pest biology, the environment, and available technology to effectively manage pests. An IPM Program helps 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 Program. Concessioners are required to comply with this policy. This means that whenever a concessioner has or anticipates having a pest problem, the concessioner should request that the park concession specialist coordinate with the park IPM coordinator¹ to identify acceptable pest management procedures and strategies and ensure compliance with the park IPM Program.

Proposed pesticide use must be reviewed and

Concession Contract Requirements

As presented in the Federal Register, July 19, 2000, NPS Concession Contract language states that “The Concessioner shall be responsible for managing weeds, and through an integrated pest management program, harmful insects, rats, mice and other pests on Concession Facilities assigned to the Concessioner . . . All such weed and pest management activities shall be in accordance with Applicable Laws and guidelines established by the Director.”

¹ Some parks may not have a park IPM coordinator. If this is the case, the concessioner should coordinate with the park to identify an individual (e.g., park superintendent, park concession specialist) who will carry out the tasks of a park IPM coordinator in order to coordinate with the Region or Washington Office on concessioner pest management activities.

approved by the NPS IPM coordinator before being purchased and/or used on NPS property.

A park may request concessioners to prepare their own documented IPM Program that includes procedures on how the concessioner will manage specific pests. This requirement may be specified in the concession contract, operating plan, or maintenance plan. Technical assistance in preparing an IPM Program is available from regional and Washington Area Support Office (WASO) IPM coordinators (see **Appendix C**), and from the NPS Biological Resources Management Division Integrated Pest Management Program (see **Additional Information**). Valuable information is also found in the *NPS Integrated Pest Management Manual*, which describes the biology and management of 21 species or categories of pests (see **Additional Information**).

What is Included in an IPM Program?

1. *Communicating with the park IPM coordinator*

The first point of contact for concessioners should be the park concession specialist. The most important part of developing and implementing an IPM Program is routine consultation with the park concession specialist, or direct consultation with the park IPM coordinator (if such communication is preferred and authorized by the park concession specialist) to discuss pest management issues. The park IPM coordinator will help the park concession specialist and concessioner 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.

Why Can't I Just Use Pesticides on an Approved List?

The NPS does have a list of pesticides that are approved for use in parks – however, this does not mean that these pesticides are approved for every project in every park. For instance, new, less toxic pest management methods may be available in one park and not another, translating into the approval of a pesticide in one park and not another. This is why concessioners, via park IPM coordinators, are required to obtain permission for the use of a pesticide on an annual basis, even if it is the same pesticide used every year.

If a concessioner and the park IPM coordinator need ideas on how to manage a specific pest issue, the regional or WASO IPM coordinators may be contacted for additional information.

2. *Pesticide or Biocontrol 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

biocontrol agents may be incorporated into the concessioner's IPM Program if, after consultation with the park IPM coordinator, 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 concessioner.** 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 submitted to the park concession specialist by the concessioner on at least an annual basis, who will then pass this information on to the park IPM coordinator. The annual submittal of this information should cover all pesticide use anticipated by the concessioner for the upcoming year. Should the concessioner 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 concessioner should submit this information, 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 concession specialist and the park IPM coordinator, although formal requests are not required.



Once the park IPM coordinator receives a request for a concessioner to use a chemical pesticide or biocontrol agent, 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 WASO IPM coordinator for review:

- Pesticides applied to water;
- Pesticides that may affect threatened and endangered species;
- Restricted use pesticides;
- Aerial application of pesticides; and
- 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 afterward by the park IPM coordinator.

After the park IPM coordinator obtains approval for use of a particular pesticide, the concessioner is notified either by the park IPM coordinator relaying the information to the park concession specialist to pass on to the concessioner, or directly to the concessioner (if such communication is preferred and authorized by the park concession specialist). 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.

3. Purchasing

When purchasing pesticides, concessioners 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 by the concessioner is greater than the amount needed.

Don't Forget Private and Commercial Pest Management Companies!

If the concessioner uses private or commercial pest management companies for pest management services, the concessioner must ensure that the contract with each company clearly specifies what pest management methods can be used on NPS lands and that pesticide use must be reviewed and approved prior to use. The concessioner is responsible for monitoring its private or commercial pest management companies to ensure pest management methods are in compliance with the park IPM program.

The concessioner is also responsible for obtaining an annual pesticide use log from its applicators and providing this information to the park concession specialist to pass on to the park IPM coordinator at the end of each calendar year. The park IPM coordinator will then incorporate it into the PUPS database.

4. Use

Concessioners and any private or commercial pest management companies used by concessioners 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. Concessioners must not deviate from these directions since they are legally binding.

