

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION**

**MEMORANDUM**

**April 16, 2025**

**TO:** Files

**THROUGH:** Legal

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

**THROUGH:** Preston Loving, Environmental Programs Manager  
Compliance Section

**THROUGH:** Peer Review

**FROM:** Alexis Fessler, Environmental Programs Specialist  
Compliance Section

**cc:** Pamela Alexander  
EHS Superintendent  
Continental Carbon Company  
1006 E Oakland Ave  
Ponca City, OK 74601  
(580) 763-8128

**SUBJECT:** Partial Compliance Evaluation (“PCE”) at Continental Carbon Company – Carbon Black Production Facility  
1006 E Oakland Ave  
Ponca City, OK 74601  
Directions: Located 1 mile south of the Intersection of SH60 and SH177  
Complaint Number: 189593  
PCE ID Number: 63322

***Introduction***

On March 18, 2025, from 1045 to 1130 hours, an unannounced partial compliance evaluation (“PCE”) was conducted at the Continental Carbon Company (“CCC”), Carbon Black Production Facility (“Facility”). The inspection was conducted in response to complaint No. 189593 received by the Oklahoma Department of Environmental Quality (“DEQ”), Environmental Complaints and Local Services (“ECLS”), regarding carbon black fugitive dust 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 the Facility is generating fugitive dust and allowing the dust

to blow onto surrounding properties. ECLS referred the complaint to the Air Quality Division (“AQD”) on March 3, 2025, for further investigation.

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

On March 18, 2025, at approximately 1045 hours, an on-site inspection was conducted by Alexis Fessler, Ellie Howell, and Oba Hughes, Environmental Program Specialists, and Brad Flaming, Environmental Programs Manager. Upon arrival, DEQ observed no visible opacity emitting from the Facility.

CCC submitted an Excess Emission (“EE”) Immediate Notice report on March 11, 2025, for a transition event that occurred at the Facility on March 11, 2025, at 1300 hours regarding Opacity/Visible Emissions of Carbon Black from the CB Unit 1 Vent Stack (EPN 3) which was caused by a main bag filter (“MBF”) malfunction while pulling oil from the unit. A 30-day excess emissions report was received on April 4, 2025, for the event on March 11, 2025. In the 30-day report, CCC stated that the EE event was caused by shutdown of EPN 3. The emissions were a result of a malfunction in MBF 1, causing pressure to increase. Oil was pulled to bring the unit down for repair which caused additional emissions from the vent stack. The unit was taken down on March 11, 2025, and repaired as quickly as possible through the cessation of operation and two-day repair to the additional MBF units. Unit 1 was brought back online on March 14, 2025. Additionally, on the same day, CCC made significant repairs to MBF 2, 3, 4, and 6. These repairs consisted of repairing leaks, cell plates, and floors to the MBF. MBF 5 was still isolated at the time of this inspection in order to continue repairs. After the repairs of MBF 2, 3, 4, and 6, all units were kicked, washed, and rebagged, according to Ms. Alexander. The pressure malfunctions that caused the units to be taken down were corrected once the units were repaired. CCC is currently executing a plan to install all new cell plates and floors for the MBF units.

CCC submitted an Immediate Notice report on March 17, 2025, for an event that occurred at the Facility on March 16, 2025, at 0910 hours regarding a pollutant exceedance of SO<sub>2</sub>. A 30-day excess emissions report was received on March 26, 2025, for the event on March 16, 2025. In the 30-day report, CCC stated that the EE event was caused by a malfunction of Co-Gen Unit 1. A notable drop in flue gas temperature at the CDS inlet. This reduction in temperature directly impacted the humidification system. Without sufficient humidification, SO<sub>2</sub> absorption was compromised, which reduced the effectiveness of lime (CaO) injections. The 30-day report disclosed that Co-Gen Unit 1 had a 7-day rolling average emissions total of 169.94 ppmvd estimated from Continuous Emissions Monitoring, this is an exceedance of 11.94 ppmvd above the permitted 7-day rolling average of 158 ppmvd. In the 30-day report, the event duration is stated to be 1,620 minutes, starting on March 16, 2025, at 0900 hours and concluding on March 20, 2025, at 1500 hours.

On March 18, 2025, AQD inspectors met with CCC at 1045 hours and informed Pam Alexander, EHS Superintendent, and Donnie Curfman, Plant 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 the oil was pulled from CB Unit 1 Vent Stack and taken down on February 14<sup>th</sup>, February 21<sup>st</sup>, March 6<sup>th</sup>, and March 11<sup>th</sup> to repair a malfunctioning bag filter and then brought back up after repairs were made. According to CCC, excess emissions were observed on March 6<sup>th</sup> and March 11<sup>th</sup>, where Method 9 readings were conducted by Ms. Alexander. In

addition, CCC stated that on March 10<sup>th</sup>, a hole in the accumulator tank, within the carbon black processing unit (Unit 3), had caused a leak. The leak caused the carbon black fugitive dust emissions which were repaired the same evening. 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*. CCC also failed to submit excess emissions immediate notice reports and 30-day reports for the events described on February 14<sup>th</sup>, February 21<sup>st</sup>, March 6<sup>th</sup>, March 10<sup>th</sup>, and March 11<sup>th</sup>. This is a violation of OAC 252:100-9-7 and OAC 252:100-9-7(b) and will be discussed in the *Exit Interview/Summary*.

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

Based upon the inspection performed on March 18, 2025, the inspectors discovered the following violation at the Facility:

1. CCC failed to submit immediate notices and 30-day reports on multiple occasions as required by OAC 252:100-9. At the time of the inspection, CCC had notified DEQ about excess emissions events that took place on February 14, February 21, March 6, March 10, and March 11, 2025. Excess emissions immediate notice reports were not submitted for the events on February 14, February 21, March 6, and March 10, 2025 and are required by OAC 252:100-9-7; which states, except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. Additionally, Excess emissions 30-day reports were not submitted for the events on February 14, February 21, March 6, and March 10, 2025 as required by, OAC 252:100-9-7(b); which states that no later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event.