

INTEGRATED PEST MANAGEMENT POLICY

To learn more please visit the sustainability section of our website:
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While pests pose significant problems to people, property, and the indoor environment, the pesticides used to solve these problems bring risks as well. In an effort to maintain a healthy indoor environment for all building occupants, the building adopts the Integrated Pest Management (IPM) programs and procedures as pest control measures.

The building will continually evaluate the progress of this IPM in terms of effectiveness and safety, and will implement such changes as are necessary. The vendor must adjust practices to adhere to all IPM policies.

What are the goals of the policy?

- Reduction in the use of EPA listed Pest Control Chemicals
- Reduction in the number of Occupant complaints regarding pest observations
- Increase in communication with tenants regarding pest applications
- Increase in the use of Environmental benign pest management materials and procedures

The goal of the program is to have 100% of the Base Building and Common areas as well as tenant areas converted to the IPM program. This policy affects the following vendors:

- ✓ **PEST MANAGEMENT VENDOR**

How will the program work?

Description of program:

IPM is a process for achieving long-term, environmentally sound pest suppression and prevention through the use of a wide variety of technological and management practices. Control strategies are intended to reduce the need for chemical application and include: Environmental, Mechanical, Organic and Chemical Controls.

Service Requirements:

The building requires that all vendors and parties who apply pesticides comply with all of the IPM specifications in this policy. Pesticide applicators must be educated and trained in the principles and practices of IPM and the use of pesticides as approved by the building and must follow all of the specifications in this policy. Vendor will furnish all supervision, labor, materials, and equipment necessary to accomplish the monitoring, trapping, pesticide application, and pest removal components of the IPM program. The Vendor shall also provide detailed, site-specific recommendations for structural and procedural modifications to aid in pest prevention. Records will be kept on the number of pests or other indicators of pest populations both before and after any treatments.

Pests

For the purpose of this IPM Policy, pests are living organisms (animals, plants, or microorganisms) that interfere with the intended building function and/or the behavior of its occupants. The pest species and the degree to which that population poses a threat to the occupants and/or structure will determine the strategy(s) for best managing that particular pest population.

Contractor Service Schedule and Conduct

Routine pest control visits must not disrupt tenant productivity nor pose a threat to tenant health or well-being. If pest control visits must occur during the hours of building occupancy, the vendor will take care to ensure minimal disruption. The Vendor will observe all safety precautions throughout the performance of the contract. Federal, state, and local safety and health requirements must be observed at all times. Where there is a conflict between applicable regulations, the most stringent will apply.

Integrated Pest Management Procedures

IPM Control Techniques:

Vendor will use the following four (4) techniques in the building as appropriate:

1. Environmental Controls: the intentional manipulation of the environment in order to reduce pests accessibility to food, water and shelter. Such control is attributed to the building occupants' conscientiousness regarding a tidy and sanitary working environment. Sanitation is crucial to pest prevention; if an environment is sanitary, the pest does not have the crucial means for survival, is vulnerable and will either die or leave. While environmental control is a powerful prevention technique, if an area is already infested, other techniques may be needed to rid the area of the pests.

A. Techniques:

- Basic housekeeping
- Storing food in insect-proof containers
- Ensuring water drainage where mosquitoes might flourish
- Frequent waste collection at both interior and exterior building collection locations and/or waste hauler loading zones.
- Proper maintenance or inspection of indoor plants

2. Mechanical Controls: without the use of chemicals, these controls are directed at destroying a pest and/or its habitat. This IPM specifies the proper use of such techniques.

B. Techniques:

- Traps – rat, mouse, insect, etc.
- Removal of nests and/or webs
- Sealing off cracks or crevices where insects and/or rodents may enter

3. Organic Controls: controls that are derived from an organic compound such as tree bark or flowers and comes in the forms of oils or dusts and can be highly effective in pest control.

4. Chemical Controls: In general, chemical controls refer to pesticides that are used to kill infesting pests. Chemical control is the last resort for pest control in the building managed facilities. This IPM specifies the handling, use and application of chemical controls.

RODENT CONTROL

- A. Trapping Devices: As a general rule, rodent control inside the building's facilities will be accomplished with trapping devices only. All trapping devices will be in protected areas and concealed from plain view so as not to be affected by routine cleaning and other operations. Trapping devices shall be logged in a vendor log. The vendor is responsible for disposing of all trapped rodents and rodent carcasses in an appropriate manner.
- B. Rodenticides: When vendor deem rodenticides as necessary means for adequate rodent control inside the building, the vendor will obtain the building approval prior to applying any interior rodenticide treatment. All rodenticides, regardless of packaging, will be placed in an EPA-approved tamper-resistant bait box or a secure location; a secure location is inaccessible to children, pets, wildlife, and domestic animals,
- C. Bait Boxes: All bait boxes will be maintained in accordance with EPA regulations, with an emphasis on the safety of non-target organisms. The vendor will take care concerning the following:
 - 1. All bait boxes are placed out of the general view, in locations where they will not be disturbed by routine operations.
 - 2. The lids of all bait boxes are securely locked or fastened shut.
 - 3. All bait boxes are securely attached or anchored to floor, ground, wall, or other immovable surface.
 - 4. Bait is secured in the feeding chamber of the box instead of the runway or entryways of the box.
 - 5. All bait boxes are labeled on the inside with the vendor's business name and address, and dated at the time of installation and each servicing.

