



February 25, 2022
Ms. Kendal Stegmann
Air Quality Division
Oklahoma Department of Environmental Quality
P.O. Box 1677
Oklahoma City, OK 73101-1677

SUBJECT: Response to 4-Factor Analysis on Control Scenarios Request
Clean Air Act Regional Haze Program
Continental Carbon
Ponca City Facility

Dear Ms. Stegmann:

Continental Carbon is submitting this response to the four-factor analysis additional clarification request from the Oklahoma Department of Environmental Quality (ODEQ) received on January 31, 2022 for the Ponca City (Facility). This response is being provided per the deadline of February 28, 2022 as specified in the request.

ODEQ Information Request

- 1. The summary of the company's response that was made publicly available (given that the full response contains confidential business information (CBI)) does not specify for which units the information/data is provided. Please provide a short summary/discussion of EUG 5- Production Units 1 through 4 (the thermal oxidizers), which are the units for which DEQ requested information for the four-factor analysis.*

EUG -5 are the carbon black production units that were previously controlled by thermal oxidizers. As part of the EPA consent order, the control devices for these units are being changed to a dry scrubber system.

- 2. Please clarify whether the baseline emissions information provided is for each thermal oxidizer for which the request applies or for all the thermal oxidizers combined.*

The baseline emissions provided were for the combined emissions from the four production units.

- 3. Please clarify whether the SO₂ scrubbing systems planned for installation are for only two of the Production Units for which DEQ requested information and whether there are any technically feasible SO₂ controls for the units on which SO₂ scrubbing systems are not planned to be installed.*

The SO₂ scrubbing system required by Consent Decree 5:15-cv-00290-F requires all four production units be controlled. The ODEQ permit issued Permit No. 2004-302-C(M-4) requires the four production units to be controlled by the two dry scrubbers. There will not be any production units without SO₂ controls.

4. *Please clarify whether the estimate of anticipated annual SO₂ emission reductions (15,800 TPY) is for each unit individually or if this is the combined anticipated annual emissions reductions across all units.*

This is the anticipated reduction for site-wide SO₂ emissions.

5. *Please provide documentation of the equipment life used to calculate costs of SO₂ scrubber controls. EPA recommends that the equipment life used to calculate costs for each control technology option, unless constrained by an enforceable retirement date for the source, be consistent with that found in the respective chapter of the Control Cost Manual¹. Any deviations from the Control Cost Manual need to be documented and an appropriate rationale provided. See Guidance at 33-34.²*

The controls are required as part of Consent Decree 5:15-cv-00290-F and the equipment useful life is based on EPA guidance in the cost control manual for similar units. The control equipment is also included in a federally enforceable permit and has been installed since the baseline date for the regional haze analysis. Based on the latest monitoring data, Oklahoma is on track to meet the regional haze benchmark. The addition of the required controls will significantly reduce SO₂ and NO_x emissions from the Facility.

6. *The company's summary indicates that the baseline emission rate information provided is based on the facility's permitted emission rates. Please clarify whether the anticipated annual emission reductions were also calculated using the permitted emission rates as the baseline or whether actual emissions were used as the baseline.*

The permitted emissions were used for the anticipated annual emissions reduction.

If you have any questions or comments please do not hesitate to contact me at (281) 647-3744.

Sincerely,



Sidney Marlborough MSc PhD
Senior EHS Manager
Continental Carbon