

POLICY AND PROCEDURE

POLICY TITLE: Integrated Pest Management Policy	NUMBER: 2023-01	PAGE: 1 of 2
APPROVED BY: Zone 7 Board	REVISION:	EFFECTIVE DATE: September 20, 2023

1.0 BACKGROUND

The California Regional Water Quality Control Board, San Francisco Bay Region (Water Board), regulates discharges of stormwater into the San Francisco Bay through National Pollutant Discharge Elimination System (NPDES) permits. Zone 7 is a member the Alameda Countywide Clean Water Program and is a permittee of the Municipal Regional Stormwater NPDES Permit, No. CAS612008 (MRP). Zone 7 developed the initial Integrated Pest Management (IPM) program in 2002 pursuant to the NPDES Permit issued to the members of the Alameda Countywide Clean Water Program, the MRP's predecessor. In 2010, Zone 7 adopted the IPM Policy as required by the previous version of the MRP.

2.0 PURPOSE

Zone 7's Vision Statement is to provide excellent water and flood protection services to enhance the quality of life, economic vitality, and environmental health of the communities we serve. To fulfill this Vision Statement, Zone 7 is committed to operating its water and flood protection facilities in an environmentally sensitive manner to protect the health and vitality of urban streams. As part of this Policy, Zone 7 is committed to training appropriate personnel on the Policy, performing monitoring and inspections to protect urban streams, and providing public information and outreach to promote community awareness of watershed stewardship. Specifically, MRP Provision C.9, Pesticides Toxicity Control, seeks to prevent impairment of urban streams by pesticide-related toxicity. This provision requires Permittees to adopt and implement an IPM policy that minimizes reliance on pesticides that threaten water quality as defined by the MRP.

3.0 SCOPE

This Policy applies to all facilities maintained by Zone 7 where pest management services are performed. Zone 7 uses contractors to perform its pest management activities. These services are conducted on flood protection channels, water treatment sites, well fields, pump stations, pipeline appurtenances, reservoirs, and office buildings.

4.0 DEFINITIONS

When implementing this Policy, the following terms shall have the meanings hereinafter set forth unless the context indicates otherwise:

Pest: Any of the following that is, or is liable to become, dangerous or detrimental to the agricultural or nonagricultural environment, including but not limited to the following:

- a) Any insect, predatory animal, rodent, nematode, or any plant which grows where not wanted
- b) Any terrestrial, aquatic, or aerial plant or animal, virus, fungus, bacteria, or other microorganism

Pesticide: Includes herbicides, insecticides, fungicides, rodenticides, etc.

IPM: Integrated Pest Management is an ecosystem-based strategy that focuses on long-term prevention of pests or their damage through a combination of techniques such as biological control, habitat manipulation, modification of cultural practices, and use of resistant varieties. Pesticides are used only after monitoring indicates they are needed according to established guidelines (and when it has been concluded that the use of non-chemical controls is insufficient), and treatments are made with the goal of removing only the target organism. Pest control materials are selected and applied in a manner that minimizes risks to human health, beneficial and nontarget organisms, and the environment (California Department of Pesticide Regulation, 2018).

5.0 GENERAL PROVISIONS

The following provisions shall apply to all of Zone 7’s pest management activities unless otherwise provided for herein:

- (a) Zone 7 shall continue to implement its pest management program in accordance with all applicable state, federal, and local regulations and permits, including the applicable Municipal Regional Stormwater NPDES Permit.
- (b) Zone 7 shall continue to consider least toxic methods such as biological, cultural, mechanical, and chemical methods to accomplish pest management. Zone 7 may select a combination of biological, cultural, mechanical, and chemical techniques to the extent feasible and limit the use of pesticides considered a threat to water quality.
- (c) All Zone 7 pest management contractors shall implement the IPM Policy and Zone 7’s pest management standard operating procedure.

HISTORY

Date	Action	Resolution
2002	Originally developed	No Resolution, staff level program only
June 16, 2010	Adopted	10-34010
June 15, 2022	Rescinded	22-41
September 20, 2023	Adopted	23-66

Zone 7 Water Agency

Title: Managing the Pest Control Contract	SOP Number:	Z7-30-22
	Revision Date (& initial):	AW 8/2/23
	Review Date (& initial):	RG 9/20/2023
	Safety Checklist included:	Yes
	Review by Safety (initial):	DM FN
	Review by WQ (initial):	AO 9/18/23
	Review by WSE/NPDES Coordinator (initial):	AW 8/25/23
	Review by Maintenance (initial):	MM 8/21/23, JP 9/14/23
	Approval by WFS (initial):	RG 9/20/2023
	In Ops Plan (Yes/No):	No

Facility: All Zone 7 sites.

