

PEST MANAGEMENT OPERATIONS

1. REASON FOR ISSUE. This Veterans Health Administration (VHA) Handbook provides the requirements for establishing and maintaining an effective Integrated Pest Management (IPM) program within VHA medical facilities.

2. SUMMARY OF MAJOR CHANGES. This Handbook documents the revision of pest management operations, and includes the following requirements:

- a. The continued banned use of Herbicide 2,4-dichlorophenoxyacetic acid;
- b. Bed Bug Management; and
- c. Annual Pest Management Training for the Pest Management Officer.

3. RELATED ISSUES. VHA Directive 1850.

4. FOLLOW-UP RESPONSIBILITY. The Director, Environmental Programs Service (10NA7) is responsible for the content of this Handbook. Questions concerning this Handbook may be directed to the Director, Environmental Programs Service at (202) 266-4603.

5. RESCISSIONS. VHA Handbook 1850.02 dated April 14, 2009, and VHA Directive 2000-026 dated September 5, 2000, are rescinded.

6. RECERTIFICATION. This VHA Handbook is scheduled for recertification on or before the last working day of December 2016.

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PEST MANAGEMENT OPERATIONS

1. PURPOSE

This Veterans Health Administration (VHA) Handbook provides the requirements for establishing and maintaining an Integrated Pest Management (IPM) Program, which promotes safe, efficient, and environmentally-preferred strategies, and prevents or controls disease vectors and other pests that may adversely affect health, impede operations, or damage property. Additionally, it provides the responsibilities for addressing bedbug issues within VHA medical facilities.

2. DEFINITIONS

a. **IPM.** IPM is a decision-making process which considers cultural, mechanical, biological, and chemical controls. Control mechanisms are selected as each situation warrants. Where chemical control is indicated, specific pest populations are targeted for treatment when they are most vulnerable rather than a general application. Through the use of appropriate control measures and proper application, IPM can result in a reduction in the use of chemicals contained in pesticides, which may adversely impact human health and the environment.

b. **Pest.** A pest is an organism that is regarded by humans as injurious or unwanted.

c. **Bedbugs.** Bedbugs are small, brownish, flattened insects that feed on blood. The main source for blood meals (i.e., “bedbug bites”) is humans, although other mammals and birds can serve as a source. The common bedbug, *Cimex lectularius*, is the species most adapted to living with humans. They are nocturnal and typically bite people while they sleep. No building structure or common source of transportation is immune to bedbug infestation. Bedbugs commonly hide in mattresses, carpets, behind electrical plates, peeling paint or wallpaper, electronics, and in crevices in furniture. Although bedbugs can harbor pathogens in their bodies, there are no known documented cases of transmission to humans.

d. **Pesticide.** Pesticide is a chemical preparation used to kill or diminish pest activity.

e. **Pest Control Operator (PCO).** The PCO is a person who engages in the trade of pest control.

f. **Licensed PCO (sometimes referred as certified).** A licensed PCO is an individual that has met the skill and competence requirements for those categories of specialization established by the local, Federal, and state government in which the PCO must engage in the trade of pest control. *NOTE: A person can be certified in one or multiple categories.*

g. **Material Safety Data Sheets (MSDS).** MSDS are written or printed material concerning a hazardous chemical, which contains all information required by Occupational Safety and Health Administration (OSHA) and title 29 Code of Federal Regulations (CFR) 1910.1200(g). It provides workers and emergency personnel with the proper procedures for handling or working with a hazardous substance.

h. **Pest Control.** Pest control refers to the actions of engaging in, recommending, advertising, soliciting the use of, supervising the use of, or using, a pesticide or device for the identification, control, eradication, mitigation, detection, inspection, or prevention of a pest in, on, or around a building, water area, air, land, plant, structure, or animal.

i. **Rinsate.** Rinsate is a mixture containing water (or another liquid as required by environmental regulations) that results from rinsing a pesticide container, pesticide equipment, or other pesticide-containing materials.

j. **General-Use Pesticide.** Are pesticides which may be legally purchased and applied by the general public without the need of any Federal, state, and local licensing requirement on the part of the user.

k. **Restrictive-Use Pesticide.** Restrictive-use pesticides are legally purchased and applied only by licensed pest control applicators, or applied under the direct supervision of trained and licensed applicators.

l. **Pest Infestation.** Pest infestation is the multiple sightings of or the presence of pest (e.g., insects, rodents, birds, etc.) numbers or quantities large enough to be harmful, threatening, or obnoxious.

