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Mr. Kevin L. Uhl
 Technical Service Chemist
 MCH Corporation
 2727 Chemssearch Boulevard
 Irving, TX 75062

Dear Mr. Uhl:

Subject: Confidential Statement of Formula Dated March 23, 1988
 and Labeling Submitted December 19, 1988
 EPA Registration No. 1769-297

The labeling referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the following comments.

1. In the ingredients section, combine the "other isomers" portion of phenothrin with the phenothrin percentage so that the percent phenothrin reported equals 0.16 percent. Delete the .01 percent listed on your label. That does not correspond to an ingredient.

2. Replace the Environmental Hazards statement on your label with:

Do not apply directly to water or wetlands
 (swamps, bogs, marshes, and potholes).
 Cleaning of equipment or disposal of wastes
 must be done in a manner that avoids
 contamination of bodies of water or wetlands.

The Confidential Statement of Formula (CSF) dated March 23, 1988 is not acceptable. The lower limit of an active must equal the label claim. This is not the case for tetramethrin. The lower limit reported for aliphatic petroleum distillate appears to be a typographical error, i.e., "05.05%." Submit a corrected CSF.

51226;I:WP5.0;Mendelsohn;C.Disk;KENC0;08/03/90;DD:VO:EK:DD

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

Note that the supplier for petroleum distillates listed on your GSP is not an EPA registered source. If you choose to maintain petroleum distillates as an active ingredient, you will be responsible for complying with the reregistration requirements for petroleum distillates. You can avoid this by amending your product's registration to make petroleum distillates an inert ingredient.

A stamped copy of the label is enclosed for your records. Please submit five (5) final printed labels.

Sincerely yours,



Phil Hutton
Product Manager (17)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enclosure

COLUMN 1

TETRA-CIDE

Fogger and Contact Spray

A Pyrethroid Formulation for Control of the Listed Insects

Pyrethroids are synthetic organic compounds of the same family as pyrethrin.

For Use Only in Non-food Areas of Industrial Buildings: schools, warehouses, office buildings, theaters, garages, hotels, motels, hospitals, kennels, truck trailers, apartments and railroad cars.

ACTIVE INGREDIENTS:

Tetramethrin [(1-Cyohexene-1,2-dicarboximido) methyl 2,2-dimethyl-3-(2-methylpropenyl) cyclopropanecarboxylate].....	0.48%
3-phenoxybenzyl (1RS, 3RS; 1RS, 3SR) -2,2-dimethyl- 3-(2-methylprop-1-enyl) cyclopropanecarboxylate.....	0.15%
3-(2-methylprop-1-enyl) cyclopropanecarboxylate.....	0.01%
*Other isomers.....	0.01%
Aromatic petroleum distillate.....	1.60%
Petroleum distillate.....	97.69%
INERT INGREDIENTS.....	0.07%
	100.00%

*d-(cis,trans)phenothrin

KEEP OUT OF REACH OF CHILDREN

CAUTION

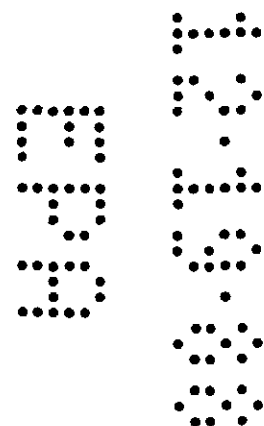
(See right panel for additional precautions.)

NET CONTENTS:

National Chemsearch
A Division of NCH Corporation
2727 Chemsearch Blvd.
Irving, Texas 75062

U.S. EPA Reg. No. 1769-297
EPA Reg. No. 1769-297
EPA Reg. No. 1769-297

1769-297



COLUMN 2

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION:

Harmful if swallowed or absorbed through skin. Avoid breathing vapors or spray mist. Avoid contact with skin and eyes. In case of contact, immediately flush eyes or skin with plenty of water. Obtain medical attention if irritation persists.

NOTE: When used in hospitals, patients should be removed prior to treatment. Ventilate for two hours after treatment. Do not return patients to room until after ventilation.

Do not use in commercial food processing, preparation, food storage or serving area. In apartments, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Exposed food should be covered or removed.

Remove pets, birds and cover fish aquariums before spraying.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Do not induce vomiting. Call a physician or Poison Control Center immediately.

IF INHALED: Remove to fresh air.

IF ON SKIN: Remove contaminated clothing and wash affected area of the skin with soap and water. Get medical attention if irritation persists. Wash contaminated clothing separately from other laundry.

IF IN EYES: Flush eyes with plenty of water. Get medical attention if irritation persists.

NOTE TO PHYSICIAN: Contains petroleum distillate. Vomiting may cause aspiration pneumonia.

ENVIRONMENTAL HAZARDS

Do not contaminate water when disposing of equipment wash water.

PHYSICAL HAZARDS

Do not store near heat or open flame.

STORAGE AND DISPOSAL

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

STORAGE: Store in a cool, dry area inaccessible to children and away from heat or open flame. Keep container closed.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

NOT INTENDED FOR HOUSEHOLD USE OR RESALE

COLUMN 3

DIRECTION FOR USE

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

In Misting Equipment: Use a spraying device such as a cold aerosol generator. We recommend an AERO-FOG or an atomizing sprayer.

To Kill Flies, Mosquitoes, Small Flying Moths and Gnats: Close room, warehouse or other area to be treated and shut off all ventilating systems. Dispense this product as a fine mist. Use dosage of one-half ounce per 1000 cubic feet of room space. Do not remain in treated areas. Leave room closed for half an hour. Ventilate the area after treatment is completed. Repeat application as necessary for insect control.

In Pressurized Tank Sprayers For Wetting Contact Sprays: To kill the listed insects, ICI-DA-CIDE should be used as follows at a rate of one gallon per 1000 square feet of surface area.

To Kill Cockroaches, Ants and Crickets: Contact as many insects as possible with the spray in addition to thorough spraying of all parts of the room suspected of harbouring these pests. Special attention should be paid to cracks, hidden surfaces under sinks, behind stoves and refrigerators and wherever these pests are suspected of hiding. To kill ants, treat doors, around window frames, ant trails and other areas of entry. Repeat as necessary.

To Kill Carpet Beetles: Directly spray as many insects as possible. Spray both interior and exterior of upholstered furniture. Both top and bottom of rugs and carpets should be sprayed thoroughly. Also treat shelves, closets, areas under furniture and wherever these insects are seen or suspected. Repeat as necessary.

To Kill Exposed Forms of Confused Flour Beetles, Saw-toothed Grain Beetles, and Rice Weevils: Find and destroy infested package foods. Remove all other items from pantry. Spray the shelves to kill any of the named insects present. Place clean paper on the shelves and return packages after shelves have dried. Apply as a coarse wet spray to all other areas infested with these insects. Pay particular attention to cracks and crevices in floors, walls and ceiling. Repeat as necessary.