

88760-1

1/22/2013

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

JAN 22 2013

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Olav Messerschmidt  
OMC AG Consulting  
828 Tanglewood Lane  
East Lansing, MI 48823

RE: Product Name: TER-RTU1  
EPA Reg. No: 88760-1  
Application for Label Notification Dated November 27, 2012 to add alternate brand name "CIRKIL", add additional pest and amend the directions for use per PR Notice 98-10 Section M.2.

Dear Mr. Messerschmidt:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under Pesticide Registration (PR) Notice 98-10 dated above. A preliminary screen of this request has been conducted for its applicability under PR Notice 98-10 and it has been determined that the action(s) requested falls within the scope of PR Notice 98-10. Our records have been duly noted, and the label submitted with this application has been stamped "Notification Accepted" and will be placed accordingly in our records.

If you have any questions concerning this action, please feel free to contact Ms. Menyon Adams at (703) 347-8496 or email at [adams.menyon@epa.gov](mailto:adams.menyon@epa.gov).

Sincerely,

*Linda Hollis*

Linda Hollis, Chief  
Biochemical Pesticides Branch  
Biopesticides and Pollution Prevention  
Division (7511P)



<p>United States <b>Environmental Protection Agency</b> Washington, DC 20460</p>	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number _____
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**Application for Pesticide - Section I**

<b>1. Company/Product Number</b> Terramera, Inc./88760-1	<b>2. EPA Product Manager</b> Ms. Linda Hollis	<b>3. Proposed Classification</b> <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
<b>4. Company/Product (Name)</b> TER-RTU1	<b>PM#</b> PM #91	
<b>5. Name and Address of Applicant (Include ZIP Code)</b> Terramera, Inc. Buena Park Station Buena Park, CA 90622-6449  <input checked="" type="checkbox"/> Check if this is a new address		<b>6. Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____  Product Name _____

**Section - II**

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Other - Explain below.
<b>Notification Accepted</b> Date: <u>JAN 22 2013</u> Reviewer: <u>M Adams</u>	
<b>Explanation:</b> Use additional page(s) if necessary. (For section I and Section II.)  Notification per PR Notice 98-10: Add "CIRKIL" as alternate brand name Addition of non-public health pests Changes in allowed use directions language and other minor changes	

**Section - III**

<b>1. Material This Product Will Be Packaged In:</b>				<b>2. Type of Container</b>	
<b>Child-Resistant Packaging</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>Unit Packaging</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>Water Soluble Packaging</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			<input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
<b>* Certification must be submitted</b>		If "Yes" Unit Packaging wgt.    No. per container	If "Yes" Package wgt    No. per container		
<b>3. Location of Net Contents Information</b> <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		<b>4. Size(s) Retail Container</b> 3.4, 16, 32, 64 oz, 1 or 5 gal		<b>5. Location of Label Directions</b> <input type="checkbox"/> _____	
<b>6. Manner in Which Label is Affixed to Product</b> <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled <input type="checkbox"/> Other _____					

**Section - IV**

<b>1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)</b>		
<b>Name</b> Olav Messerschmidt	<b>Title</b> Registration Agent	<b>Telephone No. (Include Area Code)</b> 517-881-0106
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		<b>6. Date Application Received (Stamped)</b>
<b>2. Signature</b> 	<b>3. Title</b> Registration Agent	
<b>4. Typed Name</b> Olav Messerschmidt	<b>5. Date</b> November 27, 2012	

# OMC Ag Consulting

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November 27, 2012

Ms. Linda Hollis  
Biochemical Pesticides Branch Chief (PM #91)  
Document Processing Desk (DPD) (NOTIF)  
Biopesticides & Pollution Prevention Division (BPPD) – 7504P  
U.S. Environmental Protection Agency  
401 M Street S.W.  
Washington, D.C. 20460-0001

Subject: Notification - TER-RTU1 (EPA Reg. No. 88760-1)  
Additional alternate brand name; Additional pests; Changes in use directions

Dear Ms. Hollis:

This Notification per PR Notice 98-10 requests the following changes to the subject label:

- Change of alternate brand name
- Addition of nonpublic health pests
- Changes in use directions and other minor changes

In support of this request the following are enclosed:

- Application for Pesticide Registration (EPA Form 8570-1).
- One label with all changes highlighted. All new words are highlighted in yellow. The colored letters are movement of current approved label language.
- Five (5) copies of draft labels.

