INTEGRATED PEST MANAGEMENT PLAN

FOR THE OHIO ARMY NATIONAL GUARD

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1 Signature Page

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Executive Summary:

Pests can interfere with the military mission, damage real property and the environment, increase maintenance costs and expose personnel to diseases unless properly controlled. As per Army Regulation (AR) 200-1, the Army National Guard’s (ARNG) pest management program uses integrated pest management (IPM) to achieve effective pest control with minimal environmental impacts. IPM, as used by the Ohio Army National Guard (OHARNG), is an approach that utilizes all available techniques in an organized program to suppress pest populations in an effective, economical and environmentally safe manner. The techniques of IPM include cultural, physical, mechanical, biological, and chemical controls. IPM strategies depend on surveillance to establish the need for pest control and to monitor the effectiveness of management efforts. Pest control is done by need rather than by schedule with limited use of preventative treatments (common exceptions are pre-emergent herbicides, mosquito larvicide and some fungicide treatments). Pests are controlled to acceptable levels and not always completely eliminated.

The contents of this Integrated Pest Management Plan (IPMP) apply to all OHARNG activities and individuals working at OHARNG sites and will be implemented to the maximum extent possible. There are some differences between certification and reporting requirements between Federally-owned properties and State-owned properties. These differences are identified within applicable sections throughout this IPMP. At no time will pest management operations be done in a manner that will cause harm to personnel or violate the law. The application of pesticides is governed by the label. No pesticide will be applied contrary to its label.

This plan describes OHARNG’s pest management requirements, outlines the resources necessary for surveillance and control, and describes the administrative, safety and environmental requirements of the OHARNG IPM program. The first step in pest management begins with the individuals who occupy or maintain buildings, open spaces, or forests through a cost-effective Self-Help Program. For pests that cannot be controlled through Self-Help, the program uses pest management providers, who have the necessary state and/or Department of Defense (DOD) certifications, to control pests using the procedures found in the IPM Outlines (Appendix B). If needed, contracted pest control services are administered and funded by the Directorate of Installation Management and Resources (DIMR), with IPM technical guidance provided by the Integrated Pest Management Coordinator (IPMC) and quality assurance by the IPMC and/or Pest Management Quality Assurance Evaluator (PMQAE). Additional responsibilities of pest management personnel are detailed in Section 4 of this plan.

This plan is a working document and will be continually updated to reflect actual pest management and the IPM program practices.
3 Background:

3.1 Purpose:

This IPMP is a framework that defines how pest management is accomplished by the OHARNG. The plan identifies elements of the program to include health and environmental safety, pest identification, and pest management, as well as pesticide storage, transportation, use and disposal. This plan is used as a tool to reduce reliance on pesticides, to enhance environmental protection, and to maximize the use of IPM techniques.

3.2 Authority:

3.2.1 Federal Insecticide, Fungicide, and Rodenticide Act, (FIFRA)

3.2.2 Integrated Pest Management Memorandum from the President. August 2, 1979

3.2.3 Department of Defense Instruction (DODI) 4150.07, DOD Pest Management Program, 29 May 2008.

3.2.4 Army Regulation (AR) 200-1, Environmental Protection and Enhancement, 13 December 2007.

3.2.5 Memorandum, ARNG-ILE, 04 February 2016, subject: Integrated Pest Management Program Policy

3.2.6 Ohio Pesticide Law, effective September 1976 (Ohio Revised Code Chapter 921)

3.3 Plan Maintenance:

3.3.1 The IPMC works in the DIMR Environmental Branch (DIMR-ENV) and maintains this plan.

3.3.2 Updates are minor changes to the plan and are made when necessary by the IPMC. Updates to the plan can be in the form of an attached memorandum that is referenced in the affected section of the plan. Minor changes can also be notated directly in the plan and initialed by the IPMC.

3.3.3 Plan review and approval are conducted in accordance with DOD, Department of the Army (DA) and ARNG policies and directives. This IPMP will be reviewed annually by the IPMC during the preparation of the annual Plan Update Form (PUF) (an example PUF is in Appendix H). A completed PUF will be the documentation of the annual plan review. Annual updates of this plan are sent, via the PUF, to the ARNG Pest Management Consultant (PMC) no later than 15 October.

3.3.4 This plan will be revised every five years. Revisions will formally incorporate the annual updates and any other changes to the program that have occurred since the last revision.
Complete rewriting of the IPMP during the revision process is not required unless substantial program changes have occurred. Revised IPMPs are reviewed by the ARNG PMC for technical sufficiency and are signed by the Adjutant General (TAG) (or designee). Additional signees of the IPMP are specified in DODI 4150.07.

4 Responsibilities

4.1 The Adjutant General (TAG) is considered the “Installation Commander” of the virtual installation in regard to the requirements in DODI 4150.07, AR 200-1 and the ARNG Integrated Pest Management Program Policy Memorandum, and has ultimate responsibility for pest management actions at both State and Federally-owned (Appendix A) OHARNG sites.

4.1.1 Approve and support the IPMP.

4.1.2 Designate an Integrated Pest Management Coordinator (IPMC) to oversee all pest management activities. Approval of this plan constitutes the written appointment of the listed IPMC, or the IPMC can be appointed with a signed memo (Appendix I).

4.1.3 Ensure that OHARNG personnel performing pest control as a part of their assigned duties receive adequate training (in accordance with Section 9.6 of this plan), and, when required, obtain appropriate pest management certification(s).

4.1.4 Ensure that all pest management operations are conducted safely and have minimal impact on the environment.

4.2 Integrated Pest Management Coordinator (IPMC)

4.2.1 Prepare and maintain the IPMP with 5-year revisions.

4.2.2 Annually review and update the IPMP as needed.

4.2.3 Ensure all pesticides are approved by the ARNG PMC prior to their use at OHARNG Federally-owned (Appendix A) sites and all pesticide used at Federally-owned (Appendix A) OHARNG sites are listed on the OHARNG State Pesticide Use List (SPUL) (Appendix C).

4.2.4 Coordinate with personnel conducting pest surveillance and/or control to ensure all applicable information is recorded and reported as required by the directives cited in Section 3.2 and this plan.

4.2.5 Function as a point of contact between those individuals who store and apply pesticides (e.g., facility management, pest control contractors) and activities or individuals who document or are impacted by pesticide usage at OHARNG sites (e.g., Environmental Office, Safety Office, Fire Department, and Industrial Hygienist).
4.2.6 Coordinate with the OHARNG Natural Resources Manager (NRM) about pest control actions in semi-improved or unimproved grounds where there may be endangered, threatened or sensitive animals (including insects) or plants.

4.2.7 Coordinate with the OHARNG Cultural Resources Manager (CRM) when pest control actions may impact native plants of interest to the Tribes, cultural sites, or affect a building eligible for the National Register of Historic Places.

4.2.8 Coordinate with the OHARNG Deputy Chief of Staff for Operations (DSCOPs) and Fort Ohio Commander for all pest management performed on training or maneuver land.

4.2.9 Coordinate with local health officials to determine the prevalence of disease vectors and other public health pests in the area surrounding OHARNG sites. Oversee surveillance at OHARNG sites for known vectors for diseases such as West Nile, Dengue, Chikungunya and Zika viruses.

4.2.10 Coordinate with the State Surgeon/Public Health Officer any necessary measures for control of disease vectors and other public health pests at OHARNG sites.

4.2.11 Oversee the technical aspects of the Self-Help Program (Appendix E) with respect to pest control products and training of program participants.

4.2.12 Monitor certification and continuing pest management training for pesticide applicators at OHARNG sites. Maintain copies of current certifications in Appendix K of this plan.

4.2.13 Coordinate with DIMR and other Directorates to review and approve all pest management services prior to purchase to ensure they are in compliance with the IPMP and applicable regulatory requirements. This includes purchases with a purchase order (PO), credit card, or contract.

