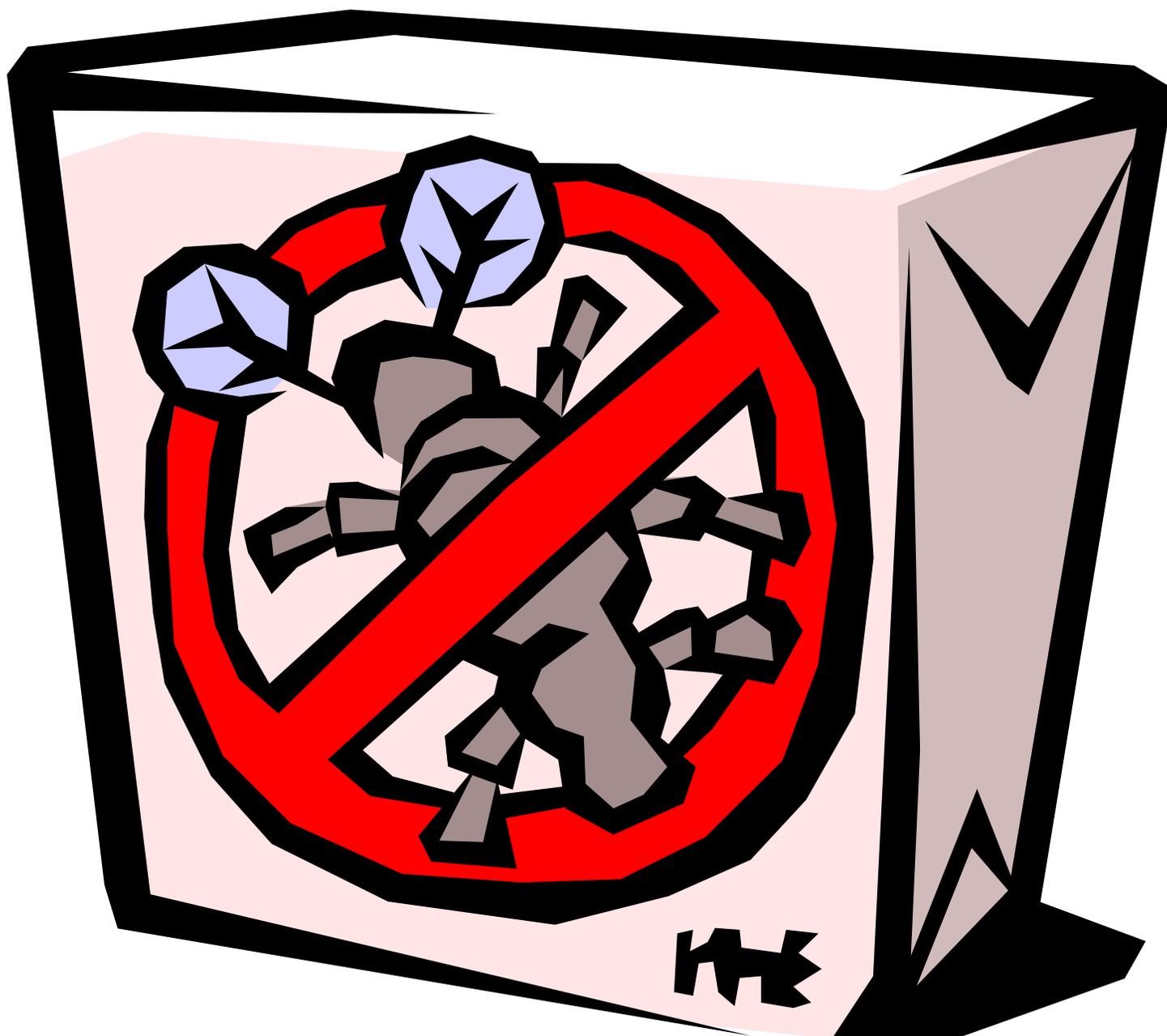


National Park Service
US Department of the Interior

Concession Environmental Management Program
Denver, Colorado



Understanding the National Park Service's Integrated Pest Management Program



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UPDATED: February 2003

The National Park Service Concession Environmental Management Program does not make any guarantee or assume any liability with respect to the use of information in this guidance. It remains the sole responsibility of concessioners to review, understand and apply the appropriate federal, state and local regulations that govern this topic area. Additional consultation with qualified professionals or federal, state and local environmental agencies may be necessary to ensure a concessioner's program complies with applicable regulations.