3. RESPONSIBILITIES OF THE FACILITY DIRECTOR

The Facility Director, or designee, is responsible for:

a. Ensuring a pest-free environment that does not adversely impact the safety and health of employees, patients, and visitors.

b. Maintaining a current and accurate Pest Management Plan describing the facility's pest problems and the programs required to deliver economical and effective control of those pests.

c. Addressing bedbug issues (see App. B).

d. Ensuring safety equipment and application procedures are major considerations when a chemical pesticide is utilized (see par. 7).

e. Ensuring the PCO is provided reasonable work space (separate from pesticide storage) for pest identification, research, consultations, and record keeping. **NOTE:** *Telephone, heating, ventilation and air conditioning are recommended for effective workplace habitability.*

f. Ensuring the Pest Management Officer (PMO) receives annual pest management training that provides continual knowledge and skills for managing an effective facility Pest Management Program.

g. Ensuring Contracting Official's Technical Representative training is provided to all staff managing pest management contracts.

4. RESPONSIBILITIES OF THE CHIEF, ENVIRONMENTAL MANAGEMENT SERVICE

The Chief, Environmental Management Service is the facility PMO and is responsible for:

- a. Preparing and publishing a Pest Management Plan (see par. 8 and App. A).
- b. Implementing procedures intended to provide a safe, comprehensive, and completely integrated program by:
 - (1) Providing technical supervision over all employees practicing pest management at the facility, regardless of whether they are staff or contract personnel.
 - (2) Ensuring that all In-House Licensed PCOs achieve all necessary certification in categories covering those areas of pest management identified in subparagraphs 4b and 4c, as required.
 - (3) Maintaining records and cost accounting data for necessary reports. All employees devoting 51 percent or more of their time to pest management must be properly classified and journalized to cost center 8562.
 - (4) Ensuring compliance with the Federal, state, and local laws and regulations governing pest management activities. Pest management operations must meet all Federal requirements as identified in Public Law (Pub. L.) 92-516, Federal Insecticide, Fungicide and Rodenticide Act, dated November 28, 1975, as amended, and Executive Order 12088 (Federal Compliance with Pollution Control Standards) and appropriate Occupational Safety and Health standards regarding hazard communication, personal protective equipment, and exposure standards.
 - (5) Ensuring effective and efficient IPM is accomplished by licensed staff or commercial PCO. Specific IPM tasks to be accomplished as a minimum include, but are not limited to:
 - (a) Inspections to identify all pests control requirements of the facility and its satellites.
 - (b) Identification of the IPM procedures to be used for both preventative (scheduled maintenance) and corrective (as required) programs.
 - (c) Environmental sanitation practices that restrict or eliminate food, water, or harborage for pests.
 - (d) The selection and utilization of non-chemical methods of control where appropriate (traps, lights, sound devices, etc.).
 - (e) Taking necessary steps to exclude pests from buildings and grounds.
 - (f) The selection and use of the least toxic chemical that is effective when required to control or eliminate infestations.

(g) Ensuring that proper storage, handling, and disposal of all pesticides and pesticide containers as required by 40 CFR, Part 165, Subparts C and D.

(h) Evaluation of the control measures utilized through follow-up inspections.

(i) Identification of all environmentally-sensitive areas, e.g., water sources, wetlands, or endangered species habitat, and actions planned to protect such areas from environmental contamination and other adverse impacts related to pesticide application.

(j) Identification of the health and safety measures that must be taken to protect both PCO and the general public. This includes being in compliance with current VHA policy regarding the Pollution Prevention (P2) Program.

(k) Ensuring each employee who applies pesticide as a part of their job has the exposure noted in their employee medical record.

(l) Provisions for safety equipment, personal protective equipment, and clothing where required.

(m) Ensuring that In-House PCOs receive annual continuing education to maintain certification and to stay abreast of the "state-of-the-art" equipment and treatment techniques.

