

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.: 438635
Place Name: Cottonwood Slag Crushing-Recycling Place ID No.: 137664 old air portable 172594	Inspector(s): Cameron Collins, Rob Verville
County: Yavapai	Arrival Date and Time: 1/16/2024 1:10 PM
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: Not Operating
Onsite Contact Person(s)/Title(s)/Number(s): Karl Harris, Ops., Stephan Gosselin, Manager Chelsea Wagner, Operations Support	Type: Copper Slag Processing-Recycling
Other Names for Site/Facility:	Last Inspection: 01/10/24 Insp ID: 438241
Inspection Report Issued: Via email from ADEQ	Facility Initial: ADEQ Initial: CC
Results of Inspection: <input checked="" 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 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 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:

A routine inspection was conducted to determine compliance with specific requirements required by the facility's Consent Order and applicable air quality regulations. Minerals Research, Inc. (MRI) and The Arizona Department of Environmental Quality (ADEQ) entered into a Consent Order (Docket No. A-12-23) on October 12, 2023. The facility representatives were Stephan Gosselin – MRI Manager, Carl Harris – MRI Operations, and Chelsea Wagner – MRI Operations Support. The AZDEQ representatives conducting the inspection were Cameron Collins - Inspector and Rob Verville – Inspector.

Prior to entering the site, the ADEQ inspectors conducted offsite observations for visible emissions. The ADEQ inspector did not observe any visible offsite emissions. The ADEQ inspectors conducted the observations from locations to the east and north of the facility. During the offsite observations, it did not appear that the facility was operating.

Upon entering the facility, the ADEQ Inspectors observed the entrance road into the site was wetted and sprinklers were wetting to slag piles. The ADEQ inspectors met with Mr. Gosselin, Mr. Harris, and Ms. Wagner in the main office located at the front of the facility. Mr. Collins, the lead inspector, introduced himself and informed Mr. Gosselin that he was at the facility to conduct an air quality inspection related to the facility's Consent Order and presented him with the Notice of Inspection Rights (NOIR) to which Mr. Gosselin signed. Mr. Collins requested and reviewed supporting documentation required by the Consent Order. During the Inspection, Mr. Gosselin explained to the ADEQ Inspectors that the plant has not operated since January 11, 2024 due to canceling a performance test. Mr. Gosselin stated that during the performance test, they appeared to be having bag issues with the BH600 Baghouse (Unit 484) and felt that canceling the performance test and shutting the plant down was the most responsible action. Mr. Gosselin Stated that they hope to make the necessary repairs and have tested within two weeks. Findings for each condition can be found in the status box inside the Compliance Order Checklist listed below.

During the physical plant inspection, the processing conveyors and observed the previous buildup of material has been removed and the area and equipment under the screens had been cleaned. Due to the plant not operating, the inspectors were unable to inspect the crushing, screening, conveying and material transfer operations.

Compliance Order (CO) Inspection Checklist

CO Section	Action	Status
Compliance Schedule		
III.A	Excluding trivial activities and qualifying routine maintenance, repair or replacement MRI shall not modify or install new process equipment without prior approval from ADEQ.	Mr. Harris stated that no equipment has been changed.
III.B	MRI shall operate all associated control equipment as listed in Attachment 1 at all times when the process equipment is in operation.	Mr. Harris stated and Mr. Gosselin both confirmed that they operate all associated control equipment listed in Attachment 1 during operations.
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.	MRI emailed the Air Permit on 10/31/2023. Jeff Christensen, ADEQ Permit Engineer, confirmed receipt of a copy of the permit and dust control plan.
Dust Control Plan		

