

**OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

MEMORANDUM

April 2, 2021

TO: Files

THROUGH: Brad Flaming, Environmental Programs Manager
Surveillance Section

THROUGH: Peer Review

FROM: Keely Dolan, Environmental Programs Specialist
Enforcement Section

CC: Jim Bennett
EHS Site Manager
Continental Carbon Corporation
1006 East Oakland Avenue
Ponca City, OK 74601
(580) 763-8135

SUBJECT: Partial Compliance Evaluation at **Continental Carbon Company
Carbon Black Production Facility**
1006 East Oakland Avenue
Ponca City, Kay County, Oklahoma.
Complaint ID 168359
PCE ID 55845

Introduction

On March 16, 2021, from 1435 to 1735 hours, an unannounced partial compliance evaluation (“PCE”) was conducted of Continental Carbon Company (“CCC”) – Carbon Black Production Facility (“Facility”). The PCE was conducted in response to Complaint ID 168359 received by the Oklahoma Department of Environmental Quality (“DEQ”), regarding allegedly land, sidewalks, and buildings in a residential neighborhood in Ponca City appearing to continue to show black residue from carbon black. The complaint was first investigated by the DEQ’s Environmental Complaints and Local Services Division on March 9, 2021, who then referred the complaint to DEQ’s Air Quality Division on March 12, 2021, for further investigation. Keely Dolan, Environmental Programs Specialist, for DEQ’s AQD conducted the evaluation. Proper credentials were presented at the time of arrival. The Facility was represented by Darin Davidson, Production Supervisor.

Facility Description

The Facility is a carbon black manufacturing plant and is designated with Standard Industrial Classification Code 2895. Carbon black is produced by burning residual oil pipelined from Phillips 66 Ponca City petroleum refinery. The oil is burned in kilns and the soot (carbon black product) is separated from the waste stream using baghouses. The waste gases then exit the process through one of three thermal oxidizers (“TOxs”) on-site. Refer to the memorandum of the Facility’s current Air Quality Permit Nos. 2017-0914-TVR2 and 2004-302-C (M-4) (DEQ’s Electronic Document Storage System (“Edoctus”) IDs 2049297 and 2082418, respectively) for a detailed description of the process used to produce carbon black at the Facility.

State/Federal Regulatory Applicability

OAC 252:100-25 (Visible Emissions and Particulate Matter)

No discharge of greater than 20% opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity.

The TOx stacks were observed prior to the on-site evaluation, during the on-site evaluation, and twice after the on-site evaluation and no opacity emissions were observed at any of those times.

OAC 252:100-29 (Fugitive Dust)

No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. The permit will require the facility to take reasonable precautions to prevent causing a problem in this area.

No fugitive dust was seen beyond the property line during the time of the evaluation.

Evaluation

At approximately 1435 hours on March 16, 2021, a DEQ representative arrived to the west of CCC’s Facility on the shoulder of US-177 North. The three stacks of CCC’s Facility were observed for 10 minutes and no visible emissions were observed coming from any of the stacks and no fugitive dust emissions were observed crossing the southern point of property line of Facility. The DEQ representative drove around the north perimeter and observed the east and west perimeter of the Facility as well and no fugitive emissions were observed crossing the property line at this time.

At approximately 1455 hours on March 16, 2021, the DEQ representative arrived on-site at the Facility to discuss the complaint with a Facility representative. Mr. Davidson represented the Facility. Mr. Davidson was explained the complaint. He stated no excess emissions have occurred from the Facility in the last several weeks. He stated that TOxs Unit 1 & 2 and Unit 3 were currently operating and that TOx Unit 4 was currently down. He also stated that performance testing was being conducted on TOx Unit 3 that day and tomorrow as well. The TOx stacks were observed while on-site and no opacity emissions were coming from them. Mr. Davidson pointed out which stack was for each thermal oxidizer as well. No fugitive dust emissions were observed crossing the Facility while on-site. The on-site evaluation of the Facility concluded at 1515 hours, with no noncompliance issues being noted at this time.

The DEQ representative drove to the residential neighborhood that the carbon black was reported to be on land, sidewalks, and buildings. The DEQ representative walked the block on the street reported for about an hour, but no black residue was noted on land, sidewalks, and buildings at this time.

The DEQ representative observed the Facility's TOx stacks and the south side and west side of property line again at 1700 hours and at 1735 hours to the west of CCC's Facility on the shoulder of US-177 North, and no opacity emissions or fugitive dust emissions were observed, respectively.

Exit Interview/Summary

Based on the information observed and obtained during this evaluation, no noncompliance issues were identified at this time.