

# University of Wisconsin-Madison Pesticide Use Policy

Department of Environment, Health & Safety  
Office of Chemical Safety /  
Environmental Compliance Program



## 1.0 OBJECTIVES

The University of Wisconsin-Madison (UW-Madison) is committed to protecting employees and the environment from hazards associated with pesticide use on University lands and controlled properties. Accordingly, the UW-Madison Environment, Health & Safety Department (EH&S) has developed the UW-Madison *Pesticide Use Policy* to reflect community standards, outline “best practices” and comply with state and federal regulations concerning pesticide use at UW-Madison facilities. Through this policy, UW-Madison endeavors to minimize pesticide exposure risk to all potentially affected individuals and the environment. Thus, the policy major objectives are:

- Ensure that UW-Madison students, faculty, staff and visitors are informed of University pesticide use practices through correct notification procedures.
- Define responsibilities of UW-Madison departments, facilities, agricultural workers, pesticide users and their supervisors.
- Minimize pesticide-contaminated runoff from UW-Madison lands into lakes, ponds and streams.

## 2.0 REGULATORY COMPLIANCE RESPONSIBILITIES

All UW-Madison departments, facilities, agricultural workers, pesticide users and their supervisors shall comply with this policy and all federal and state laws that apply to indoor and outdoor pesticide use. Private contractors providing pest control programs for UW-Madison are also responsible for following this policy. Regulations pertaining to pesticide use and their respective applicability are included in the following table (Table 1).

**Table 1. UW-Madison Pesticide Use Regulatory Compliance Responsibilities.**

<b>Regulation</b>	<b>Scope</b>	<b>Applicability</b>
<i>OSHA Hazard Communication Standard (29 CFR 1910.1200; WI Stats. 101.055)</i>	Requires implementation of a Hazard Communication Program for work with or use of hazardous chemicals. Employees have the need and right to know the identity of chemicals they are exposed to in the workplace, specific hazards of those chemicals and protective methods and measures.	UW-Madison departments, facilities, agricultural workers, pesticide users and their supervisors are responsible for adhering to the <a href="#">UW-Madison Hazard Communication Program standard</a> .
<i>EPA Worker Protection Standard (WPS; 40 CFR 170)</i>	Protects employees on farms, forests, nurseries and greenhouses from occupational exposure to agricultural products, covering both pesticide handlers and agricultural workers.	UW-Madison Agricultural Research Stations are required to comply with EPA WPS requirements – see the <a href="#">Chemical Safety WPS guidance document</a> .
<i>Wisconsin Pollutant Discharge Elimination System (WPDES) Stormwater Permit</i>	Requires UW-Madison to adopt and carryout comprehensive pollution prevention plans, and promote the proper use of lawn and garden fertilizers and pesticides on UW-Madison lands and controlled properties.	UW-Madison EH&S oversees the implementation of campus stormwater permit requirements.

<p><i>Wisconsin Department of Agriculture, Trade &amp; Consumer Protection (DATCP) Pesticide Use &amp; Control (ATCP29)</i></p>	<p>Regulates the distribution and use of pesticides, the licensing and certification of pesticide applicators, and the registration of pesticide products.</p>	<p>As a state government entity, UW-Madison is generally exempt from the commercial and individual commercial applicator license requirements of ATCP 29.</p> <p>Contractors and pesticides used on a for-hire basis remain subject to ATCP 29 pesticide applicator requirements.</p>
<p><i>Wisconsin's School Pesticide Use Law (s. 94.715, Wis. Stats.)</i></p>	<p>Guides the use of pesticides on public school property, ensuring that pesticides are applied by a properly certified applicator and treated areas are properly posted.</p>	<p>UW-Madison is not subject to this law, which applies specifically to Wisconsin public schools grades K-12.</p>
<p><i>UW-Madison Pesticide Use Policy</i></p>	<p>Ensures that pesticide application on UW-Madison lands and controlled properties maximizes effectiveness and safety, and minimizes environmental impact through the use of best practices.</p> <p>As part of pesticide use best practices, requires compliance with ATCP 29 notification procedures and outlines university requirements for pesticide application, training, recordkeeping and reporting, spill prevention and response, and disposal and minimization.</p>	<p>UW-Madison departments, facilities, agricultural workers, pesticide users and their supervisors, as well as private contractors providing pest control programs for UW-Madison.</p>

