

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

MEMORANDUM

June 17, 2026

TO: Files

THROUGH: Brad Flaming, Environmental Programs Manager
Surveillance Section, Air Quality Division

THROUGH: Peer Review

FROM: Ellie Howell, Environmental Programs Specialist
Compliance Section, Air Quality Division

cc: Pamela Alexander
EHS Superintendent
1006 E. Oakland Ave
Ponca City, OK 74601
(580) 763-8128
Contacted by email

SUBJECT: Partial Compliance Evaluation (“PCE”) at **Continental Carbon Co (“CCC”),
Carbon Black Production Facility (“Facility”)**
Ponca City, Kay County, Oklahoma
1006 E. Oakland Ave
Ponca City, OK 74601
Complaint Numbers: 195018, 195085, 195124, 195172, 195174, and 195180
PCE ID Number: 63547

Introduction

On February 25, 2026, from approximately 1045 to 1300 hours, an unannounced air-quality PCE was conducted at CCC’s Carbon Black Production Facility. The inspection was conducted in response to Complaint Nos. 195018, 195085, 195124, 195172, 195174, and 195180, received by the Oklahoma Department of Environmental Quality (“DEQ”) on February 10, 2026 (195018), February 12, 2026 (195085), February 17, 2026 (195124), and February 19, 2026 (195172, 195174, and 195180), regarding visible emissions and fugitive dust emissions from the Facility. The Environmental Complaints and Local Services Division (“ECLS”) initially investigated the complaints on, on February 10, 2026, February 12, 2026, February 17, 2026, and February 19, 2026, respectively and then referred the complaints to the Air Quality Division (“AQD”). The air quality inspection was conducted by Environmental Programs Specialists, Ellie Howell, Oba Hughes, and Ethan Bell, and Environmental Programs Manager Brad Flaming with the AQD. Pamela Alexander, EHS Superintendent, and Donnie Curfman, Plant Manager, represented CCC.

History/Process Description

The Facility produces carbon black. Furnace carbon black is a large volume commodity chemical used primarily in the tire and rubber industry. Carbon black is produced from a high molecular weight, low vapor pressure, highly aromatic liquid hydrocarbon feedstock and other high carbon, low sulfur hydrocarbon products of commerce. This material is a by-product of the catalytic cracking of gas oil in a crude oil petroleum refinery and other suitable sources of feedstock. Feedstock for the production of carbon black is commonly referred to as carbon black oil (CBO). This material is purchased from refineries and other sources and delivered to Ponca City by tank truck or rail. For a full process description, see the active construction permit, Permit No. 2017-0914-C (M-3), located in DEQ's Online Document Retention System, OnBase (**OnBase Identification Number ("OID"): 6110032**).

On-Site Evaluation

On February 25, 2026, DEQ performed a PCE at the Facility beginning at approximately 1045 hours. At the time of inspection, the Facility was not operating under normal conditions; most of the plant was not in operation due to equipment adjustments and maintenance. Moderate winds were observed, and the sky was partly cloudy during the duration of the PCE. The primary purpose of the PCE was to observe the Facility's control of fugitive emissions related to the complaints.

Upon arrival, the inspectors met with Ms. Alexander and Mr. Curfman and explained the reason for the inspection. No visible or fugitive dust emissions were observed leaving the plant property at the time of the inspection. The inspectors reviewed the specific conditions of Permit No. 2017-0914-C (M-3) related to control of PM emissions throughout the process. Upon request, CCC provided transition event records, manufacturer's specification sheets for all particulate filters used in the process, baghouse maintenance records, the most recent performance tests for their main stacks (CGEUs), and records associated with their PM Monitoring system.

Exit Interview/Summary

CCC was investigated by both AQD and ECLS regarding Complaint Nos. 195018, 195085, 195124, 195172, 195174, and 195180. Issues of non-compliance related to the complaints investigated in this PCE will be addressed in a recent full compliance evaluation conducted at the Facility.