For more information, contact the Concession Environmental Management Program:



GreenLine Technical
Assistance Number
303/987-6913



GreenLine Email
NPS_GreenLine@nps.gov

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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 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 control pests (e.g., insects, rodents, weeds, mold) on their property or in their buildings. While this guidance was written specifically for educating concessioners on NPS procedures for managing pests, it focuses on procedures and requirements governing 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. An IPM Program helps prevent unacceptable levels of pest damage by identifying cost-effective methods or strategies that pose 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) 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 consult the park IPM coordinator to identify acceptable pest management procedures and strategies and ensure compliance with the park IPM Program. Proposed pesticide use must be reviewed and approved before being purchased and used on NPS property.

Standard 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."

A park may request concessioners to prepare their own documented IPM Program that outlines procedures on how the concessioner will address 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 Office IPM Coordinators, and from the NPS Biological Resources Management Division Integrated Pest Management Program.

What is Included in an IPM Program?

Communicating with the Park IPM Coordinator For concessioners, the most important part of developing and implementing an IPM Program is routine consultation with the park IPM coordinator. The park IPM coordinator will help identify procedures and strategies for pest management including determining the type, source, and number of pests and recommended treatment methods. Treatment may involve nonchemical or chemical options, ongoing monitoring, and evaluations.

The first point of contact for concessioners should be the park IPM Coordinator. If additional assistance is needed, concessioners may also contact regional and Washington Area Support Office (WASO) IPM coordinators. These park, regional, and WASO IPM coordinators are specifically trained in IPM procedures and hold valid state pesticide applicator licenses.

Pesticide or Biocontrol Requests In parks, preference is given to using effective, low-risk methods to control or prevent pest invasions. Nonchemical methods are preferred. These include the use of disease resistant plants, structural modifications, steam cleaning, and improved storage procedures. Chemical methods and release of biocontrol agents may be incorporated into the concessioner's IPM program if after consultation with the IPM coordinator, it is determined they are necessary.

All proposed chemical pesticides must **first** be reviewed and approved by the park IPM coordinator. **This includes methods and chemicals that a concessioner's third party pest management contractor will use.** A concessioner must submit information on chemical pesticides that it anticipates it will use during a calendar year prior to that new calendar year, or during the year as unanticipated pest issues arise. The concessioner should submit this information using the sample **Pesticide Request Form (Appendix A)** or a comparable document. Nonchemical pest management methods should also be discussed with the park IPM coordinator, although formal requests are not required.

Once the park IPM coordinator receives a request from a concessioner to use a chemical pesticide, 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. For certain pesticides

(i.e., application to water, where use may affect threatened and endangered species, restricted use pesticides, aerial application, and application over 200 contiguous acres), the approval process is elevated to the Washington Area Support Office (WASO) IPM coordinator. In emergencies, pesticide approvals can be provided to a concessioner via phone. These requests are entered into the PUPS database afterwards by the park IPM coordinator.

After the park IPM coordinator obtains approval for use of a particular pesticide, the concessioner is notified if the proposed chemical pest management method is approved. That pesticide can then be used within the park up until the last day of the calendar year. The concessioner should retain a copy of pesticide use approval forms for their records.

NOTE:

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.

Purchasing

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

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. Applicators are individually responsible and liable for pesticide application. Applicators are also required to have pesticide certifications and/or licenses as required by state regulations.

All pesticides have instructions on how they should be used, such as safety equipment that must be worn, and pesticide application guidelines. Concessioners must not deviate from these directions since they are legally binding.

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

concessioner must ensure that it has a **certified commercial applicator** to apply these chemicals on NPS property.

Storage

If concessioner pesticide storage facilities are located on NPS property, the facilities must be managed in accordance with OSHA regulations (e.g., facilities must be locked, fireproof, ventilated, and have proper warning signs). Pesticides must be stored separately from other substances (e.g., food, cleaning chemicals).