III.D	<p>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.</p> <p>a. Minerals Research, Inc. will update this plan as necessary and will submit to ADEQ a copy of updated plans.</p> <p>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.</p>	Source emailed the permit with dust control plan to ADEQ on 10/31/23.
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 ADEQ Inspector reviewed records from December 2023 through January 15, 2024. The has not operated since January 11, 2024. The Facilities largest throughput was on January 5 & 10 displaying 188 TPD.
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.	<p>The source has two reports that indicate daily material processed and operating hours. The production report has a start and stop for the shifts.</p> <p>The source has a calibrated Truck Scale and a front-end loader bucket scale. Documentation was provided for review.</p>
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. The ADEQ Inspector Reviewed all shift Inspection/Daily Reports from December 2023 through the date of inspection.
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.	The ADEQ Inspector reviewed fluorescent dye test were conducted on January 3 & 4 on BH601 (Unit 356). Records indicate that 16 bags were replaced from January 3&4.
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	The facility started a performance testing on

	performance tests of each baghouse (BH-600 and BH-601), to demonstrate compliance with the PM10 emissions limits identified in Condition III.E.d.	1/9/2024 and stopped the test early on 1/11/2024 due to low confidence for Unit BH600 (Unit 484). Mostardi Platt was contracted to conduct the Performance test.
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.	The Facility/Performance Test Contractor is aware of the testing requirements.
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.	The Facility/Performance Test Contractor is aware of the testing requirements.
III.E.d	Baghouse PM10 Emissions Limits: BH-600 = 0.0051 lbs/ton; BH-601 = 0.0146 lbs/ton	The Facility/Performance Test Contractor is aware of the testing requirements.
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.	Daily Production reports indicates differential pressure monitoring.
III.E.e.i	Minerals Research, Inc. shall record the dP on a daily basis, for every production day.	The ADEQ Inspector reviewed Daily production reports from December 2023 through the date of inspection. Pressure differential was listed on all production reports reviewed.
III.E.e.ii	Minerals Research, Inc. shall maintain each dP within the manufacturer's recommended values.	Recorded on Daily Production Report Mr. Gosselin stated Donaldson determined the range to be 2-8 inches of water.
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.	16 Bags were replaced in unit 356 on January 3 & 4. The facility is shut down unit BH600 (Unit 484) can be repaired.
III.E.f	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.	The source provided daily VE monitoring records for review.

		During the physical inspection, no opacity could be observed due to the plant not operating.
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).	Visible Emissions surveys were reviewed from December 2023 through January 15 2024 via the facilities Air Quality Checklist.
III.E.h	MRI shall monitor and record daily opacity from all process equipment and fugitive sources for each production day.	Records were reviewed from December 2023 through January 15, 2024.
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.	Records were reviewed from December 2023 through January 15, 2024.
III.E.h.iii	If any instantaneous survey appears greater than the opacity standard, Mineral Research, Inc. shall immediately conduct a six-minute EPA Reference Method 9 visible emissions observation.	The ADEQ Inspector did not observe any surveys that exceeded the opacity standard per the facilities Air Quality Checklist
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.	Observed on Facilities Air Quality Checklist.
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 for each production day.	The facility employs water wetting to prevent excessive emissions from becoming airborne.
<i>Subpart UUU Requirements for Fluid Bed Dryer</i>		
III.E.j.i	The Fluid Bed Dryer (BH-601 exhaust) shall not discharge into the atmosphere particulate matter in excess of 0.025 grains per dry standard cubic foot (gr/dscf).	Source is aware of requirement. A performance test was started on January 9, 2024 and ceased on January 11, 2024. Mr. Gosselin stated that MRI hopes to conduct a retest within the next two weeks once the filter bags are replaced for BH600 (Unit 484)
III.E.j.ii	The Fluid Bed Dryer (BH-601 exhaust) shall be limited to 10 percent opacity.	The facility was not operating at the time of

		inspection. The facility has not operated since 1/11/2024.
III.E.j.iii	<p>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.</p> <ol style="list-style-type: none"> 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. Method 9 and the procedures in § 60.11 shall be used to determine opacity from the stack emissions. Performance tests shall be conducted during representative operations of the source. A test plan (protocol) shall be submitted to ADEQ at least 14 working days prior to the test. 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. 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. A written report of the results of performance tests conducted shall be submitted within 4 weeks a performance testing reports s the Arizona Testing Manual an 	<p>A performance test was started on January 9, 2024 and ceased on January 11, 2024.</p> <p>Mr. Gosselin stated that MRI hopes to conduct a retest within the next two weeks once the filter bags are replaced for BH600 (Unit 484)</p>
III.E.k	All excess emissions, including opacity limits, shall be reported t	<p>f any emissions and outlined in A.A.C. R18-2-310.01.A, B, and C.</p>
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.	The Facility Maintains 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.	The facility has submitted the latest status report to ADEQ on 1/10/2024.
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"> Describe what measures that have been taken under Section III of this Consent Order; 	The facility has submitted the latest status report to ADEQ on 1/10/2024.

