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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
PREVENTION, PESTICIDES,
AND TOXIC SUBSTANCES

August 16, 2006

Ms. Kristle McCullough
XT-2000, Inc.
6328 Riverdale Street, Suite A
San Diego, CA 92120

Dear Ms. McCullough:

Subject: Submission of minor amendments to product label
XT-2000 Orange Oil
EPA Registration No. 71986-1
Your submission dated November 14, 2005

The labeling amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable with the following provision:

Under the liability section, delete the phrase, "This product is for professional use only."

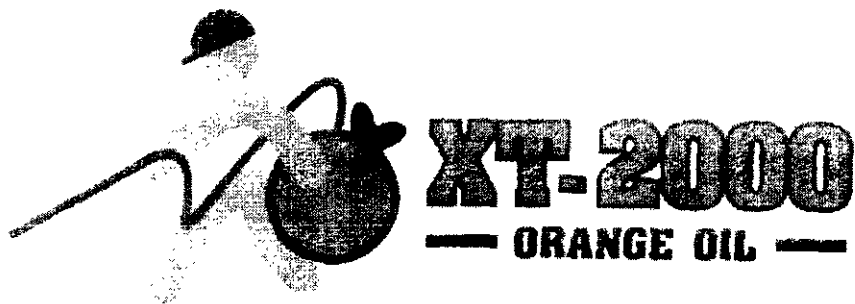
The above language is not required for your product, and may cause confusion for users and state regulatory/enforcement agencies. Therefore, it must be removed.

Submit two copies of your final printed labeling before you release the product for shipment. A stamped copy is enclosed for your records. If you have any questions, please contact me at (703) 308-8045 or eagle.venus@epa.gov.

Regards,

Venus Eagle
Insecticide-Rodenticide Branch
Registration Division (7505P)

(Enclosure)



FOR DRYWOOD TERMITES AND WOOD BORING BEETLES

Ingredients

Active Ingredient: d-Limonene.....92%

Inert Ingredients:8%

Total Ingredients:100%

KEEP OUT OF REACH OF CHILDREN

CAUTION

**See Back Panel for Additional Precautionary
Statements**

EPA Reg. No. 71986-1 EPA Est. No.11715-TN-1

Manufactured for Xtermite, Inc.

6328 Riverdale St., Ste. #A, San Diego, CA 92120

(877) 300-6483 (toll free)

NET CONTENTS 1 GALLON (3.785L)

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

AUG 16 2006

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.**

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**PRECAUTIONARY STATEMENTS
FIRST AID**

Have the product container or label with you when calling a poison control center or going for treatment.

If Swallowed: Call a poison control center or a doctor immediately for treatment advice. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

If on Skin: Take off contaminated clothing. Rinse skin immediately with soap and plenty of water for 15-20 minutes. Call poison control center or doctor for treatment advice.

If Inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed through the skin. Avoid contact with skin, eyes or clothing. May cause eye or skin irritation. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Harmful if inhaled. Avoid breathing vapor. Wash thoroughly with soap and water after handling. Do not use or store near heat or open flame.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination (NDPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

SPILL PROCEDURES

Remove source of spill. Use absorbent materials to clean up liquid spills. Put absorbed liquid in waste disposal container and flush contaminated surfaces with water. Dispose of according to local and regional authority requirements. This product is biodegradable.

LIABILITY

Read directions before use. Follow directions for use. Misuse of this product is dangerous. NT-2000 is not responsible for any injury or liability due to the user's failure to follow the label instructions. This product is for professional use only. For more information, please call 1-866-870-8485.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING

FOR USE ON WOODEN STRUCTURES AND/OR WOODEN OBJECTS.

PERSONAL PROTECTIVE EQUIPMENT

All pesticide handlers (loaders and applicators) must wear long-sleeved coveralls worn over a minimum of short-sleeved shirt and short pants, socks, chemical-resistant footwear, chemical resistant gloves and protective eyewear.

Structural Drywood Termite Infestation: Applicator must locate termite galleries. Visual signs of infestation such as frass or pellets, blistered wood, "kick-out holes" and presence of live insects can be used to locate nests and galleries. Fiber optic equipment or listening devices can also be used. Tapping on wood with screwdriver and listening for different sounds that would indicate variations in wood density may help locate galleries.

Application Equipment: Apply NT-2000 using B&G Injector Model T100 Trigger with 646 T-Jet Valve or equivalent with 14.5 psi in-line pressure regulator.

Wood Injection: Drill 7/64" holes into "kick-outs" to intersect galleries within infested wood. Avoid electrical wiring and plumbing when drilling. Do not drill completely through wood. Use a "W" pattern at 3"-5" intervals to ensure coverage and penetration of NT-2000. Drill holes on opposite sides of 4" x 10" or larger beams to effectively penetrate galleries. Inject for up to one minute. Avoid splash back or runoff from excessive or prolonged use. Plug holes after treatment with wood filler or other non-wood material.

Retreatment: Reapply if termite activity is detected following treatment. For best results, inject NT-2000 into new holes drilled between previous injects at sites. Do not reapply again to same area within one year.

Wood Boring Beetle Infestation: Applicator must locate beetle infestation. Topically apply NT-2000 at a rate of 1 gallon per 100 square feet or until surface is thoroughly wet.

Retreatment: Reapply as necessary to eradicate infestation.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or puncture and dispose of in a sanitary landfill, or by other approved State and local procedures.