



Pesticide Program

**Santa Clara University (SCU)
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Program Review Record

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Program Approval

<i>Signature on file in the EHS Office</i>	<i>04/11/2018</i>
Signature	Date
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Revision History

No.	Date	Responsible Person	Revision
3	04/11/2018	Dave Mathe	Review Attachment 2
2	05/16/2017	Dave Mathe	Review Attachment 2
1	07/13/2015	Dave Mathe	Update Attachment 2
New	07/26/2010	Joe Sugg	New

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Pesticide Program

1. References

- Food & Agriculture Code Section 11401 et seq.
- 3 CCR 6000 et seq.
- **SCU Hazardous and Universal Waste Program**
- **SCU Chemical Hygiene Plan**

2. Purpose

This Pesticide Program describes policies, procedures, equipment, personal protective equipment, and work practices that are capable of:

- Protecting SCU Faculty, Staff and Students from health hazards due to exposure to pesticides;
- Preventing environmental contamination from the use of pesticides; and
- Ensuring compliance with applicable federal, state and local requirements.
- Responding to exposure-related emergencies.

3. Applicability

This program applies to all uses of and exposures to pesticides at SCU, with the exception of laboratory use of disinfectants and other registered pesticides. Laboratory uses of pesticides as sanitizers are addressed in the **Chemical Hygiene Plan**.

4. Definitions

Adjuvants - Emulsifiers, spreaders, and other compounds added to improve the effectiveness of a pesticide

Pesticide - A pesticide is any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest. Though often misunderstood to refer only to insecticides, the term pesticide also applies to herbicides, fungicides, and various other substances used to control pests. A pesticide is also any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant. California also regulates adjuvants as pesticides.

Exempted Pesticide Products include the following:

- Preservatives for biological specimens
- Fertilizers, nutrients, and other substances used to promote plant survival and health.
- Biological control agents, except for certain microorganisms. Biological control agents include beneficial predators such as birds or ladybugs that eat insect pests.

Pests - Any living organism that causes damage or economic loss or transmits or produces disease. Pests can be animals (like insects or mice), unwanted plants (weeds), or microorganisms (like plant diseases, bacteria and viruses).

5. Requirements

Pre-Use Review and Approval Process

Only pesticides on the pre-approved list shall be purchased at SCU. The approved list is presented in Attachment 1.

Prior to purchasing or using pesticides not on the pre-approved list in Attachment 1, the following steps must be followed:

- The registration number must be reviewed to confirm that the pesticide is registered in California.
- The label must be reviewed to confirm that:
 - A respirator is not required.
 - The signal word is “Caution.”
- It is SCU policy that restricted pesticides or pesticides requiring respirators and/or pesticides with the signal word “Warning” or “Danger” will not be approved. A change to this policy will require a change to this program and the implementation of the requirements of the respiratory protection program.
- A request must be submitted in writing to EHS requesting the review of any new pesticide. The request must include the name of the pesticide, proposed method and frequency of application and proposed safety precautions. The safety precautions must comply with the information in the label.
- The EHS Director or Manager will review the label, MSDS and other sources of information about the pesticide active ingredient(s) and formulation and approve or disapprove based on if the safety precautions provide appropriate protection

Qualification

Only trained and qualified staff will mix, load or apply pesticides. Minors and students will not be hired for work involving pesticide mixing, loading or application.

Santa Clara staff must complete the training required in Attachment 2 of this program prior to working with pesticides.

Hazard Communication

A copy of the label and MSDS for each pesticide will be maintained at the site. A copy of the Pesticide Safety Information Series leaflet N-8 “Hazard Communication Information for Employees Handling Pesticides in Noncrop Settings” will be posted in a public location in the Facilities Department.

Employees will be informed of the location and availability records and documents relating to employee training, monitoring, and potential exposure before they are allowed to handle pesticides, at least annually thereafter and upon changes in location.