(6) Ensuring the IPM program includes, but is not limited to, the management of the following types of pests:

(a) General arthropod pests (insects, arachnids, centipedes, millipedes, etc.);

(b) Feral (wild) rodents (rats and mice, gophers, squirrels, etc.);

(c) Feral birds (pigeons, starlings, blackbirds, sparrows, etc);

(d) Other feral vertebrate pests (bats, skunks, moles, snakes, dogs, cats, etc.);

(e) Wood destroying organisms (termites, carpenter ants, fungi, etc.);

(f) Stored food pests (weevils, beetles, moths, etc.);

(g) Weeds and plants (dandelion, plantain, industrial weeds, aquatic plants, algae, etc.);

(h) Diseases and insects of ornamental plants and shade trees (powdery mildew, leaf spot, viruses, aphids, leafhoppers, scales, etc.);

(i) Diseases and insects of turf and lawns (fungi, viruses, sod worms, nematodes, etc.); and

(j) Disease vectors and arthropods, (mosquitoes, flies, ticks, mites, etc.)

(7) Coordinating pest management operations in research facilities with the Associate Chief of Staff for Research and Development; when related to animal research facilities, the staff or consultant Veterinary Medical Officer.

(8) Determining the scope of pest management contractual services to be utilized and ensuring technical compliance with the contract.

(9) Ensuring the management of pesticide programs in the VHA facility is fully integrated into the facility's Green Environmental Management System (GEMS).

(10) Ensuring the contractors used to control pests at the VHA facility are familiar with the facilities GEMS, in accordance with Executive Order (EO) 13423 requirements.

(11) Ensuring that contract PCO's hazard chemicals and materials are not disposed on Department of Veterans Affairs (VA) property. **NOTE:** *The Contractor is responsible for management and disposal of all pesticides and materials used in the performance of service.*

(12) Ensuring that contract pest management companies providing service have the proper licensing for the service being performed.

c. Selecting and placing electrocuting light traps (see par. 9).

d. Ensuring the proper utilization of all products compounded with pesticides (see par. 10).

NOTE: *VHA Program Guide 1850.2, which provides additional guidelines for administering an IPM program, is intended to enhance the policy requirements within this Handbook. This guide can be found at Environmental Programs Service web site: <http://vaww.vhaco.va.gov/eps/>. NOTE: This is an internal web site and is not available to the public.*

5. CERTIFICATION AND TRAINING

a. All PCOs In-House or Commercial must be licensed by the state and local municipalities where work is being performed. As a minimum requirement, applicators must demonstrate skills, knowledge, and abilities that meet Federal, state, and local requirements. Skills, knowledge, and abilities include, but are not limited to:

(1) Recognizing common pests to be controlled and the damage caused by them.

(2) Reading and understanding the label and labeling information to include:

(a) The common name of pesticides applied;

(b) Pest(s) to be controlled;

(c) Timing and methods of application;

- (d) Safety precautions; and
- (e) Any specific disposal procedures.

(3) Applying pesticides in accordance with label instructions and warnings. This includes the preparation of the proper concentration of pesticide to be used under particular circumstances, and taking into account such factors as the area to be covered and the quantity dispersed in a given period of application.

(4) Recognizing local environmental situations that must be considered during application to avoid contamination of special facilities, especially those particular areas in medical research facilities (chemical laboratories, animal research units, etc.).

(5) Reducing the potential for pesticide resistance by rotating pesticides, which involves alternating among pesticide classes with different modes of action to delay the onset of or mitigate existing pest resistance. **NOTE:** *It is strongly recommended that non-chemical methods (e.g., sanitation or elimination of breeding areas) be explored prior to the consideration of chemical applications.*

(6) Recognizing common poisoning symptoms and the procedures to follow in case of a pesticide accident.

b. The categories (reference is made to the listing of categories described in the implementing regulations, 40 CFR, Part 171.3, to Pub. L. 92-516) in which certification is required are: **NOTE:** *Since states may number the categories differently, cross-referencing these categories may be required.*

(1) **Category (3) - Ornamental and Turf Pest Control.** Applicators must demonstrate practical knowledge of pesticide problems associated with the production and maintenance of ornamental trees, shrubs, plantings, and turf, including cognizance of potential toxicity due to a wide variety of plant material, drift, and persistence beyond the intended period of pest control. Due to the frequent proximity of human habitations to application activities, applicators in this category must demonstrate practical knowledge of application methods, which must minimize or prevent hazards to humans, pets, and other domestic animals.

