



Katie Hobbs
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Karen Peters
Cabinet Executive Officer
Executive Deputy Director

Air Quality Field Inspection Report

Company Name: Minerals Research, Inc. RP: 37790	Inspection Report No.: 436695
Place Name: Cottonwood Slag Crushing-Recycling Place ID No.: 137664 (172594 portable place for air)	Inspector(s): Rob Verville, Michael Wilder
County: Yavapai	Arrival Date and Time: 12/11/2023 10:00 AM
Physical Location: 705 E Birch St., Cottonwood, AZ 86326	Reason for Inspection: <input type="checkbox"/> Complaint Complaint No.: <input checked="" type="checkbox"/> Full Inspection <input type="checkbox"/> Partial Inspection <input type="checkbox"/> Follow-Up Original Inspection Report No.:
Mailing Address: 4620 S Coach Dr., Tucson, AZ 85714	
Coordinates (for new locations): Latitude: Longitude:	Was Inspection Announced? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Permit No.: Consent Order A-12-23 Permit Expiration Date:	Operational Status: Operating
Onsite Contact Person(s)/Title(s)/Number(s): Carl Harris, Ops., Stephan Gosselin, Manager Chelsea Wagner, Operations Support	Type of Source: Copper Slag Processing-Recycling
Other Names for Site/Facility:	Last Inspection: 11/7/23, Insp ID: 434451
Inspection Report Issued: Via email at facility	Facility Initial: ADEQ Initial:
Results of Inspection: <input type="checkbox"/> No alleged deficiencies were noted during the course of the inspection. No ADEQ action will result from this inspection. <input type="checkbox"/> Alleged deficiencies were noted during the course of the inspection and all deficiencies were corrected by the close of business on the final day of inspection. No ADEQ action will result from this inspection. <input checked="" type="checkbox"/> Alleged deficiencies were noted during the course of the inspection. Additional correspondence regarding this inspection may be forthcoming. If applicable, ADEQ documents its initial determination that the alleged deficiencies are: <input type="checkbox"/> Committed intentionally. <input checked="" type="checkbox"/> Not correctable within a reasonable period of time as determined by the agency. <input type="checkbox"/> Evidence of a pattern of noncompliance as demonstrated by alleged deficiencies previously identified in an inspection report or other written notice at the same premises. <input type="checkbox"/> A significant risk to any person, the public health, safety or welfare or the environment. <input type="checkbox"/> No compliance determination was made during the inspection, information has been requested.	



Comments:

ADEQ and Minerals Research, Inc. (MRI) entered a Consent Order on October 12, 2023, (Docket No. A-12-23).

Prior to entering the site, the ADEQ inspector conducted offsite observations for visible emissions. No visible emissions were observed from the plant. The ADEQ inspectors drove into the site and parked at the front office. The entrance road into the site was wetted.

At the office, the ADEQ inspectors met Chelsea Wagner, Operations Support. Ms. Wagner contacted Stephan Gosselin, Plant Manager. The ADEQ inspectors explained the purpose of the inspection, was related to the Consent Order. After a few minutes, Mr. Harris, Operations, arrived to participate in the inspection.

The ADEQ inspector requested supporting documentation required in the Consent Order. Mr. Harris and Ms. Wagner provided the requested documentation.

During the physical plant inspection, the processing plant was operating. The ADEQ inspectors observed the ground was saturated from continual wetting. The ADEQ inspectors observed visible emissions from the PEP screen Chute and the Conveyor Feeder Box. Mr. Gosselin stated a cover would be installed on the PEP screen Chute and a water mister at the Conveyor Feeder Box.


Mr. Gosselin stated Donaldson Filtration Solutions and its contractor conducted an inspection on 11/18/23 and finished the inspection on 11/20/23. Donaldson Filtration established a pressure differential range and made recommendations including changing all the filter bags in DH-601 (356). Mr. Gosselin stated the filter bags have been ordered.

