

**INTEGRATED PEST MANAGEMENT AT VA NATIONAL CEMETERIES**

**1. REASON FOR ISSUE:** To update National Cemetery Administration (NCA) policy on the management of pests and use of pesticides.

**2. SUMMARY OF MAJOR CHANGES:** This directive is revised to update organizational titles and include components of the NCA Environmental Management System.

**NOTE:** *New/revised information is indicated by a line in the left margin.*

**3. RESPONSIBLE OFFICE:** NCA, Office of Field Programs, 810 Vermont Avenue, NW, Washington, DC 20420, is responsible for the information contained in this directive. Questions may be referred to the NCA Chief Agronomist in the Cemetery Development and Improvement Service, Office of Field Programs.

**4. RELATED DIRECTIVE AND HANDBOOKS:**

- a. VA Directive 0057 – VA Environmental Management Program (January 15, 2010)
- b. NCA Directive 0320/3 – Emergency Preparedness Planning (May 30, 2008)
- c. NCA Handbook 0320 – Emergency Preparedness Planning Procedures (July 13, 2004)
- d. NCA Directive 3000 – Operational Standards for National Cemeteries (January 5, 2010)
- e. NCA Handbook 3410 – Integrated Pest Management Procedures for National Cemeteries (published simultaneously)
- f. NCA Handbook 3420 – Turfgrass Maintenance in VA National Cemeteries (February 29, 2012)

**5. RESCISSION:** NCA Directive 3410 – Integrated Pest Management at VA National Cemeteries (September 9, 2008)

**6. RECERTIFICATION:** This publication is scheduled for recertification in April 2015.

/s/  
Steve L. Muro  
Under Secretary  
for Memorial Affairs

Distribution: Electronic

## **INTEGRATED PEST MANAGEMENT AT VA NATIONAL CEMETERIES**

### **1. PURPOSE AND SCOPE**

a. This directive sets policy for all Department of Veterans Affairs (VA) National Cemetery Administration (NCA) staff on Integrated Pest Management (IPM), pesticide use and applicator certification, and related legal requirements.

b. The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) requires Federal agencies to use IPM techniques in carrying out pest management activities and to promote IPM through procurement and other activities. Other relevant Public Laws include the Resource Conservation and Recovery Act (RCRA), the Occupational Safety and Health Act, and the Emergency Planning and Community Right-to-Know Act (EPCRA). A brief summary of applicable laws is included in NCA Handbook 3410 – Integrated Pest Management Procedures for VA National Cemeteries and the Environmental Management System Pest Management Standard Operation Procedure (SOP).

c. Regulations governing the safe use of pesticides include, but are not limited to, those issued by the Environmental Protection Agency (EPA) and Occupational Safety and Health Administration (OSHA) in the Code of Federal Regulations.

d. States and some non-Federal entities have been given authority to regulate pesticide use.

e. The statutory authority for NCA IPM activities comes from title 38, United States Code section 512(a) and chapter 24.

### **2. BACKGROUND**

a. IPM is a decision making process that uses knowledge of pest biology, the environment, and available technology to prevent unacceptable levels of damage by animal, insect or plant pests while posing the least possible hazard to people, resources, and the environment. IPM is an ecosystem-based strategy that uses biological controls, habitat manipulation, cultural controls, and, if necessary, targeted chemical controls.

b. IPM program objectives are to prevent, mitigate, and/or manage pest problems by:

(1) Maintaining and promoting safe, efficient, and environmentally sound strategies by preventing or controlling disease vectors and other pests that may adversely affect health, impede operations, or damage property or cemetery appearance;

(2) Fully complying with all appropriate laws and regulations involving pesticide use and other pest control procedures (see Appendix A of NCA Handbook 3410 – Integrated Pest Management Procedures for VA National Cemeteries);

(3) Identifying and phasing out ineffective treatments;

(4) Incorporating IPM philosophy and strategies into all relevant aspects of national cemetery pest management planning, training, and operations;

(5) Complying with any existing NCA integrated grounds maintenance standards and standard operating procedures; and

(6) Providing customized training in IPM techniques for cemetery staff involved in pest management operations, as well as required training and certification for pesticide applicators.

