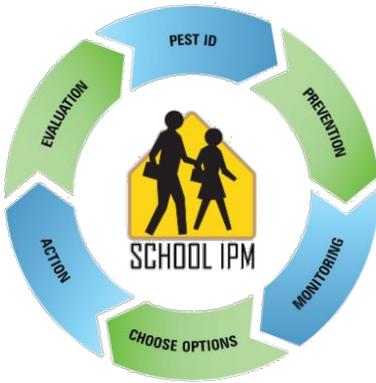


The Aurora Report

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IPM: You're Compliant...or ARE You?

Integrated Pest Management (IPM) in schools is not new; the Healthy Schools Act (HSA), enacted in September 2000, mandates that K-12 schools in California use IPM for effective, lower risk pest management practices. IPM is an approach to managing pests that focuses on long-term pest prevention, takes advantage of all pest management strategies, and advocates using pesticides (includes disinfectants, insecticides, herbicides, sanitizers, fungicides, and repellents) only when absolutely necessary. There is also a list of banned pesticides that is updated as needed.

The HSA is a state right-to-know law that provides parents and school staff with information about pesticide use taking place at public schools and child care centers (except family day care homes). The Department of Pesticide Regulation (DPR) is charged with carrying out the HSA. There are **8 specific requirements** of the law and most school district management probably assumes their schools are compliant, after so many years of regulation. Aurora ESI understands the complexity of the IPM requirements and wants to help you ensure that your schools are in compliance and protected from liability. Here is a checklist for IPM compliance covering the 8 requirements:

1. **Have you identified an IPM Coordinator?** The IPM Coordinator is a school district employee who helps to ensure that your district is meeting the requirements of the HSA.
2. **Do you have an IPM Plan?** An IPM plan provides information about how pests are managed at your school district. The IPM Plan must be posted on your school district's website; if you do not have a website, then the IPM Plan must be sent home to all parents and staff.
3. **Do you provide annual written notifications?** Your school district *must send all parents and staff a written notification of pesticide products expected to be applied during the school year. Pesticides to be applied by contracted pest control businesses need to be included in the notice.*
4. **Have you created a registry?** Have parents and staff that want to be notified *72 hours before every pesticide application* been given the opportunity to register with your school district?

What exactly is a pesticide?

A pesticide is any substance that controls, destroys, repels, or attracts a pest. Pesticides include insecticides, herbicides, fungicides, fumigants, rodenticides, avicides, plant growth regulators, defoliants, desiccants, algicides, and antimicrobials. Plant nutrients, fertilizers, and soil amendments are not considered pesticides unless they include a pesticide. However, weed-and-feed products and fertilizers that contain insecticides are considered pesticides.

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Bats, mice and rats... the real classroom pests



IPM Compliance – Continued

- Do you post the correct warning signs?** Warning signs must be posted around the treatment area *24 hours before pesticide application* and must remain posted for *72 hours after application is complete*. Signs must provide information about when, where, and why a pesticide application was made.
- Do you keep complete records?** Records of pesticide use must be kept on site for four years and you must make this information available to the public, if requested.
- Do you report all pesticide use?** All pesticides, (even herbicides) applied by the school staff must be annually reported to DPR. (This can be reported more frequently.) You do not have to submit reports for pesticides applied by contractors, who are responsible for submitting their own reports.
- Do you provide complete training?** All staff who apply or use pesticides, *including disinfectants, and sanitizers*, and herbicides, must complete DPR-approved HSA training *each year prior to any pesticide application* that year.

How well do you think your district complies, using this checklist?

What about when your school district hires a Licensed Pest Control Business?

If you hire a licensed pest control business to make pesticide applications at your schools, your IPM Coordinator is still responsible for making sure that all HSA requirements are met. In your contract bid, make sure that your contractor will provide information before and after pesticide applications, so that the IPM Coordinator has enough time to provide notifications, post warning signs, and keep records. The IPM Coordinator does not submit pesticide use records for applications made by a hired contractor; the licensed pest control business will submit their pesticide use reports to DPR.

More about training, and what about hand sanitizers?

Annual HSA training is required for everyone—including teachers and custodians—who use disinfectants, disinfecting wipes, and sanitizers at schools. However, *disinfectants and sanitizers used on hands are exempt* from IPM plans and other HSA requirements.

TRAINING REQUIREMENT IF USING DISINFECTANTS OR SANITIZERS

Pesticide type	Where used	Who regulates	Training required?
Disinfecting wipes Disinfecting sprays	Desks, counters, doorknobs, toys	U.S. EPA	Yes
Hand sanitizers Hand-sanitizing wipes	Hands	FDA	No



IPM compliance is not simple or easy. And there are substantial penalties for failure to comply. Plus, there is reputational risk if parents and/or the public becomes involved. Make sure you're covering all of your IPM bases.

More information can be found at https://apps.cdpr.ca.gov/schoolipm/managing_pests/guidebook.cfm

Give us a call at (855) 500-2374 or email us at info@auroraesi.com to inquire about an independent review of your IPM Program.

OSHA Top 10 Violations in 2018

Fall Protection and Haz Com continue to top the list...



OSHA has announced the preliminary Top 10 most frequently cited workplace safety violations for fiscal year 2018. Patrick Kapust, deputy director of OSHA's Directorate of Enforcement Programs, presented the list during the 2018 NSC Congress & Expo in Houston, TX.

Year to year, the rankings rarely change, although this year's No. 10, "Eye and Face Protection" (1926.102) was not on the 2017 list.