Compliance Order (CO) Inspection Checklist

CO Section	Action	Status
Compliance Sch		
III.A	Excluding trivial activities and qualifying routine maintenance or repair MRI shall not modify or install new equipment without prior approval from ADEQ.	Mr. Harris stated no equipment changes.
III.B	MRI shall operate all associated control equipment as listed in Attachment 1 at all times when the process equipment is in operation.	
Administratively Complete Air Quality Permit Application		
III.C	MRI shall submit to ADEQ an administratively complete air quality permit application for a Class II Permit.	Source emailed the permit application to ADEQ on 10/31/23. Jeff Christensen, ADEQ Permit Engineer, confirmed receipt of a copy of the permit and dust control plan.
Dust Control Plan		
III.D	MRI shall submit to ADEQ a Dust Control Plan At minimum, the dust control plan shall include operation and maintenance procedures for proper operation of the Primary and Secondary Crushing and Screening Plants along with preventative measures to minimize fugitive dust from process equipment, storage piles, and the blasting operation. a. Minerals Research, Inc. will update this plan as necessary and will submit to ADEQ a copy of updated plans.	Source emailed the permit with dust control plan to ADEQ on 10/31/23.

	b. ADEQ will notify Minerals Research, Inc. of any deficiencies in the plan as necessary and will work with Minerals Research, Inc. on corrective actions as needed.	
Until ADEQ Issues A Class II Permit		
III.E.a.i	MRI shall be limited to the following throughput for Primary C&S to 2,000 TPD	The primary C&S operation is not currently at the facility. Source is unsure when the primary crusher will be at the site.
III.E.a.ii	MRI shall be limited to the following throughput for Secondary C&S to 190 TPD	The source maintains a Daily Production Report that indicates the amount of material processed daily. No day has exceeded the 190 TPD limit. The ADEQ inspector reviewed all daily production reports from 11/7/23 to current. The single largest production day was 11/15/23, 186.36 tons.
III.E.a.iii	MRI shall maintain records of daily operating hours and total daily material processed (TPD), as measured using a calibrated weigh scale.	The source has two reports that indicate daily material processed and operating hours. The production report has a start and stop for the shifts. The source has a calibrated Truck Scale and a front-end loader bucket scale. Documentation provided during previous inspection.
III.E.b	During each production shift, MRI shall inspect process equipment and associated control equipment to ensure proper capture and control and prevent excessive emissions from becoming airborne. If fugitive emissions due to leaks are observed, Minerals Research, Inc. shall pause operations of the affected unit until all leaks are resolved.	Source provided Shift Inspection/Daily Reports.
III.E.c	Within thirty (30) days of the effective date of this order, and monthly thereafter, Minerals Research, Inc. shall perform fluorescent dye testing on each baghouse (BH-600 and BH-601) to ensure a leak-free baghouse.	Fluorescent dye test conducted 10/11/2023. Report indicates one bag replaced and two holes plugged on BH-601 (unit 356). Fluorescent dye test conducted on 12/8/23. Report indicates one bag replaced on BH-601 (356),