### 3.0 BEST PRACTICES

#### ***Pesticide Application***

Pesticide applicators at UW-Madison facilities are expected to use the most advanced practices (i.e., "best practices") that maximize effectiveness and safety, and minimize environmental impact. In addition, applications are to be made according to product label directions.

Important best practice considerations for pesticide application include:

- *Continuously Improving Practices* – Applicators are to minimize pesticide risks by following current best practices and Integrated Pest Management (IPM), and by using lower-risk pesticides. Applicators should stay informed of current best practices and are encouraged to consult with pesticide experts. Applicators need to regularly review and evaluate alternative pest control methods.

- *Deciding with Care* – The following factors should be considered when deciding to use pesticides: risks of pesticides to health and the environment; pest population; pest risks to health and safety; and potential for economic or aesthetic damage. It is understood that these factors are difficult to assess and balance in practice, and that turf and playing fields require special care to maintain their quality. Routine and preventive uses should be minimized. Preventive use is acceptable when the need is highly probable (e.g., prevention of Dutch Elm Disease).
- *Minimizing Risks* – Application of pesticides should be conducted during hours of non-occupancy to reduce exposure risks. Following pesticide application, the area should be secured according to label directions to allow for drying, settling or absorption.

***Pesticide Use Training***

Pesticides are considered hazardous chemicals. Therefore, UW-Madison departments and facilities must provide information and training on such hazardous chemicals according to the [UW-Madison Hazard Communication Program standard](#) for non-agricultural pesticide users and the EPA Worker Protection Standard (see the [Chemical Safety WPS guidance document](#)) for agricultural workers and pesticide handlers. Pesticide users should consult with their respective UW-Madison department or facility, which may require additional, specific training and/or licensing.

***Pesticide Use Notification***

Pesticide applicators at UW-Madison facilities are to comply with the information and notification requirements of the Wisconsin DATCP (ATCP 29 Subchapter IX – Pesticide Use and Subchapter X – Agricultural Worker Protection), informing faculty, staff, students and visitors of campus pesticide use by reasonable and effective means, such as:

- Posting signs where pesticides have been applied (e.g., lawn signs for areas frequented by visitors and students).
- Distributing posters, flyers and electronic mail to people who may frequent the application area.
- Publishing notices in campus newspapers, newsletters, on WisInfo or on the EH&S website by request ([www.safety.wisc.edu](http://www.safety.wisc.edu)).

In addition, campus pesticide applicators are to inform the campus community through the Central Answering and Response Service (CARS; 263-3333) of their pesticide use according to following notification procedures. Advance notification must be standard practice for planned routine applications and is a requirement to those individuals who have requested notice as part of a reasonable accommodation under the Americans with Disabilities Act (ADA).

**Table 2. Central Answering and Response Service Notification Procedures.**

<b><i>Notification Type</i></b>	<b><i>Time Point</i></b>	<b><i>Objective</i></b>
Advance Notification	Notify CARS a minimum of 24-hr prior to any planned or routine application (most	For ADA purposes, to allow CARS to provide advance e-mail notification to

	preferable notification type).	those individuals who require it.
Uncertain-Date Notification	Notify CARS of potential application dates in infrequent instances when standard advance notification of planned or actual application date is not possible (e.g., weather dependent spraying). When the application date is finalized, the applicator is to confirm with CARS that spraying will or has occurred.	For ADA purposes, to allow CARS to provide an e-mail notice of potential dates, along with their intention of providing an actual notice on the day of application. Individuals who should avoid any pesticide exposure can call CARS to ascertain whether spraying occurred before coming to campus.
Immediate Notification	Notify CARS on the day that application is or will be occurring, if determined that a 24-hr delay is not possible to allow for standard advance notice in infrequent instances where an infestation requires immediate attention and application.	For ADA purposes, CARS will provide notice as appropriate.
Onetime Seasonal Notification	A onetime seasonal notice to CARS will suffice for spot treatments of minute quantities of pesticides (e.g., use of glyphosate for weeds or pyrethrums for flies).	For ADA purposes, CARS will provide notice as appropriate.