The Top 10 for FY 2018* are:

- Fall Protection** – General Requirements (1926.501): 7,270
- Hazard Communication** (1910.1200): 4,552
- Scaffolding** (1926.451): 3,336
- Respiratory Protection** (1910.134): 3,118
- Lockout/Tagout** (1910.147): 2,944
- Ladders** (1926.1053): 2,812
- Powered Industrial Trucks** (1910.178): 2,294
- Fall Protection** – Training Requirements (1926.503): 1,982
- Machine Guarding** (1910.212): 1,972
- Eye and Face Protection** (1926.102): 1,536

*Based on data as of Oct. 1, 2018.



Inspector Field Notes...



A new feature with observations from Aurora ESI's team of certified and qualified inspectors of asbestos and lead, hazardous chemicals and waste, health and safety, and stormwater.

In this issue, we hear from Robert Beattie, one of our health and safety inspectors, on his observations concerning his recent inspections of eyewashes at schools.

Emergency Eyewash Stations - will yours work when you need it?

Chemical injuries to the eye represent ophthalmic emergencies, where time is critical. When working with chemicals in high school laboratories, the first line of defense is safety goggles and safe practices. Should a chemical splash to the eyes occur, the eyes need to be flushed with water immediately. *A functioning emergency eyewash station could be the only thing preventing total blindness.* During my Health and Safety inspections of school districts' laboratories, I have noticed a disturbing trend: emergency eyewash stations are not being regularly inspected or tested.

The eyewash units installed in the schools' laboratories are there to protect the eyes of the students and faculty should a chemical splash occur. However, if these units are not inspected and tested weekly, they may not function properly during an emergency. The American National Standards Institute (ANSI) Z358.1 requires that, "Plumbed equipment shall be activated weekly for a period long enough to verify operation and ensure that flushing fluid is available." A note further states, "The intent is to ensure that there is a flushing fluid supply at the head of the device and to clear the supply line of any sediment build-up that could prevent fluid from being delivered to the head of the device and minimize microbial contamination due to sitting water."

Do school laboratories and other locations really need industrial eyewashes? Any area that has corrosives must have eyewashes and in many cases, showers. **Corrosives** are substances that cause visible destruction of, or irreversible alterations in, living tissue by chemical action at the site of contact. They include strong acids, strong bases, and concentrated solutions of weak acids or bases. There are other compounds that are corrosive to living tissues but less obvious, including calcium oxide, concentrated hydrogen peroxide, sodium hypochlorite, acid anhydrides, alkylating agents, and some organics. The chemical container label and Section 2 of the Safety Data Sheet (SDS) can be used to determine if a chemical is corrosive.

Performing the **weekly** inspection required by ANSI Z358.1 will ensure that your eyewash unit will perform to standard. If any discrepancies are found during the inspection, they must be reported immediately. Additionally, any experiments or lab work involving corrosives or any other potentially eye damaging material should be postponed until the eyewash unit is fully operational.

During the **weekly** inspection, you should check emergency eyewash units to ensure that:

1. There is a controlled flow of water provided to both eyes simultaneously that is not injurious to the user.
2. The actuator stays in the open position when activated to allow for *hands-free operation*.

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We use pesticides every day in our homes. Is bleach a pesticide?

- A. Yes
 B. No
 C. Yes or no depending on the situation.

Answer: C. Products containing bleach that claim to "sanitize" or "disinfect" are considered pesticides; however, if they do not make those claims, they are not.



DO I REALLY HAVE TO COMPLY WITH ALL OF THESE REGULATIONS?

At any one snapshot in time, 6.2 million students are attending class at 10,473 schools. There are 313,989 teachers, and an uncounted number of non-teaching staff such as groundskeepers and custodians. School districts have a clear mandate from federal and state governments to protect all of these individuals from physical and health hazards.

Source of statistics:
www.cde.ca.gov



Emergency Eyewash Stations - Continued

3. The emergency eyewash nozzles are covered and protected and do not require a separate motion to remove (you should not have to manually remove the nozzle protectors, they should pop off when unit is activated).
4. The spouts are clean, and the bowl and/or sink drains are free of trash or any obstruction.
5. The emergency eyewash is unobstructed and accessible *and requires no more than 10 seconds for the injured person to reach*.
6. The emergency eyewash location is identified with a highly visible sign that contains graphical symbols to communicate across language barriers. Signs are white and green to comply with safety instruction and equipment location sign standards.
7. There are no broken parts, leakage, etc.

Once lost, eyes usually cannot be restored. Checking your emergency eyewash stations weekly is something that should not be neglected or ignored. A tag or spreadsheet posted next to the unit to record the inspection can serve as a reminder to perform the weekly check. – **Robert Beattie, Environmental Specialist**

UPCOMING TRAINING

Aurora ESI’s upcoming school training sessions per location are listed below. Cost is per person. Be certain to contact your School Program Coordinator at (855) 500-2374 to reserve your seat. Classes sell out fast!

COURSE	San Francisco 150 Executive Park Blvd San Francisco, CA	Oakland 220 Fourth Street Oakland, CA	Martinez 601 Ferry Street Martinez, CA	Sacramento 3009 Douglas Blvd Roseville, CA
Lab Safety Training	April 16	April 17	April 18	April 19
Hazardous Waste Generator Training	April 23	April 24	April 25	April 26
HazCom Training	April 23	April 24	April 25	April 26



Coming in April...



The **2Q2019 Aurora Report** will focus on drinking water sampling for lead and other contaminants, chemical donations, radioactive materials, and biological/pathological materials (specimen waste).