#### Change of alternate brand name:

We request to add to the list of alternate brand names. "CIRKIL RTU" and "CIRKIL READY-TO-USE SPRAY" are the current alternate brand names for TER-RTU1. We would like to add "CIRKIL" to the alternate name list.

PR Notice 98-10, Section II(A), allows addition or change of alternate brand names by Notification provided that:

- Each name differs from the name of any other of the registrant's products so as to permit clear identification;
- Brand names may not be false or misleading; and
- The change or addition of alternate brand names for use by the registrant is not the same as supplemental distribution by a different company or individual under agreement with the registrant.

This change in brand name meets the above 98-10 criteria.

#### Additional pests:

The following pests have been added to the label: **smoky brown cockroaches, house crickets, firebrats, silverfish, moisture ants, ravida field ants, pavement ants, bean aphid, pea aphid and green bottle fly.** None of these new pests are public health pests or pests that damage wooden structures. PR Notice 98-10, Section II(B), allows the addition of new pests if the following conditions are met:

Ph: 517-881-0106 \*\* Fax: 517-336-9788 \*\* email: [omesserschmidt@comcast.net](mailto:omesserschmidt@comcast.net)

1. the registrant maintains efficacy data for each pest added;
2. the pest occurs on a specific site on the approved label;
3. the pest matches the type of product registered (e.g., a fungus may not be added to an insecticidal product);
4. the dosage, frequency, concentration or method of application do not change;
5. addition of the pest does not increase exposure of the pesticide to humans or the environment; and
6. the pests are not subject to quarantine by the Animal and Plant Health Inspection Service of the U.S. Department of Agriculture.

The addition of these pests meet the above 98-10 criteria.

**Changes in use directions and other minor changes:**

The following changes were made:

- The Batch Number has been added to the first page.
- The company address has been updated per an earlier notice to EPA.
- The format of the First Aid section has been revised to meet preferred BPB formatting
- To differentiate the use directions for these new pests from bedbugs, some additional language has been added. Specifically, these are:
  1. The phrase "*Not registered for use in California*" to refer to the new pests that were added.
  2. The phrases "*and other listed insects*" and "*For all insects, except bed bugs, re-apply every 1 to 2 weeks or as needed.*" were added so that the user knows that the use directions also apply to the new pests (and not just bed bugs)

PR Notice 98-10, Section II(M), allows changes in use directions if the amendments do not affect the dilution ratio or the minimum or maximum use dilutions. The movement of the current language and the new language are to clearly differentiate bedbugs from the other pests; there are no changes in use rates, sites, or dilutions.

These changes in use directions and other minor change are consistent with PR Notice 98-10.

This notification is consistent with the provisions made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under section 12 and 14 of FIFRA.

To facilitate state approvals, a stamped approved label is requested.

If you have any questions, please don't hesitate to contact me directly at 517-881-0106 or by email at [omesserschmidt@comcast.net](mailto:omesserschmidt@comcast.net) .

Sincerely



Olav Messerschmidt  
 Registration Agent for Terramera, Inc.

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**TER-RTU1 (EPA Reg. No. 88760-1)**  
**MASTER LABEL**  
**Sublabel A is for Commercial Use**  
**Sublabel B is for Residential/Homeowner Use**

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***TER-RTU1 Ready To Use Insecticide and Ovicide  
Controls, Manages and Prevents Bed bug Infestations,  
Kills Bed bug Adults, Nymphs and Their Eggs***

Active Ingredient:

Cold Pressed Neem Oil.....	5.5%
Other Ingredients.....	94.5%
Total	100.0%

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

**READ ALL DIRECTIONS BEFORE USING THIS PRODUCT**

If you do not understand the label, find someone to explain it to you in detail.  
(Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.)

EPA Reg. No. 88760-1  
EPA Est. No. XXXXX-A

NET CONTENTS: 3.4, 16, 32 or 64 oz.,  
1 or 5 Gallons

Batch No.