Any pesticide container other than the original labeled container must be labeled with:

- Name and address of the person or firm responsible for the container,
- Name of the pesticide, and
- Signal word from the original container, e.g., "Caution."

Storage, Mixing, Loading and Application

Each registered pesticide must be stored, mixed, loaded and applied in accordance with the requirements of the pesticide label. The quantity of pesticide used will be the minimum amount needed for the specific pest control task.

Pest control equipment must be in good repair and safe to operate. The equipment used for mixing, loading, transferring, or applying pesticides must be inspected before each day of use and equipment with any safety defect must be removed from service and repaired or discarded. Repairs may only be performed by trained and authorized persons who have been informed by the SCU Facilities Department of the hazards of the pesticides and associated safety precautions.

Running water for hand washing and flushing of eyes must be provided in the mixing area.

Concentrated pesticides which are to be mixed shall be weighed or measured accurately using devices which are calibrated to the smallest unit in which the pesticide is being weighed or measured.

All application equipment which is connected to a source of potable water such as a hose must have an air-gap separation permanently affixed to the equipment. Backpack type spray equipment and hand-held sprayers with a capacity 5 gallons or less are exempt. These may be filled by hand holding a hose over the tank. The hose must be held well above the tank at all times to prevent contact with the tank or its contents.

Applications will only be performed when weather and conditions at the site permit the safe and proper application of the pesticide. Pesticides will not be applied if there is the possibility of contamination of persons, clothing or other public or private property. The employee applying the pesticide is responsible for consulting the wind sock or other source of wind information prior to application to confirm that weather conditions are acceptable.

Personal Protective Equipment

Each SCU employee must at a minimum wear the following personal protective equipment (PPE) while mixing, loading or applying a pesticide:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves
- Shoes plus socks.

Other PPE, such as safety glasses or a chemically resistant apron, must also be worn if required by the label. PPE must be inspected daily (before use) and cleaned after each use according to pesticide labeling instructions or, absent any instructions, washed in detergent and hot water. PPE must be dry before storage and stored in a designated pesticide-free location separate from personal clothing. The supervisor is responsible and accountable for assuring that all workers wear the required PPE, inspect it prior to use, and store it properly.

PPE must remain on the SCU campus unless authorized, e.g. sent to a designated laundry, and must not be taken home for laundering. Potentially contaminated personal protective equipment must be washed separately from other clothing or laundry.

Postings

The employee applying the pesticide is responsible for posting the area, as appropriate with signs and or barriers to notify people of the application, if such a requirement is noted on the label. He/she will also monitor the area until after the material has dried or the time limit for re-entry on the label has been satisfied. The notice must include the following information:

- The date of the scheduled application;
- The identity of the pesticide (including spray adjuvants, if applicable) by brand or common chemical name; and
- Precautions to be observed as printed on the pesticide product labeling or included in applicable laws or regulations related to the entry of the treated area.

Spraying

Tanks must be labeled with the name of the pesticide, the signal word (e.g., "Caution") listed on the pesticide label, and the name and address of the SCU Facilities Department. After the tank is mixed, the measuring cup will be rinsed with water with the rinse water put back into the tank. The remaining concentrate must be stored in a safe manner while the application is proceeding.

Disposal

At the conclusion of the spraying, additional clean water will be added to the tank to flush the tank, pump, and hose. Then the rinse water will be sprayed onto the vegetation that was already sprayed. The application equipment and product will then be returned to safe storage.

The following steps will be followed to rinse each emptied container that has held less than 28 gallons of a liquid pesticide diluted for use:

- Use the following amount of water or other designated spray carrier for each rinse:

<i><u>Size of container</u></i>	<i><u>Amount of rinse medium</u></i>
Less than 5 gallons	1/4 container volume
5 gallons or over	1/5 container volume

- Place required minimum amount of rinse medium in the container, replace closure securely, and agitate.
- Drain rinse solution from container into tank mix. Allow container to drain 30 seconds after normal emptying.
- Repeat the above steps a minimum of two times so as to provide a total of three rinses; or
- Use an equally effective approved method for triple rinsing containers.