(2) **Category (7) - Industrial, Institutional, Structural, Health Related Pest Control.** Applicators must demonstrate a practical knowledge of a wide variety of pests, including their life cycles, types of formulations appropriate for their control, and methods of application that avoid contamination of food, damage and contamination of habitat, and exposure of people and pets. Since human exposure including babies, children, pregnant women, and elderly people is frequently a potential problem, applicators must demonstrate practical knowledge of the specific factors, which may lead to a hazardous condition, including continuous exposure in the various situations, encountered in this category. Because health-related pest control may involve outdoor applications, applicators must also demonstrate practical knowledge of environmental conditions, particularly those related to this activity.

(3) **Category (8) - Public Health Pest Control.** Applicators must demonstrate practical knowledge of vector-disease transmission as it relates to, and influences, application programs.

A wide variety of pests are involved, and it is essential that they be known and recognized, and the appropriate life cycles and habitats be understood as a basis for control strategy. These applicators must have practical knowledge of a great variety of environments ranging from streams to those conditions found in buildings. They need to have a practical knowledge of the importance and employment of such non-chemical control methods as sanitation, waste disposal, and drainage.

c. Certification in other categories are necessary as individual facility conditions dictate. PCOs must be certified as required.

d. PCOs must not work outside of their individual license requirement.

e. Continuing education activities are required to maintain a license. Continuing education activities must meet Federal, state, and local requirements related to same. **NOTE:** *Training is available from a variety of sources, such as: military installations, local and state health departments, Consumer Protection and Environmental Health Services, correspondence courses, pesticide manufacturers, etc.*

6. RECORDS MAINTENANCE

a. The Chief, Environmental Management Service or GEMS Coordinator must ensure that records required in 40 CFR, Parts 171.11(c) (2) and 40 CFR 262.20 to 262.27, are kept and maintained for a period of 2 years or as otherwise mandated. Such records must be maintained whether staff or contractual personnel are utilized to provide services. Maintaining these records in accordance with 40 CFR, Parts 171.11(c) (2) and 40 CFR 262.20 to 262.27, must provide for the following:

(1) Data for VHA monitoring. Purchasing, inventory, and usage records must be maintained.

(2) MSDS and other data necessary to ensure legal and safe usage, effective selection, and economical management of pesticides and facility pest management programs. **NOTE:** *It is illegal to use a pesticide that is unregistered with Environmental Protection Agency (EPA). EPA registration of pesticide active ingredients indicates the materials have been reviewed and approved for human safety and effectiveness when applied according to instructions on the label.*

(a) Pesticide registration data are available in the EPA Compendium of Registered Pesticides: Volume 1, Herbicides (730R74101A); Volume II, Fungicides and Nematicides (730R74101B); Volume III, Insecticides, Acaricides, and Anti-fouling Compounds (730R74101C); and Volume IV, Rodenticides and Mammal, Bird and Fish Toxicants (730R74101D). **NOTE:** *EPA Compendium of Registered Pesticides can be found at the EPA National Service Center for Environmental Publications (NSCEP) Web site: <http://nepis.epa.gov/EPA/html/Pubs/pubtitleOPPTS.html>.*

(3) Hazardous waste manifests as required by Federal and state regulations for the disposal of pesticide wastes that are hazardous or toxic. Hazardous waste manifests are to be maintained indefinitely. Facilities must ensure that they receive a Certificate of Destruction. Any other

documents that verify the final dispensation of the material are required and are to be maintained in accordance with the medical facility's guidelines and policies for the management of hazardous and toxic materials.

b. The Safety Officer or GEMS Coordinator must be furnished, by PMO, an inventory of the product names and amounts of pesticides present at each storage or mixing location. This inventory must be updated annually, at the end of each fiscal year by the PCO along with appropriate MSDS review.

