



July 12, 2015

By E-Mail

Jason Dunn Jason.Dunn@usdoj.gov
Kellie Ortega Ortega.Kellie@epa.gov
Lorraine Dixon Dixon.Lorraine@epa.gov
John-L Jones jones.john-l@epa.gov

By Overnight Mail Service

Director, Air Enforcement Division
U.S. Environmental Protection Agency
MC 2242A
Room 1119
1200 Pennsylvania Ave. NW
Washington, D.C. 20004

John Blevins, Director
Compliance Assurance and Enforcement Division
U.S. Environmental Protection Agency, Region 6
1445 Ross Ave.
Dallas, TX 75202-2733

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
ENRD Mailroom, Room 2121
601 D Street, NW
Washington, D.C. 20004

Eddie Terrill, Director
Oklahoma Department of Environmental Quality
Air Quality Division
707 North Robinson
Oklahoma City, Oklahoma 73102

Laura J. Finley, Supervising Attorney
Office of General Counsel
Oklahoma Department of Environmental Quality
707 North Robinson
Oklahoma City, Oklahoma 73102

Re: United States v. Continental Carbon, Case 5:15-cv-00290-F –
Consent Decree Mitigation Project Plan – Ponca City Oklahoma

~~To the above Addressees:~~

RECEIVED
JUL 14 2015
AIR QUALITY



In accordance with Section V and Appendix A of the above referenced Consent Decree, Continental Carbon Company ("CCC") submits the attached Mitigation Project Plan ("Plan"). The Plan proposes a Project which would address a requirement in Appendix A to spend Project Dollars on energy efficiency projects by proposing to spend \$25,000 to purchase energy efficient LED lighting for the campus and vocational training shops of the Pioneer Technical Center located in Ponca City Oklahoma.

As outlined in the proposed Plan, CCC believes the proposed Project will provide valuable energy savings (and associated cost savings and reduced emissions); long-life lighting for the school, reduced maintenance costs, and provide a significant monthly savings for the school.

Continental Carbon submits this Plan for approval and authorization to proceed under the Decree. There is, however, a high degree of urgency in our request for your approval. We have learned from the Facilities Manager Mike Orr that the Center has the balance of the funds to complete the Project upon approval from the EPA and Plaintiff-Intervenor, ODEQ. If funded now, then the Technical Center will be able to complete the work by the beginning of the fall training programs.

By this letter, in accordance with paragraph 15 of the Decree, Continental Carbon certifies that it is not otherwise required by law to perform this Project, that CCC is unaware of any other person who is required by law to perform the Project, and that CCC will not use this Project, or any portion thereof, to satisfy any obligations that it may have under other applicable requirements of law.

Should you have any questions, please do not hesitate to contact our Counsel, Mr. Sam Boxerman at Sidley Austin.

Sincerely,

Todd Miller

Todd N. Miller
Director - EHS

Enclosure (Mitigation Project Plan)

Copy:

Sam Boxerman, Partner
Sidley Austin, LLP
1501 K Street, N.W.
Washington, DC 20005

Dennis Hetu, President CCC

Consent Decree - Mitigation Project Plan
Pioneer Technical Center, Ponca City Oklahoma
United States v. Continental Carbon Company
July 13, 2015

Continental Carbon Company (“CCC”) prepares this Mitigation Project Plan (“Plan”) in accordance with Section V and Appendix A of the Consent Decree in United States v. Continental Carbon Company, Case 5:15-cv-00290-F (“Decree”). The Plan addresses the requirement to spend at least \$25,000 in Project Dollars on energy efficiency projects for Ponca City, OK. Decree, Appx. A at ¶A.

Specifically, as allowed by the Decree, this Plan proposes to spend at least \$25,000 (“Project Dollars”) for the purchase and installation of environmentally beneficial energy efficiency technologies designed to have long-lasting benefits and to minimize the use of electricity and/or natural gas in the Pioneer Technical Center in Ponca City Oklahoma. Decree, Appx. A at ¶C.

The specifics of the proposed project are as follows:

Project/Plan. As allowed by the Decree, the Project would provide for the purchase of new, energy efficient LED light fixtures (238-watt) for the vocational school’s “shops” located at 2101 N. Ash Street, Ponca City OK, 74601. The new fixtures would replace 67, metal halide fixtures (400-watt) which are based on 1960’s era technology.

Summary-level budget for the Project. According to Jason Kubik and Mike Orr of the Technical Center, the budget for the Project is \$50,030.64. CCC will spend at least \$25,000 in Project Dollars to purchase the necessary GE Albeo LED Luminaire fixtures and associated materials. . Mr. Kubik has estimated that based on present energy use, the new fixtures will provide an average cost savings of \$5,053.65/month. The Technical Center will provide the labor necessary to install the fixtures using their employees.

