

Ice Age Trail Alliance (IATA)
Policy: Pesticide Use Policy
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1.0 Background and Purpose

To provide a high-quality user experience along the Ice Age National Scenic Trail, the Ice Age Trail Alliance occasionally uses pesticides to control invasive, non-native, or aggressive plants, and, on rare occurrences, for the removal of insects along the Trail.

The purpose of this policy is to:

- Help determine if/when pesticide applications are the best option.
- Ensure that IATA volunteers, staff and contractors use pesticides in a safe and responsible manner.
- Inform volunteers, staff and public users of the Ice Age Trail and surrounding environs about potential exposure to pesticides.
- Ensure that the IATA uses pesticides judiciously and minimizes potential adverse effects on non-target areas.

2.0 Authority for This Policy and Applicability

Authority for this policy is provided by the Ice Age Trail Alliance's bylaws and corporate law. This policy is applicable to all IATA staff, volunteers and contractors. Prior to applying pesticides on any property, permission must be obtained from the managing authority of the subject property (often requiring the submission of forms), including private landowners. IATA staff and volunteers may apply general use (non-restricted) pesticides without being Department of Agriculture, Trade and Consumer Protection (DATCP) certified provided they are trained by and working under the direction of someone who is certified. The certified supervisor must be aware of the pesticide use and available for consultation but does not need to be present at the site. The IATA's Pesticide Use Policy, the Material Safety Data Sheet (MSDS) for each product, and the Job Hazards Analysis (JHA) must be provided to and gone over with the applicator prior to applying pesticides.

3.0 Best Application Practices

Pesticide applicators are expected to use the most advanced practices (i.e., "best practices") that maximize effectiveness of the pesticide application, maximizes personal and public safety, and minimize potentially negative environmental impact. Applicators must read and follow all information found on the product label. All pesticide applicators shall have adequate training, experience, and knowledge to perform the tasks at hand. Avoid working alone whenever possible.

3.1 When Is It Appropriate to Use Pesticides? Pesticides are only one tool used in efforts to control invasive plants and other pests. The goal is to manage pest populations in a way that avoids collateral damage to non-target species and minimizes adverse side effects. Routine and unnecessary uses (i.e. preventative) of pesticides should be minimized or avoided. The following questions are among those that must be considered when deciding whether or not to use pesticides:

- What are other alternatives (eg. mechanical controls such as hand-pulling or prescribed fire)?
- What are the immediate risks of pesticides to public health and the environment?
- What is the likelihood of treatment success on the target pest population?
- What are the risks of the pest to public health and safety?
- What is the potential for economic or aesthetic damage arising as a result of the pesticide application?
- What environment and aesthetic benefits will be realized from the use of the pesticide?

3.2 Stay Current. Applicators are to minimize pesticide risks by following *current* best practices and/or an Integrated Pest Management (IPM) plan. Applicators should stay informed of current best practices, and are encouraged to consult with pesticide experts, such as the local county extension office or the Wisconsin Department of Natural Resources (WDNR) Bureau of Endangered Species. Applicators need to regularly (at least annually) review and evaluate alternative pest control methods.

3.3 Minimize Risks. Application of pesticides should be conducted during times when exposure risks to property users and neighbors are reduced (eg. on Monday, rather than the Friday before a busy weekend). Use the most appropriate chemical and lowest effective concentration whenever practical. Applications should be done at the optimal time of year, using the appropriate application method to minimize damage to non-target species. Surveys for rare and desirable species should be done prior to an application. Consider weather conditions at the time of application. For example, avoid spraying on windy days (to avoid pesticide drift), or during extremely warm days (due to evaporation), near open water or prior to forecasted rain events (because it increases mobility and non-target exposure).

3.4 Inform the public. Prior to the pesticide application, the area must be marked with Pesticide Application Warning Signs according to label directions to allow for drying, settling or absorption to minimize the risk of exposure to Trail users. Concentrate these placards at trailheads, parking areas, spur trails, road crossings or other locations where the public will see them prior to entering the affected areas. This also makes placard removal easier.