In addition, pesticides should be stored 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 as they can off-gas and chemically alter other pesticides).

Disposal

By limiting the amount of pesticides purchased, there should be few, if any, pesticides that need to be disposed. If excess chemical pesticides are found, concessioners should attempt to use those chemicals as intended until no pesticides remain. If it is determined that leftover pesticides are unusable, they must be discarded according to label instructions and in compliance with 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”).

Annual Reporting

The park IPM coordinator must submit a report at the end of each calendar year (annual pesticide use log) to the Region that documents what pesticides were used in the park on a project-by-project basis (including the pests targeted), the locations where the pesticides were used, and the total amount used. This information is entered into PUPS. The park IPM coordinator is required to include in this report, information on pesticides used by concessioners and private or commercial pest management companies in the park.

In order to provide this information, concessioners must keep an annual pesticide use log and submit it to the park IPM coordinator at the end of each year. This annual pesticide use log should include both pesticides used by the concessioner itself, and pesticides used by the concessioner’s private or commercial pest management company.

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** and bear deterrents if purchased with personal funds and applied to employees' own persons, pets, and privately owned livestock.
- **Disinfectants** and cleaning solutions used in restrooms and restaurants.

Additional Information

Resource Type	Name	Description	Source
phone number	NPS Biological Resources Management Division Integrated Pest Management Program	Provides technical assistance on IPM.	NPS 970/225-3592
phone number	NPS IPM Coordinators	Listing of all NPS IPM Coordinator and contact information.	See Appendix C of this document
website	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
website	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
website	NPS Director's Order 77-7, Section on Integrated Pest Management	Information on the NPS IPM.	NPS www2.nature.nps.gov/nps77/ipm.new.html
document	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> Technical Assistance Number 303/987-6913
document	EnviroCheck Sheet: Pesticide Management	Multi-page document used as a tool during NPS environmental audits.	NPS Concession Environmental Management Program <i>GreenLine</i> Technical Assistance Number 303/987-6913
document	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> Technical Assistance Number 303/987-6913



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, and type, amount, and location of pesticides used during the calendar year must be submitted to the park IPM Coordinator at least annually.

This sample Log provides space to track other information such as the date on which pesticides were applied, who applied the pesticides, and whether the method or strategy was successful. Similar forms may also be obtained from each state's respective Pesticide Board.



Appendix C: National Park Service IPM Coordinators

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

REGIONAL OFFICES

ALASKA	Pat Owen Denali National Park P.O. Box 9 McKinley Park, AK 99755 907-683-9547 Fax 907-683-9639	NORTHEAST REGION	Wayne Millington 209a Ferguson Building University Park, PA 16802 814-863-8352 Fax 814-865-1649 npspests.cas.psu.edu/orl
MIDWEST REGION	Mike Gallagher National Park Service 1709 Jackson St. Omaha, NE 68102 402-221-3418 Fax 402-221-3480	SOUTHEAST REGIONAL OFFICE	Chris Furqueron National Park Service 1924 Building 100 Alabama St., SW Atlanta, GA 30303 404-562-3113x540
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		

CLUSTERS

COLORADO PLATEAU CLUSTER	Craig Hauke Canyonlands National Park 2282 S. West Resource Blvd. Moab, UT 84532-2995 435-259-3911x2132 Fax 435-719-2300	PACIFIC ISLAND CLUSTER	Stephen J. Anderson Halekala National Park P.O. Box 369 Makawao, HI 96768 808-572-4480 Fax 808-572-4498 Hale_veg_mgt@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	ROCKY MOUNTAIN & SOUTHWEST CLUSTERS	Jerry Mc Crea National Park Service Intermountain Support Office P.O. Box 728 (DNR) Santa Fe, NM 87504 505-988-6024 Fax 505-988-6876

WASHINGTON AREA SUPPORT OFFICE

WASHINGTON OFFICE	Carol Disalvo National Park Service Room 2423 1849 C ST., NW Washington, DC 20242-0001 202-513-7183 Fax 202-371-6820	Terry Cacek National Park Service 1201 Oakridge Dr., Ste. 350 Fort Collins, CO 80525 970-225-3542
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