(281) 516-3950 FAX (281) 351-8925
Sales@ASIKECO.com or Service@ASIKECO.com
www.ASIKECO.com

Reference: Texas Commission on Environmental Quality TCEQ & Texas Natural Resource Commission TNRCC Summary VOC in Water Model 204 Analyzer

Thank you for your interest in our products and service related to our analyzers including our VOC in Water analyzers. In regard to the VOC in Water analyzers, we have received a letter from Mr. Bob Mann of the TCEQ/TNRCC dated May 31, 2002 which states on page 2 in the final paragraph:

> ***The testing of the KECO Model 204 instrument was performed at a 20 parts per billion PPB benzene concentration in water & this level satisfies the Best Available Control Technology (BACT) requirement of 84 PPB for cooling towers.***

The test data, calculations, & Federal Register # 40CFR, Part 63, Appendix A, Method 301-5.3 is the proof for the above statement. It is also important to note that the El Paso method was also tested with the same sample but because of the poor results no data was reported. The El Paso method has no precision or standard deviation data available.

Also available upon request is a letter from John P. Survis of the TCEQ/TNRCC dated May 10, 1996 which states:

> ***KECO's Membrane Probe & Permeation Transfer Monitor [Model 204] are suitable for this purpose & would fulfill the requirements of an air permit to monitor VOC's in aqueous solution for the purposes of leak detection or calculation of a mass emission rate from these sources.***

Other test data is available upon request related to our Hydrocarbon (VOC) in Water Analyzer including "Test Program, Propylene", KECO strip chart record Dated Oct. 26, 2000, ISA Technical Paper of ISA by Charles Kimbell, & data of general interest.

For more information on the Oil in Water analyzer follow the link below:
http://www.asiwebpage.com/204O_oil_in_water.htm

For more information on the VOC (Hydrocarbon) in Water analyzer follow the link:
http://www.asiwebpage.com/model_204new.htm

To **request a quote** for the analyzers/monitors please fill out the following form online:
http://www.asiwebpage.com/quote_liquids.html

Barry R. McBee, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Dan Pearson, *Executive Director*

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
Protecting Texas by Reducing and Preventing Pollution

May 10, 1996

Mr. Charles Kimbell
KECO R&D., Incorporated
Route 3, Box 141
Navasota, Texas 77868

Subject: Equivalency of Method Determination for Measurement of Volatile Organic Compounds (VOC) by Semipermeable Membrane Transfer

Dear Mr. Kimble:

This letter is in response to your request of March 11, 1996 asking for an equivalency determination for KECO R. & D., Incorporated's (KECO) Membrane Probe™ and Permeation Transfer Monitor™ with other test methods and analyzers used in Texas to measure VOC's in water. Typically the types of sources that are required to monitor VOC concentrations in water are wastewater treatment plants and cooling towers. The basis for this requirement in permits issued to regulate emissions into the air is leak detection in water that is in contact with heat exchangers in hydrocarbon service. Wastewater treatment plants are facilities which process liquid hydrocarbons which are regulated under state air permits issued to control emissions released to the atmosphere.

The data that was submitted shows that the KECO's Membrane Probe™ and Permeation Transfer Monitor™ [Model 204] are suitable for this purpose and would fulfill the requirements of an air permit to monitor VOC's in aqueous solution for the purposes of leak detection or calculation of a mass emission rate from these sources.

Should you have a question concerning this letter, please feel free to contact me at (512) 239-1724.
Thank you for your interest in air pollution control in Texas.

Sincerely,

John P. Survis
Project team, Engineering Services Section
Enforcement Division

JPS/db