INSECT CONTROL

- A. Non-Pesticide Methods: The Vendor will employ non-chemical methods of control wherever possible. Such methods may include: The use of trapping devices and vacuums rather than pesticide sprays as a means to cleanout cockroach, ant or other insect infestations.
- B. Monitoring: Sticky traps will be used to monitor and evaluate indoor insect control.
- C. Cracks and Crevices: As a general rule, the Vendor will apply all insecticides as "crack and crevice" treatments only, meaning the insecticide is not visible to a bystander during or after the application process because it is concentrated and applied to the cracks and crevices only.
- D. Bait Methods: Bait application is the standard pesticide technology for cockroach and ant control. Vendor will use bait as a method of insect control in all cases unless some circumstance calls for alternative forms of control in which case the building approval is required.
- E. Application of Insecticides to Exposed Surfaces: Application of insecticides to exposed surfaces or as space sprays is, in general an unacceptable method of treatment. If the vendor deems it necessary to employ such a technique, the building must approve the treatment. No surface application or space spray will be made while tenants or occupants are in the building. In the case of such an application, the Vendor and the building will take all necessary precautions to ensure tenant and employee safety, and the containment of the pesticide to the site of application.

USE OF PESTICIDES

The Vendor is responsible for applying all pesticides according to the product instructions. All pesticides used by the Vendor must be registered with the U.S. Environmental Protection Agency (EPA), state and/or local jurisdiction. The Vendor will adhere to the following rules for pesticide use:

- A. Approved Products: The Vendor will only use products approved, in writing, by the building.
- B. Pesticide Storage: The Vendor will not store any pesticide product in the building managed buildings without the building consent or instruction.
- C. Application as Needed: Pesticide application will be on an as needed basis instead of by schedule. As a general rule, application of pesticides in any area should not occur unless the Vendor has already monitored and inspected that area and found a reasonable need for chemical treatment. Written approval must be granted by the building prior to any pesticide application as a preventative measure.
- D. Minimization of Risk: When pesticide use is necessary, the Vendor will apply the least hazardous material and use precise application techniques in order to use a minimal quantity of product.
- E. Least toxic, according to this plan, is any pesticide product for which all active ingredients and known inert ingredients meet the least toxic Tier 3 Hazard criteria under the City and Country of San Francisco's hazard screening protocol. Least toxic also applies to any pesticide product, other than rodent bait that is applied in a self-contained, enclosed bait station placed in an inaccessible location or applied in a gel that is neither visible nor accessible.
- F. Under extreme conditions, use of pesticides that do not meet the definition of least toxic may be used when necessary. When this occurs, the vendor will discuss with building representative prior to its use giving a full description of the pesticides used - where, when and how it will be used. MSDS and Labels will be sent to building office and also placed within the site logbook, prior to its use. This type of application will be considered an emergency use application, and will only be used if approved by the vendor's account representative and the appropriate building representative, preferably the building manager. Notification to surrounding building occupants regarding the pesticide application will occur at least 72 hours prior to the application. Building notification could occur in the following ways: emails, posted signs, etc. the building will contact the building occupants located in the treated area.
- G. In the case of an emergency application, no less than 24 hours-notice will be given after the application of the pesticide. The building will contact the building occupants located in the treated area. An emergency situation is one that would present an immediate threat to the health, safety and welfare of building occupants. These situations are:
 - a. Bed Bugs
 - b. Cockroach Infestation
 - c. Fleas
 - d. Mosquitoes or other stinging insects
 - e. Rodent Infestation
- H. Pesticide Handling: Transport, handling, and use of all pesticides will be in strict accordance with the manufacturer's label instructions and all applicable Federal, state, and local laws and regulations.

Cautionary Labeling for Pesticides

Law requires that precautionary statements and signal words be included on all pesticide labels. This does not apply to non-toxic or “natural” materials. If none of these warnings are provided, do not use the pesticide.

- DANGER- A taste to a teaspoonful taken by mouth could kill an average-sized adult.
- WARNING- A teaspoonful to an ounce taken by mouth could kill an average-sized adult.
- CAUTION- An ounce to over a pint taken by mouth could kill an average-sized adult.

What are our LEED responsibilities?

As required with Integrated Pest Management Policy, certain actions and purchases will be required to be tracked. Complying with all above requirements will help the building earn one (1) LEED point. The following will need to be tracked on a monthly basis:

- **Pesticide Product Purchases/Applications (IEQc3.6)**

Who is responsible for policy implementation?

The Facility Manager, will ensure that the following procedure and strategies are implemented in the facility to ensure that the policy is being met and that information regarding IAQ complaints will be conveyed to the cleaning manager accordingly. The facility manager will also ensure that upon vendor contract renewal that the vendor’s contract is inclusive of all policy requirements listed above.

What is the Quality Assurance?

A log will be kept and updated by exterior facility services provider to determine if the incremental implementation of the sustainable practices is being met.

Building management reviews all product usage submissions and ensures they are both to the contract and in accordance with this policies standard. Any new products are reviewed and approved before they are implemented.

Any new construction jobs that require land clearing will adhere to this plan and applicable contractors will be provided with this plan.

When does the policy go into effect?

This policy is effective as of **immediately** and will be revised annually as per contract renewals.

What are some useful resources?

- Products Screened by the IPM Program, City and County of San Francisco (attached)

- EPA Pesticides – www.epa.gov/pesticides
- Directory of Least Toxic Pest Control Products (organized by pest type) from the Bio-Integral Resource Center – <http://www.birc.org/2012Directory.pdf>



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