Manufactured by:  
Terramera, Inc.  
Buena Park Station  
Buena Park, CA 90622-6449

**Notification Accepted**

**Date:** JAN 22 2013

**Reviewer:** *M Adams*

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**TER-RTU1 (EPA Reg. No. 88760-1)**  
**Sublabel A: Commercial Use**

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[Alternate name: CIRKIL RTU]

***TER-RTU1 Ready To Use Insecticide and Ovicide  
Controls, Manages and Prevents Bed bug Infestations,  
Kills Bed bug Adults, Nymphs and Their Eggs***

Active Ingredient:	
Cold Pressed Neem Oil.....	5.5%
Other Ingredients.....	94.5%
Total	100.0%

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

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NET CONTENTS: 3.4, 16, 32 or, 64 oz,  
1 or 5 Gallons

Batch No.

Manufactured by:  
Terramera, Inc.  
Buena Park Station  
Buena Park, CA 90622-6449

Notification Accepted

Date:

Review:

<b>Route of Entry</b>	<b>First Aid</b>
<b>If in eyes</b>	<ul style="list-style-type: none"><li>• 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.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If swallowed</b>	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to by a poison control center or doctor.</li><li>• Do not give anything to an unconscious person.</li></ul>
Have the product container or label with you when calling a poison control center, doctor, or going for treatment. For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30 am to 4:30 pm Pacific Time (NPIC Web site: <a href="http://www.npic.orst.edu">www.npic.orst.edu</a> )	

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Caution: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

## PHYSICAL AND CHEMICAL HAZARDS

**Flammable.** Keep away from heat and open flame. Do not spray around open flame or heat sources or in electrical sockets. Any goods or equipment that use power must be unplugged before being treated. Check to ensure any electrical equipment is completely dry before reconnecting to a power source.

## DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read entire label. Use strictly in accordance with precautionary statements and directions, and with applicable state and Federal regulations.

### General Information

**TER-RTU1 Insecticide and Ovicide** is a Ready-to-Use liquid insecticide and ovicide for indoor use containing 5.5% pure cold-pressed neem oil.

**TER-RTU1 Insecticide and Ovicide** provides effective knockdown, residual and preventative control of bed bugs, including pyrethroid-resistant bed bugs, and their eggs. **TER-RTU1 Insecticide and Ovicide** kills bed bugs and eggs and helps manage the spread of pesticide resistance.

Use **TER-RTU1 Insecticide and Ovicide** to control bed bugs, cellar spiders<sup>†</sup>, smoky brown cockroaches<sup>†</sup>, house crickets<sup>†</sup>, firebrats<sup>†</sup>, silverfish<sup>†</sup>, moisture ants<sup>†</sup>, ravidia field ants<sup>†</sup>, pavement ants<sup>†</sup>, bean aphid<sup>†</sup>, pea aphid<sup>†</sup> and green bottle fly<sup>†</sup>.

<sup>†</sup> Not registered for use in California.

**For Bed bug Control:**

**TER-RTU1 Insecticide and Ovicide** is a ready to use product. Do not dilute. Shake well prior to use. Use for spot treatments, or for treatments to small and defined areas where a need for rapid dry time or concern about water damage prevents use of TER-CX1 Insecticide and Ovicide Concentrate (e.g. artwork, picture frames, keyboards, luggage, etc). Spray until moist. Allow to dry completely. For optimal performance, close doors and windows and turn off air circulation (e.g. heaters and air conditioners), and keep site of application undisturbed for at least 4 hours after treatment if possible. After 4 hours, return to normal ventilation and allow reentry into treated area. Do not spray around open flame or heat sources or in electrical sockets. Ensure any equipment requiring power is unplugged before being treated, and allowed to dry thoroughly before re-use.

For crack and crevice applications, use a straw tip or pin tip nozzle.

Use **TER-RTU1 Insecticide and Ovicide** on a variety of indoor surfaces, fabrics and materials, painted and unpainted wood, under beds, box springs, bed frames, headboards, mattresses, linens, under and behind night stands, closets, dressers, curtains, blinds, under and behind wall hangings, carpets, rugs, upholstery, wall and window treatments, suitcases, seams, points where carpets and wall meet, moldings, and anywhere bed bugs may harbor or their eggs may be found. Spraying all surfaces, especially tufts, folds, seams, edges, cracks and crevices, will help minimize further infestation.