4.2.14 Coordinate with the DIMR and Fort Ohio to ensure that contracts, purchase orders, and credit card purchases including pest management activities at OHARNG Federally-owned (Appendix A) sites are forwarded to the ARNG PMC for technical sufficiency review prior to solicitation of the contract or purchase. For contracted pre-construction treatment of soil to control termites at Federally-owned OHARNG sites (Appendix A), ARNG PMC review and approval of the termite management section of contracts is not required if the contract language is in accordance with the current Unified Facilities Guide Specification for chemical termite control.

4.2.15 Ensure that pest management contracts at OHARNG Federally-owned (Appendix A) sites with efforts that exceed 0.25 work-years are monitored by a certified PMQAE.

4.2.16 Coordinate with local, state and federal agencies, as necessary, to conduct the OHARNG IPM program in accordance with federal, state, and local laws and regulations that apply to pest management, pesticide use, applicator certification, record-keeping, and reporting.
4.2.17 Provide answers to questions concerning pest management from Commanders, ARNG Directorate, Headquarters Department of Army (HQDA), and interested state agencies.

4.2.18 Perform design review of new construction and landscaping projects to ensure that pest entry points and potential harborage sites have been eliminated and that proper preconstruction termite treatment is included in project specifications.

4.2.19 Prepare, with assistance from a PMC certified in DOD Category 11: Aerial Application Pest Control, an Aerial Spray Statement of Need (ASSON) for any potential aerial application of pesticides to Federally-owned (Appendix A) OHARNG sites.

4.2.20 Obtain IPMC certification within two years of being appointed to the position and maintain certification with refresher training every three years.

4.3 Pest Management Quality Assurance Evaluator (PMQAE)

4.3.1 Monitor pest management contracts at OHARNG Federally-owned (Appendix A) sites when total efforts exceed 0.25 work-years.

4.3.2 Obtain PMQAE certification and maintain certification with refresher training every three years.

4.3.3 If an installation’s pest management contract efforts are less than 0.25 work-years, the presence of a trained PMQAE at the installation is not mandatory.

4.4 Pest Management Provider (PMP)

4.4.1 Use IPM techniques to the maximum extent possible.

4.4.2 Maintain current DOD or state certification to apply pesticides in the category of pest control for work being done at OHARNG Federally-owned (Appendix A) sites and comply with all state and federal regulations. For applications on Federally-owned sites the person mixing and/or applying pesticides must hold a license/certification in the applicable categories in their name. Send a copy of the certification to the IPMC annually, and prior to conducting any pest control operations, for inclusion in Appendix K of this plan.

4.4.3 Maintain current Ohio Department of Agriculture pesticide applicator certification in accordance with Ohio pesticide regulations, in the category of pest control for work being done, to apply pesticides at OHARNG State-owned sites (those not listed in Appendix A) and comply with all other state and federal regulations. For applications on State-owned sites the person mixing and/or applying pesticides may apply under the direct supervision of a properly licensed/certified individual in accordance with the Ohio Pesticide Law. Send a copy of the pesticide applicator certification to the IPMC annually, and prior to conducting any pest control operations, for inclusion in Appendix K of this plan.
4.4.4 Control pests according to the provisions of this plan, in accordance with Ohio state and local laws and regulations, and DOD, Army and ARNG instructions, regulations and policies (DODI 4150.07, AR 200-1, ARNG Integrated Pest Management Program Policy Memorandum).

4.4.5 Conduct surveillance for mosquitoes, ticks, cockroaches, or other pests that could adversely affect the health and welfare of installation personnel.

4.4.6 Operate in a manner that minimizes risk to personnel and the environment.

4.4.7 When using pesticides, always read and follow the label. The label is the law.

4.4.8 Keep accurate and complete records of all pest surveillance and control efforts and provide reports to the IPMC using the format(s) and at the frequency as specified in this plan.

4.4.9 Maintain effective liaison with county, state, and federal health and environmental officials, as necessary.

4.5 Pest Management Contractors

4.5.1 Use IPM and conduct pest management in accordance with this plan, including ARNG PMC pre-approval of pesticides applied at OHARNG Federally-owned (Appendix A) sites and OHARNG IPMC pre-approval of pesticides applied at State-owned sites.

4.5.2 Comply with all federal, state, and local laws and regulations.

4.5.3 When using pesticides, always read and follow the label. The label is the law.

4.5.4 Submit written records of all pest management activities to the IPMC (or PMQAE) using the format(s) and at the frequency as specified by the directives cited in Section 3.2, this plan and the contract.

4.5.5 Ensure that personnel applying pesticides are adequately trained and licensed/certified and provide proof of certification to the IPMC prior to pesticide application. For applications on Federally-owned sites the person mixing and/or applying pesticides must hold a license/certification in the applicable categories in their name. For applications on State-owned sites the person mixing and/or applying pesticides may apply under the direct supervision of a properly licensed/certified individual in accordance with the Ohio Pesticide Law.

4.6 Directorate of Installation Management and Resources (DIMR)

4.6.1 Determine the pest management requirements for the OHARNG sites and request appropriate funding to support contracted pest control operations.

4.6.2 Ensure that OHARNG personnel performing pest control as a part of their assigned duties receive adequate training (in accordance with Section 9.6 of this plan), and achieve pest management certification, as required. For applications on Federally-owned sites, the person...
mixing and/or applying pesticides must hold a license/certification in the applicable categories in their name. For applications on State-owned sites, the person mixing and/or applying pesticides may apply under the direct supervision of a properly licensed/certified individual in accordance with the Ohio Pesticide Law.

4.6.3 Ensure all pest management activities, including those that are part of the Self-Help Program, are recorded in accordance with this plan and reports are provided to the IPMC at intervals as specified in this plan. Require those who oversee pest management contracts, purchase orders, and/or credit card purchases submit vendor completed reports to the IPMC as specified in this plan and approved scopes of work. Maintain records of pest management operations as required by the directives cited in Section 3.2 and this plan.

4.6.4 Request and monitor contracted pest control operations.

4.6.5 Coordinate all pest management contracts, purchase orders, and credit card purchase with the IPMC and receive concurrence of the IPMC prior to making purchases. Ensure project managers/purchasers submit copies of the vendor’s application license/certification, product labels, product safety data sheets, and a detailed description of the needed treatment to the IPMC so the application can be adequately reviewed.

4.6.6 Coordinate with the IPMC to ensure that contracts, purchase orders, and credit card purchases including pest management activities at OHARNG Federally-owned (Appendix A) sites are forwarded to the ARNG PMC for review for technical sufficiency prior to solicitation of the contract. For contracted pre-construction treatment of soil to control termites at OHARNG Federally-owned (Appendix A) sites, ARNG PMC review and approval of the termite management section of contracts is not required if the contract language is in accordance with the current Unified Facilities Guide Specification for chemical termite control.

4.6.7 Provide a copy of each finalized pest control contract to the IPMC within seven (7) days of being issued.

4.6.8 Initiate requests for aerial application of pesticides, when necessary.

4.6.9 Ensure stray and feral animals are managed and/or controlled in accordance with the IPMP (IPM Outline Feral Dogs and Cats) and Integrated Natural Resources Management Plans applicable. For stray animals contact the local dog warden or municipal animal authority.

4.7 Deputy Chief of Staff for Operations (DSCOPs)

4.7.1 Determine the pest management requirements for the OHARNG training and maneuver lands and request appropriate ITAM funding when pests are impeding training/maneuvers.

4.7.2 For management of pests that are not impeding training/maneuvers (e.g., hornet nests in bivouac areas, noxious/invasive weeds in maneuver areas, etc.), use all non-chemical pest control techniques as recommended in the IPM outlines (Appendix B) before requesting further assistance from the DIMR for in-house or contracted pest control.
4.7.3 Coordinate with the IPMC any pest management activities occurring on OHARNG training and maneuver lands.

4.7.4 Ensure all pest management activities on training and maneuver lands, including those that are part of the Self-Help Program, are performed in accordance with this plan, including the records and reporting of pesticide usage.