	<p>2. Certify when compliance with the requirements of Section III of this Order are achieved;</p> <p>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>	
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:

- No Areas of Concern were noted at the time of inspection. The facility was not operating at the time of inspection.

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: 1/16/2024 12:00 AM
Facility Location (Place): 705 E Birch St., Cottonwood, AZ 86326	County: Yavapai
Mailing Address: 4620 S Coach Dr., Tucson, AZ 85714	Inspector: Cameron Collins
	Telephone: (602) 540-9735
Responsible Party: Minerals Research, Inc. RP: 37790	Accompanied by: Rob Verville
On-Site Representative: Stephan Gosselin	ADEQ Follow-up Contact: Cameron Collins
Title: Manager	
Telephone: 928-821-2846	Telephone: (602) 540-9735
Email: stephan.gosselin@mineralsresearch.com	Email: collins.cameron@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. 

- 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

 Signature of Regulated Person or Authorized On-Site Representative 1/16/2024

- 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) 234-5677, 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: Cameron Collins	Camera: Samsung Cell Phone
Weather: clear			
Photo No. 1	Date: 1/16/2024		
Direction Photo Taken: North			
Photo Description: View of the front lot of the property.			


Photo No. 2	Date: 11/16/2023	
Direction Photo Taken: East		
Photo Description: View of the east side of the property. Area appears to have been adequately wetted.		

Photo No. 3	Date: 1/16/2024
Direction Photo Taken: Southeast	
Photo Description: Click here to enter text.	



Photo No. 4	Date: 1/16/2024
Direction Photo Taken: West	
Photo Description: Sprinklers were observed wetting the slag piles.	