Pesticide notification should include information that is consistent with the Wisconsin DATCP requirements for commercial applications to residential structures with:

- Pesticide common chemical or brand name
- Date and time of application
- Post-application or reentry precautions
- Date and time of reentry
- Contact or UW-Madison unit who will (or has) applied the pesticide
- Application site (when information is distributed via fliers, email, web or newspaper notices).

General information on pesticide safety and campus use is available on the UW-Madison EH&S website ([www.safety.wisc.edu](http://www.safety.wisc.edu)). EH&S will respond to pesticide inquiries by providing label information, answering questions about hazards and exposures, and directing people to other sources of information.

### ***Recordkeeping and Reporting***

UW-Madison departments and facilities are to record and report outdoor pesticide use that may lead to runoff to the storm sewer system, and to annually report the total amount of pesticides used, reason for use and special precautions taken to EH&S. These reports will be used for public information and internal review. Private pest control contractors must also provide this information to EH&S.

Because of the small quantities used and decentralization of purchasing records, internal reporting is not required for pesticides used in research and teaching. However, when such data is available, researchers are encouraged to report annual usage to EH&S.

***Spill Prevention and Response***

Precautions must be taken to prevent spills and prepare for spill cleanup. Mixing, loading, emptying and rinsing must be done on an impervious surface with secondary containment (e.g., a small plastic swimming pool works well for this purpose). A sufficient amount of spill absorbents (e.g., oil dry) must be available nearby.

Pesticide users are responsible for cleanup of any pesticide spills. The Madison Fire Department’s Hazardous Incident Team (HIT) is available to clean large spills and when hazardous atmospheres may be present. All spills must be reported to the UW-Madison Environment, Health & Safety Department.

***Pesticide Disposal and Minimization***

Pesticide users should carefully plan their needs so that they purchase, store and prepare amounts equal to their immediate need. Researchers should minimize waste by accepting samples only in quantities for which they have immediate plans.

Rinsate should be disposed of by applying the material at or less than the prescribed application rates. Surplus pesticides and spill residues may also be disposed of by appropriate application at application rates. Spill debris and larger quantities of surplus pesticides generated by UW-Madison activities may be disposed of via UW-Madison EH&S. Users should regularly (at least every two years) review their storage areas and contact EH&S for disposal of surplus pesticides. Contract applicators are responsible for proper disposal or removal of their rinsate, surplus and waste.

**4.0 POLICY HISTORY AND REVIEW**

This policy was originally adopted by the UW-Madison Chemical Safety Committee on 23 April 1996. The University may modify this Policy at any time. At a minimum, the UW-Madison Chemical Safety Committee (and other UW committees as applicable) will review this policy biennially.

**Table 3. UW-Madison Pesticide Use Policy Review History.**

<b><i>Reviewer</i></b>	<b><i>Action</i></b>	<b><i>Date</i></b>
UW-Madison Chemical Safety Committee	Approved revision Approved Interim final version approved Approved revision Approved	04 April 2012 15 February 2000 18 March 1997 16 July 1996 23 April 1996
UW-Madison ADA Staff	Review	February 2012
UW-Madison Arboretum Committee	Review	March 2012
UW-Madison Physical Plant (Extermination and	Review	February 2012

Environmental Services)		
UW-Madison Recreational Sports	Review	February 2012
UW-Madison Housing	Review	February 2012
UW-Madison Athletics Department	Review	February 2012