### 3. POLICY

a. All VA national cemeteries administered by NCA will develop a comprehensive IPM program that incorporates any existing pest management procedures as part of the Environmental Management System Pest Management SOP. Each cemetery will maintain records that track pest problems and their probable causes, treatment, and treatment results (both effective and ineffective).

b. Chemical controls will be used only if other IPM methods fail to achieve a satisfactory effect. The least toxic appropriate pesticide will be used. When application of chemical pesticides is required, the handling of pesticides and pesticide waste(s) must be conducted in accordance with all Federal, State and local (city, county, etc.) laws and regulations.

**NOTE:** For the purpose of this directive and accompanying handbook, "handling" is defined as all activities involved in the selection, purchase, storage, handling, application, and disposal associated with pesticides.

(1) All precautions will be taken to ensure the protection and safety of individuals and the environment during the conduct of these activities; and

(2) Local restrictions on pesticide use associated with land uses on cemetery property and adjacent lands and all other agreements with local (city, county, etc.), State, and Federal agencies must be enforced.

c. NCA staff who handle pesticides will receive appropriate training and guidance to ensure compliance with all applicable Federal, State and local laws and regulations.

d. Cemetery employees applying pesticides in a national cemetery must be certified or licensed in that State, or under the supervision of a State-certified applicator. Volunteers may not apply pesticides. If pesticide application is to be done by contractors, the Statement of Work must include the following requirements:

(1) The contract must require that the contractor (and applicator(s)) is State-certified and/or licensed, and has been made aware of and agreed to abide by NCA IPM procedures and requirements as stated in this directive and current NCA Handbook 3410 – Integrated Pest Management Procedures for VA National Cemeteries; and

(2) The contractor must submit a plan to the Cemetery IPM Coordinator documenting:

- All chemical and non-chemical controls that will be used (including product names and types and estimated rates of application),
- Monitoring and record-keeping practices, and
- All required licensing documentation (in accordance with State pesticide application laws and regulations).

e. Any individual applying pesticides must first read the appropriate Material Safety Data Sheet (MSDS) and take necessary precautions to limit negative effects to human safety and health and/or the environment. MSDSs must be available to all employees, contract employees, and other potentially exposed individuals in areas where pesticide mixing or application is being performed, as required by the Occupational Safety and Health

Administration. A copy of EPA Handbook "Recognition and Management of Pesticide Poisoning" must be kept with the MSDSs and must be readily available to any individual who may be exposed to pesticides.

f. All NCA cemeteries will have site-specific Cemetery Emergency Plans available to staff in accordance with current NCA Directive and Handbook 0320 – Emergency Preparedness Planning and Procedures. First aid, cleanup, and other appropriate equipment and supplies must be available at all times.

g. NCA national cemeteries will landscape with pest resistant plant varieties and use cultivation, pruning, fertilizing, and irrigation practices that discourage pest development. Cemetery staff will remove potential sources of food, shelter, and water in structures and the landscape that may attract pests.

h. All national cemeteries will follow reporting and recordkeeping procedures as specified in the accompanying handbook.

#### 4. RESPONSIBILITIES

a. **Under Secretary for Memorial Affairs** ensures that NCA staff develop and implement IPM programs and comply with Federal, State, and local (city, county, etc.) laws or regulations related to pest management and pesticide use.

b. **Principal Deputy Under Secretary for Memorial Affairs** is responsible for the implementation of appropriate IPM programs at all NCA cemeteries.

c. **Deputy Under Secretary for Field Programs**, sets program goals related to the development of NCA cemetery IPM programs and oversees the NCA Chief Agronomist.

d. **Deputy Under Secretary for Finance and Planning:**

(1) Ensures that operational standards and measures align with the requirements of this directive;