7. SAFETY

Pest management in health care facilities is more complex than control practices in other types of institutions. The potentially serious adverse effect of pesticide exposure on patients in various stages of debilitation and convalescence, and in varied physical and attitudinal environments, requires that a cautious, conservative policy be adopted concerning all uses of pesticides. The use of any pesticide poses a potentially significant threat to human health. Therefore, the benefits of using pesticides must be examined in light of the potential environmental hazards and adverse impacts on human health. Safety considerations must be paramount. Pesticide applications alone are not the primary remedy for addressing pest issues. It is important to consider alternative control methods (environmental sanitation, trapping, exclusion, etc.) as the first choice. Only after these methods have failed are pesticide applications to be considered. The use of safety equipment and proper application procedures are major considerations when a pesticide is utilized.

a. **Pest Management Activities.** Pest management activities must be performed by a licensed PCO except in the case of the following: Department of Veterans Affairs (VA) employees, in an approved training program, under the supervision of a staff licensed PCO, must be in compliance with Federal, state, and local requirement before participating in pest control activities.

b. **Pest Control Equipment and Work Space**

(1) Only authorized, trained personnel are to operate pest control equipment.

(2) Cleaning and storage of pest control equipment must be done by authorized, trained personnel, only in accordance with the manufacturer's instructions.

(3) Maintenance and adjustment of pest control equipment must be performed in accordance with manufacturer's instructions by authorized, trained personnel.

(4) All equipment used in pest control activities must be marked "Contaminated with Pesticides."

(5) A deep sink must be used to wash small equipment and provide water for pesticide mixing.

c. **Protective Clothing and Equipment**

(1) The following personal protective clothing and equipment must be provided to appropriate staff, when recommended by the MSDS:

- (a) Chemical resistant gloves, selected based on the chemical content of the pesticide used;
- (b) Aprons;
- (c) Rubber boots, impervious to liquids;
- (d) Full face shield;
- (e) Splash goggles;
- (f) Full-Face respirators with cartridges approved for use with pesticides; and
- (g) Coveralls.

(2) Coveralls contaminated with pesticides through spillage or during normal use must be placed in a durable plastic bag and visibly labeled with appropriate warnings, and the name of chemical contaminant. A copy of the MSDS for the product must be attached to the exterior of the bag and returned to designated soiled uniform turn-in areas for replacement and laundering. Laundering must be done at the medical center's expense; contaminated clothing must not be taken home to be laundered.

(3) All reusable chemical resistant protective equipment, including aprons, gloves, boots, splash goggles, face shields, and pesticide respirators must be washed daily after use and properly stored in lockers or other areas free of contamination.

(4) Respirators must be worn during pest control operations as required by the MSDS, or as deemed appropriate by responsible VHA facility Respiratory Protection Program Coordinator.

(5) Respirators must be included in the facility's Respiratory Protection Program, including medical surveillance, fit testing, training, maintenance, and care. Respirator fit testing must be conducted by the facility Respiratory Protection Program Coordinator, or designee, prior to first use, and follow-up fit testing frequency in accordance with OSHA requirements.

d. Pesticide Storage

(1) All pesticides must be stored in buildings or rooms within buildings designated for this purpose; there must be proper ventilation and the pesticides protected in accordance with applicable National Fire Protection Association Standards.

(a) Pesticide storage rooms must maintain sufficient lighting to allow the observation of containers and their labeling.

(b) The pesticides must be stored in their original containers.

(c) The buildings and storage rooms must be kept locked when not in use.

(2) The pesticide storage room must be identified by legible signage that clearly indicating that pesticides are in storage, as follows:

(a) Sign(s) must include the word "Warning," "Danger," or "Pesticides" (lettering of the words 1.5 inches in height) followed by wording that indicates pesticides are in storage; and

(b) Chemical Hazard Signage.

(3) During storage all pesticides must be segregated as to kind of pesticide. Labels on all containers must be visible at all times. Pesticides are only to be stored in facilities that meet the criteria described in 40 CFR 165.10.

(4) Pesticides must be stored in a dry place and in accordance with temperature requirements on the label.

e. **Pesticide Mixing.** All pesticides must be handled and mixed only by authorized, licensed personnel.