		and BH-600 (484) three bags replaced.
III.E.c.i	No later than one-hundred and twenty (120) days from the effective date of this order, Minerals Research, Inc. shall conduct initial performance tests of each baghouse (BH-600 and BH-601), to demonstrate compliance with the PM10 emissions limits identified in Condition III.E.d.	Source is aware of requirement. Performance test due by 2/9/2024. Source should be preparing for and scheduling with performance test company. A test protocol is due prior to testing.
III.E.c.ii	Method 201A shall be used to determine compliance with the PM10 emissions limit for BH-600. However, for PM10 compliance purposes, in lieu of Method 201A and with prior approval from ADEQ, Method 5 can be used followed by particle size speciation. Alternatively, Minerals Research, Inc. may elect to assume all PM emissions measured by Method 5 are PM10.	Source is aware or requirement.
III.E.c.iii	Method 201A in conjunction with Method 202 shall be used to determine compliance with the PM10 emissions limit for BH-601. However, for PM10 compliance purposes, in lieu of Method 201A and with prior approval from ADEQ, Method 5 can be used followed by particle size speciation. Alternatively, Minerals Research, Inc. may elect to assume all PM emissions measured by Method 5 are PM10.	Source is aware of requirement.
III.E.d	Baghouse PM10 Emissions Limits: BH-600 = 0.0051 lbs/ton; BH-601 = 0.0146 lbs/ton	Source is aware of the requirement.
III.E.e	Within thirty (30) days MRI shall Install a pressure differential monitor to measure the differential pressure (dP) from the inlet and outlet of each baghouse (BH-600 and BH-601) in inches of water.	Source Daily Production Report indicates differential pressure monitoring.
III.E.e.i	Minerals Research, Inc. shall record the dP on a daily basis, for every production day.	Recorded on Daily Production Report.
III.E.e.ii	Minerals Research, Inc. shall maintain each dP within the manufacturer's recommended values.	The baghouse manufacturer is Donaldson Filtration Solutions. Donaldson Filtration Solutions and its contractor conducted an inspection on 11/18/23 and finished the inspection on 11/20/23. Mr. Harris stated Donaldson determined the range to be 2-8 inches of water. Donaldson submitted an RF Deferential Pressure letter on 11/30/23, to explain filter caking issues. Mr. Gosselin stated, Donaldson Filtration recommended changing all the bags in the 356

		baghouse. The replacement filters will not be in until later in the month.
III.E.e.iii	dP values observed outside of the manufacturer’s recommended values shall be investigated and resolved in a timely fashion. For any resolutions requiring more than seventy-two (72) hours from the time of discovery, Minerals Research, Inc. shall submit to ADEQ, for approval, within two (2) business days from discovery, a plan for corrective actions.	<p>Mr. Gosselin stated the BH-600 (484) operates within the manufactures range.</p> <p>Mr. Gosselin stated BH-601 (356) is not within the manufactures range. Donaldson recommended changing all the filter bags.</p> <p>Mr. Harris provided the current filter Inspection / Maintenance log that indicated 94 filters were replaced in BH-601 (356) on 11/29/23. The baghouse contains 356 bags.</p>
III.E.f	<p>Except as required by paragraph “j” below (40 CFR Part 60, Subpart UUU Requirements), Minerals Research, Inc. shall not cause, allow or permit to be emitted into the atmosphere, any plume or effluent, which exceeds 20% opacity.</p> 	<p>The source provided daily VE monitoring records for review.</p> <p>During the physical inspection, no opacity exceedance issues were observed.</p> <p>The ADEQ inspector observed some visible emissions emanating from the PEP screen chute and dropping from the VSI crusher feed box (photographs #15 & #16). Mr. Gosselin stated they would install a cover on the PEP screen chute and a water mister at the crusher feed box.</p> <p>The ADEQ inspector was unable to locate a proper location within proper sun angle alignment to collect DOCS observations.</p>
III.E.g	MRI shall not cause opacity of emissions greater than 40% from any fugitive dust non-point sources (open areas, roadways & streets, storage piles, and material handling).	No opacity issues observed during the inspection. The ground is saturated from continual wetting.