4.7.5 Request and assist with the monitoring of contracted pest control operations.

4.7.6 Coordinate with the IPMC to ensure that contracts including pest management activities at OHARNG Federally-owned (Appendix A) training and maneuver lands are forwarded to the ARNG PMC for review for technical sufficiency prior to solicitation of the contract.

4.7.7 Initiate requests for aerial application of pesticides, when necessary.

4.8 Department of Public Works (DPW), Facility Managers and Maintenance Personnel

4.8.1 Apply good sanitary practices, landscape maintenance, and materials management to prevent pest infestations.

4.8.2 Use all non-chemical pest control techniques as recommended in the IPM outlines (Appendix B) before requesting further assistance from the DIMR for in-house or contracted pest control.

4.8.3 Ensure all pest management activities, including those that are part of the Self-Help Program, are recorded in accordance with this plan and reports are provided to the IPMC at intervals specified in this plan.

4.8.4 Cooperate fully with pest management personnel in scheduling pest management operations, to include preparing the areas to be treated.

4.8.5 Have available on-site Product Labels and Safety Data Sheets (SDSs) for any pesticide stored or used on the premises.

4.9 State Surgeon

4.9.1 Evaluate the human health aspects of the IPM program.

4.9.2 Coordinate with the IPMC any necessary human health-related measures for control of disease vectors and other public health pests at OHARNG sites.

4.10 Unit Commanders

4.10.1 Assure the proper use of the DOD Arthropod Repellent System and other personal protective measures while troops are exposed to potential disease vectors such as mosquitoes and ticks.
4.10.2 Brief troops on potential biological threats (such as poison ivy, stinging insects, and bed bugs) before training exercises.

4.10.3 Appoint a field sanitation team for each company, troop, or battery-size unit. Assure that field sanitation teams are trained and supplied and mission capable prior to deployment.

4.10.4 Coordinate with the IPMC, Ohio Department of Agriculture, and the local USDA inspectors to determine requirements regarding inspection of cargo, vehicles, and equipment for the presence of eggs, larvae, or adult insects that the USDA or Ohio Department of Agriculture has prohibited from entering certain geographic areas.

4.11 Building Occupants

4.11.1 Apply good sanitary practices to prevent pest infestations. Areas need to be free of open food containers. Don’t accumulate pest harborage materials such as empty boxes or dunnage.

4.11.2 Cooperate fully with contractors and DIMR personnel in scheduling pest management operations, to include preparing the areas to be treated.

4.11.3 Report all pest management issues to the DIMR, IPMC, or as otherwise directed.

4.12 Self-Help Program Participants (generally maintenance workers, but Self-Help is available to all OHARNG members and employees):

4.12.1 Keep all areas clean, dry, and sanitary. Areas need to be free of open food containers. Don’t accumulate pest harborage materials such as empty boxes or dunnage.

4.12.2 Use the IPM outlines in Appendix B to determine if Self-Help is appropriate for the pest problem.

4.12.3 If Self-Help is appropriate, follow the requirements found in Appendix E covering the Self-Help Program. At Federally-owned properties, only pesticides that are pre-approved for Self-Help Program use and listed as such on the OHARNG SPUL (Appendix C) are allowed. All training, recording, reporting, handling and storage of pesticides must be done as specified under the Self-Help Program and in accordance with the pesticide label.

4.12.4 If Self-Help is not appropriate for the pest or level of the pest problem, submit a work request/help ticket on TAGNET for assistance with your pest problem.

4.12.5 When using pesticides as part of the Self-Help Program, always read and follow the label. The label is the law.
5 Integrated Pest Management

5.1 Legal Mandate

5.1.1 “Integrated Pest Management Memorandum from the President. August 2, 1979”

5.2 Operations

5.2.1 The four basic principles of IPM work together to provide long term control of pest populations at acceptable levels with the least detrimental impact on the environment. Although the use of the least-toxic pesticide is an integral part of IPM, non-chemical control is emphasized. Use of pesticides is almost always a temporary measure and often more expensive if used regularly. Non-chemical control may initially be more expensive, but will usually be more cost effective long-term with ongoing pest management. Non-chemical controls have the added advantage of being less toxic which reduces the potential risk to human health and the environment. Surveillance and monitoring of pests are stressed in an IPM program since it is important to determine the cause of the pest infestation and the most effective management of the problem. Insect and vertebrate pests require food, water, and harborage (a place to rest or breed). Long term control is dependent upon eliminating or restricting pests’ access to these requirements.

5.2.2 Mechanical and Physical Control: This type of control alters the environment where pests live, excludes pests, or traps and removes pests where they are not wanted. Examples of mechanical and physical control include: harborage elimination in structures through caulking or filling voids, screening, mechanical traps or glue boards, and nets and other barriers to prevent entry into buildings.

5.2.3 Cultural Control: Strategies in this method involve manipulating environmental conditions to suppress or eliminate pests. For example, judicious sanitation at dining facilities reduces the attractiveness of the area to flocks of birds that may cause increased air strike hazard. Replacing ornamental trees and shrubbery with native plants that are less attractive to defoliating pests is another cultural measure.

5.2.4 Biological Control: In this control strategy, predators, parasites or disease organisms are used to control pest populations. For example, the introduction of ragwort flea beetle, and the cinnabar moth have dramatically reduced the prevalence of tansy ragwort. Release of these biological controls in infested areas can eliminate tansy ragwort at that location. Introduction of new biological controls is the responsibility of the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Plant Protection and Quarantine, Biological Control Program.

5.2.5 Chemical Control: Pesticides kill living organisms, whether they are plants, insects or other animals. At one time, pesticides were considered to be the most effective control available, but pesticide resistance has rendered many ineffective. In recent years, the trend has been to use pesticides that have limited residual action. While reducing human exposure and lessening environmental impact, the cost has risen due to requirements for more frequent application.
Since personal protection and special handling and storage requirements are necessary with the use of pesticides, the overall cost of control can be quite high when compared with non-chemical control methods. However, the use of chemicals may be warranted to control some pests and invasive species when other control methods are not sufficiently effective.

6 **Priority of Pest Management**

Priorities of pest control operations are in the order shown below. Pests that affect the health of OHARNG personnel are of greatest importance. Other important pests included in this section are pests that damage real property, food and other commodities and those that are a threat to natural resources.

6.1 **Disease Vectors and Public Health Pests**

6.1.1 Bed bugs are a problem in the major metropolitan areas of Ohio and are showing up more and more at OHARNG sites. Bed bugs are spread when soldiers or OHARNG employees carry them from their homes or other areas where they have picked them up and infest bedding, office furniture, clothing, and equipment. Other personnel become infected when they use infected items and equipment. The OHARNG is managing the issue at our Central Issue Facility and other sites where bed bugs have been detected. The program includes education, inspections and prevention, the use of dogs to detect bed bugs, and heat and chemical treatments.

6.1.2 Mosquito species have the potential to transmit Western equine encephalitis, St. Louis encephalitis, West Nile virus, Zika virus, Dengue, Chikungunya and other diseases. Mosquito-borne virus transmission is usually most prevalent from June through October when mosquitoes are most abundant.

6.1.3 Ticks may transmit disease organisms (such as Lyme disease). Personnel conducting outdoor activities can minimize tick exposure by wearing appropriate clothing (see DOD Arthropod Repellent System), applying tick repellent, and performing personal hygiene inspections (with bathing) daily.

6.1.4 Some spiders (such as Brown Recluse) and stinging insects may produce painful bites as well as toxic reactions. Bees and wasps may produce allergic reactions in some individuals.

6.1.5 Scorpions and black widow spiders are usually encountered in undisturbed areas. They are venomous and the stings painful, but typically cause few problems to personnel who are not allergic.

6.1.6 Venomous snakes are capable of causing serious illness or death. Snakes, even when non-venomous, may have painful bites. Snakes found in areas where they are not wanted are captured alive and relocated to other areas away from ongoing activities.

6.1.7 Skunks, foxes, raccoons and bats may be infected with rabies. Since these animals may be found in or under buildings, the disease potential should be considered when doing control
work with these animals. Bat feces may contain several fungi which, when aerosolized and inhaled, can cause potentially fatal illnesses. Utilize appropriate Personal Protective Equipment (PPE) when cleaning bat-contaminated areas.