Background: Uncontrolled pests can damage Zone 7 facilities and structures and pose a safety hazard to staff and the public. Zone 7 is a permittee of the Municipal Regional Stormwater NPDES Permit (referred to as the MRP), Permit No. CAS612008. The MRP requires permittees to implement procedures to prevent pesticides from entering the storm drainage system or receiving waters and to have an Integrated Pest Management (IPM) Policy and Standard Operating Procedure (SOP). Zone 7 adopted its initial IPM Policy by Resolution No. 10-34010 on June 16, 2010, and adopted a revised IPM Policy by Resolution No. 23-66 on September 20, 2023.

Goals and Objectives: Although the Blanket Purchase Order (BPO) for pest services may be under one contract, the individual facility supervisors are responsible for maintaining contact with and directing the work of pest services contractors. The objective of this document is to provide the facility supervisors with direction on the scope of work and Zone 7's expectations for this contract work.

Limitations: This SOP does not apply to the application of pesticides conducted under the authority of and in accordance with the following statewide National Pollutant Discharge Elimination System (NPDES) Permits or reissuances of these permits.

- Aquatic Animal Invasive Species Control Order 2011-0003-DWQ
- Spray Applications Order 2011-0004-DWQ
- Weed Control Order 2013-0002-DWQ
- Vector Control Order 2016-0039-DWQ

Safety: When working within a treatment process, facility or location always be aware of your surroundings and the task you have been assigned. Your activity, along with others (contractors) could impact the work environment and potentially expose you and others to the following;

dangerous chemicals, automatic starting of machinery, high noise levels, electrical shock, confined space hazards, fall hazards, drowning and engulfment hazards, etc. Approach every job with safety as the "primary concern." Always follow instructions provided by the equipment manufacturer, Zone 7 policy or procedure, and don the appropriate personal protective equipment (PPE) as indicated by the chemical Safety Data Sheet (SDS) information found online at <http://www.3eonline.com/> or located at the specific facility. Enter the username ZWA and password Zone7water for access to the database.

Pesticides are potentially hazardous to human health. Zone 7 employees shall take appropriate precautions before entering a work area where pesticides are being applied.

The attached Regulatory Safety Checklist (RSC) identifies various safety program elements and should not be considered all-inclusive. Contact your supervisor for more detailed information and always refer to the current employee safety handbook for additional information.

Procedure: Before contacting the pest services contractor for work to be performed, the Facility Supervisor should contact the maintenance and laboratory supervisors to determine if they have any special needs regarding pest control or weed abatement. This will prevent double booking of the services and keep oversight of the contract in the hands of one person per site.

Key Definitions:

As used in this document, **pesticide** is a general term that includes insecticides, fungicides, rodenticides, and herbicides, and other "-cides".

Integrated Pest Management or **IPM** is an ecosystem-based strategy that focuses on long-term prevention of pests or their damage through a combination of techniques such as biological control, habitat manipulation, modification of cultural practices, and use of resistant varieties. Pesticides are used only after monitoring indicates they are needed according to established guidelines (and when it has been concluded that the use of non-chemical controls is insufficient), and treatments are made with the goal of removing only the target organism. Pest control materials are selected and applied in a manner that minimizes risks to human health, beneficial and nontarget organisms, and the environment (California Department of Pesticide Regulation, 2018).

Zone 7 employees do not apply pesticides at Zone 7 facilities. Instead, Zone 7 contracts for pest control services. The IPM Policy and this SOP is included in requests for proposals or bids from pest control operators and in the resulting contracts or purchase orders. Pest control contractors providing service to Zone 7 must be licensed by the State of California Department of Pesticide Regulation, and IPM trained or IPM certified. Contractors shall submit copies of appropriate valid licenses and documentation of IPM certification and/or training prior to execution of a contract with Zone 7.

Zone 7 requires that contractors use an integrated approach by adopting IPM practices that monitor for pests before taking action. Sanitation and exclusion practices are implemented first,

treat only as necessary, and use or consider mechanical, physical, and biological methods before resorting to chemical methods.

Contractors shall use IPM tools and procedures that are safe, effective, economical, and appropriate for the site at the time. A copy or sample label and Safety Data Sheet (SDS) for each product must be submitted for review upon request. All contractors must have a copy of the Zone 7 IPM Policy, their organizational IPM policy, and a list of pesticides to be utilized that day available at the job site for review by Zone 7. Access to Zone 7 facilities is controlled and coordinated with Zone 7 staff.

Contractor's representative performing work at Zone 7 facilities must have appropriate IPM experience and a Pest Control Qualified Applicator license from the California Department of Pesticide Regulation.

Contractors are required to maintain records of pest control activities and submit a summary of activities to Zone 7. Contractors that provide routine on-going service, shall provide the activities summary on a quarterly basis, or more often if requested. The pest control activities summary shall include:

1. IPM (least toxic control) recommendation;
2. Date of application;
3. Name of pest(s);
4. Site/facility;
5. Type of pesticide applied and Safety Data Sheet (SDS);
6. Amount of pesticide applied including the percentage and volume of the active ingredient(s);
7. Name of pest control contract company and technician(s) performing work.