III.E.h	MRI shall monitor and record daily opacity from all process equipment and fugitive sources for each production day.	The source provided daily VE monitoring records, for each shift.
III.E.h.i	MRI shall have on site a certified EPA Reference Method 9 visible emissions observer.	During previous inspection, the source provided Method 9 field certification cards (smoke school) for six operators.
III.E.h.ii	Minerals Research, Inc. shall conduct daily instantaneous surveys of visible emissions from both process sources in operation and fugitive dust sources.	Source provided records for review.
III.E.h.iii	If any instantaneous survey appears greater than the applicable opacity standard, Minerals Research, Inc. shall immediately conduct a six-minute EPA Reference Method 9 observation of the visible emissions.	Ms. Wagner stated no instantaneous visible emission monitoring has required a Method 9.
III.E.h.iv	MRI shall record the name of the observer, date of the observation, and results of the observation for all instantaneous and Method 9 observations.	The form has the correct information.
III.E.i	MRI shall employ reasonable precautions to prevent excessive emissions from becoming airborne. Reasonable precautions can include, but is not limited to, housekeeping measures, use of dust suppressants, water spray, and temporary enclosures. Records of reasonable precaution activities shall be maintained each production day.	Source provide copies of the water truck wetting log.
Subpart UUU Requirements for Fluid Bed Dryer		
III.E.j.i	The Fluid Bed Dryer (BH-601 exhaust) shall not emit particulate matter into the atmosphere in excess of 0.025 grains per dry standard cubic foot (gr/dscf).	Source is aware of requirement. Performance test due by 2/9/2024.
III.E.j.ii	The Fluid Bed Dryer (BH-601 exhaust) shall be limited to 10 percent opacity.	No opacity observed from the BH-601 exhaust stack.
III.E.j.iii	To demonstrate compliance, MRI shall conduct an initial performance test of the Fluid Bed Dryer (BH-601 exhaust) no later than one-hundred and twenty (120) days from the effective date of this order. 1. Method 5 shall be used to determine compliance with the particulate matter concentration in subparagraph "i" above. The sampling time and volume for each test run shall be at least 2 hours and 1.70 dscm. 2. Method 9 and the procedures in § 60.11 shall be used to determine opacity from the stack emissions. 3. Performance tests shall be conducted during representative operations of the source. 4. A test plan (protocol) shall be submitted to ADEQ at least 14 working days prior to the test. 5. Minerals Research, Inc. shall provide safe sampling platforms, sampling ports adequate for the test methods required, and any utilities necessary to complete the performance test. 6. Each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic mean of the results of the three runs shall apply. 7. A written report of the results of performance tests conducted shall be submitted within 4 weeks after the test is performed. All	Source is aware of requirement. Performance test due by 2/9/2024. Source should be preparing for the performance test.

	performance testing reports shall be submitted in accordance with the Arizona Testing Manual and A.A.C. R18-2-312.A.	
III.E.k	All excess emissions, including exceedances of any emissions and opacity limits, shall be reported to ADEQ as outlined in A.A.C. R18-2-310.01.A, B, and C.	Ms. Wagner stated no excess emissions.
III.E.l	MRI shall retain records of all required monitoring data and support information required by this order for a period of at least five (5) years from the date of monitoring.	Source is maintaining records.
III.E.m	MRI shall furnish to ADEQ, within a reasonable time, any information that ADEQ requests in writing to determine compliance with this order. All records required by this order shall also be made available to ADEQ upon request.	

Status Reports

IV.A	<p>MRI agrees to submit a written status report to ADEQ by the 10th of every month, beginning the first month following the effective date of this Consent Order and ending with the first status report filed after ADEQ issues the permit referenced in section III.B of this order. Each written status report shall be for the previous calendar month and shall:</p> <ol style="list-style-type: none"> 1. Describe what measures that have been taken under Section III of this Consent Order; 2. Certify when compliance with the requirements of Section III of this Order are achieved; 3. Be accompanied by evidence showing compliance, as appropriate. Evidence showing compliance can include documents, photographs, or copies of any other supporting information that Minerals Research, Inc. deems necessary. 	<p>First written status report due 11/10/2023.</p> <p>On Friday, November 10, 2023, Michael Vick transmitted the status report to several ADEQ recipients, via email.</p> <p>ADEQ received the second statue report Saturday 12/9/23 via email.</p>
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Site Access

VI.	<p>Upon presenting credentials to authorized personnel on duty, ADEQ may at any time enter the premises at the Facility in order to observe and monitor compliance with the provisions of this Consent Order. This right of entry is in addition to ADEQ's rights under applicable law.</p>	ADEQ inspectors were provided access to the facility.

Exit Debrief:

- Provide the ADEQ inspector with documentation of installing the new bags in BH-601 (356).
- Provide the ADEQ inspector with documentation (photograph) that BH-600 (484) is operating within the proper range.
- Provide the ADEQ inspector with documentation of installing a cover on the PEP Screen chute.
- Provide the ADEQ inspector with documentation of installing a water mister at the Crusher Feed Box.