**TER-RTU1 Insecticide and Ovicide** may cause damage or discolor certain surfaces and materials, including papers and soft plastics such as plexiglass, plastic varnishes, some flooring and finishes, frames, photographs, artwork, wallpaper and consumer electronics. Make small inconspicuous spot treatments to test all surfaces and fabrics for colorfastness, discoloration or damage before use.

Use **TER-RTU1 Insecticide and Ovicide** in indoor areas including residential homes, multi-dwelling units, apartments, dormitories, hospitals, nursing homes, prisons, temporary shelters, aircraft, buses, marine vessels, airports, offices, theaters, hotels, motels, restaurants, lounges, arenas, retail stores, conference centers and other indoor spaces.

**TER-RTU1 Insecticide and Ovicide** works as a direct or indirect treatment (when wet or dried as a residue on treated surfaces). [**TER-RTU1 Insecticide and Ovicide** works quickly to kill bed bug adults and nymphs [, typically within 24 hours when exposed to recently treated surfaces (depending on the surface treated)]. **TER-RTU1 Insecticide and Ovicide** kills bed bug eggs exposed to recently treated wet or dry surfaces. **TER-RTU1 Insecticide and Ovicide** will continue to kill eggs laid on treated surfaces for up to two to three weeks in ideal conditions.]

*For Direct Treatment:*

Apply **TER-RTU1 Insecticide and Ovicide** to kill bed bugs and other listed insects or eggs by spraying directly.

*For Indirect Residual Treatment:*

Apply **TER-RTU1 Insecticide and Ovicide** to surfaces and fabrics to kill or prevent bed bug and other labeled insects infestations.



**Application Rates and Treatment Schedule:**

- Spray until treated surfaces are moist. Use approximately one ounce of TER-RTU1 Insecticide and Ovicide per 1.5 to 6 sq. ft. of surface area depending on material treated.
- For optimal results, allow 4 hours for product to dry before re-entry.
- For all labeled insects and for bed bugs adults, nymphs and eggs, re-apply every 1 to 2 weeks or as needed.
- For ongoing control of bed bug eggs only, re-apply every 2 to 3 weeks or as needed.

**STORAGE AND DISPOSAL**

DO NOT contaminate water, food, or feed by pesticide storage or disposal. Open dumping is prohibited. Do not reuse container.

**PESTICIDE STORAGE:** Do not store this product above 104°F or below 20°F for extended periods of time. Keep containers tightly closed when not in use. Keep containers tightly closed and in original containers when not in use. Do not store exposed to ultraviolet light (sunlight) or moisture.

**PESTICIDAL DISPOSAL:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**CONTAINER HANDLING:** Non-refillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**Triple rinse containers small enough to shake (capacity ≤ 5 gallons) as follows:** Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

**NOTICE ON CONDITIONS OF SALE**  
**Conditions of Sale and Warranty**  
**IMPORTANT: READ BEFORE USE**

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

To the extent consistent with applicable law, TERRAMERA, INC., TERRAMERA LLC and any current or future parent companies, subsidiaries or affiliates (collectively referred to herein as "Terramera") and the Seller offer this product, and the Buyer and User accept it, subject to the following **Conditions of Sale and Warranty** which may be varied only by agreement in writing signed by a duly authorized representative of Terramera. By using or buying this product, the User or Buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

**CONDITIONS:** The **Directions For Use** of this product reflects the opinion of experts based on experimental use and tests. The directions are believed to be adequate and must be followed carefully. Attempts have been made to eliminate or draw attention to the risks associated with the use of this product; however, it is impossible to eliminate all risks inherently associated with the use, handling and transport of this product. Damage to products, materials, treated surfaces or fabrics, ineffectiveness or other unintended consequences may result because of factors such as environmental conditions, the presence of other materials, the manner of use or application, the use of the product in a manner inconsistent with its labeling, or other unknown reasons, all of which are beyond the control of Terramera. All such risks shall be assumed by the User or Buyer and User and Buyer agree to hold Terramera and Seller harmless for any claims relating to such factors. Terramera does not agree to be an insurer of these risks beyond what is expressly warranted by this label.

Terramera warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the **Directions For Use** when used in accordance with the directions under normal conditions of use, subject to the inherent risks referred to above.

