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



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

OCT 3 1 2007

Mr. Jeff Jones
Delta Analytical Corporation
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

Authorized agent for XT-2000, Inc.

Dear Mr. Jones:

Subject:

Label amendment

XT-2000 Orange Oil

EPA Registration Number 71986-1 Submission dated July 20, 2007

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below:

Replace the directions for use in the paragraph titled <u>Structural Carpenter Ant Infestation</u> with the following statement: "This product will only kill foraging carpenter ants present at the time of application." Acceptable indoor field studies must be submitted before directions for use in wall voids for structural ants infestation can be approved.

Submit two (2) copies of the final printed label before you release the product for shipment bearing the revised labeling. A stamped copy of the label is enclosed for your records. A copy of the latest efficacy review is also enclosed for your perusal.

Sincerely yours,

Rita Kumar Rita Kumar

Senior Regulatory Specialist Insecticide-Rodenticide Branch Registration Division (7505C) e-mail: kumar.rita@epa.gov

Enclosures (2)



FOR DRYWOOD TERMITES, WOOD BORING BEETLES AND CARPENTER ANTS

Ingredients

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 XT-2000, Inc.

6328 Riverdale St., Ste. #A, San Diego, CA 92120 For product use information call (866) 870-8485 (toll free)

For Chemical Emergency, Spill, Leak or Fire call CHEMTREC (800) 424-9300 For Medical Emergency or Adverse Event call PROSAR (800) 983-4711 NET CONTENTS 1 GALLON (3.785L) Under the Federal Insecticide,
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
As amended, for the pesticide
Registered under EPA Reg. No.
71986-1

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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 (NDPES) 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 all directions. Misuse of this product is dangerous. XT-2000, Inc. is not responsible for any injury or liability due to the user's failure to follow the label instructions. 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 XT-2000 using B&G Injector Model T100 Trigger with 6466 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 XT-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 XT-2000 into new holes drilled between previous injection sites.

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

Retreatment: Reapply as necessary to eradicate infestation.

Structural Carpenter Ant Infestation: Applicator must locate ant infestation. Inject 1 oz. of XT-2000 in wall void framing at 10 to 15 PSI using B&G Injector Model T100 Trigger with 6466 T-Jet Valve or equivalent. Patch and seal area after treatment.

Retreatment: Reapply as necessary to eradicate infestation.

STORAGE AND DISPOSAL

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

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

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