(1) Concentrate dispensing and liquid pesticide mixing must be done on a nonporous surface (cement, asphalt, etc.) that is capable of retaining any spillage that might occur. Nonporous surfaces upon which concentrate dispensing and liquid pesticide mixing is accomplished, must not contain any drainage devices or appurtenances.

(2) Any pesticide contamination on the skin must immediately be washed off with soap and water. After washing, the individual must secure immediate medical attention.

(3) Emergency eye wash and deluge shower must be adjacent to the mixing site, unless devices inside the facility are accessible within 10 seconds from the outdoor mixing site and can be reached without obstructions, such as door or equipment. After using the eyewash or shower, the individual must secure immediate medical attention.

(4) Pesticide containers must be returned to their storage locations upon completion of mixing.

f. **Pesticide Application.** All pesticides must be applied in accordance with the label directions.

(1) Unlicensed personnel may apply restricted-use pesticides. This applies to VA staff engaged in an authorized pest control training program under the direct supervision of a staff licensed PCO.

(2) Pesticides purchased by VA are for VA use only.

(3) Outdoor pesticide applications (liquids, dusts) must be conducted when wind speed is less than 10 miles per hour (mph) to prevent drift. An approved respirator must be worn

whenever required by the label or deemed necessary by licensed POC. The outdoor operator must wear a respirator when pesticide dust is a hazard.

g. **Pesticide Spill Cleanup Kit**

(1) A pesticide spill cleanup kit, appropriate to the type and amount of pesticide used or stored, must be located in each building where pesticides are stored. In addition, absorptive material to contain minor amounts of spilled liquid pesticides must be kept in each pesticide storage room.

(2) All items in the kit that are used must be replaced as soon as possible.

h. **Pesticide Container Disposal**

(1) All pesticide containers must be triple rinsed with an appropriate solvent, which must include, but not be limited to the diluents as prescribed by the pesticide label. The rinsate and container must be disposed of in a manner consistent with instructions found upon the pesticide label and in accordance with the requirements of local, state, and Federal agencies. Pesticide containers are not to be used for any purpose except for holding the pesticide shown on the label. The Chief Environmental Management Service or facility Director must be consulted by VA staff for approved storage location or disposal process for any of the aforementioned.

(2) Dry, granular pesticide containers (bags or sacks) must be emptied thoroughly and disposed of in a manner approved by the Safety Officer or GEMS Coordinator. Pesticide bags or sacks are not to be burned or stored near heat or open flame.

(3) The Safety Officer or GEMS Coordinator must be consulted by VA staff prior to disposal of any pesticides which are obsolete, have been banned, are unregistered, physically altered, or which otherwise cannot be used for the intended labeled uses.

i. **Pesticide Transportation**

(1) When transporting pesticides, operators must have protective clothing and equipment with them.

(2) Pesticides are not to be transported in the cabs, passenger compartments of vehicles, or trunks. Pesticides are not to be left unattended or unsecured in the vehicle.

(3) No pesticide container is to be re-used for any other purpose except as provided on the manufacturer's label.

8. PEST MANAGEMENT PLAN

The Chief, Environmental Management Service must prepare a pest management plan to ensure the best technical approach to an integrated, economical, effective, and safe pest management program. The pest management plan, in its entirety, is to be in one document and must conform to appropriate facility policies, standards, requirements, and applicable Federal, state, and local regulatory requirements.

- a. The plan must include a summary, i.e., a section describing problems, risks, costs, resources, materials, equipment, related topics, with attachments with detailed information on pest management operations.
- b. Maintenance of the pest management plan is provided:
 - (1) Through reviews and updates at 2-year intervals, or
 - (2) When there is significant change to:
 - (a) The pesticide management plan, or
 - (b) The methods and means of pesticide application at the facility.
- c. The plan is required for each facility regardless of whether the facility is serviced by a contract or staff PCO to provide the service. **NOTE:** *See Appendix A for plan outline and VHA Program Guide 1850.*

9. ELECTROCUTING LIGHT TRAPS

The Chief, Environmental Management Service, is responsible for selection and placement of electrocuting light trap devices. The use of these devices is acceptable in limited areas of the medical care facility. **NOTE:** *See VHA Program Guide 1850.02 for guidance on efficacious use of these devices.*

10. PESTICIDES COMPOUNDED WITH OTHER PRODUCTS

The Chief, Environmental Management Service, must ensure the proper utilization of all products which are compounded with pesticides.