**DISCLAIMER OF WARRANTIES:** To the extent consistent with applicable law, Terramera or the Seller make no other warranties, guarantees or representations of any kind, either express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. No agent of Terramera or the Seller is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein.

**LIMITATIONS OF LIABILITY:** To the extent consistent with applicable law, the exclusive remedy of the User or Buyer and the exclusive liability of Terramera for any and all losses, injuries or damages resulting from the use handling or transport of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid for the product, or at Terramera's or the Seller's election, the replacement of product. To the extent consistent with applicable law, Terramera and the Seller disclaim any liability for special, consequential, incidental, or indirect damages resulting from the use, transport, or handling of this product.

<i>{Optional marketing claims, may be used on any panel}</i>	
<b>GENERAL CLAIMS:</b>	
<ul style="list-style-type: none"> <li>- [Controls] [Manages] [and] [Prevents] bed bug infestations [for up to three weeks] [when used as directed]</li> <li>- [100%] Effective [for] [bed bug control] [up to three weeks] [when used as directed]</li> <li>- Long-lasting [protection from] [bed bug] [s] [control] [when used as directed]</li> <li>- [The only product that] kills [bed bugs], [nymphs], [and eggs] [prevents egg-hatch] [as a residual treatment] [when used as directed]</li> <li>- [Stop] [stops] [bed bug] infestations [fast] [quickly] [when used as directed]</li> <li>- Patent[ed][-pending] [formula]</li> <li>- [Kills] [Keeps on killing] [100%] [Protects] [From] bed bug[adults] [and] [nymphs] [for up to 2 weeks] [on treated surfaces] [and] [prevents egg hatch] [eggs] [on contact] [and] [or] [as a residual treatment] [for] [up to 3 weeks] [with Regular Use] [when used as directed]</li> <li>- [Limit][s] [prevent][s] [the] [growth] [spread] of bed bug[bed bug][s] [infestations] [populations] [when used as directed]</li> <li>- Effective against [pyrethroid] [chemical] resistant [field] strains [when used as directed]</li> <li>- All-in-one [protection from] [bed bug[s]] [and egg[s]] [kill] [and] [protection]</li> <li>- Be Bed bugFree</li> <li>- [Provide][s] [a] Circle of Protection [from bed bugs]</li> <li>- Works quickly [when used as directed]</li> <li>- [The] Bed bug[and egg] [Buster] [Killer]</li> <li>- [A] [Smarter] [Safer] [Faster] way to [Control] [Manage] [Protect] [Yourself] [Your Family] [From] Bed bugs</li> <li>- [Bed bugs] Dead and Gone</li> <li>- [Ready-to-Use] [RTU] formula</li> <li>- Made in the USA</li> </ul>	<ul style="list-style-type: none"> <li>- [Great] [for] [Use] [as] [part of] [an] Integrated Pest Management [IPM] [strategy]</li> <li>- [Just] spray [and] [leave to dry] [walk away]</li> <li>- Can be [readily] washed out [of] [fabrics]</li> <li>- [No] [Non-]staining</li> <li>- [Smells] [strong] [and] [but] it works</li> <li>- [Starts] work[s][ing] [immediately] [quickly] [when used as directed]</li> <li>- [works] [kills] within hours [and keeps] [killing] [working] [for weeks] [when used as directed]</li> <li>- The only registered bio-pesticide [labeled] for [indoor] use [as] [a] [an] [indoor] [surface], [fabric] [and] [crack and crevice] [treatment] [product] [for] [against] bed bugs</li> <li>- Use on [mattresses] [beds] [upholstery] [wood] [carpets] [rugs] [suitcases] [fabrics]</li> <li>- [Kills] [bed bugs] [and] [Works] [Protects] [continues] [killing] [protecting] [working] [and] [preventing egg hatch] for weeks [after treatment] [when used as directed]</li> <li>- Great for use [all around] [everywhere in] [the] [house] [home] [kitchen] [bathroom]</li> <li>- Use [at home] [or] [at the office] [at work] [in the workplace] [while travelling] [on the road]</li> <li>- [Convenient] [Travel] size</li> <li>- [Providing] [Provides] [Delivers] Around the clock protection from Bed bugs [and their eggs] [when used as directed]</li> <li>- [Use] The Power of Neem</li> <li>- [Derived] [Developed] [Formulated] From [cold-pressed] [natural] [tree] [seed] [Ingredients] [Oils] [the neem tree]</li> <li>- [All] [Ingredients] [are] Generally Recognized as Safe [GRAS] [by the FDA]</li> <li>- [Kills] [Eliminates] [Ends] Bed bugs where they [live] [hide] [when used as directed]</li> <li>- Protect [yourself] [your home] [your family] [from bed bugs] [with Terramera]</li> <li>- [a] [plant based] [botanical] insecticide</li> </ul>