- Render container unusable and discard in a sanitary landfill.

Cardboard containers will be completely emptied and discarded in the trash.

Pesticide containers will never be reused. Unused pesticide will be disposed of in accordance with the requirements of the **SCU Hazardous and Universal Waste Program**.

Recordkeeping and Reporting

Application records must be maintained that include the following information for each pest control operation:

- Date of application;
- Name of the operator of the property treated;
- Location of property treated;
- Crop commodity, or site treated;
- Total acreage or units treated at the site; and
- Pesticide, including the U.S. Environmental Protection Agency (U.S. EPA) or State registration number which is on the pesticide label, and amount used.

Storage

Pesticides must be stored in a secured, well ventilation location which is not accessible to unauthorized persons. Containers must be kept tightly closed when not in use.

Emergency Medical Care

The source of emergency response information is the pesticide label. Emergency medical care will be arranged in advance by SCU. The name of the emergency medical provider will be communicated to employees on the "Hazard Communication Information for Employees Handling Pesticides in Noncrop Settings" poster.

The following steps will be followed in case of exposure/contamination to the employee applying the pesticide or to others:

- Call extension 408-554-4444 to report the exposure and request the assistance of the EHS Director. Report the name of the pesticide.
- Immediate first aid measures include:
 - If on skin, rinse skin with plenty of water for 15 – 20 minutes.
 - If on clothing, remove contaminated clothing.
 - If in eyes, hold eye open and rinse slowly and gently with water for 15 – 20 minutes.
- The EHS Director or EHS Manager will review the pesticide label to provide additional guidance.

6. Roles and Responsibilities

The following are the SCU Roles and Responsibilities in regards to pesticides:

Group	Responsibilities
Director, Facilities	<ul style="list-style-type: none">Assign responsibility for pesticide compliance in the Facilities Department.
Associate Director, Facilities	<ul style="list-style-type: none">Work with the EHS Dept. to develop a list of pesticides approved for use at SCU.Ensure the current approved pesticides list is available and is adhered to by staff and vendors.Ensure that employees and vendors utilize pesticides according to their current labels and applicable regulations.Provide staff with appropriate safety equipment and ensure that it is used in all required circumstances.Maintain use records and submit reports as required.Assist with a periodic review of the possession and use of pesticides to ensure compliance with regulatory requirements.
EHS Dept	<ul style="list-style-type: none">Work with the Associate Director, Facilities to develop a list of pesticides approved for use at SCU.Review pesticide labels and Material Safety Data Sheets (MSDS) and identify appropriate personal protective equipment.Ensure the availability and presentation of training for employees in the safe use of pesticides.Ensure the availability of hazard communication at SCU, including required posters, labels and MSDSs.Ensures that this program is kept up-to-date with regulatory requirements.Performs an annual review of the effectiveness of the Plan.
Pesticide Users	<ul style="list-style-type: none">Use pesticides in accordance with the label and this program.Use and maintain personal protective equipment in accordance with the manufacturer's instructions.

7. Training

Before working with pesticides, SCU employees must receive training in pesticide safe handling procedures in accordance with the training program presented in [Attachment 2](#).

8. Reporting

The Pesticide Program will be reviewed every three years or as need for effectiveness by the EHS Department. Any changes in the Pesticide Program will be transmitted to impacted Facilities management, users and others in the department that need to be aware of the changes.

9. Document Retention

The following documents are retained as indicated:

Record	Location	Retention Period	Responsible Party
Pesticide Program	EHS Files	Until superseded	EHS Dept.
Training Program	EHS Files	While in use and for two years after use, at a central location at the workplace.	EHS Dept.
Pesticide Use Records	Facilities Files	3 Years	Facilities Director
Pesticide Disposal Records	EHS Files	Indefinitely	EHS Dept.
Annual Pesticide Program Review	EHS Files	3 Years	EHS Dept.
Personnel Training	EHS Training Record System	3 Years after termination of employment	EHS Dept.