(2) Assists in the development and evaluation of accurate, valid and reliable data collection systems; and

(3) Analyzes data collected to provide reports to responsible offices.

e. **NCA Chief Agronomist**, within the Cemetery Development and Improvement Service (CDIS), Office of Field Programs, is responsible for overall management of NCA programs related to pest management and pesticide use and will:

(1) Develop guidance and deliver training related to IPM and pesticide handling, storage, application, and disposal;

(2) Ensure that Memorial Service Network (MSN) Directors enforce State certification requirements necessary for continuation of licensing;

(3) Respond to requests from MSN and cemetery staff for information on Integrated Pest Management controls and programs;

(4) At the request of a MSN Agronomist and/or contracting staff, provide review and advice on Statements of Work for contracting out pest management activities and/or the final selection process to ensure compliance with applicable laws, regulations, VA, and NCA requirements (as stated in paragraph 3.d. above);

(5) Review site design of new construction to address IPM concerns; and

(6) Work with appropriate Federal and State regional staff on specific local (city, county, etc.) requirements and concerns.

f. **NCA Environmental Engineer**, within the Design and Construction Office, is responsible for providing an Environmental Management System Pest Management SOP for each Cemetery and will assist with IPM activities on an as-needed basis.

g. **MSN Directors** will ensure that:

(1) IPM programs are implemented at all NCA cemeteries and reviewed annually by the MSN agronomist;

(2) Federal, State and local pesticide requirements are followed at all MSN cemeteries; and

(3) Cemetery staff receive adequate resources and training to comply with State certification requirements and maintain applicator licenses.

h. **Memorial Service Network (MSN) Agronomists** will:

(1) Review each MSN cemetery IPM program records (including purchase inventories, Pesticide Application Logs, storage and disposal records, and associated IPM program audit materials) at least annually, and work with NCA Chief Agronomist and Cemetery IPM Coordinator to resolve any problems;

(2) Provide technical support, including advice regarding spills and whether notification of the MSN Director, Chief Agronomist, or other personnel is appropriate;

(3) Review and approve Statements of Work submitted by Cemetery IPM Coordinators for pesticide management activities to be done by contract at MSN cemeteries to ensure compliance with applicable laws, regulations, VA, and NCA requirements (as stated in paragraph 3.d. above), consulting with NCA Chief Agronomist as necessary;

(4) Maintain a list of all State-certified cemetery personnel; and

(5) Assist in identifying training resources that target specific regions and/or pests, on an as-needed basis.

i. **Cemetery Directors** will either act as Cemetery IPM Coordinator or directly oversee the activities of the individual designated, and are responsible for:

(1) Overall IPM program plans and activities (including maintenance of all required records) at the cemetery;

(2) Safe and proper handling of all pesticides from selection through disposal; and

(3) Ensure training requirements are met by all cemetery personnel involved in IPM activities and adequate resources are available.

k. **Cemetery IPM Coordinators** (the Cemetery Director will act as Cemetery IPM Coordinator unless the duty is specifically assigned to another individual) will:

(1) Ensure that cemetery-specific IPM programs are developed and implemented according to guidelines in NCA Handbook 3410 – Integrated Pest Management Procedures for VA National Cemeteries and the Environmental Management System Pest Management SOP;

(2) Continually monitor and evaluate the cemetery IPM program, including annual evaluation of cemetery use of pesticides to determine if less toxic products may be substituted;

(3) Ensure that the chemicals used in pest control are registered with the State and applied in accordance with label instructions, pesticide applicators' laws, and all other local (city, county, etc.), State, and Federal regulations;

(4) Enforce any cemetery-specific additional restrictions on pesticide use (including those associated with the cemetery property and/or adjacent land uses, natural resource management areas, endangered/protected species), and all other agreements with local (city, county, etc.), State, and Federal agencies;

(5) Select employee(s) to attend training and receive Public Agency Applicator Certificate(s) for applying pesticides. This certification must be renewed as required by the State. If no employee is certified, a Cemetery Director may:

