

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

MEMORANDUM

June 5, 2023

TO: Files

THROUGH: Rick Groshong, Environmental Programs Manager III
Compliance and Enforcement Group

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 180262
PCE ID 63059

Introduction

On June 5, 2023, a PCE was conducted in response to Complaint ID 180262 received by the Oklahoma Department of Environmental Quality (“DEQ”) against Continental Carbon Company (“CCC”) – Carbon Black Production Facility (“Facility”). The complaint alleged that grey soot was being discharged from one of their stacks throughout the day of April 16, 2023. The complaint was first investigated by the DEQ’s Environmental Complaints and Local Services Division on April 17, 2023, who then referred the complaint to DEQ’s Air Quality Division on April 21, 2023, for further investigation. TJ Wall, Environmental Programs Specialist, for DEQ’s AQD conducted the evaluation. The Facility was represented by 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 gas emissions are controlled 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

On the morning of April 19, 2023, Mr. Wall had a phone conversation with Ms. Pamela Alexander regarding the complaint received on April 17, 2023. Ms. Alexander stated Unit 1 was taken down but was unaware of any excess emissions expelled due to the shutdown. She stated she would verify the event by using the closed-circuit cameras. On April 25, 2023, a phone conversation between Mr. Wall and Ms. Alexander confirmed there was a small discharge event, and she would be submitting a 30-day Excess Emissions report. The report was due on May 16, 2023. It appears that the excess emission event was caused by a shutdown, therefore; immediate notice was not required.

On May 24, 2023, Ms. Alexander submitted a 30-day Emissions report via email. The report stated an isolated emission of lime was released into the atmosphere due to the system tripping, which caused a system shutdown. The trip caused residual in the elbow to release lime out of the stack. The emission was considered brief and did not last long enough to monitor or record. No exceedance was calculated.

Exit Interview/Summary

Based on the information obtained during this evaluation, one noncompliance issue was identified at this time.

- The 30-day Excess Emissions Report exceeded the deadline required by OAC 252:100-9-7. The report was submitted 8 days late.