3.5 Wear proper protective equipment. The applicator shall comply with all information regarding Personal Protective Equipment (PPE) on the product label. At a minimum the applicator shall wear long pants, long sleeved shirt, shoes/socks and chemical resistant nitrile gloves (at least 14mil (0.35mm) in thickness). Other recommended protective equipment (even if not mentioned on the product label) includes chemical resistant goggles or other eye protection, appropriate airway protection, sturdy boots, rubber boots, gaiters, chaps, hat, and an impermeable top layer when using a backpack sprayer.

3.6 Clean-up. Clean water must be available on site in the amount needed to properly wash hands and other parts of the body if pesticide has contacted the skin. Triple rinse tools and equipment with clean water in an area near the application site or on an impermeable surface at least 100 feet from open water. Rinsate (pesticide-contaminated water resulting from the cleaning of equipment) must be diluted to 1% of per acre concentration and cannot be dumped near the spray zone. Rinsate, once diluted to 1% of field strength, can be used as mix water for future applications. Furthermore, a minimum of one pint of sterile eyewash buffer must be available for each applicator. Contact lens solution is an approved sterile eyewash buffer.

3.7 Pesticide efficacy. Before using any pesticide carefully consider all cost/benefit issues in your decision process. Use pesticides at proper concentrations and do not mix pesticides not listed as mixable. Remember that chemicals are not a cure-all and may have serious side effects.

4.0 Record keeping and reporting. For pesticide use along the Ice Age Trail, IATA volunteers contractors and staff must annually submit a Pesticide Use Notification Form to the IATA's main office. Pesticide use on state, county, or other publicly owned lands will likely require reports to the managing authority of those properties. If applying pesticides on IATA easements or hand-shake agreement properties, permission must be granted from landowners prior to any applications. On state lands, the applicator must complete the Chemical Use Approval, Form 4200-009 and Chemical Use Report, Form 4200-008 according to WDNR guidelines. A Pesticide Use Report Form must also be submitted by December 1 to the IATA's main office.

5.0 Spill prevention and response

Precautions must be taken to prevent spills and prepare for spill cleanup. Mixing, loading, emptying and rinsing should be done on an impervious surface with secondary containment (e.g. a small plastic swimming pool or plastic tub work well for this purpose). A sufficient amount of spill absorbents (e.g., Oil-Dri® or cat litter) should be available nearby. Pesticide applicators are responsible for cleanup of any pesticide spills. If the spill is greater in volume than the amount of pesticide that would cover one acre at label rates, DATCP and WDNR must be notified of the spill. The person responsible for the spill is also responsible for the clean-up of the spill.

For a poison emergency, call (800) 222-1222. For spill emergencies, call WDNR Spill hotline at (800) 943-0003.

6.0 Waste minimization, management and storage

To minimize the need for disposal of waste, pesticide users should carefully plan their needs so that they purchase, store and prepare amounts necessary only for their immediate need. All pesticide containers should be labeled clearly with pesticide, concentration and date. MSDS and pesticide labels should be available wherever pesticides are stored and/or mixed. Rinsate should be disposed of by applying the material at a concentration equal to or less than the prescribed application rates (per product label). Rinsate must be diluted to less than 1% of label field application concentrations prior to disposal. Amounts in greater concentration need to be taken to a local Agricultural Clean Sweep. Waste and surplus pesticides and spill residues may also be disposed of by appropriate application at application rates. It is forbidden by Wisconsin Pesticide Laws to burn pesticide containers or pesticide-contaminated clothing, equipment, etc. Contract applicators are responsible for proper disposal or removal of their rinsate, surplus and waste.

Pesticide users should also regularly (at least every two years) review their storage areas and contact Wisconsin Clean Sweep Program (608) 224-4545 or visit:

<http://datcp.state.wi.us/core/environment/environment.jsp> for disposal of surplus pesticides.

7.0 Compliance with federal and state laws

All IATA staff, volunteers, contractors, pesticide users and their supervisors shall comply with Federal and State laws and guidelines that apply to pesticide use. These laws require that:

- Pesticides are stored, handled, and disposed of in accordance with label directions. *The label is the law.*
- Under certain circumstances, persons who use pesticides must be trained or certified, or be supervised by someone who has received formal training, such as:
 - Restricted use pesticides can only be applied by DATCP certified personnel with training in a relevant commercial applicator category.
 - Pesticide applications in aquatic environments require DATCP training certification and appropriate permits.
 - Pesticide applicators must be certified if they apply or direct the use of pesticides in public schools or on school grounds, or pesticides that contain metam sodium.