6.1.8 Deer flies may transmit tularemia through their bites, but contracting the disease in this manner rarely occurs.

6.1.9 Mice occasionally invade buildings and cause damage to food and other products. In addition, mice present a potential human health threat of Hantavirus pulmonary syndrome (HPS). This disease results from the inhalation of the aerosolized virus found in the feces and urine of rodents, particularly deer mice (*Peromyscus maniculatus*). Although this disease is relatively rare, the high fatality rate (50 percent) makes it significant in the range where it occurs. Utilize appropriate PPE when either handling or removing mice and/or cleaning mouse-contaminated areas.

6.1.10 Fleas found in rodents can transmit plague. Human plague cases have occurred in the past, but are extremely rare occurrences.

6.2 Quarantine and Regulated Pests.

The USDA and the State of Ohio have prohibitions on several insects (eggs, larvae, and adults) from entering the country/state and/or certain geographic areas. Military cargo, equipment, and vehicles being shipped around the state/country and coming back from OCONUS deployment require inspection to ensure they are pest free. Unit Commanders will coordinate with the IPMC, Ohio Department of Agriculture, and the local USDA inspectors to determine requirements regarding inspection of cargo for the presence of eggs, larvae, or adult insects that are prohibited from entering certain geographic areas. Any retrograde cargo that is received is inspected inside the common carrier (e.g., truck, aircraft) used for transport. If any signs of live pests or plant/soil material are present, the shipping container is to be immediately sealed and impounded to prevent discharge of the contents. Notify the local Ohio Department of Agriculture or USDA inspector and determine further disposition of the materiel after a joint inspection. If any quarantine pest is suspected, the Facility Manager/Unit Commander must notify the IPMC.

6.3 Vertebrate Pests

6.3.1 Mice and rats occasionally invade buildings. The primary management techniques for controlling these rodents are exclusion and sanitation. Snap traps are the main method used for controlling rodent infestations indoors.

6.3.2 Groundhogs, moles, voles and ground squirrels damage lawns and other turf areas through their burrowing. Sometimes they damage facilities by burrowing under steps and concrete slabs. Squirrels can cause damage by burrowing into and nesting in structures. Management of these and other vertebrate pests require a licensed professional and prior coordination with the DIMR-ENV.
6.3.3 Beaver and muskrat often cause flooding throughout OHARNG training sites, particularly at Camp James A. Garfield. These animals can cause damage to facilities and infrastructure and flood roads and railroad tracks. Control is done through a regulated trapping program and occasionally using a licensed nuisance trapper. These operations are conducted in accordance with the Integrated Natural Resources Management Plan.

6.3.4 Stray animal control at OHARNG sites is coordinated and performed by the facility occupants (Facility Maintenance, NCOIC, Range Control, etc.). The occupants can contact the local municipal animal control authorities to pick up strays.

6.3.5 Feral animals (mostly dogs and cats and possibly hogs) are different from stray animals in that they are no longer tame, but have gone wild and may represent a risk to personnel safety. Feral (and domestic) cats also do immeasurable damage to bird populations through predation. Feral animals are only known to be an occasional problem on OHARNG training sites. Control is done by hunters dispatching animals during hunting season or as otherwise needed by Range Operations staff.

6.3.6 Wildlife such as bats, raccoons, skunks, coyotes, snakes, or deer occasionally get into an OHARNG building or area occupied by troops. Most of the time such animals will leave if there is no food source and an available exit. Periodically a sick animal (coyote with mange or raccoon with distemper) shows up in a location occupied by personnel. Such animals are dispatched by Range Operations in accordance with the Integrated Natural Resources Management Plan (INRMP). If assistance is needed to remove an animal, the facility occupants must coordinate with DIMR-ENV for assistance and instructions on how to proceed.

6.3.7 Control efforts for regulated wildlife species, such as game species, furbearers, and waterfowl, are coordinated through DIMR-ENV with the United States Fish and Wildlife Service, US Department of Agriculture Animal and Plant Health Inspection Service (APHIS) wildlife damage services and Ohio Department of Natural Resources as applicable.

6.3.8 Some animals (to include insects) are protected under the Endangered Species Act (ESA) and/or state wildlife regulations. It is required to coordinate with the DIMR-ENV before performing any animal pest control.

6.4 Structural Pests

6.4.1 Birds roost in warehouses, aircraft hangars, maintenance and other buildings and damage equipment and supplies with their droppings. Most birds are protected under the Migratory Bird Treaty Act, so coordination with the DIMR-ENV is necessary before taking any management action.

6.4.2 Due to the high cost of repairing termite damage, infestible structures are periodically inspected for termites or termite damage. Carpenter ants may also damage wooden structures.
6.5 Pests Found In and Around Buildings

6.5.1 Food items located in dining facilities, in armory kitchens or in food storage facilities may become infested by stored food product pests. Food and trash containers in field training areas when left unsecured can attract unwanted animals and insects.

6.5.2 Crawling insects (e.g., ants, cockroaches and bedbugs) and spiders may require control in offices, billeting, food service facilities, warehouses and administrative buildings. Proper sanitation and housekeeping is very effective in discouraging these pests.

6.6 Noxious and Invasive Plants and Animals

Invasive plants are species that have few, if any, natural controls in their location and spread out of control. The OHARNG supports the three goals of the National Strategy for Invasive Plant Management: prevention, control, and restoration. Detailed control strategies may also be found in the INRMP, if there is one for that site.

6.7 Undesired Vegetation

Vegetation along fence lines, on road shoulders and ditches, in railroad track beds, paved surfaces (including runways), gravel parking lots, other developed areas and training areas may require control using IPM techniques, including the appropriate use of herbicides. Noxious vegetation such as poison ivy should be controlled when it grows where it can frequently contact personnel. Often, control of unwanted plants can be done mechanically using mowers and trimmers.

7 Health and Safety

7.1 Medical Surveillance of Pest Management Personnel

Pesticide applicators must read and follow all health and safety information on the label. If applying pesticides requires formal medical surveillance or respirators, OHARNG personnel must work with the OHARNG Occupation Health Office and the Safety Office to initiate medical surveillance physical exams, as appropriate. Contractors performing pest management services are responsible for their own medical surveillance program.

7.2 Hazard Communication

Safety Data Sheets (SDSs) for pesticides used are made available to all individuals who have contact with these chemicals. Hazard Communication (HAZCOM) training is mandatory for individuals working with hazardous materials, including pesticides. In addition to SDSs, product labels are required to be kept on site for all products in storage or use.
7.3 Personal Protective Equipment

7.3.1 Personal Protective Equipment (PPE) as specified on the pesticide’s label is provided to pest management personnel by the DIMR or the unit. Submit purchase order requests, when supplies of PPE become low.

7.3.2 Appropriate respiratory protection (High-Efficiency Particulate Air (HEPA) filter cartridges) should be used when working in enclosed areas infested with rodents and rodent waste, as well as additional measures like disposable gloves and the use of disinfectants. Rodent waste is associated with Hantavirus and Hantavirus pulmonary syndrome.

7.4 Fire Protection

The usual hazards presented by a fire are compounded in the case of a pesticide fire by the danger of pesticide poisoning and contamination. Fire protection of pesticides will be governed by the product label and the OHARNG Hazardous Material, Waste and/or Spill Management Plans.

7.5 Pest Management Vehicle(s)

Whenever possible, designate a single vehicle to transport and apply pesticides. Pesticides are never transported in the cabs of vehicles, in personally-owned vehicles, or in vehicles generally used for non-pesticide related activities unless the pesticides are being used in the Self-Help program. Whenever possible, pesticides are transported in a lockable storage compartment of an assigned vehicle(s). In addition, care is taken to secure pesticides to prevent damage to the containers and spillage of the chemicals. At no time are pesticides to be left unsecured in an unattended vehicle at an unsecure location.