Facility Supervisor Responsibilities:

1. Facility supervisors, or their designee, are responsible for maintaining contact with and directing the work of pest services contractors.
2. Before contacting the pest control contractor to perform work, it is recommended that the facility supervisor contacts the maintenance supervisor(s) to determine if they have any special needs regarding pest control including weed abatement.
3. Facility supervisors, or their designee, will schedule and conduct a walk-through of application area with the pest control contractor. During the walkthrough the facility supervisor, or their designee, will discuss and document:
 - a. Pests requiring control; and
 - b. Recommendation from the pest control contractor's representative on the least toxic method to control the pests including:
 - i. Recommendations for non-chemical methods;
 - ii. Recommendations to eliminate or minimize conditions that encourage pests; and

- iii. Recommendations for no-action for pests that do not pose a threat to Zone 7 facilities, staff, or the public.
4. Use of the following pesticides, which have been identified in the MRP as being of particular concern to water quality, need to be minimized to the extent practical:
 - a. diamides (chlorantraniliprole and cyantraniliprole);
 - b. diuron;
 - c. fipronil and its degradates;
 - d. indoxacarb;
 - e. organophosphorous insecticides (chlorpyrifos, diazinon, and malathion);
 - f. pyrethroids (metofluthrin, bifenthrin, cyfluthrin, beta-cyfluthrin, cypermethrin, deltamethrin, esfenvalerate, lambdacyhalothrin, and permethrin);
 - g. carbamates (e.g., carbaryl and aldicarb); and
 - h. neonicotinoids (e.g., imidacloprid, acetamiprid, and dinotefuran).
5. Facility supervisor, or their designee, will advise the pest control contractor that pesticides may not be applied during rain events and when windy.
6. Facility supervisor, or their designee and the pest control contractor are to sign the Sign-In Sheet (Attachment A) and check off the facility locations where pesticides were applied. Send these forms to the NPDES Coordinator.

Contract Management:

1. Accounting will direct the invoices to the facility supervisors for final approval for payment.
2. The facility supervisor will review the invoice for accuracy assuring that Zone 7 is paying for work that was performed and requested and that the records of pest control activities has been received.
3. Questions concerning the contract or invoice should be directed to the purchasing department.

Attachments:

- A. Sign-In Sheet
- B. Regulatory Safety Checklist (RSC)



Provision C.9 - Pesticide Monitoring

SIGN - IN SHEET

DATE: _____

Pleasanton/Dublin

- Parkside Office
- Hopyard Well 6
- Hopyard Well 9
- Mocho Well 1
- Mocho Well 2
- Mocho Well 3
- Mocho Well 4
- Mocho Groundwater Demineralization Plant
- Stoneridge Well
- Dougherty Reservoir
- Valley Pump Station
- Chain of Lakes Area
- Chain of Lakes Well 1
- Chain of Lakes Well 2
- Chain of Lakes Well 5

Livermore

- Del Valle Water Treatment Plant
- Patterson Pass Water Treatment Plant
- North Canyons Office
- Silver Oaks Pump Station/Cal T.O. 1
- Airport Rate Control Station
- Flood Protection Facilities (Agency-Wide)

NAME	COMPANY	SIGNATURE

Note: Both the Pest Control Contractor and Zone 7 Operator must sign the form.

Attachment B

SOP Regulatory Safety Checklist (RSC)

SAFETY ELEMENT	Required	Not Required	Links/Forms
Injury and Illness Prevention Program (IIPP), including documentation forms (CCR, Title 8, Section 3203)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Hazardous Communication Program including placards, labeling and SDS. (CCR, Title 8, Section 5194)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Site-specific safety plan, detailing procedures for your site-specific activities. (CCR, Title 8, Section 3203 & 1509)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Site specific permits required, such as trenching and shoring, (CCR, Title 8, Section 1503); confined space entry, (CCR, Title 8, Section 5157); asbestos abatement notification, (CCR, Title 8, Section 1529)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Required certifications and/or training records of employees as stipulated in this document. (CCR, Title 8, Section 3203)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Medical approval to wear respiratory protection. (CCR, Title 8, Section 1531, 5144)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Medical approval to work with, but not limited to asbestos, cadmium and lead. (CCR, Title 8, Section 1529, 1532 & 1532.1)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Hearing conservation Program (CCR Title 8, Sections 5095-5100)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Bloodborne Pathogens Program (CCR Title 8, Section 5193)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Respiratory Protection Program (CCR Title 8, Section 3409 and 5144)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Heat Stress Program (CCR Title 8, Section 3395)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Training Documentation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	