Attachments:

Notice of Inspection Rights
Photograph Log



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY NOTICE OF INSPECTION RIGHTS

FACILITY INFORMATION	ADEQ INFORMATION
Facility Name (Customer): Cottonwood Slag Crushing-Recycling	Date of Inspection: 12/11/2023 10:00 AM
Facility Location (Place): 705 E Birch St., Cottonwood, AZ 86326	County: Yavapai
Mailing Address: 4620 S Coach Dr., Tucson, AZ 85714	Inspector: Rob Verville
	Telephone: (602) 320-1814
Responsible Party: Minerals Research, Inc. RP: 37790	Accompanied by: Michael Wilder
On-Site Representative: Stephan Gosselin, Carl Harris	ADEQ Follow-up Contact: Rob Verville
Title: Plant Manager & Operations	
Telephone:	Telephone:
Email:	Email: rgv@azdeq.gov

The ADEQ representative(s) identified above were present at the above address on the above listed date and time. Upon entry to the premises, the ADEQ representative(s) met with me, presented photo identification indicating that they are ADEQ employees and explained:

That the purpose of the inspection is to determine:

Compliance with Title 49 of the Arizona Revised Statutes, Title 18 of the Arizona Administrative Code* and/or:

Arizona Revised Statutes: Title 49, Chapter 3
Arizona Administrative Code: Title 18, Chapter 2
Permit/Agreement Number: Consent Order A-12-23

Qualification for a license issued pursuant to:

Arizona Revised Statutes: Title 49, Chapter 3
Arizona Administrative Code: Title 18, Chapter 2

That this inspection is conducted pursuant to the authority granted in Arizona Revised Statutes § 49-104(B)(8) and/or:

Arizona Revised Statutes: § 41-1009
Arizona Administrative Code: Title 18, Chapter 2
Permit/Agreement Number: Consent Order A

That the state shall not be barred by the statutes of actions, according to A.R.S. § 12-510, except as provided in A.R.S. § 12-529 concerning certain claims based on navigability of water within 5 years after the date the claim first accrued. X

Possible applicability of Small Business Bill of Rights pursuant to Arizona Revised Statutes § 41-1001(21)

That the fee for this inspection is: No fee for the inspection

*The Arizona Revised Statutes (A.R.S.) can be found on the internet: www.azleg.state.az.us/ArizonaRevisedStatutes.asp while the Arizona Administrative Code (A.A.C.) can be found at www.azsosaz.gov/public_services/Table_of_Contents.htm

While I have the right to refuse to sign this form, the ADEQ representatives may still proceed with the inspection

I have read this notice and discussed any questions or concerns with the ADEQ representatives and I have received the Small Business Bill of Rights

12/11/2023

Signature of Regulated Person or Authorized On-Site Representative

The regulated person or authorized on-site representative refused to sign.

Name of Regulated Person or Authorized On-Site Representative _____
Title

The regulated person or an authorized on-site representative was not present at the facility.

