



# Department of Pesticide Regulation



Mary-Ann Warmerdam  
Director

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DEC 20 2010

December 14, 2010

ID # 242744

Mr. David B Morris  
CDG Environmental, LLC  
205 Webster Street  
Bethlehem, Pennsylvania 18015

Dear Mr. Morris:

**REMOVAL OF CONDITIONS  
CDG Solution 3000, EPA REG. NO. 75757-2-AA;**

Your product was conditionally registered effective April 30, 2008.

Submitted data have been reviewed and found acceptable to support full registration of your product.

Since all conditions for California registration have been met, full registration is granted effective December 14, 2010.

Sincerely,

Don Antonowich  
Regulatory Scientist  
Pesticide Registration Branch  
(916) 445-3686  
E-mail: [dantonowich@cdpr.ca.gov](mailto:dantonowich@cdpr.ca.gov)

cc: Licensing Technician





**Summary:** (Continued)

The registrant submitted an additional 30-days cooling water tower efficacy study using the subject product to satisfy conditions for registration. The 1,500-gallon medium sized cooling tower was without any algae control for 6-days prior to use of subject product. An initial dose of 50ppm or 50mg/L (1:60 dilution of subject product) was added to the cooling tower basin followed by a continuous dose of 0.2ppm or 0.2mg/L instead of the label rate of 5ppm or 5mg/L. The reduced continuous dosing was used to minimize the amount of active ingredient in the cooling water system and was found to be adequate in preventing re-growth of algae for the entire 30-day study period. Due to cooling requirements, the cooling tower could not be drained and refilled as per the label directions for use. After discontinuing the study, algae regrowth was observed within 7-days.

**Discussion:**

The applicant previously submitted efficacy studies using a use-solution with 1.5ppm chlorine dioxide at 20°C with a contact time of 5-minutes against the following organisms:

- *Klebsiella terrigena* ATCC # 33257 resulted in a 6-log reduction of bacteria
- *Legionella pneumophila* ATCC # 33152 resulted in a 3-log reduction of bacteria.
- Poliovirus Type-1 (L Sc) ATCC # VR-59 resulted in a 4-log reduction of virus\*
- Rotavirus SA-11 ATCC # VR-2018 resulted in a 4-log reduction of the virus\*

\*Virus study protocol used a mixture Poliovirus and Rotavirus for testing

The submitted efficacy data indicates the subject product was effective in preventing regrowth of algae in cool water system for 30-days following an initial slug dose of 50ppm active ingredients followed by a continuous feed of 0.2ppm active ingredients. Since the systems water was not drained and refilled as indicate in the use-directions, this study represents a "worst-case" scenario. The submitted data supports the label claims and directions for use.

The submitted efficacy data satisfy the conditions for registration of the subject product.

**Conclusion:**

The submitted data and data on file are adequate to support label claims.



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Brian Portoni  
Staff Environmental Scientist