If approval is obtained to apply **restricted use pesticides** (as defined by the Environmental Protection Agency), a concessioner 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).

5. Storage

If concessioner pesticide storage facilities are within concession contract 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.

How Do You Store Insect Repellants Being Sold in Stores?

Note that pesticides (such as insect repellants) that are being displayed and sold in a retail situation do not need to be stored in locked, fireproof, ventilated facilities with proper warning signs as long as the manner in which they are being displayed and sold complies with pesticide label instructions.

In addition, pesticides will be labeled and 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., sulfides and acids) or other adverse reactions. For example:

- Herbicides should be stored separately away from other pesticides and fertilizers as they can off-gas and chemically contaminate other pesticides or become explosive; and
- Rodent and insect baits can absorb other chemicals, adversely affecting their performance.

6. 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, concessioners should attempt to use those chemicals as intended and approved by the park until the pesticides are used up. If it is determined that leftover pesticides are unusable, the pesticides and the container must be discarded according to label instructions and in compliance with EPA hazardous waste and the Occupational Safety and Health Administration (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**).

7. Recordkeeping and Annual Reporting

Concessioners are required to keep an annual pesticide use log and submit a copy both to the park concession specialist and the park IPM coordinator soon after the end of the calendar year. This pesticide use log (see **Appendix B**) should include all pesticides applied by concessioner 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 dining area is approved for use in calendar year 2007, all use of boric acid for this specific project should be tallied under this same project number.)

The park IPM coordinator will include the concessioner's 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.

Concessioners should not forget that the storage and use of pesticides should be included under an OSHA-compliant Hazard Communication (HAZCOM) Program (29 CFR 1910.1200). A concessioner's written HAZCOM Program should provide a list of hazardous chemicals, MSDSs 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!

Exceptions

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

- **Personal insect repellants** used on oneself or personal livestock.
- **Disinfectants** and cleaning solutions used in restrooms and restaurants.

Additional Information

Name	Description	Source
NPS Biological Resources Management Division IPM Program	Provides technical assistance on IPM.	Carol DiSalvo, 202/513-7183 www.nature.nps.gov/biology/ipm
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.	www.nature.nps.gov/biology/ipm/manual/ipmmanual.cfm
NPS Rodent Exclusion Manual	Provides technical information on rodent-proofing NPS structures.	www.nps.gov/public_health/info/eh/vektor/NPS_RP_Manual_v2.pdf
Bio Integral Resource Center	Nonprofit organization dedicated to finding non-toxic and least-toxic IPM solutions.	Bio Integral Resource Center, www.birc.org
The IPM Institute of North America	Nonprofit organization that fosters recognition and rewards in the marketplace for goods and service providers who practice IPM.	http://www.ipminstitute.org/
Plant Conservation Alliance's Alien Plant Working Group	Website with information on the serious threat and impacts of invasive alien plants to the native flora, fauna, and natural ecosystems of the United States.	http://www.nps.gov/plants/alien/
NPS-77 Natural Resources Management Guideline	Information on the NPS IPM.	NPS Commercial Services Program, <i>GreenLine</i> Number 303/987-6820
Natural Resource Management Reference Manual #77 (under development)	Information on the NPS IPM.	NPS, www.nature.nps.gov/rm77
NPS 2006 Management Policies	States pest management policy pertaining to concessions operations on pages 71-73.	NPS, www.nps.gov/policy/mp2006.pdf
NPS EnviroCheck Sheet: Pesticide Management	Multi-page document used as a tool during NPS environmental audits	NPS Commercial Services Program, <i>GreenLine</i> Number 303/987-6820
Guidance for Managing Universal Waste	Guidance for understanding the Universal Waste Rule. Some hazardous wastes, called universal wastes (i.e., fluorescent bulbs, pesticides), are subject to less stringent standards.	NPS Commercial Services Program, <i>GreenLine</i> Number 303/987-6820



Appendix A - Sample Pesticide Request Form

Background: This sample Pesticide Request Form may be used by concessioners to compile a list of pesticides that will be used over a calendar year.



Appendix B - Sample Pesticide Use Log

Background: This Pesticide Use Log may be used by concessioners to track the type and amount of pesticides used during a calendar year. 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 submitted to the park concession specialist by the concessioner on at least an annual basis.



Appendix C - National Park Service IPM Coordinators

Background: The first point of contact for concessioners with questions about pest management should be the park concession specialist, then the park IPM coordinator. If additional assistance is needed, concessioners may also contact the Regional and WASO IPM coordinators identified on the next page.

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