

Requirements in the Municipal Regional Permit for Municipal Pest Control Contractors

**Vishakha Atre
EOA, Inc.**

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Overview of Presentation

- Pesticide Control Requirements in the Stormwater Permit
- Stormwater and Pesticides
- IPM Policy
- Requirements for Contractor Management

Regulatory Background: Municipal Stormwater Permits

- Pollutants entering the storm drain system flow to local creeks and the Bay with no treatment
- Since 1987 the federal Clean Water Act has required municipalities to obtain permits to discharge stormwater from municipal storm drain systems
- These are National Pollutant Discharge Elimination System (NPDES) Municipal Regional Stormwater Permits (MRP)

Municipal Regional Permit (MRP)

- Santa Mateo agencies are part of the MRP that covers four Bay Area counties
- MRP developed and enforced by the SF Bay Regional Water Quality Control Board
- Includes requirements for controlling urban runoff pollutants – litter, sediment, pesticides, etc.



What are Pesticides?

- Any chemical that repels or kills any pest:
 - Insecticide
 - Herbicide
 - Fungicide
 - Rodenticide
 - Disinfectant
- Active ingredients, listed on the label, are the chemicals in pesticide products that kill, control, or repel pests.

Pesticides of Concern

- Active ingredients listed in the MRP as pesticides of concern:
 - Diamides
 - Diuron
 - Indoxacarb
 - Fipronil and its degradates
 - Organophosphates
 - Pyrethroids
 - Carbamates

Pesticides and Water Quality

- 1990s – Focus on organophosphates
- 1999 – Bay Area creeks listed as impaired for pesticides in 303(d) list
- 2004 – Ban on urban uses of diazinon and chlorpyrifos
- 2005 – Pesticide Total Maximum Daily Load (TMDL) established for Bay Area creeks
 - Diazinon Target
 - Pesticide Toxicity Targets

Pesticide and Water Quality

- US EPA recently approved an updated California list of impaired water bodies in the 303(d) list
 - Includes 800 pesticide impairment listings across the state (both agricultural and urban).
 - ~100 listings of these involve pesticides currently used in urban areas - specifically pyrethroids and malathion.
 - > 60 listings are for pyrethroids in waterways receiving urban runoff.
 - Malathion is listed as impairing 35 water bodies, 22 of which receive urban runoff.

MRP Provision C.9

- Implements requirements of the TMDL for Diazinon and Pesticide Related Toxicity for Urban Creeks
- Municipal agencies required to implement a pesticides control program to help reduce pesticide discharges in stormwater runoff
- Implementation guidance provided through the SMCWPPP Parks Maintenance and IPM Work Group

MRP Provision C.9

- Implement an IPM Policy/Ordinance
- Report trends in municipal use of pesticides of concern, and IPM tactics and strategies used
- Provide IPM training for municipal staff
- Require municipal staff and contractors to implement IPM
- Coordinate with the County Ag. Commissioner
- Conduct public outreach

Why Have an IPM Policy?

- Approved by City/Town council
- Formalizes your agency's commitment to minimize the use of pesticides that threaten water quality.
- Good for public image
- Required by Permit!

IPM Policy Components

- **Goal/Purpose**
 - Effective pest management
 - Reduce the potential for water pollution
 - Health of staff and community
- **Approach to implementing IPM**
 - Definition
 - IPM hierarchy/decision making process

IPM Policy Components

- **Approach to implementing IPM (cont.)**
 - Prohibited pesticides/pesticide categories
 - *“staff and contractors are prohibited from using pesticides classified as Toxicity Category 1”*
 - *“staff and contractors are prohibited from using pesticides of concern listed in the municipal regional permit”*
- **Designation of a responsible party – IPM coordinator, facilities supervisor, etc.**

IPM Policy Components

- **Requirements for municipal staff & contractors**
 - Applicator license
 - IPM certification
 - Record keeping and reporting
 - Reporting
 - Purchasing and disposal
 - IPM training
- **Implementation mechanism** - IPM strategy, pest management plan, standard operating procedures

SMCWPPP IPM Policy Template

- Developed in 2003
- Revised in 2011 per comments from Water Board
 - Language added to make IPM a requirement.
 - Edited to describe the IPM hierarchy and decision making process
- Template available on www.flowstobay.org
- All SMCWPPP agencies have adopted an IPM Policy

Implementing an IPM Policy

- Provide training on IPM Policy
 - Landscape maintenance staff and contractors
 - Structural pest control contractors
 - Facilities staff
 - Purchasing staff
 - Stormwater program coordinators
- Ensure that all contractors are aware of the IPM Policy: landscape, structural, on-call, etc.

Provision C.9.c - Require Contractors to Implement IPM

- Hire IPM-certified contractors
- Challenges:
 - IPM-certification is available only for structural contractors
 - Does not guarantee that IPM will be followed; most companies offer IPM and traditional services
 - Not many contractors are certified



Provision C.9.c - Require Contractors to Implement IPM

- **Include contract specifications requiring contractors to implement IPM**
- **Advantages:**
 - Require compliance with IPM Policy
 - Require use and documentation of IPM techniques
 - Attach pest management plans

Provision C.9.c - Require Contractors to Implement IPM

- **Observe contractor pesticide applications to verify compliance with IPM Policy**
- **Annually report how contractor compliance with IPM policies was verified**
 - Meetings
 - Monthly invoices
 - Review pesticides used
 - Fields visits

For more information...

www.FlowsToBay.org

Vishakha Atre

EOA, Inc.

408-720-8811 x3

vatre@eoainc.com