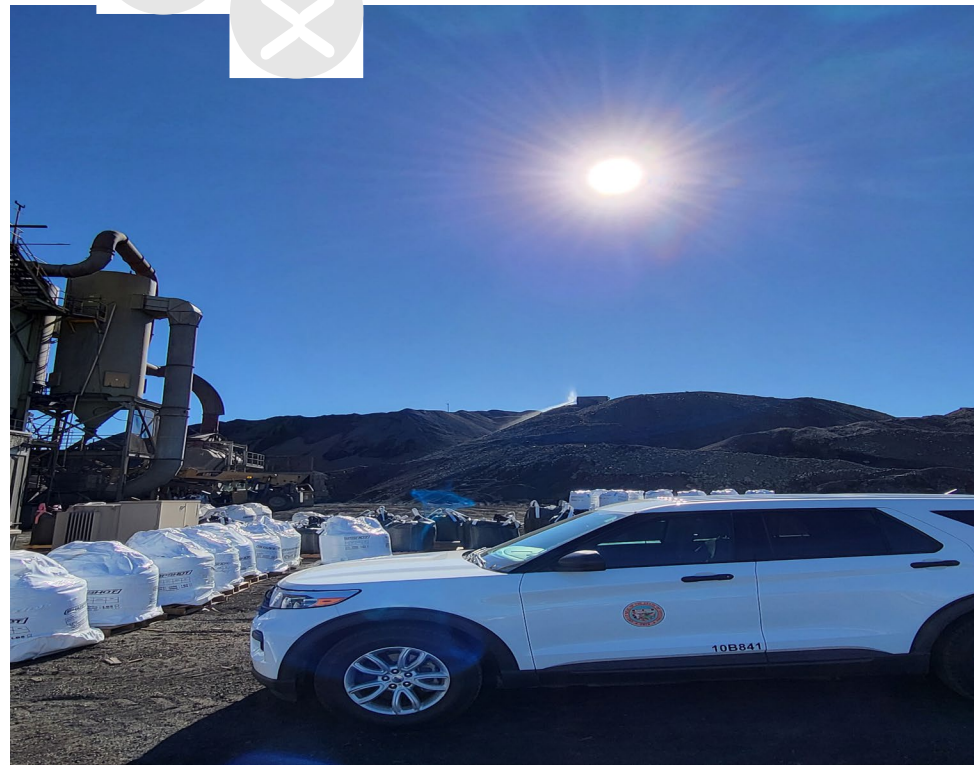


Photo No. 5	Date: 1/16/2024
Direction Photo Taken: Southwest	
Photo Description: Plant Overview	



Photo No. 6	Date: 1/16/2024
Direction Photo Taken: Northeast	
Photo Description: View of both Baghouses	



Photo No. 7	Date: 1/16/2024
Direction Photo Taken: South	
Photo Description: View of conveyor	



Photo No. 8	Date: 1/16/2024
Direction Photo Taken: Northeast	
Photo Description: Overview of the back side of the plant.	



Photo No. 9	Date: 1/16/2024
Direction Photo Taken: Down	
Photo Description: Method 9 Certification	

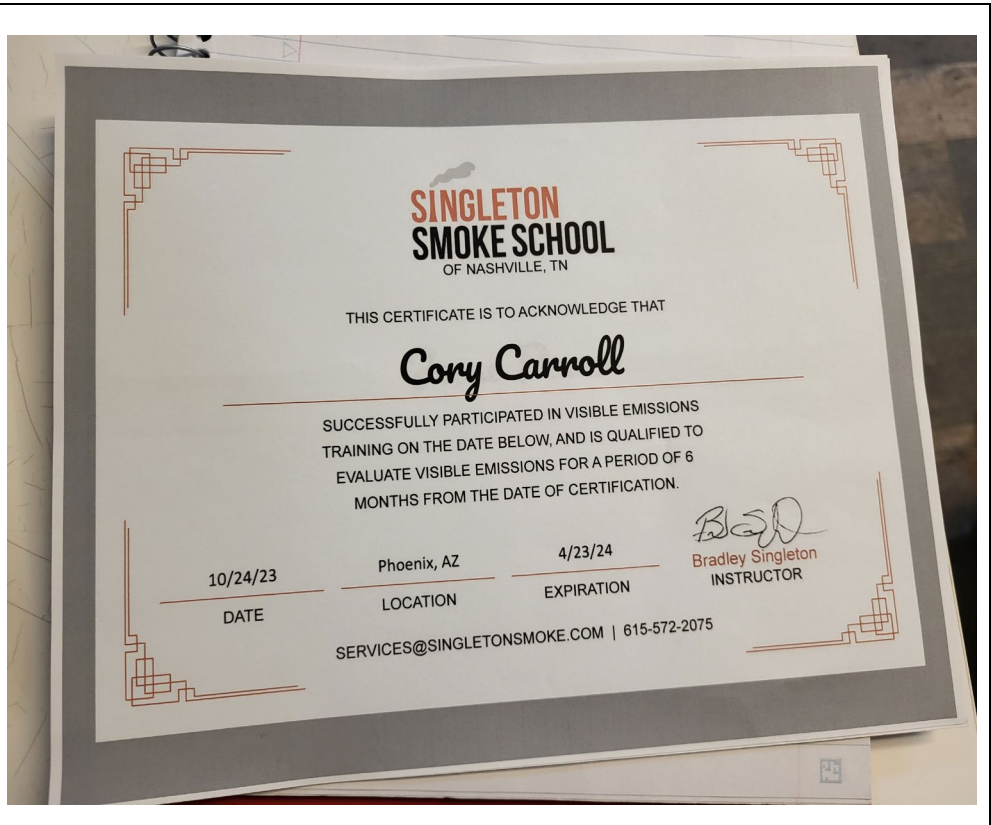


Photo No. 10	Date: 1/16/2024
Direction Photo Taken: Down	
Photo Description: Method 9 Certification	