7.6 Protection of the Public

Take precautions during pesticide application to protect the public, on and off OHARNG sites. Follow all precautions listed on the label. Pesticides are not applied outdoors when the wind speed exceeds label-specified levels. Whenever pesticides are applied outdoors, ensure that any drift is kept away from individuals, including the applicator. At no time are personnel permitted in a treatment area during pesticide application unless they are appropriately trained, have met the medical monitoring standards, and are protected in accordance with the pesticide label requirements.

7.7 Pesticide Shop Health, Safety, and Hazards

7.7.1 Personnel will follow all label precautions that deal with the storage of pesticides. Pesticides should be kept secure at all times. Pesticides should be under the applier’s direct control or located in a secure locked facility or cabinet that is marked “Pesticide Storage” and posted with applicable “Danger”, “Poison” and/or “Flammable” signs. Pesticides are a hazardous material and must be stored and managed according to the SDS and OHARNG policies and procedures.
More information on pesticide storage can be found in the Armed Forces Pest Management Board (AFPMB) Technical Guide No. 17, “Design of Pest Management Facilities”. This technical guide can be found on the AFPMB website (go to: http://www.acq.osd.mil/eie/afpmb/ search for “AFPMB”) or obtained from the ARNG PMC.

7.7.2 Used pesticide aerosol cans used in Self-Help applications must be turned-in to the Hazardous Waste Program Manager as hazardous waste. All other pesticide containers must be disposed of according to the label directions or turned-in as hazardous waste. Pest management contractors are responsible for the proper management and disposal of the aerosol cans and other pesticide containers that they generate.

8 Environmental Considerations

8.1 Sensitive Areas

8.1.1 Special consideration is given prior to conducting pest control operations in sensitive areas that are identified on pesticide labels. No pesticides are applied directly to wetlands or water areas (lakes, rivers, etc.) unless their use is specifically approved on the label and in compliance with National Pollutant Discharge Elimination System (NPDES) regulations for application over or into waters of the United States. Separate NPDES permitting may be required in some instances and will require coordination with DIMR-ENV.

8.1.2 In addition to aquatic and marine habitats, sensitive areas also include critical habitat of endangered, threatened, or rare flora or fauna species, active nesting habitat, and unique geological and other natural features.

8.1.3 All aerial application of pesticides to Federally-owned (Appendix A) OHARNG sites requires an Aerial Spray Statement of Need (ASSON) that has been approved by the ARNG PMC. The ASSON is prepared by OHARNG personnel with assistance from a PMC certified in DOD Category 11: Aerial Application Pest Control or equivalent Ohio Department of Agriculture category. Aerial application of pesticides to Federally-owned (Appendix A) OHARNG sites also requires additional environmental documentation (see Section 8.4.2 of this plan). Aerial applications must also be done in compliance with the Ohio EPA General NPDES Permit for application over or into waters of the United States.

8.2 Endangered or Protected Species and Critical Habitats

8.2.1 Protected migratory birds that occur on OHARNG property cannot be controlled without a permit. Migratory birds and their nests are protected. Neither migratory birds nor their eggs may be harmed. If not already nesting, birds may be scared or herded to encourage them to move (unless the birds are otherwise protected under separate authority such as the ESA). Nuisance nests may be destroyed (not collected) before eggs are laid or after chicks have fledged unless protected under the ESA or the Bald and Golden Eagle Protection Act (BGEPA).

8.2.2 The IPMC periodically reviews, with assistance from the OHARNG NRM, ongoing pest control operations and also evaluates all new pest management operations to ensure compliance
with the ESA, Migratory Bird Treaty Act, the Bald and Golden Eagle Protection Act and state wildlife regulations. No pest management operations are conducted that are likely to have a negative impact on endangered or protected species or their habitats without prior approval from the ARNG PMC, the USFSW, and DIMR-ENV. Special consideration must be given when using pest management tactics in areas where endangered species and/or nesting/roosting eagles are found. Refer to the site-specific INRMP for special environmental concerns pertaining to endangered species and coordinate with DIMR-ENV before performing any pest management operations that might affect endangered or protected species or their habitats.

8.2.3 Coordinate with DIMR-ENV regarding pest control operations that could affect pollinators (such as insecticides and herbicides that kill flowering plants). All efforts should be made to reduce the use of pesticides that may affect pollinators. If pesticides must be used, apply the lowest toxicity pesticide available and apply pesticides at times of day and/or season when pesticide use will have the least impact on pollinators, but achieve pest contract objectives. When honey bees are a problem, salvaging and moving the hive must be the first control method employed.

8.3 Cultural and Historical Sites

All IPM activities must be in accordance with the OHARNG Integrated Cultural Resources Management Plan (ICRMP). Follow the procedures and notifications specified in the ICRMP immediately after discovering cultural resources. If any native plants of interest to the Tribes are identified during the tribal consultation process, the OHARNG Cultural Resources Manager will inform the OHARNG IPMC and NRM so proper avoidance procedures can be incorporated into pest control activities. The OHARNG Cultural Resources Manager will review any necessary ground disturbance or work requiring alteration of a building eligible for the National Register of Historic Places.

8.4 Environmental Documentation

8.4.1 An ARNG Programmatic Environmental Assessment (PEA) was completed to identify, document, and evaluate the ARNG IPM Program. In the PEA, the ARNG Directorate addresses potential environmental effects of implementing IPMPs on a broad, programmatic scale. Assessing environmental impacts of the OHARNG IPM Program has been conducted and documented via an ARNG Checklist and Record of Environmental Consideration (REC). The REC was completed in accordance with 40CFR § 1502.20 and was treated as a tiering action. Environmental documentation can be found in Appendix G.

8.4.2 Aerial application of pesticides to Federally-owned (Appendix A) OHARNG sites may require an Environmental Assessment (EA). Advanced coordination with DIMR-ENV is required to determine the National Environmental Policy Act (NEPA) requirements.
8.5 Pesticide Spills and Remediation

An adequate pesticide spill cleanup kit is maintained wherever bulk pesticides are stored or used. All pesticide spills are reported to the OHARNG Hazardous Waste Program Manager. Spills are governed by the label and the OHARNG Hazardous Material, Waste and/or Spill Management Plans.

8.6 Climate Change

There is a potential for climate change to impact the control of pests on state and local levels. Shifts in precipitation regimes and temperature ranges can result in changes to vegetation that could impact training areas, promote noxious weed infestations, or compromise wildlife habitat. OHARNG supports the development of a vulnerability assessment to better understand the potential impacts related to a changing climate. However, the abundance and distribution of species and habitats at OHARNG sites are too small in scale to address comprehensive climate change vulnerabilities and OHARNG will instead utilize existing state and regional plans, partnerships, or reports that other agencies, universities, or non-profits are conducting to assess, develop and implement climate change adaptation strategies. In general, OHARNG will identify and implement sound IPM strategies, regardless of whether climate changes occur.

9 Program Administration

9.1 Pest Management Operations

9.1.1 Pest management operations are conducted in accordance with Appendix B, “Integrated Pest Management (IPM) Outlines”.

9.1.2 If the pest problem cannot be solved using the Self-Help Program (see Appendix E), then a request for pest control is sent to the DIMR via the TAGNET help ticket system.

9.1.3 All pesticides used at OHARNG Federally-owned (Appendix A) sites will be approved prior to use by the ARNG PMC and listed on the OHARNG SPUL (Appendix C).

9.2 Pest Management Contracts and Contract Quality Assurance

9.2.1 OHARNG site personnel may use contracts when essential pest management services are not provided in-house. Contracts are administered in accordance with DODI 4150.07 for OHARNG Federally-owned (Appendix A) sites. The DIMR will contact the IPMC for guidance for any contracts that include pest management.

9.2.2 Pest management contracts for OHARNG Federally-owned (Appendix A) sites where the OHARNG manages pest control operations are forwarded to the ARNG PMC for technical sufficiency review prior to advertisement of the contract. All contracted pest management activity at OHARNG Federally-owned sites to include contracts, purchase requests, and credit card purchases will be accompanied by an OHARNG IPMC and ARNG PMC approved scope of work. For contracted pre-construction treatment of soil to control termites, PMC review and
approval of the termite management section of contracts is not required for OHARNG Federally-owned (Appendix A) sites if the contract language is in accordance with the current Unified Facilities Guide Specification for chemical termite control.

