



Protecting, maintaining and improving the health of all Minnesotans

April 7, 2009

Mr. Mike Hodge
Rhomar Water Management, Inc.
2435 North Patterson Avenue
Springfield, Missouri 65803

Dear Mr. Hodge:

Subject: Approval of EnviroGard™ as a Heat Transfer Fluid for Use in Closed Loop Vertical Heat Exchangers in Minnesota

The Minnesota Department of Health (MDH) has reviewed your request to allow EnviroGard™ to be used in regulated vertical heat exchangers in Minnesota. Your April 2, 2009, e-mail to me indicates that EnviroGard™ is the new name for RhoGard™ Ultra DP, which was approved by the MDH on February 26, 2009. Your e-mail further explains that this is a name change only, and that the ingredients and formulation for EnviroGard™ are exactly the same as for RhoGard™ Ultra DP.

Information previously submitted for RhoGard™ Ultra DP, now known as EnviroGard™, indicates that EnviroGard™ is manufactured by Rhomar Water Management, Inc. and is a propylene glycol with corrosion and scale inhibitor additives. Ingredient details indicate that EnviroGard™ is made up primarily of United States Pharmacopeia (USP) grade propylene glycol, with small percentages of de-ionized water (water source is the Springfield, Missouri municipal water supply), Food Chemicals Codex (FCC) grade dipotassium phosphate, and USP/FCC-grade potassium hydroxide. A FCC-grade material is a food-grade material.

A letter from NSF International to Rhomar Water Management, Inc. dated March 30, 2009, documents that EnviroGard™ is a registered nonfood compound acceptable for use as a heat transfer fluid where there is a possibility of incidental food contact. EnviroGard™ is included in the current NSF White Book™ listing of nonfood compounds.

Minnesota Rules, part 4725.7050, subpart 1, item E specifies that only food-grade or USP-grade propylene glycol and potable water may be used as heat transfer fluid. The Minnesota Department of Health (MDH) has also accepted food-grade or USP-grade propylene glycol with additives when a complete list of additives is provided to the MDH, documentation is submitted verifying that each of the additives is food-grade or USP-grade, and the product is listed by NSF International as a nonfood compound suitable for use where there is a possibility of food contact.

The MDH has determined that EnviroGard™ satisfies the requirements of Minnesota Rules, Chapter 4725, Wells and Borings. Therefore, EnviroGard™ may be used as a heat transfer fluid in regulated vertical heat exchangers in Minnesota.

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Approval of EnviroGard™ is based on the label and formulation information provided in your request, and is contingent on continued listing in the NSF White Book™ listing of nonfood compounds. Any change to the product name, formulation, or NSF listing status will result in suspension or termination of the MDH approval until such time as a new written approval is issued by the MDH.

Approval of a product by the MDH does not constitute an endorsement of the product by the MDH, nor does it constitute an assessment of the product's effectiveness.

Please feel free to contact me at 651/201-4595 if you have any questions or if I can be of further assistance.

Sincerely,

A handwritten signature in cursive script that reads "Edward C. Schneider".

Edward C. Schneider, Hydrologist
Well Management Section
Minnesota Department of Health
P.O. Box 64975
St. Paul, Minnesota 55164-0975

ECS:bar