Photo No. 11	Date: 1/16/2024
Direction Photo Taken: Down	
Photo Description: Method 9 Certification	

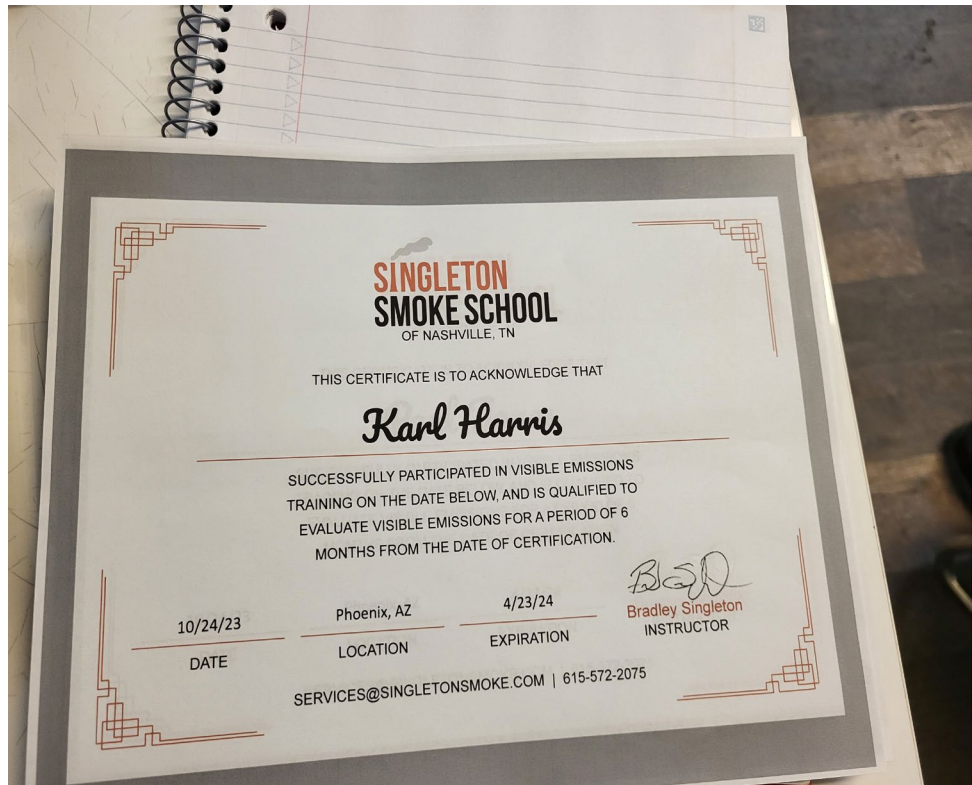


Photo No. 12	Date: 1/16/2024
Direction Photo Taken: Northwest	
Photo Description: Method 9 Certification	

