

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION**

**MEMORANDUM**

April 10, 2024

**TO:** Files

**TO:** Legal

**THROUGH:** Rick Groshong, Senior Environmental Manager  
Compliance and Enforcement Group

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

**THROUGH:** Peer Review

**FROM:** Oba Hughes, Environmental Programs Specialist  
Surveillance Section

**CC:** Pamela Alexander  
EHS Superintendent  
Continental Carbon Company  
1006 East Oakland Ave.  
Ponca City, OK 74501  
580-763-8128  
Contacted by email

**SUBJECT:** Partial Compliance Evaluation at **Continental Carbon Corporation  
Carbon Black Production Facility**  
1006 East Oakland Ave.  
Ponca City, OK 74501  
Directions: Located 1 mile south of the Intersection of SH60 and SH177  
Complaint Number 184633  
PCE ID Number: 63206

***Introduction***

On April 3, 2024, from 1100 to 1300 hours, an unannounced partial compliance evaluation (“PCE”) was conducted at the Continental Carbon Corporation (“CCC”), Carbon Black Production Facility (“Facility”). The inspection was conducted in response to complaint No. 184633 received by the Oklahoma Department of Environmental Quality (“DEQ”), Environmental Complaints and Local Services (“ECLS”), regarding carbon black fugitive dust and opacity coming from the Facility. The complainant (“CP”) provided videos and pictures of what appeared to be carbon black coming from the Facility. The CP stated that carbon black and lime are deposited on the

home. ECLS referred the complaint to the Air Quality Division (“AQD”) on March 1, 2024, for further investigation.

### ***On-Site Evaluation***

On April 3, 2024, at approximately 1100 hours, an on-site inspection was conducted by Oba Hughes, Environmental Specialist, and Brad Flaming, Environmental Programs Manager. Upon arrival, DEQ observed opacity emitting from Co-Gen Unit 1. At 1111 hours, while conducting a 12-minute opacity reading, inspectors recorded emissions of 60% opacity for the entire 12-minute reading. CCC submitted an immediate notice for this event by 4:30 p.m. on April 4, 2024. The 30-day report for the excess emission (“EE”) event was submitted on April 5, 2024. In the 30-day report, CCC stated that the EE event was due to a malfunction caused by leaking bag filters. The 30-day report disclosed that the Co-Gen Unit 1 had emissions of 132.96 lb/hr, an exceedance of the 5.63 lb/hr particulate matter (“PM”) emission limit and 65% opacity, an exceedance of the 20% opacity limit. Emissions continued for approximately 29 hours before the unit was brought back into compliance. This is a violation of OAC 252:100-9-8(a) that will be addressed in the Exit Interview/Summary.

On April 3, 2024, AQD inspectors met with the CP at 12:00 p.m. and observed what appeared to be carbon black and lime buildup on multiple areas of the CPs property. The CP stated that the opacity issues and carbon black issues have been going on for some time.

On April 3, 2024, AQD inspectors met with CCC at 12:24 p.m. and informed Pam Alexander, EHS Superintendent, and Sidney Marlborough, Senior EHS Manager, about the ongoing complaint. The inspectors reviewed videos obtained by the CP to try to determine the cause of the fugitive dust complaint. CCC stated that on February 28<sup>th</sup>, a pipe on the accumulator tank, within the carbon black processing unit (Unit 4), had developed a pinhole leak. The leak caused the carbon black fugitive dust emissions which were repaired the same evening. In addition, CCC stated that on February 28<sup>th</sup> an issue occurred with faulty bags on the Exhaust Bagfilter (“EBF”) (Unit 2). The EBF (Unit 2) was taken out of service to prevent further carbon black emissions and repaired the following day. CCC failed to control fugitive dust originating from the Facility. This is a violation of OAC 252:100-29 that will be addressed in the Exit Interview/Summary.

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

Based upon the inspection performed on April 3, 2024, the inspectors discovered the following violations at the Facility:

1. On February 28, 2024, CCC failed to control fugitive dust originating from the Facility. The inspectors observed carbon black and lime buildup on the CPs property. This is a violation of OAC 252:100-29.
2. On April 3, 2024, the Facility had EEs of PM and opacity that were reported to DEQ on April 4, 2024. All EEs are considered violations under OAC 252:100-9-8(a). OAC 252:100-9-8(b) and (c) allow for mitigating factors for penalties on EEs that occurred during startup, shutdown, or malfunction. The cause of the malfunction was reported to have been corrected.