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**TER-RTU1 (EPA Reg. No. 88760-1)**  
**Sublabel B: Residential/Homeowner Use**

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[Alternate name: CIRKIL]

***TER-RTU1 Ready To Use Insecticide and Ovicide  
Controls, Manages and Prevents Bed bug Infestations,  
Kills Bed bug Adults, Nymphs and Their Eggs***

Active Ingredient:	
Cold Pressed Neem Oil.....	5.5%
Other Ingredients.....	94.5%
Total	100.0%

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

**READ ALL DIRECTIONS BEFORE USING THIS PRODUCT**

If you do not understand the label, find someone to explain it to you in detail.  
(Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.)

EPA Reg. No. 88760-1  
EPA Est. No. XXXXX-A

NET CONTENTS: 3.4, 12, 16, 32, or 64 oz.

Batch No.

Manufactured by:  
Terramera, Inc.  
Buena Park Station  
Buena Park, CA 90622-6449

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Caution: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Route of Entry	First Aid
If in eyes	<ul style="list-style-type: none"><li>• 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.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
If swallowed	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to by a poison control center or doctor.</li><li>• Do not give anything to an unconscious person.</li></ul>
Have the product container or label with you when calling a poison control center, doctor, or going for treatment. For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30 am to 4:30 pm Pacific Time (NPIC Web site: <a href="http://www.npic.orst.edu">www.npic.orst.edu</a> )	

## PHYSICAL AND CHEMICAL HAZARDS

**Flammable.** Keep away from heat and open flame. Do not spray around open flame or heat sources or in electrical sockets. Any goods or equipment that use power must be unplugged before being treated. Check to ensure any electrical equipment is completely dry before reconnecting to a power source.

## DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read entire label. Use strictly in accordance with precautionary statements and directions, and with applicable state and Federal regulations.

**TER-RTU1 Insecticide and Ovicide** is a Ready-to-Use liquid spray for indoor use containing 5.5% pure cold-pressed neem oil. Use **TER-RTU1 Insecticide and Ovicide** around the home and other indoor spaces.

**TER-RTU1 Insecticide and Ovicide** works to kill bed bugs for up to 2 weeks and bed bug eggs for up to 3 weeks, and can be used to prevent bed bug infestations. Use **TER-RTU1 Insecticide and Ovicide** to control bed bugs, cellar spiders<sup>†</sup>, smoky brown cockroaches<sup>†</sup>, house crickets<sup>†</sup>, firebrats<sup>†</sup>, silverfish<sup>†</sup>, moisture ants<sup>†</sup>, ravidia field ants<sup>†</sup>, pavement ants<sup>†</sup>, bean aphid<sup>†</sup>, pea aphid<sup>†</sup> and green bottle fly<sup>†</sup>.

<sup>†</sup> Not registered for use in California.

**TER-RTU1 Insecticide and Ovicide** is a ready to use product. Do not dilute. Shake well prior to use. Spray surface until moist. Allow to dry completely. Ensure all treated goods or materials are allowed to dry completely before re-use. For optimal performance, close doors and windows and turn off air circulation (e.g. heaters and air conditioners) for at least 4 hours after treatment. Leave treated areas undisturbed for at least 4 hours after treatment. After 4 hours, return to normal ventilation and allow reentry into treated area. [For crack and crevice applications, use a straw tip or pin tip nozzle.]

Use **TER-RTU1 Insecticide and Ovicide** on a variety of indoor surfaces, fabrics and materials such as suitcases, travel bags, wood, under beds, box springs, mattresses, linens, under and behind night stands, curtains, blinds, under and behind wall hangings, carpets, rugs, upholstery, wall and window treatments, bed frames, headboards, closets, dressers, seams, points where carpets and wall meet, moldings, and anywhere bed bugs or spiders harbor or their eggs may be found. Spray all surfaces, especially tufts, folds, edges, cracks and crevices.