Signature of ADEQ Representative

INSPECTION RIGHTS

- I understand that I can accompany the ADEQ representative(s) on the premises, except during confidential interviews.
- I understand that I have right to, on request:
 - Copies of any original documents taken during the inspection, and that ADEQ will provide copies of those documents at ADEQ's expense;
 - A split of any samples taken during the inspection, if the split of the samples would not prohibit an analysis from being conducted or render an analysis inconclusive;
 - Copies of any analysis performed on samples taken during the inspection and that ADEQ would provide copies of this analysis at ADEQ's expense;
 - Copies of any documents to be relied on to determine compliance with licensure or regulatory requirements if the agency is otherwise permitted by law to do so.
- I also understand that:
 - Each person who is interviewed by an ADEQ inspector during the inspection must be informed that:
 - participation in an interview is voluntary, unless legally compelled to participate;
 - they have the right to have an attorney or other experts in their field present during the interview to represent or advise the regulated person;
 - the ADEQ inspector may not take any adverse action or treat less favorably or draw any inference as a result of the regulated person's decision to be represented by an attorney or advised by any other experts in their field;
 - statements made by the person may be included in the inspection report; and
 - they have the right to 24 hours to review and revise any written witness statement drafted by the ADEQ inspector on which the ADEQ inspector requests that person's signature.
 - If the information and documents provided to the ADEQ inspector become a public record, trade secrets and proprietary and confidential information may be redacted, unless the information and documents are not confidential pursuant to statute.
 - Each person interviewed during the inspection must be informed that statements made by the person may be included in the inspection report;
 - Each person whose conversation is tape recorded during the inspection must be informed that the conversation is being tape recorded;
 - If an administrative order is issued or a permit decision is made based on the results of the inspection, I have the right to appeal that administrative order or permit decision. I understand that my administrative hearing rights are set forth in Arizona Revised Statutes § 41-1092 et seq. and my rights relating to an appeal of a final agency decision are found in Arizona Revised Statutes § 12-901 et seq;
 - If I have any questions or concerns about this inspection, I may contact the person listed as the ADEQ Follow-up Contact on the front of this form; ADEQ's Ombudsman at (602) 771-4322 (toll free inside Arizona at (800) 2345677, extension, 771-4322); or the Arizona Ombudsman-Citizens' Aid office at (602) 277-7292 (toll free at (800) 872-2879);
 - If I have any questions concerning my rights to appeal an administrative order or permit decision, I may contact Edwin Slade, ADEQ's Office of Administrative Counsel at (602) 771-2212 (toll free inside Arizona at (800) 234-5677, extension 771-2212).

41-1001.01. Regulatory bill of rights; small businesses

A. To ensure fair and open regulation by state agencies, a person:

1. Is eligible for reimbursement of fees and other expenses if the person prevails by adjudication on the merits against an agency in a court proceeding regarding an agency decision as provided in section 12-348.
2. Is eligible for reimbursement of the person's costs and fees if the person prevails against any agency in an administrative hearing as provided in section 41-1007.
3. Is entitled to have an agency not charge the person a fee unless the fee for the specific activity is expressly authorized as provided in section 41-1008.
4. Is entitled to receive the information and notice regarding inspections and audits prescribed in section 41-1009.
5. May review the full text or summary of all rulemaking activity, the summary of substantive policy statements and the full text of executive orders in the register as provided in article 2 of this chapter.
6. May participate in the rulemaking process as provided in articles 3, 4, 4.1 and 5 of this chapter, including:
 - (a) Providing written comments or testimony on proposed rules to an agency as provided in section 41-1023 and having the agency adequately address those comments as provided in section 41-1052, subsection D, including comments or testimony concerning the information contained in the economic, small business and consumer impact statement.
 - (b) Filing an early review petition with the governor's regulatory review council as provided in article 5 of this chapter.
 - (c) Providing written comments or testimony on rules to the governor's regulatory review council during the mandatory sixty-day comment period as provided in article 5 of this chapter.
7. Is entitled to have an agency not base a licensing decision in whole or in part on licensing conditions or requirements that are not specifically authorized by statute, rule or state tribal gaming compact as provided in section 41-1030, subsection B.
8. Is entitled to have an agency not make a rule under a specific grant of rulemaking authority that exceeds the subject matter areas listed in the specific statute or not make a rule under a general grant of rulemaking authority to supplement a more specific grant of rulemaking authority as provided in section 41-1030, subsection C.
9. May allege that an existing agency practice or substantive policy statement constitutes a rule and have that agency practice or substantive policy statement declared void because the practice or substantive policy statement constitutes a rule as provided in section 41-1033.
10. May file a complaint with the administrative rules oversight committee concerning:
 - (a) A rule's, practice's or substantive policy statement's lack of conformity with statute or legislative intent as provided in section 41-1047.
 - (b) An existing statute, rule, practice alleged to constitute a rule or substantive policy statement that is alleged to be duplicative or onerous as provided in section 41-1048.
11. May have the person's administrative hearing on contested cases and appealable agency actions heard by an independent administrative law judge as provided in articles 6 and 10 of this chapter.
12. May have administrative hearings governed by uniform administrative appeal procedures as provided in articles 6 and 10 of this chapter and may appeal a final administrative decision by filing a notice of appeal pursuant to title 12, chapter 7, article 6.
13. May have an agency approve or deny the person's license application within a predetermined period of time as provided in article 7.1 of this chapter.
14. Is entitled to receive written notice from an agency on denial of a license application:
 - (a) That justifies the denial with references to the statutes or rules on which the denial is based as provided in section 41-1076.
 - (b) That explains the applicant's right to appeal the denial as provided in section 41-1076.
15. Is entitled to receive information regarding the license application process before or at the time the person obtains an application for a license as provided in sections 41-1001.02 and 41-1079.
16. May receive public notice and participate in the adoption or amendment of agreements to delegate agency functions, powers or duties to political subdivisions as provided in section 41-1026.01 and article 8 of this chapter.
17. May inspect all rules and substantive policy statements of an agency, including a directory of documents, in the office of the agency director as provided in section 41-1091.
18. May file a complaint with the office of the ombudsman-citizens aide to investigate administrative acts of agencies as provided in chapter 8, article 5 of this title.
19. Unless specifically authorized by statute, may expect state agencies to avoid duplication of other laws that do not enhance regulatory clarity and to avoid dual permitting to the extent practicable as prescribed in section 41-1002.
20. May have the person's administrative hearing on contested cases pursuant to title 23, chapter 2 or 4 heard by an independent administrative law judge as prescribed by title 23, chapter 2 or 4.