9.2.3 Pest management contracts for OHARNG State-owned facilities do not require ARNG PMC review. State contracting procedures and regulations are utilized to contract pest control on OHARNG State-owned sites. Pest management activities on State-owned property will utilize integrated pest management practices as much as practical and possible. Contracts, purchase orders, and credit card purchases will be accompanied by an OHARNG IPMC approved scope of work or statement of requirements to facilitate compliance with this plan and the Ohio Pesticide Law. On State-owned property a vendor proposal may suffice as a statement of requirements once approved by the IPMC.

9.2.4 Pest management contracts are initiated on an "as needed" basis. Regularly scheduled, monthly or periodic treatments will not be done unless deemed necessary after surveying and monitoring pest population levels. Regularly scheduled monthly or periodic treatments at all OHARNG sites must be approved by the OHARNG IPMC. Regularly scheduled monthly or periodic treatments at OHARNG Federally-owned (Appendix A) sites must also be approved by the ARNG PMC. Use of IPM techniques is encouraged in all contracts to decrease DOD's use of toxic chemicals and pollutants. Pest problems threatening the health, safety, or welfare of installation personnel receive priority.

9.2.5 Contractors will conduct pest management in accordance with this plan at both Federally-owned and State-owned facilities and may only apply pesticides listed on the OHARNG SPUL at OHARNG Federally-owned (Appendix A) sites. Contractors may request addition of pesticides to the OHARNG SPUL via the IPMC. For application at State-owned facilities vendors may use any appropriate Ohio EPA approved pesticide after receiving approval from the OHARNG IPMC.

9.2.6 Once a contract is awarded, it is the responsibility of the DIMR to establish a date and time for work to commence. A copy of each finalized contract dealing with pest control must be forwarded to the OHARNG IPMC within seven (7) days of being issued.

9.2.7 The OHARNG IPMC is responsible for identifying the requirements of this plan that are applicable to contracted pest management activities, for educating appropriate OHARNG personnel on the requirements, and for overseeing the OHARNG pest management program for compliance with this plan and applicable regulatory requirements. It is the responsibility of DIMR project managers, State Maintenance Supervisors, and others who conduct, direct, or oversee pest management activities / contracts to ensure the requirements of this plan, as they pertain to their contracts/purchases, are implemented.

9.2.8 Pest management contracts with efforts that exceed 0.25 work-years must be monitored by a certified PMQAE at OHARNG Federally-owned (Appendix A) sites. Work performed by contracted pest management personnel is evaluated based on the adherence to the contract statement of work negotiated through the DIMR, the requirements outlined in this plan, and the State Maintenance Supervisor/DPW/Facility Manager (or PMQAE) reviews of the pest control
work to determine the effectiveness of control efforts. Failure of a contractor to adequately control pests is reported to the DIMR and the IPMC. Ongoing contracts are evaluated annually or as necessary. An evaluation to confirm the satisfactory completion of all work is performed prior to payment being made.

### 9.2.9 Pest management contracts at locations where the OHARNG is a tenant and/or located on a host agency property where the host agency administers the pest management program, maintains records and does pesticide reporting will comply with the host agency IPMP and program requirements. This is applicable to those OHARNG Federally-owned properties in Appendix A where an agency other than the OHARNG is identified as maintaining records and reports.

### 9.3 Outleases

If the OHARNG initiates outleases, the lessee will be governed by this plan as a contractor. IPM techniques will continue to be used to the maximum extent possible and the lessee may only apply pesticides listed on the OHARNG SPUL at OHARNG Federally-owned (Appendix A) sites. Lessees may request addition of pesticides to the OHARNG SPUL via the IPMC.

### 9.4 Interservice Support Agreements

Tenants of OHARNG sites will be governed by this plan. If the OHARNG has activities or units that are tenants on another installation, they will follow that installation’s IPMP unless the interservice support agreement states otherwise. In no instance will a pesticide be applied contradictorily to its label.

Appendix A lists OHARNG Federally-owned sites and identifies locations where support agreements are in place and where host agencies maintain pesticide application records and complete DOD reporting requirements. How pest management services are conducted and who keeps records and reports pesticide use to the DOD varies between host locations.

For OHARNG Federally-owned facilities at Air National Guard Bases (ANGB), the OHARNG conducts pest management activities in accordance with this plan, maintains records and reports pesticide use to the DOD with the exception of the joint use maintenance and dining facilities at Rickenbacker ANG Base. The ANGB manages the pest management services, record keeping, and reporting for the Rickenbacker joint use facilities.

The Defense Logistics Agency (DLA) maintains all pest management records and reports pesticide usage to the DOD for DLA owned properties located at the Defense Supply Center Columbus (DSCC). The OHARNG maintains all pest management records and reports pesticide usage to the DOD for OHARNG federally-owned properties as DSCC (Bldg. 1 (RTI), Bldg. 5 (USFPO Warehouse), Bldg. 6 (CSMS), and Bldg. 24 (Yearling Rd. Armory)). The current support agreement does not allow the OHARNG to use DLA provided pest management services. The OHARNG contracts services using in-house contracting processes and complies with the OHARNG IPMP.

The OHARNG is a tenant at the Army Forces Readiness Center (AFRC) at DSCC. Pest
management services at the AFRC are provided by the U.S. Army Reserve (USAR) and record keeping and reporting are done by the USAR.

9.5 Reports and Records

9.5.1 The OHARNG IPMC is responsible for the maintenance of records for all in-house and contracted pest management operations (e.g., pesticide use, surveillance, non-chemical controls). Copies of all pest management records must be turned into the IPMC as specified in this plan.

9.5.2 Records of pesticide applicator certification must be retained by the applicator and available for review. Vendors must provide a copy of their license/certification to the OHARNG prior to award of a contract, a PO, or a credit card purchase. It is the responsibility of the project manager or maintenance supervisor who purchased or is overseeing the pest management operation to obtain the vendor license/certification and ensure the IPMC receives a copy. Current pesticide applicator licenses/certifications are provided to the IPMC for inclusion in Appendix K of this plan.

9.5.3 All pest surveillance and control operations are recorded by the pesticide applicator or pest management provider. This includes pest management actions done in-house, by contractors, Self-Help Program participants, and as part of outleases, land management, and forestry programs. The information required varies depending upon if the application is done on State-owned or Federal-owned property and if it is Self-Help or done by a licensed/certified applicator. Generally these records must contain at a minimum:
   a. Date and time of pesticide application
   b. Target pest(s)
   c. Specific pesticide application location(s)
   d. Name of the person (and company, if contractor) applying the pesticide and their certification number (if applicable)
   e. Name and manufacturer of pesticide
   f. EPA registration number of the pesticide
   g. Sufficient information to determine the amount (in pounds) of pesticide active ingredient applied (such as amount of undiluted pesticide used, total amount of concentrate used, or amount of diluted pesticide applied, and the dilution rate)

9.5.4 The Ohio Pesticide Law requires more information be kept for pesticide applications than the Department of Defense. Therefore, the OHARNG developed the OHARNG Daily Pest Control Summary Sheet (Appendix D), which provides for collection of all the information needed by the State of Ohio and the DOD. Under the Ohio Pesticide Law application records for Self-Help applications of wasp spray are not required. The DOD requires records for all pest management activity and pesticide applications on Federally-owned property so the OHARNG developed a Self-Help Policy and application record to facilitate this requirement on Federally-owned properties.

9.5.5 State law requires pesticide applicators to retain copies of application records at their place of business. Applications done by licensed/certified in-house staff are kept on site at the facility by the applicator. Copies are sent by the applicator to the IPMC. Records for contracted
applications are included in the project files and a copy sent by the project manager/maintenance supervisor to the IPMC. Self-Help application records are forwarded to the IPMC annually. All records are maintained indefinitely by DIMR-ENV on the Environmental server and are a permanent record of pest management activities.