**TER-RTU1 Insecticide and Ovicide** may cause damage or discolor certain surfaces and materials, including papers and soft plastics such as plexiglass, plastic varnishes, some flooring and finishes, frames, photographs, artwork, wallpaper and consumer electronics. Make small inconspicuous spot treatments to test all surfaces and fabrics for colorfastness, discoloration or damage before use.

**TER-RTU1 Insecticide and Ovicide** works as a direct or indirect treatment (when wet or dried as a residue on treated surfaces). [**TER-RTU1 Insecticide and Ovicide** works quickly to kill bed bug adults and nymphs [, typically within 24 hours when exposed to recently treated surfaces (depending on the surface treated)]. **TER-RTU1 Insecticide and Ovicide** kills bed bug eggs exposed to recently treated wet or dry surfaces. **TER-RTU1 Insecticide and Ovicide** will continue to kill eggs laid on treated surfaces for up to two to three weeks in ideal conditions.]

*For Direct Treatment:*

Apply **TER-RTU1 Insecticide and Ovicide** to kill bed bugs or eggs and other listed insects by spraying directly.

*For Indirect Residual Treatment:*

Apply **TER-RTU1 Insecticide and Ovicide** to surfaces and fabrics to kill or prevent bed bug and other labeled insects infestations

**Application Rates and Treatment Schedule:**

- Spray surface until moist. Use approximately one ounce **TER-RTU1 Insecticide and Ovicide** per 1.5 to 6 sq. ft. of surface area depending on material treated.
- Allow 4 hours for product to dry completely.
- For all labeled insects and for bed bug adults, nymphs and eggs, re-apply every 1 to 2 weeks or as needed.
- For ongoing control of bed bug eggs only, re-apply every 2 to 3 weeks or as needed.

**STORAGE AND DISPOSAL**

Store in a cool dry place out of reach of children and pets and away from direct sunlight, windows, flames and other sources of heat or ignitions. Keep containers tightly closed and in original containers when not in use. Do not store exposed to ultraviolet light (sunlight) or moisture. Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

**NOTICE ON CONDITIONS OF SALE**  
**Conditions of Sale and Warranty**  
**IMPORTANT: READ BEFORE USE**

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

To the extent consistent with applicable law, TERRAMERA, INC., TERRAMERA LLC and any current or future parent companies, subsidiaries or affiliates (collectively referred to herein as "Terramera") and the Seller offer this product, and the Buyer and User accept it, subject to the following **Conditions of Sale and Warranty** which may be varied only by agreement in writing signed by a duly authorized representative of Terramera. By using or buying this product, the User or Buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

**CONDITIONS:** The **Directions For Use** of this product reflects the opinion of experts based on experimental use and tests. The directions are believed to be adequate and must be followed carefully. Attempts have been made to eliminate or draw attention to the risks associated with the use of this product; however, it is impossible to eliminate all risks inherently associated with the use, handling and transport of this product. Damage to products, materials, treated surfaces or fabrics, ineffectiveness or other unintended consequences may result because of factors such as environmental conditions, the presence of other materials, the manner of use or application, the use of the product in a manner inconsistent with its labeling, or other unknown reasons, all of which are beyond the control of Terramera. All such risks shall be assumed by the User or Buyer and User and Buyer agree to hold Terramera and Seller harmless for any claims relating to such factors. Terramera does not agree to be an insurer of these risks beyond what is expressly warranted by this label.

Terramera warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the **Directions For Use** when used in accordance with the directions under normal conditions of use, subject to the inherent risks referred to above.

**DISCLAIMER OF WARRANTIES:** To the extent consistent with applicable law, Terramera or the Seller make no other warranties, guarantees or representations of any kind, either express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. No agent of Terramera or the Seller is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein.

**LIMITATIONS OF LIABILITY:** To the extent consistent with applicable law, the exclusive remedy of the User or Buyer and the exclusive liability of Terramera for any and all losses, injuries or damages resulting from the use handling or transport of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid for the product, or at Terramera's or the Seller's election, the replacement of product. To the extent consistent with applicable law, Terramera and the Seller disclaim any liability for special, consequential, incidental, or indirect damages resulting from the use, transport, or handling of this product.

