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August 4, 2020

Kendal Stegman, Director
Air Quality Division
Oklahoma Department of Environmental Quality
P.O. Box 1677
Oklahoma City, OK 73101-1677

RE: Regional Haze Program – 4-Factor Analysis
Continental Carbon Company
Carbon Black Production Facility

Dear Mr. Stegman:

The purpose of this letter is to comply with the request received by Oklahoma Department of Environmental Quality (ODEQ) dated July 1, 2020 requesting a "4-factor" analysis from Continental Carbon to assist ODEQ in its development of a regional haze strategy in its upcoming state implementation program update. Some information in the request is considered confidential business information and has been submitted in a separate letter.

Below is a summary of the data requested by ODEQ and Continental Carbon's responses:

- I. Emission reductions achievable by implementation of the measure (Note: the numbers below are based on permitted emission rates in the facility's current PSD and Title V air permits.
 - a. Baseline emission rate (lb/hr, lb/MMBTU, etc)
Emissions from the thermal oxidizers are currently permitted for 5,257 pounds per hour (lb/hr) of sulfur dioxide (SO₂).
 - b. Controlled emission rate (same form as baseline rate)
Two waste gas boilers were installed at Ponca City in the Fall of 2018. The units are still in the commissioning phase. A dry scrubber system will be installed on each boiler unit and is expected to be operational in early 2021. The scrubbing system will reduce SO₂ emissions to approximately 272 lbs/hr.
 - c. Control effectiveness (percent reduction expected)
Approximately 95% reduction of SO₂ is expected.
 - d. Annual emission reductions expected (ton/year)
A reduction in approximately 15,800 tons of SO₂ is expected.
- II. Time necessary to implement the measure
The SO₂ scrubber systems are expected to be online and operational in the first quarter of 2021.
- III. Remaining useful life
 - a. Remaining useful life of the control measure, or

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- b. The corresponding life of the unit may be used if an enforceable shutdown date of the emission unit is no later than 2028.

The waste gas boilers and associated equipment, including the SO₂ scrubber have a life expectancy of 20-25 years.

IV. Energy and non-air quality environmental impacts of the measure.

- a. Detail any cost of energy, waste disposal, regulatory requirement, etc. incurred with implementation of the control measure. **[Submitted under separate cover, as contains Confidential Business Information]**

V. Cost of implementing the measure

- a. Capital costs
- b. Annual operating and maintenance costs
- c. Annualized costs

[Submitted under separate cover, as contains Confidential Business Information]

If you have any questions concerning this submittal, please contact me at (281) 647-3807 or at email address: jaraiza@continentalcarbon.com

Sincerely,



Joe Araiza, P.E.
Sr. Manager, EHS



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Houston, TX 77084

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Factor Analysis

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