- a. This applies to pesticides formulated and labeled for use as paint additives resulting in a paint-insecticide mixture, which must be applied by certified applicators when used on VA property as required.
- b. This does not apply to the use of paints containing fungicides as mildew inhibitors, or the use of anti-microbial pesticides where application procedures on the label require no special measures.

11. BAN USE OF HERBICIDE 2,4-DICHLOROPHENOXYACETIC ACID

2,4-Dichlorophenoxyacetic Acid (2,4-D) is registered with the EPA as a pesticide and is widely used as a selective herbicide. However, there is the perception among Veterans that there is a perceived relationship between 2,4-D, Dioxin and Agent Orange. Previous directives have banned the use of 2,4-D on all VHA facility grounds.

- a. VHA continues the ban of the selective herbicide 2,4-dichlorophenoxyacetic acid for use on all VHA facility grounds.
- b. Any contracts for grounds or pest management services must fully disclose this ban to the potential provider and the contracting officer's technical representative must monitor the use of all pesticides used to ensure compliance.
- c. Any and all existing stocks of 2,4-D must be disposed of in an appropriate manner and are not to be used on VHA property.

12. REFERENCES

- a. Environmental Protection Agency. "Pesticide Registration (PR Notice) Notice 2002-1" *Pesticide Registration (PR) Notices*. 2002. http://www.epa.gov/PR_Notices/pr2002-1.pdf (November 30, 2010).
- b. Potter, Michael F. "Bed Bugs" *University of Kentucky College of Agriculture*. August 2008. <http://www.ca.uky.edu/entomology/entfacts/ef636.asp> (November 30, 2010).
- c. Environmental Protection Agency. "EPA'S National Bed Bug Summit: Participant Recommendations" *Pesticide: Science and Policy*. April 15, 2009. <http://www.epa.gov/oppfead1/cb/ppdc/bedbug-summit/partic-recom.pdf> (November 30, 2010).

PEST MANAGEMENT PLAN OUTLINE

The Pest Management Plan must be a comprehensive document describing the facilities' pest problems and the programs required to deliver economical and effective control of those pests. The plan must include: administration of contracts and inter-service agreements; program funding; staffing; materials required to implement the plan; provisions for the safety of personnel, patients, and visitors; shop; vehicles; and record keeping.

1. The Facility Pest Management Plan must:

- a. Identify and prioritize all pest management requirements of the activity and tenants.
- b. Identify the integrated pest management procedures to be used for both preventive (scheduled maintenance) and corrective (as required) programs.
- c. Identify program resources and staffing (applicator, supervisory, and inspection personnel).
- d. Outline surveillance procedures for ongoing pest problems.
- e. Identify all pesticides (with generic names) applied to the facility and antidotes for those pesticides.
- f. Identify control procedures of special interest, and areas with specific application constraints.
- g. Identify all environmentally sensitive areas, e.g., food service areas, surgical suites, respiratory treatment areas, water resources, endangered species' habitats, etc., with the actions planned for their protection.
- h. Identify the health and safety measures that must be taken to protect both pest control personnel and the general public, to include appropriate medical surveillance.
- i. Develop an emergency management plan that identifies measures that would need to be taken to protect employees, the public, patients, and the environment in the event of a involuntary chemical discharge or spill.
- j. Address Superfund Amendments and Reauthorization Act Title III (Community-Right-to-Know) requirements that apply to pesticides used and stored at the facility.
- k. Identify how the Medical Facility Pest Management Plan must be integrated into the facility GEMS.

2. Following is the prescribed formatting for the preparation of the Pest Management Plan. Any part of this format that does not apply at the facility must be annotated as "not applicable."