**9.5.6** Records of pesticides used at OHARNG sites by OHARNG licensed/certified applicators are compiled at the end of each month by the applicator and provided to the IPMC. For contracted pesticide applications, the Contractor provides records to the DPW, Facility/Project Manager, State Maintenance Supervisor, PMQAE or IPMC at the interval required per the contract, usually weekly. If contracted pesticide usage is reported to the DPW, Facility/Project Manager, State Maintenance Supervisor, or PMQAE, they will forward the information to the IPMC weekly. Self-Help wasp spray application records must be compiled by the Self-Help PMC annually and submitted to the IPMC not later than 25 September.

**9.5.7** In addition to the OHARNG Daily Pest Control Summary Sheet (Appendix D), applications that fall under the umbrella of the Ohio Environmental Protection Agency General NPDES Permit Authorization to Discharge Pesticides In, Over, or Near Water of the State must comply with the terms of this permit and complete the OHARNG Supplemental Pesticide Application Report for Ohio Environmental Protection Agency General Permit Authorization to Discharge Pesticides In, Over or Near Water of the State (Appendix L). This permit is applicable to both State-owned and Federally-owned properties. The form is turned in to the IPMC along with the OHARNG Daily Pest Control Summary Sheet.

Below is a matrix that shows the OHARNG reporting requirements.

<table>
<thead>
<tr>
<th></th>
<th>OHARNG Daily Form</th>
<th>OHARNG Supplemental Report</th>
<th>Contractor Provided Report</th>
<th>OHARNG Self-Help Report</th>
<th>Turn in to IPMC</th>
</tr>
</thead>
<tbody>
<tr>
<td>In-House Certified Applicator (Federal and State Property)</td>
<td>Yes</td>
<td>As applicable</td>
<td>NA</td>
<td>NA</td>
<td>Monthly</td>
</tr>
<tr>
<td>Contracted - Federal Property</td>
<td>Yes</td>
<td>As applicable</td>
<td>No</td>
<td>NA</td>
<td>Weekly</td>
</tr>
<tr>
<td>Contracted - State Property</td>
<td>No</td>
<td>As applicable</td>
<td>Yes</td>
<td>NA</td>
<td>Weekly</td>
</tr>
<tr>
<td>Self-Help Federal Property</td>
<td>No</td>
<td>NA</td>
<td>NA</td>
<td>Yes</td>
<td>Yearly, by 25 Sep</td>
</tr>
<tr>
<td>Self-Help State Property</td>
<td>No</td>
<td>NA</td>
<td>NA</td>
<td>No</td>
<td>NA</td>
</tr>
</tbody>
</table>

**9.5.8** The IPMC calculates and provides the data required for the annual PUF (an example PUF is in Appendix H). All pesticide usage will be reported in pounds of active ingredient (PAI) yearly via the PUF, or when requested by the ARNG PMC. The PUF is sent to the ARNG PMC by the IPMC. Only pest-management activities performed at OHARNG Federally-owned sites (Appendix A) are reported on the PUF.
9.5.7 For pest management activities at OHARNG State-owned sites (those not listed in Appendix A), there is no state or federal requirement to submit annual pesticide use data. The OHARNG Daily Pest Control Summary Sheets for applications done by in-house applicators must be retained on site and by the applicator (if off-site) and available for inspection by the Ohio Department of Agriculture, Division of Plant Health, Pesticide & Fertilizer Regulation Section.

9.5.8 The DPW, Facility Managers, or State Maintenance Supervisors responsible for facilities maintenance provide the data required for the quarterly IPM Installation Status Report (ISR). This data is reported in square footage (indoor pest management) or acreage (outdoor pest management) treated and is reported to the State ISR Program Manager or designated representative. Only Federally-funded pest management activities are reported in the ISR.

9.5.9 The IPMC (or designee) is responsible for answering all IPM-related data calls and submittal of information via the Army Environmental Database Environmental Quality/Headquarters Army Environmental System (AEDB-EQ/HQAES) or another electronic reporting system as specified by ARNG-IEZ.

9.5.10 For OHARNG pest management activities conducted on a host facility that has primacy in pest management pest management inspections, reports, and records will be submitted to the host’s designated representative.

9.6 Training and Certification

9.6.1 All individuals (including contractors) who apply pesticides at OHARNG Federally-owned (Appendix A) sites are to hold current pesticide applicator certification in the appropriate categories for the pests being treated, unless the pesticide application is done under the Self-Help Program. In-house pesticide applicators are to be certified by the DOD or the Ohio Department of Agriculture, Division of Plant Health, Pesticide & Fertilizer Regulation Section. All contractors who apply pesticides must be certified by the Ohio Department of Agriculture, Division of Plant Health, Pesticide & Fertilizer Regulation Section in order to apply pesticides at OHARNG Federally-owned (Appendix A) sites. The actual individual mixing and applying pesticides must hold the certification in their name. Application by non-certified trained personnel operating under the direct supervision of a certified applicator as described in Ohio pesticide regulations is not permitted on Federally-owned property. Initial training, apprenticeship periods and refresher training will be completed as required by the certifying agency to maintain current pesticide applicator certification.

9.6.2 All individuals (including contractors) who apply pesticides at OHARNG State-owned sites (those not listed in Appendix A) are to hold current pesticide applicator certification from the Ohio Department of Agriculture, Division of Plant Health, Pesticide & Fertilizer Regulation Section, in the appropriate categories for the pests being treated, unless the pesticide application is done under the Self-Help Program or they are under the direct supervision of a Certified Pesticide Applicator as defined by Ohio pesticide regulations. Initial training, apprenticeship periods and refresher training will be completed as required by the certifying agency to maintain current pesticide applicator certification.
9.6.3 The OHARNG IPMC must complete an initial DOD-taught PMQAE/IPMC training course within two years of being appointed IPMC and take refresher training every three years. HAZCOM training is also appropriate since exposure to pesticides may occur in the course of the job. The IPMC is not required to be a certified pesticide applicator if the IPMC will not apply pesticides as part of their duties.

9.6.4 Self-Help Program participants training will consist of reading the Self-Help Handouts, Ohio Department of Agriculture Safety Training Guide for Trained Servicemen and following the directions of the label for each pesticide used. Additional training on the OHARNG Pest Management Program and/or the OHARNG Self-Help Pest Management Program is provided at yearly Environmental Compliance Officer (ECO) training and periodically at Camp James A. Garfield and other locations. Applicable HAZCOM training is included as part of the training. When pest management actions are performed in accordance with the requirements of the Self-Help Program (Appendix E), participants are not required to be certified pesticide applicators.

9.6.5 PMQAEs must complete an initial DOD-taught PMQAE/IPMC training course and take refresher training every three years. PMQAEs are not required to be a certified pesticide applicator if the PMQAE will not apply pesticides as part of their duties.

9.7 Self-Help Pest Management Program

The OHARNG Self-Help Program Policy is included in this IPMP as Appendix E. The policy is applicable to both OHARNG Federally-owned and State-owned properties with some slight differences in record keeping and reporting between the two that is identified in the policy. At locations where the OHARNG is a tenant or occupies space on a host installation where the host provides or administers the pest management program, the host Self-Help program will be followed unless the host has approved use of the OHARNG program.

The Self-Help Program allows maintenance workers, facility managers, building occupants and unit personnel to use non-chemical Integrated Pest Management (IPM) measures for control of minor nuisance pests within their work environment while ensuring compliance with the OHARNG Integrated Pest Management Plan (IPMP), DOD policies, and the Ohio Pesticide Law. The focus of the program is in the use of non-chemical pest control methodologies. OHARNG Self-Help Program participants may only perform pest management actions listed in the Self-Help section of the IPM Outlines (Appendix B) for the pest(s) being controlled.

