Consent Decree Section VI – SO_2 Control Technology, Emissions Limits, and Monitoring Requirements

1. To demonstrate compliance with paragraph 17 for Ponca City, please provide a native format Excel spreadsheet with data for each day from April 1, 2021, through August 31, 2026, that has each of the following parameters for each Process System:

    a. Feedstock sulfur content, in weight %;
    b. Production, in pounds;
    c. Waste gas flow, in thousands of standard cubic feet per hour (MSCFH);
    d. Lime flow rate, in pounds per hour;
    e. Trough valve position, in %;
    f. Gas Recirc valve position, in %;
    g. Stack gas flow rate, in MSCFH;
    h. Stack gas temperature, in degrees Fahrenheit;
    i. Dry Gas Scrubber pressure drop, in inches of water column;
    j. SCR inlet SO_2 concentration, in ppmvd at actual stack oxygen levels;
    k. SCR inlet oxygen concentration, in volume percent;
    l. SCR inlet SO_2 concentration, in ppmvd at 0% oxygen levels;
    m. Stack SO_2 concentration, in ppmvd at actual stack oxygen levels; and
    n. Stack oxygen concentration, in volume percent;
    o. Stack SO_2 concentration, in ppmvd at 0% oxygen levels.

2. Provide unredacted copies of the SO_2 optimization and demonstration reports.

Consent Decree Section VII - NOx Control Technology, Emissions Limits, and Monitoring Requirements

3. To demonstrate compliance with paragraphs 23 and 24 for Ponca City, please provide a native format Excel spreadsheet with data for each day from April 1, 2021, through August 31, 2026, that has each of the following parameters:

    a. Volume of natural gas consumed by the process system, in standard cubic feet;
    b. Heat value of natural gas, in millions of British Thermal Units (mmBTU) per standard cubic foot;
    c. Volume of oil consumed by the process system, in gallons;

d. Heat content of oil, in mmBTU per gallon;
e. Energy input, in mmBTU, from combustion of natural gas and oil while in heat load operation, startup or shutdown;
f. NO_X emissions in tons from combustion of natural gas and oil while in heat load operation, startup or shutdown; and
g. Cumulative sum of NO_X emissions in tons for the preceding 365 days while in heat load operation, startup or shutdown.

4. To demonstrate compliance with paragraph 26 for Ponca City, please provide a native format Excel spreadsheet with data for each day from April 1, 2021 through August 31, 2026 that that has each of the following parameters for each Process System:

    a. Daily average NO_X emissions, in ppmvd at actual stack oxygen levels;
    b. Daily average stack oxygen, in volume percent;
    c. Daily average NO_X emissions, in ppmvd at 0% oxygen levels;
    d. 7-day rolling average NO_X emissions, in ppmvd at 0% oxygen levels; and
    e. 365-day rolling average NO_X emissions, in ppmvd at 0% oxygen levels.

Consent Decree Section VIII – PM Control Technology, Emissions Limits, Best Management Practices, and Early Warning System Requirements

5. To demonstrate compliance with paragraphs 31 and 32 for Ponca City, please provide each PM stack test report for each Process System from April 1, 2021 through August 31, 2026.

6. To demonstrate compliance with paragraph 33 for Ponca City, provide a list of each carbon black product storage tank, silo and bin, carbon black pellet dryer, reactor, main bag filter, dryer exhaust bag filter, and process secondary bag filter at Ponca City. For each piece of equipment listed in response to the previous sentence, provide a native format Excel spreadsheet with the results of the required daily Method 22 evaluation for each day from April 1, 2021, through August 31, 2026. Provide copies of the record of each Method 22 evaluation.

Prohibition on Use of Flares

7. To demonstrate compliance with paragraph 38 for Ponca City, provide a native format Excel spreadsheet for each day from April 1, 2021 through August 31, 2026, that lists the hours in each day during which Tail Gas was combusted in each flare and that lists the estimated volume of gas combusted and estimated resulting SO_2 and NO_X emissions in pounds per day.