- a. **Summary**
- b. **Pest Management Plan** (standards, policies, and responsibilities)
 - (1) **Introduction.** This includes information regarding the:
 - (a) Objective;
 - (b) Plan maintenance; and
 - (c) Facility.
 - (2) **Pest Management Problems.** This includes:
 - (a) General household and nuisance pests;
 - (b) Structural pests;
 - (c) Weed control;
 - (d) Stored product pests,
 - (e) Health-related pests;
 - (f) Pests of ornamental plants and turf;
 - (g) Wood product pests; and
 - (h) Miscellaneous pests.
 - (3) **Administration.** This includes:
 - (a) The Quality Assurance Program;
 - (b) Complaints and sightings;
 - (c) Contracts;
 - (d) Reports and records;
 - (e) Training; and
 - (f) Resources (current and proposed), to include:
 - 1. Funding;

- 2. Staffing;
- 3. Materials-pesticides and equipment; and
- 4. Facilities.

(4) **Health and Safety.** This includes:

- (a) Requirements;
- (b) Shop;
- (c) Vehicles; and
- (d) Hazards, to include:
 - 1. Pest control personnel; and
 - 2. The public.

(5) **Public Laws and Regulations.**

(6) **Coordination.**

(7) **Environmental Considerations.** This includes:

- (a) Environmentally sensitive areas;
- (b) Protected species;
- (c) Pollution control projects;
- (d) Pollution abatement procedures; and
- (e) Compliance with Federal, state, and local environmental requirements.

(8) **Pest Management Services Provided Other Activities.** (Outpatient Clinics, Regional Offices, etc.)

(9) **Signature Block with Review Date.**

c. **Attachments** (Operational Information). To include:

- (1) Facility map and floor plans;
- (2) Pest management recommendations;

- (3) Pest management maintenance record;
- (4) Pest management summary report;
- (5) Work schedule;
- (6) Applicable instructions, procedures, and special protocols;
- (7) Shop equipment and sources;
- (8) Lists of safety items;
- (9) Technical information manuals and references;
- (10) Pesticide spill prevention and clean-up plan;
- (11) Pesticide labels and antidotes;
- (12) Contracting standards and specifications; and
- (13) Copy of current contracts (where appropriate).

BED BUG MANAGEMENT

1. Prior to World War II, infestations were common in the United States (U.S.). However, with improvements in hygiene, and the widespread use of DichloroDiphenylTrichloroethane (DDT) during the 1940's and 1950's, the bed bugs all but vanished in the U.S. In the 1970's, with the banning of DDT, increased international travel, and the Environmental Protection Agency (EPA) continued banning of other pesticides, bedbugs infestations in the U.S. escalated.

2. Public health worries have brought greater awareness to the stigma and the difficulty associated with eradicating and or controlling these pests. Accordingly, state and local governments have taken a proactive approach in addressing bedbug issues. The EPA has identified the bed bug as "a pest of significant public health importance."

3. Each facility Director, or designee, is responsible for:

a. Developing and implementing a systematic procedural plan that addresses bed bug issues in the following areas:

- (1) Inspection;
- (2) Pest identification;
- (3) Chemical and non-chemical options;
- (4) Sanitation;
- (5) Staff and patient education; and
- (6) Preventative measures.

b. Ensuring adequate resources are available to support prevention, education, and chemical and non-chemical initiatives.

c. Ensuring in-house pest management personnel and contractors are trained and qualified in the area of Public Health Pest Control (Category 8 see subpar. 5b(3) in the Directive), specifically bed bug prevention and treatment options. **NOTE:** *In cases of prolonged and severe bed bug infestations, the use of Subject Matter Experts is strongly encouraged.*

d. Initiating a course of action that ensures accurate, detailed, and timely notification to the Deputy Under Secretary for Health for Operations and Management (10N) through the Veterans Integrated Service Network Office when bed bug infestation is confirmed.

e. Including the procedural plan for bed bugs as an addendum to the facility Pest Management Plan and updating the plan annually. **NOTE:** *The Guide for Bed Bug Management provides additional information and guidance for addressing bed bug issues. This guide is intended to enhance the policy requirements within this Handbook and can be found on*

Environmental Programs Service web site at: <http://vaww.vhaco.va.gov/eps/>. This is an internal web site and is not available to the public.