This program features limited use of ready-to-use, low toxicity pesticides pre-approved by the ARNG Pest Management Consultant (ARNG PMC) by non-certified/non-licensed personnel for the incidental control of wasps, hornets, and bees when necessary to avoid personal harm. Only pesticides that are listed on the OHARNG SPUL for use in the Self-Help Program (Appendix C) may be used and participants must review the educational materials for the pest and the control method prior to their use. All application, safety, storage, disposal and recording requirements as outlined on the pesticide label, the Self-Help training materials, this IPMP and the Self-Help IPM Outlines are to be followed.
In order to apply these Self-Help pesticides an individual must be trained by reading the OHARNG Self–Help Pest Management Program Policy, applicable Self-Help IPM Outlines, product labels, product Safety Data Sheets, and the publication “Safety Training Guide For Trained Servicemen” supplied by the Ohio Department of Agriculture. This training guide is available on line at the Environmental web site or from the IPMC.

All Self-Help pest management activity on Federally-owned properties must be recorded on the OHARNG Self-Help Pest Management Record and reported as specified in the OHARNG Self-Help Program Policy. Originals of these record will be retained at the location and copies forwarded to the IPMC not later than 25 September each year. There is no recording and reporting requirement for Self-Help activity on State-owned properties. Self-Help pest management activities done under a host Self-Help Program will comply with the host program requirements.

9.8 Pesticide Security

Pesticides and pesticide equipment must be properly stored in facilities and safeguarded. Facilities must be well lighted with a secure perimeter and locked to prevent access by untrained and unauthorized personnel. Access to pesticides should be restricted with appropriate warning signs posted. Refer to the AFPMB Technical Guide No. 7, “Installation Pesticide Security” for more information on proper storage and security of pesticides. This technical guide can be found on the AFPMB website (go to: http://www.acq.osd.mil/eie/afpmb/search for “AFPMB”) or obtained from the ARNG PMC.

9.9 Emergency Disease Vector Surveillance and Control

The OHARNG’s State Surgeon will stay up-to-date of any new disease vectors entering the area and assess and disseminate information regarding any necessary surveillance and control measures.

9.10 Coordination (DOD, other federal, state, and local)

9.10.1 The ARNG PMC reviews the OHARNG IPMP, and gives special attention to any pesticide applications that use restricted use pesticides, use of any pesticide that may significantly contaminate surface or ground water, may adversely affect endangered or other protected species or habitats, or involve aerial application of pesticides.

9.10.2 Liaison is maintained between the IPMC, State Surgeon and local, county and state health agencies to determine the prevalence of disease vectors and other public health pests in the areas surrounding OHARNG sites.

9.10.3 County health and environmental personnel are consulted for proposed actions that may impact adjacent off-post areas or where pests located in off-post areas are impacting OHARNG sites or personnel health.
9.10.4 Wildlife control is coordinated with the USDA, APHIS, Wildlife Service’s regional office or local game enforcement officers when wildlife control is necessary.

9.10.5 OHARNG pest management personnel and IPMC may also coordinate with County Cooperative Extension offices and USDA Natural Resources Conservation Offices to obtain information about the identification and control of specific pests in their locale or to obtain soil surveys.

9.10.6 The IPMC will inform the OHARNG Cultural Resources Manager that consultation with the State Historic Preservation Office and/or Tribal representatives may be appropriate if provisions of the IPMP or pest control activities impact cultural resources.

9.10.7 Construction projects including landscaping on OHARNG sites are reviewed with pest prevention and control in mind. The IPMC or DIMR-ENV and DIMR Project and Facilities Management personnel will review the design of new buildings or other structures and conduct a pest evaluation in the constructed facility prior to completion of the project to ensure that pest entry points and potential harborage sites have been eliminated.

10 Sale and Distribution of Pesticides

No pesticides will be sold at OHARNG sites.

11 IPM References and Links

11.1 Federal Laws

11.1.1 Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)

11.1.2 Resource Conservation and Recovery Act (RCRA)

11.1.3 Occupational Safety and Health Act (OSHA)

11.1.4 Federal Noxious Weed Act

11.1.5 Food Quality Protection Act (an amendment to FIFRA)

11.1.6 Endangered Species Act (ESA)

11.1.7 Pollution Prevention Act

11.1.8 Clean Water Act (CWA)
11.2 State Laws

11.2.1 Ohio Pesticide Law, effective September 1976 (Ohio Revised Code Chapter 921)

11.3 Directives and Instructions

11.3.1 EO 13751: Safeguarding the Nation from the Impacts of Invasive Species, 5 December 2016

11.3.2 EO 13112: Invasive Species (Amended by EO 13286, Amendment of Executive Orders, and Other Actions, in Connection With the Transfer of Certain Functions to the Secretary of Homeland Security), 3 February 1999

11.3.3 Presidential Memorandum, “Integrated Pest Management”, 2 August 1979


11.4 DOD Regulations and Policy

11.4.1 Department of Defense Instruction 4150.07, Department of Defense Pest Management Program, 29 May 2008.


11.4.3 AR 40-5, Preventive Medicine, 25 June 2007

11.4.4 AR 200-1, Environmental Protection and Enhancement, 27 December 2007.

11.4.5 NGR No. 385-10, Army National Guard Safety Program, 12 November 2008.

11.4.6 ARNG-ILE Memorandum for Environmental Program Managers and Construction and Facilities Management Office for 54 States, Territories, and District of Columbia, Integrated Pest Management Policy, 4 February 2016

11.5 Other References, Manuals, Books and Guides

11.5.1 The most current IPM information is available on the Armed Forces Pest Management Board’s website, (go to: http://www.acq.osd.mil/eie/afpmb/ search for “AFPMB”). Technical Guides are available on the AFPMB website for more specific information regarding Pest Management, including:

TG 2 - Integrated Pest Management in Child Development Centers and Schools, November 2016
TG 7 (CAC access only) - Installation Pesticide Security, August 2003
TG 14 - Personal Protective Equipment for Pest Management Personnel, April 2011
TG 15 - Pesticide Spill Prevention and Management, August 2009
TG 16 - Pesticide Fires: Prevention, Control, and Cleanup
TG 17 (CAC access only) - Military Handbook - Design of Pest Management Facilities, August 2009
TG 21 - Pesticide Disposal Guide for Pest Control Shops
TG 26 - Tick-Borne Diseases: Vector Surveillance and Control, November 2012
TG 27 - Stored-Product Pest Monitoring Methods, November 2015
TG 29 - Integrated Pest Management in and around Buildings, August 2009
TG 34 - Bee Resource Manual with emphasis on The Africanized Honey Bee, November 2013
TG 37 (CAC access only) - Integrated Management of Stray Animals on Military Installations, May 2012
TG 38 - Protecting Meal, Ready-to-Eat Rations (MREs) and Other Subsistence During Storage, November 2015
TG 41 - Protection from Rodent-borne Diseases, with special emphasis on occupational exposure to Hantavirus, December 2013
TG 42 - Self-Help Integrated Pest Management, April 2015
TG 44 - Bed Bugs - Importance, Biology, and Control Strategies, March 2012
(Supplemental Information)
TG 47 - Aedes Mosquito Vector Control, March 2016


11.5.3  TB MED 530, Tri-Service Food Code, 30 April 2014.


11.5.5  ARNG-IEN Guidance for National Environmental Policy Act (NEPA) Compliance in Support of Natural Resource Planning Actions, 01 APR 16
LIST OF APPENDICES

Appendix A – List of Federally-owned OHARNG Sites
Appendix B – Integrated Pest Management (IPM) Outlines
Appendix C – OHARNG State Pesticide Use List (SPUL)
Appendix D – OHARNG Daily Pest Control Summary Sheet
Appendix E – Self-Help Program
Appendix F – IPM Points of Contact
Appendix G – National Environmental Policy Act (NEPA) Documentation
Appendix H – Program Update Form (PUF)
Appendix I – IPMC Appointment Memo Format
Appendix J – Definitions and Glossary
Appendix K – Pest Management Provider Certifications
Appendix L – OHARNG Supplemental Pesticide Application Report for Ohio Environmental Protection Agency General Permit Authorization to Discharge Pesticides In, Over or Near Water of the State