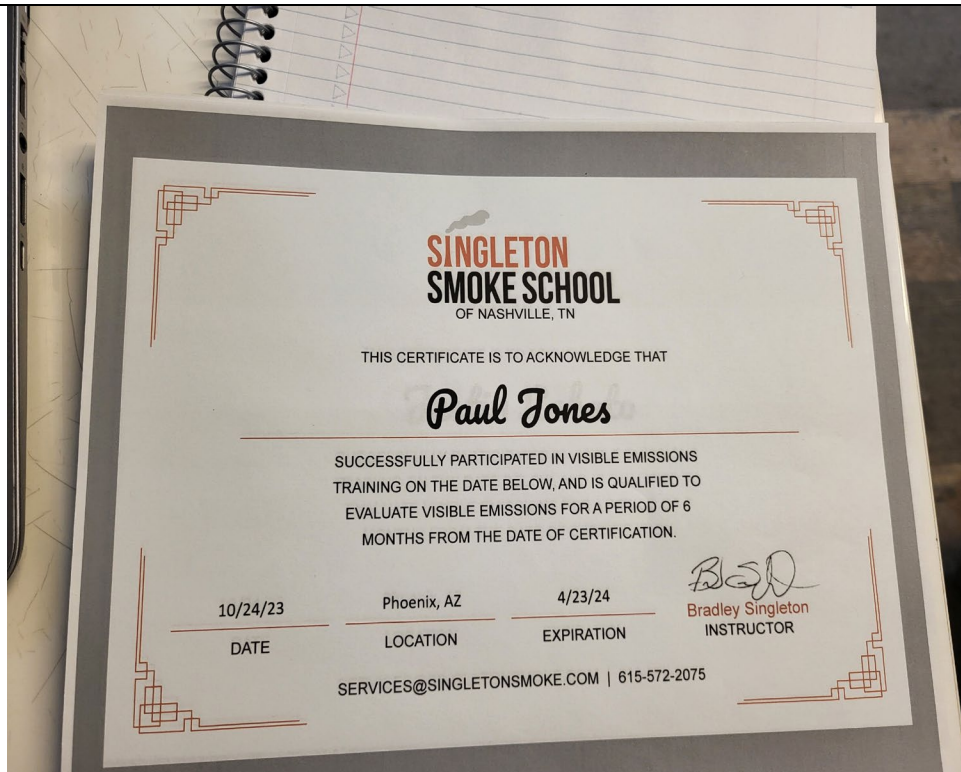


Photo No. 13	Date: 1/16/2024
Direction Photo Taken: Southwest	
Photo Description: Method 9 Certification	

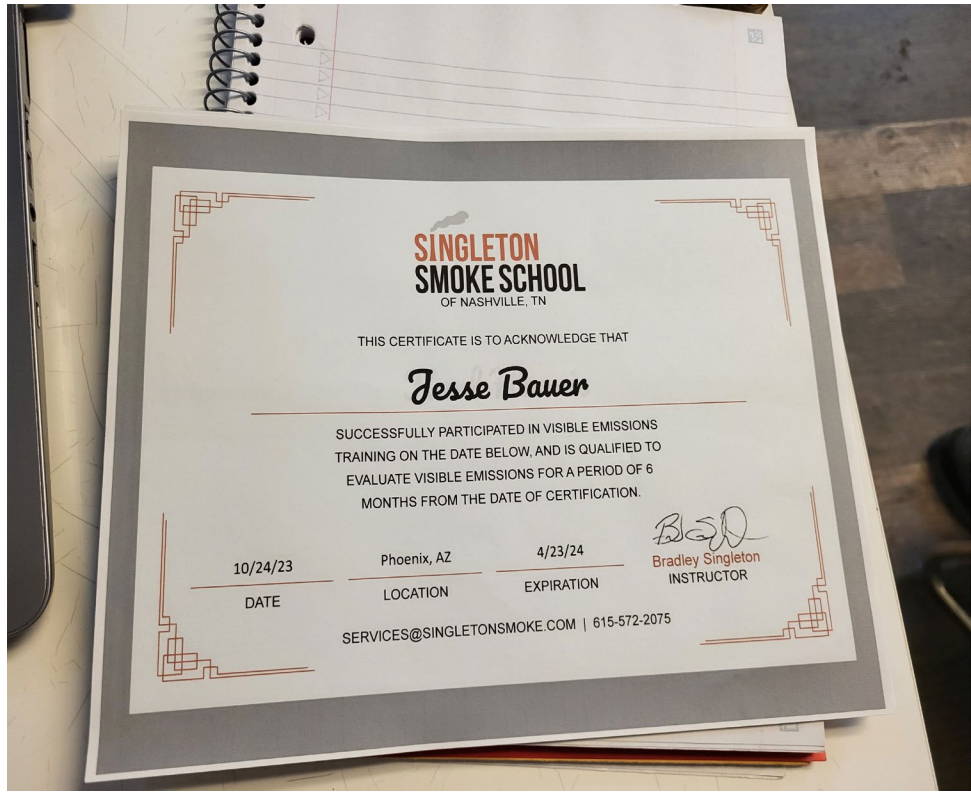


Photo No. 14	Date: 1/16/2024
Direction Photo Taken: Down	
Photo Description: Method 9 Certification	