Attachment 1- List of Pesticides Approved for Use at SCU

(Reviewed: 04/10/2018)

Name	Manufacturer	Active Ingredient	CAS Number	EPA Registration Number	California Registration Number	Signal Word
Merit® 75 WP Insecticide	Bayer	Imidacloprid	138261-41-3	432-1314	432- 1318-AA	Caution
No Foam® B	Creative Marketing and Research	POE Nonylphenol Dodecylbenzene sulfonate Isopropyl Alcohol	26027-38-3 27176-87-0 67-63-0	Not required	CA-54705-50003-AA	Caution
Roundup® Pro Herbicide	Monsanto	Isopropylamine salt of glyphosate,	38641-94-0	524-475	524- 475-ZA	Caution
SedgeHammer™	Gowan Company	Halosulfuron-methyl	100784-20-1	81880-1-10163	81880- 1-AA-10163	Caution
Sluggo®	Lawn & Product	Iron Phosphate	product is a mixture —no specific CAS number	67702-3-54705	67702- 3-AA-54705	Caution
SPEED ZONE Broadleaf Herbicide for Turf	PBI/Gordon Company	Dicamba MCP 2,4-D, 2-ethylhexyl ester	1918-00-9 16484-77-8 1928-43-4	2217-833	2217- 833-AA	Caution
Surflan* AS Herbicide	Dow AgriSciences	Oryzalin	19044-88-3	62719-113	70506- 43-AA	Caution
Suspend SC Insecticide	Bayer	Deltamethrin	52918-63-5	432-763	432- 763-ZB	Caution
Turfon Ester Herbicide	Dow AgriSciences	Triclopyr	62719-258	64700-56-7	17545- 8-AA	Caution

Attachment 1 – Written Training Program

Training will be provided by the EHS Director or designee.

Frequency: Training shall be completed before the employee is allowed to handle pesticides, continually updated to cover any new pesticides that will be handled, and repeated at least annually thereafter. Certified applicators are considered trained.

Documentation: Training will be documented on a sign in sheet, including the original signature of the trainee. A signature is required, even if the employee completes an online course.

Content: Training will address the following:

- (1) Format and meaning of information, such as precautionary statements about human health hazards, contained in pesticide product labeling;
- (2) Hazards of pesticides, including acute and chronic effects, delayed effects, and sensitization, as identified in pesticide product labeling, Material Safety Data Sheets, or Pesticide Safety Information Series leaflets;
- (3) Routes by which pesticides can enter the body;
- (4) Signs and symptoms of overexposure;
- (5) Emergency first aid for pesticide overexposure;
- (6) How to obtain emergency medical care;
- (7) Routine and emergency decontamination procedures, including spill cleanup and the need to thoroughly shower with soap and warm water after the exposure period;
- (8) Need for, limitations, appropriate use, and sanitation, of, any required personal protective equipment;
- (9) Prevention, recognition, and first aid for heat-related illness;
- (10) Safety requirements and procedures for handling, transporting, storing, and disposing of pesticides;
- (11) Environmental concerns such as drift, runoff, and wildlife hazards;
- (12) Warnings about taking pesticides or pesticide containers home;
- (13) Requirements relating to pesticide safety, Material Safety Data Sheets, and Pesticide Safety Information Series leaflets;
- (14) The location of the written Pesticide Safety Information Series leaflet N-8 "Hazard Communication Information for Employees Handling Pesticides in Noncrop Settings" and Material Safety Data Sheets;
- (15) The employee's rights, including the right;
 - (A) To personally receive information about pesticides to which he or she may be exposed;
 - (B) For his or her physician or employee representative to receive information about pesticides to which he or she may be exposed; and
 - (C) To be protected against retaliatory action due to the exercise of any of his or her rights.