*{Optional marketing claims, may be used on any panel}*

**GENERAL CLAIMS:**

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| <ul style="list-style-type: none"> <li>- [Controls] [Manages] [and] [Prevents] bed bug infestations [for up to three weeks] [when used as directed]</li> <li>- [100%] Effective [for] [bed bug control] [up to three weeks] [when used as directed]</li> <li>- Long-lasting [protection from] [bed bug] [s] [control] [when used as directed]</li> <li>- [The only product that] kills [bed bugs], [nymphs], [and eggs] [prevents egg-hatch] [as a residual treatment] [when used as directed]</li> <li>- [Stop] [stops] [bed bug] infestations [fast] [quickly] [when used as directed]</li> <li>- Patent[ed][-pending] [formula]</li> <li>- [Kills] [Keeps on killing] [100%] [Protects] [From] bed bug[adults] [and] [nymphs] [on contact] [and] [or] [as a residual treatment] [for up to 2 weeks] [on treated surfaces] [and] [prevents egg hatch] [eggs] [on contact] [and] [or] [as a residual treatment] [for] [up to 3 weeks] [on treated surfaces] [with Regular Use] [when used as directed]</li> <li>- [Limit][s] [prevent][s] [the] [growth] [spread] of bed bug[bed bug][s] [infestations] [populations] [when used as directed]</li> <li>- Effective against [pyrethroid] [chemical] resistant [field] strains [when used as directed]</li> <li>- All-in-one [protection from] [bed bug[s]] [and egg[s]] [kill] [and] [protection]</li> <li>- Be Bed bugFree</li> <li>- [Provide][s] [a] Cirkil of Protection [from bed bugs]</li> <li>- Works quickly [when used as directed]</li> <li>- [The] Bed bug[and egg] [Buster] [Killer]</li> <li>- [A] [Smarter] [Safer] [Faster] way to [Control] [Manage] [Protect] [Yourself] [Your Family] [From] Bed bugs</li> <li>- [Bed bugs] Dead and Gone</li> <li>- [Ready-to-Use] [RTU] formula</li> <li>- Made in the USA</li> </ul> | <ul style="list-style-type: none"> <li>- [Great] [for] [Use] [as] [part of] [an] Integrated Pest Management [IPM] [strategy]</li> <li>- [Just] spray [and] [leave to dry] [walk away]</li> <li>- Can be [readily] washed out [of] [fabrics]</li> <li>- [No] [Non-]staining</li> <li>- [It] [Smells] [strong] [and] [but] it works</li> <li>- [Starts] work[s][ing] [immediately] [quickly] [when used as directed]</li> <li>- [works] [kills] within hours [and keeps] [killing] [working] [for weeks] [when used as directed]</li> <li>- The only registered bio-pesticide [labeled] for [indoor] use [as] [a] [an] [indoor] [surface], [fabric] [and] [crack and crevice] [treatment] [product] [for] [against] bed bugs</li> <li>- Use on [mattresses] [beds] [upholstery] [wood] [carpets] [rugs] [suitcases] [fabrics]</li> <li>- [Kills] [bed bugs] [and] [Works] [Protects] [continues] [killing] [protecting] [working] [and] [preventing egg hatch] for weeks [after treatment] [when used as directed]</li> <li>- Great for use [all around] [everywhere in] [the] [house] [home] [kitchen] [bathroom]</li> <li>- Use [at home] [or] [at the office] [at work] [in the workplace] [while travelling] [on the road]</li> <li>- [Convenient] [Travel] size</li> <li>- [Providing] [Provides] [Delivers] Around the clock protection from Bed bugs [and their eggs] [when used as directed]</li> <li>- [Use] The Power of Neem</li> <li>- [Derived] [Developed] [Formulated] From [cold-pressed] [natural] [tree] [seed] [Ingredients] [Oils] [the neem tree]</li> <li>- [All] Ingredients [are] [Generally Recognized as Safe] [GRAS] [by the FDA]</li> <li>- [Kills] [Eliminates] [Ends] Bed bugs where they [live] [hide] [when used as directed]</li> <li>- Protect [yourself] [your home] [your family] [from bed bugs] [with Terramera]</li> <li>- [a] [plant based] [botanical] insecticide</li> </ul> |
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