Specifics of the Project are:

Existing fixtures

Metal Halides – Model # SWD400H-8AP-WH	Draw: 456watts	Fixtures: 198	Total Draw: 90,288watts
Fluorescents – Model# 2LF96T12	Draw: 138watts	Fixtures: 149	Total Draw: 20,562watts
Model # F44T12	Draw: 172watts	Fixtures: 5	Total Draw: 860watts
Model # F96T8	Draw: 144watts	Fixtures: 15	Total Draw: 2,160watts
Model # unknown	Draw: 150watts	Fixtures: 8	Total Draw: 1,200watts
Overall Draw of Removed: Fixtures: 115,070watts		2,014Kw/day	735,010Kw/Yr.

Lights to be removed:

C-111 MH400w – 25	2LF96T12- 27	
C-110 MH400w – 25	2LF96T12- 27	
C-109 MH400w – 20	2LF96T12- 12	
B-106 MH400w – 35	2LF96T12– 30	
B-114 MH400w – 14	2LF96T12– 9	
B-116 MH400w – 26	F96T8 – 15	F44T12 – 5

Consent Decree - Mitigation Project Plan
Pioneer Technical Center, Ponca City Oklahoma
United States v. Continental Carbon Company
July 12, 2015

B-123 MH400w – 29 2LF96T12– 25 Par 38 fixture 150watt incandescent – 8
B-124 MH400w – 24 2LF96T12– 19

Replacements

Replacement fixtures : GE Albeo LED Luminaire. Cost Per Fixture \$252.68 (Total- \$50,030.64)
Model # ABV1-0-1-V-57-1-N-V-22-K-N-W These are a 5000K fixture with 12310 Lumens and draw a rated 95 watts.

The MH400's (198) will be replaced one for one with the GE Albeo's.
All Fluorescents and Incandescent fixtures will be removed.

Total Albeo Draw:	18,810watts	329Kw/day	120,149Kw/Yr.
Deduced Draw:	96,260watts	1,685Kw/day	614,861Kw/Yr.
Deduction in Draw:	84%		
Money Saved:	Daily: \$168.46	Monthly: \$5,053.65	Yearly: \$61,486.10

Timeline for implementation of the Project. If approved by on or about July 24, 2015, the lighting would be purchased and installation completed during the summer of 2015 so that the lighting would be ready for the opening of school in the fall of this year.

Description of the anticipated environmental benefits. The LED fixtures will provide superior lighting reducing the energy currently required to light the extensively used shops by approximately 84% , with corresponding reductions in emissions and GHG equivalents from the local electric utility. Pioneer Technical Center has estimated the environmental benefits of the Project as follows:

Environmental Impact due to reduction of 614,861Kw per Year –

Carbon Dioxide Saved / Yr.:	431 Tons
Sulfur Dioxide Saved / Yr.:	1071 lbs.
Nitrogen Oxide Saved / Yr.:	1287 lbs.
Methane Saved / Yr.:	14.7lbs.
Nitrous Oxide Saved / Yr.:	6.64lbs.
Coal burning Avoided / Yr.	261.32 Tons
Equivalent Forest Added / Yr.:	152 Acres
Equivalent Cars Removed / Yr.:	106

FedEx®

SS

RECEIVED
JUL 14 2015
AIR QUALITY

Page 1 of 1

ORIGIN ID: NQIA (281) 647-3823
CCC LEGAL
CONTINENTAL CARBON COMPANY
16850 PARK ROW

HOUSTON, TX 77084
UNITED STATES US

SHIP DATE: 13 JUL 15
ACTWGT: 1.00 LB
CAD: 5487477/NET3670

BILL SENDER

TO EDDIE TERRILL, DIRECTOR
OKLAHOMA DEPT OF ENVI QUALITY
707 N ROBINSON AVE

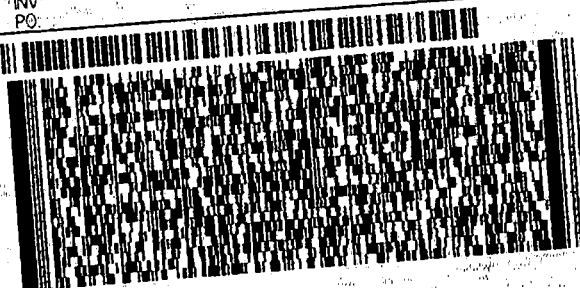
OKLAHOMA CITY OK 73102

(405) 702-4100

REF

INV
PO

DEPT



FedEx Express



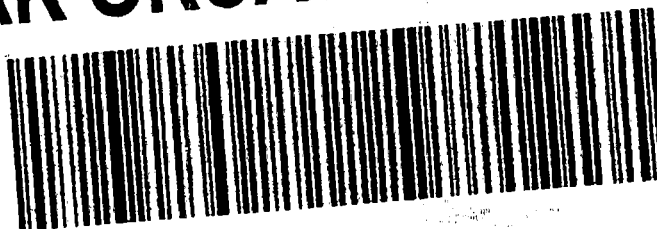
REL# 3785346

TUE - 14 JUL AA
STANDARD OVERNIGHT

TRK# 7740 3346 5343
0201

AK OKCA

73102
OK-US OKC



Print Your Label(s)

RT 268
ST 9

2 15:00

B 5343
07.14

dEx