(a) Assign an employee to apply pesticides under the supervision of a State-certified applicator;

(b) Request the services of a certified Public Agency Applicator from a VA medical center, or, if appropriate;

(c) Contract for commercial pest management service:

1. Submit Statements of Work for pest management contract activities (incorporating the requirements stated under paragraph 3.d. above, plus any other legal requirements or information relevant to the work to be done) to the MSN Agronomist for review/approval; and

2. Each person or company hired for lawn and ornamental pest control or fumigation or any other service involving the use of pesticides or devices for the control, eradication, mitigation, or prevention of pests in or around buildings, lawn, trees, and shrubs must hold a State license stating those categories in which they are authorized to do business (which should be appropriate for the specific contracted effort).

(6) Ensure that cemetery employees and/or contract employees who apply pesticides or otherwise handle pesticides are adequately trained, licensed, or certified in all aspects of Federal, State, and local (city, county, etc.) laws and regulations that apply to the use and handling of pesticides and that they use appropriate Personal Protective Equipment (PPE) when handling or applying pesticides;

(7) When pesticide application is planned, post appropriate signage for the local community, visitors and staff in areas visible to the public and staff, and at specific pesticide application location(s) as required by the State and locality;

(8) Ensure that pesticides are applied only when there are no non-participating individuals within the area to be treated, and post signs identifying treated areas;

(9) Ensure that the Cemetery Emergency Plan includes procedures to follow if a pesticide is spilled or otherwise unintentionally released into the environment (required by EPA and OSHA regulations and NCA Handbook 0320 – Emergency Preparedness Planning Procedures), including procedures for personal health and safety, as well as reporting of a spill or release of chemical pesticides to authorities (for details see accompanying handbook);

(10) Prepare all necessary reports in accordance with applicable laws, regulations, and VA/NCA policy;

(11) Maintain records of all IPM activities as specified in the accompanying handbook;

(12) Make sure the following materials are available to all employees, contractors, and other individuals that may be potentially exposed to pesticides:

(a) Material Safety Data Sheets (MSDS); and

(b) EPA Handbook “Recognition and Management of Pesticide Poisoning;”

(13) If any pesticides with cholinesterase inhibitor are used (organophosphorous, carbamate, or chlorinated hydrocarbon pesticides):

(a) That information should be highlighted on the appropriate product MSDS; and

(b) Employees potentially exposed to such pesticides should have a cholinesterase baseline test and annual testing at the servicing VA medical center (where the distance to a servicing VA medical center prohibits support, the Cemetery Director may procure testing services through a contract with a non-VA laboratory);

(14) Provide appropriate PPE and training to employees and contractors and ensure that:

(a) A respiratory protection program is in effect (if required) and that only trained staff determine when respirators must be used; and

(b) Staff follow information provided on the pesticide label or in the MSDS, EPA Handbook, etc. on how to handle accidental pesticide spills and receive medical treatment if individuals are contaminated with or exposed to pesticides; and

(15) In case of medical emergency, follow procedures outlined in Cemetery Emergency Plan, accompanying handbook, and ensure that appropriate MSDS and product labels are provided to physicians giving emergency medical care to an individual experiencing pesticide poisoning symptoms.

k. **Cemetery employees involved in IPM** are responsible for:

- (1) Meeting all training and safety requirements; and
- (2) Adhering to NCA guidance regarding IPM activities.

l. **First-line Supervisors** will:

(1) Coordinate cleanup of spills according to the cemetery emergency plan and MSN Agronomist instructions; and

(2) Report spills and corrective actions to the Cemetery IPM Coordinator, Cemetery Director, MSN Agronomist, and MSN Director, as appropriate.