B. The enumeration of the rights listed in subsection A of this section does not grant any additional rights that are not prescribed in the sections referenced in subsection A of this section.

C. Each state agency that conducts audits, inspections or other regulatory enforcement actions pursuant to section 41-1009 shall create and clearly post on the agency's website a small business bill of rights. The agency shall create the small business bill of rights by selecting the applicable rights prescribed in this section and section 41-1009 and any other agency-specific statutes and rules. At the request of an authorized on-site representative of the regulated small business, the agency shall provide a written document of the small business bill of rights. In addition to the rights listed in this section and section 41-1009, the agency notice of the small business bill of rights shall include the process by which a small business may file a complaint with the agency employees who are designated to assist members of the public or regulated community pursuant to section 41-1006. The notice must provide the contact information of the agency's designated employees. The agency notice must also state that if the regulated person has already made a reasonable effort with the agency to resolve the problem and still has not been successful, the regulated person may contact the office of ombudsman-citizens aide.

Air Quality Field Inspection Photograph Log


Site Location: Cottonwood Slag Crushing-Recycling - 705 E Birch St., Cottonwood, AZ 86326		Photographer: Rob Verville	Camera: HP Elite x2
Weather: overcast			
Photo No. 1	Date: 12/11/2023		
Direction Photo Taken: Down			
Photo Description: Water truck log.			

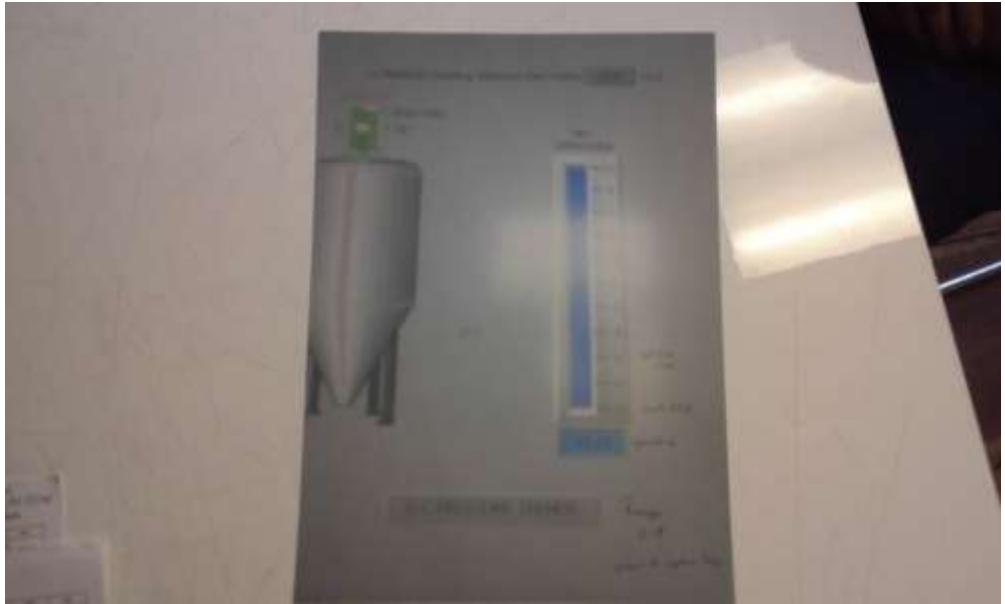
Photo No. 2	Date: 12/11/2023	
Direction Photo Taken: Down		
Photo Description: Baghouse 356, instant pressure drop reading during inspection. Operating at 11.23 WC (Range 2-8 inches water column). Operating above the range. Mr. Gosselin stated Donaldson recommended replacing all the bags.		


