

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

**MEMORANDUM**

March 10, 2023

**TO:** Files

**THROUGH:** Brad Flaming, Environmental Programs Manager  
Surveillance Section

**THROUGH:** Peer Review

**FROM:** TJ Wall, Environmental Programs Specialist  
Compliance Section

**CC:** Pamela Alexander  
EHS Superintendent  
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 62818

***Introduction***

On March 1, 2023, from 1100 to 1300 hours, an unannounced partial compliance evaluation (“PCE”) was conducted of Continental Carbon Company (“CCC”) – Carbon Black Production Facility (“Facility”). A second unannounced visit was conducted on March 9, 2023, from 1100 to 1200 hours. The PCE was conducted in response to Complaint ID 179103 received by the Oklahoma Department of Environmental Quality (“DEQ”), regarding allegedly having many rotting pipes and waste gas leaks all over the facility. The complaint was first investigated by the DEQ’s Environmental Complaints and Local Services Division on February 10, 2023, who then referred the complaint to DEQ’s Air Quality Division on February 17, 2023, for further investigation. TJ Wall, Greg Clark, Environmental Programs Specialists, and Brad Flaming, Environmental Programs Manager, for DEQ’s AQD conducted the evaluation. Proper credentials were presented at the time of arrival. The Facility was represented by Asish Adhikary, Plant Manager, and Pamela Alexander, EHS Superintendent.

***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 brought in by railcar. The oil is burned in kilns and the soot (carbon black product) is separated from the waste stream using baghouses. The waste gases previously exited the process through one of three thermal oxidizers (“TOxs”) on-site. This waste gas removal process has been replaced with two cogeneration units, each consisting of one boiler, one selective catalytic reduction system (SCR) and one scrubber. 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.

### ***Evaluation***

At approximately 1100 hours on March 1, 2023, the DEQ representatives arrived on-site at the Facility. Mr. Adhikary and Ms. Alexander represented the Facility. It was explained to Mr. Adhikary that DEQ was there to walkthrough the Facility. The Facility was running normal operations apart from having network issues. The cloud servers were unavailable, and the plant was operating on paper recordings. Due to the network being down, DEQ was unable to complete the safety brief to allow a walkthrough inside the Facility. Ms. Alexander drove DEQ staff around the exterior of the Facility, pointing out the process areas and various piping along the Facility. Mr. Adhikary gave a detailed explanation of the production in his office once DEQ returned with Ms. Alexander. The on-site evaluation of the Facility concluded at 1315 hours, with no noncompliance issues being observed at this time.

The DEQ representatives made a second unannounced site visit at approximately 1100 hours on March 9, 2023, with a FLIR camera. The Facility was still having network issues. It was explained to Mr. Adhikary that DEQ was there due to a complaint. Mr. Adhikary explained the entire plant would have to shut down if there were any leaks on the tail gas end of the production. He explained they were able to monitor pressures to verify any leaks and has staff performing three inspections daily. Ms. Alexander drove DEQ representatives around to various points of the Facility to utilize the FLIR camera. Mr. Adhikary followed and pointed out different piping consisting of the tail gas. Nothing significant was found using the FLIR camera. The on-site evaluation of the Facility concluded at 1230 hours, with no noncompliance issues being observed at this time.

### ***Exit Interview/Summary***

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