## 5. REFERENCES

*(Contact the appropriate MSN Agronomist to obtain copies of references not available electronically.)*

a. Federal Insecticide, Fungicide, and Rodenticide Act, Public Law 92- 516 (codified at title 7, United States Code, section 136 *et seq.*), as amended by the Federal Environmental Pesticide Control Act of 1972, Public Law 92-516 \* (codified at 7 U.S.C. 136, *et seq.* \*\*)

b. National Environmental Policy Act (NEPA) of 1969 \* (42 U.S.C. 4321 *et seq.* \*\*)

c. Superfund Amendments and Reauthorization Act of 1986 (SARA), Public Law 99-499, Title III; also known as the Emergency Planning and Community Right-To-Know Act of 1986, Public Law 99-499, Title III \* (codified at title 42, U.S.C., section 11001 *et seq.* \*\*)

d. Resource Conservation and Recovery Act (RCRA) of 1976, as amended \* (42 U.S.C. 6901, *et seq.* \*\*)

e. Executive Order 13101, Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition (September 14, 1998) \*\*\*

f. Environmental Protection Agency (EPA):

(1) EPA Handbook "Recognition and Management of Pesticide Poisonings" (1999) (available electronically on the EPA Emergency Information page at <http://www.epa.gov/oppfead1/safety/healthcare/handbook/handbook.htm>)

(2) Electronic listing of major environmental laws and Executive Orders at <http://www.epa.gov/lawsregs/laws/index.html#env>

(3) Regulatory guidance in Title 40 of the Code of Federal Regulations (CFR) – see in particular Parts 156 (Labeling requirements for pesticides and devices), 171 (Certification of pesticide applicators), and 302.4 (List of Hazardous Substances and Reportable Quantities)

(4) Explanation of pesticide product labels at <http://www.epa.gov/pesticides/label/>

(5) Additional guidance on Prevention, Pesticides and Toxic Substances available electronically at <http://www.epa.gov/opptsmnt/>



(6) General information on the Toxic Release Inventory program and requirements is available at <http://www.epa.gov/tri/>.

g. Occupational Safety and Health Administration (OSHA)

(1) Regulatory guidance in Title 29 of the CFR (section 1900 et seq.)

(2) General information available electronically at <http://www.osha.gov/>

h. United States Department of Agriculture (USDA)

(1) Statutory guidance in Title 7, United States Code (U.S.C.), Chapter 6 (Insecticides and Environmental Pesticide Control)

(1) Regulatory guidance in Title 7, Code of Federal Regulations, Part United States Code (U.S.C.), Chapter 6 (Insecticides and Environmental Pesticide Control)

(2) Pest management information is available at:  
<http://www.csrees.usda.gov/nea/pest/pest.cfm>

(3) BioPreferred program and product information available electronically at  
<http://www.biobased.oce.usda.gov>

i. VA Directive 0057 – VA Environmental Management Program (January 15, 2010)(available electronically at <http://www1.va.gov/vapubs/>)

j. NCA Directive 0320/2 (May 30, 2008) and Handbook 0320 (July 13, 2004) – Emergency Preparedness Planning and Procedures \*\*\*\*

k. NCA Directive 3000 – Operational Standards for National Cemeteries (January 5, 2010) \*\*\*\*

l. NCA Handbook 3410 – Integrated Pest Management Procedures for National Cemeteries (April 30, 2012) \*\*\*\*

m. NCA Handbook 3420 – Turfgrass Maintenance in National Cemeteries (February 29, 2012) \*\*\*\*

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\* **Public Laws** (from 1973 to present) are available electronically at <http://thomas.loc.gov/>

\*\* **United States Code** (U.S.C.) and **Code of Federal Regulation** (CFR) citations are available electronically at <http://www.gpo.gov/fdsys/browse/collectiontab.action>

\*\*\* **Executive Orders** are available electronically at <http://www.archives.gov/federal-register/executive-orders/disposition.html>

\*\*\*\* **NCA Directives and Handbooks** are available to NCA staff electronically at <http://vaww.nca.va.gov/>, "Legislative and Regulatory Division," "NCA Directives and Handbooks"