Photo No. 3	Date: 12/11/2023	
Direction Photo Taken: Down		
Photo Description: Baghouse 484, instant pressure drop reading during the inspection. Operating at 9.53 WC. (Operating range 2-8 inches water column). Mr. Gosselin stated the reading moves around throughout the day.		


Photo No. 4	Date: 11/7/2023	
Direction Photo Taken: East		
Photo Description: Picture from front gate. West side of plant. Plant is operating. Wetted road.		


Photo No. 5	Date: 12/11/2023	
Direction Photo Taken: South		
Photo Description: Front-end loader loading feeder and 300 belt.		




Photo No. 6	Date: 12/11/2023	
Direction Photo Taken: North		
Photo Description: Former Air Wash area, Deduster operating. No visible emission observed. The conveyor tops were free of material buildup.		

Photo No. 7	Date: 12/11/2023
Direction Photo Taken: Northwest	
Photo Description: Center area near Deduster, area is soaked and “muddy”. Pooled water visible.	



Photo No. 8	Date: 12/11/2023
Direction Photo Taken: Northwest	
Photo Description: Tops of conveyors free of material buildup.	



Photo No. 9	Date: 12/11/2023
Direction Photo Taken: Northeast	
Photo Description: Water mister installed under the Dryer Feed conveyor. Pooled water visible.	



Photo No. 10	Date: 12/11/2023
Direction Photo Taken: Northeast	
Photo Description: Standing water near the screening area.	



Photo No. 11	Date: 12/11/2023	
Direction Photo Taken: Northwest		
Photo Description: VSI crusher with the water misters operating. The ground underneath is saturated.		


Photo No. 12	Date: 12/11/2023	
Direction Photo Taken: West		
Photo Description: Water saturated ground and an employee hand spraying water throughout the site.		

Photo No. 13	Date: 12/11/2023	
Direction Photo Taken: Northwest		
<p>Photo Description: Conveyors with an approximately 1/2 inch to 1 inch of material buildup.</p> <p>Approximately 1 inch on conveyor with blue tape. The material is granular.</p>		

Photo No. 14	Date: 12/11/2023	
Direction Photo Taken: Down		
<p>Photo Description: From the second screen deck looking down on the saturated ground and an operator hand wetting.</p> <p>Pooled water visible.</p> <p>No visible emissions observed.</p>		


Photo No. 15	Date: 12/11/2023	
Direction Photo Taken: Northeast		
<p>Photo Description: Some visible emissions observed dropping from the crusher feed box (center opening).</p> <p>Mr. Gosselin stated a water mister would be installed the following morning.</p> <p>Camera unable to capture the visible emissions.</p>		


Photo No. 16	Date: 12/11/2023	
Direction Photo Taken: North		
<p>Photo Description: Some visible emission observed at the PEP Screen chute (white box center). Camera unable to capture the visible emissions.</p> <p>Mr. Gosselin stated a cover would be installed the following morning.</p>		

Photo No.
17

Date:
12/11/2023

Direction Photo Taken:
South

Photo Description:
East side of the plant, the screens are visible on the right and the VSI crusher and misters in the background.

