

Katie Hobbs  
Governor

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Karen Peters  
Cabinet Executive Officer  
Executive Deputy Director

## Air Quality Field Inspection Report

<b>Company Name:</b> Minerals Research Inc.	<b>Inspection Report No.:</b> 455312
<b>Place Name:</b> Cottonwood Slag Crushing-Recycling <b>Place ID No.:</b> 137664	<b>Inspector(s):</b> Cameron Collins
<b>County:</b> Yavapai	<b>Arrival Date and Time:</b> 10/1/2024 8:00 AM
<b>Physical Location:</b> 705 E Birch St., Cottonwood, AZ 86326	<b>Reason for Inspection:</b> <input type="checkbox"/> Complaint Complaint No.: <input type="checkbox"/> Full Inspection <input checked="" type="checkbox"/> Partial Inspection <input type="checkbox"/> Follow-Up Original Inspection Report No.:
<b>Mailing Address:</b> 4620 S Coach Dr., Tucson, AZ 8714	
<b>Coordinates (for new locations):</b> Latitude: Longitude:	
<b>Permit No.:</b> Pending Air Permit Application LTF: 100924 <b>Permit Expiration Date:</b> N/A	<b>Was Inspection Announced?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Onsite Contact Person(s)/Title(s)/Number(s):</b> Carl Harris / Plant Superintendent Chelsea Wagner / Plant Coordinator	<b>Operational Status:</b> Operating
	<b>Type of Source:</b> Copper Slag Processing/Recycling
<b>Other Names for Site/Facility:</b>	<b>Last Inspection:</b> September 5, 2024
<b>Inspection Report Issued:</b> Via email from ADEQ office	<b>Facility Initial:</b> <b>ADEQ Initial:</b> <i>CC</i>
<b>Results of Inspection:</b> <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.	

## INTRODUCTION

A routine compliance inspection was conducted to determine compliance with applicable air quality regulations. This inspection primarily focused on observing the facility during operation. The facility representatives were Chelsea Wagner, Plant coordinator for Minerals Research and Carl Harris, Operations Manager for Minerals Research. The Arizona Department of Environmental Quality (ADEQ) representatives conducting the inspection were Cameron Collins, Allie Kubiak, and Sydni Nedza, Inspectors for ADEQ.

## FACILITY INFORMATION

### Process Description

Minerals Research, Inc. (MRI) owns and operates a crushing and screening facility located in Cottonwood, Arizona which processes a pre-existing copper slag pile for various industrial mineral applications.

### Permitting

MRI began operating their facility in Cottonwood, AZ in 2015 after receiving a negative permit determination on December 11, 2009 from ADEQ based on the information provided by the facility. ADEQ conducted a 2017 inspection at the MRI facility while superstation crushing was on site and concluded the facility would need to apply for a Crushing and Screening General Permit. On July 10, 2018 MRI was issued a Crushing and Screening General Permit (Permit No. 72319/ATO 122389). The Crushing and Screening General Permit was terminated on February 28, 2024 due to ADEQ concluding that the MRI facility does not qualify for the Crushing and Screening General Permit because copper ore slag processed at this plant does not meet the definition of non-metallic minerals as specified in 40 CFR 60.671.

MRI submitted a Class II Individual Air Quality Permit application to ADEQ on October 31, 2023, following a Consent Order (Docket No. A-12-23) issued on October 12, 2023. ADEQ determined the application to be administratively complete on November 14, 2023. Accordingly, pursuant to A.A.C. R18-2-510(D), MRI is authorized to operate its Cottonwood Plant under its individual air quality permit application while that application is pending.

### Compliance History

Since the Issuance of the facility's first General Permit MRI has submitted 5 annual compliance certifications, submitted 2 excess emissions reports, conducted 2 stack tests, and 14 air quality compliance inspections conducted, and has received 1 Consent Order (CO). The compliance certifications were reviewed by the ADEQ Permits Unit concluding no deficiencies. The excess emissions reports were also reviewed internally by ADEQ concluding no deficiencies. Of the 14 air quality compliance inspections conducted, the facility has received 1 Notice of Opportunity to Correct (NOC) and 2 Notice of violation's (NOV). ADEQ terminated the Consent Order on February 21, 2024 based on results from a failed performance test which occurred on January 31, 2024. A subsequent performance test was conducted on February 8, 2024 yielding passing results within the previously failed limits listed in the Consent Order.

## AREAS EVALUATED

Prior to entering the facility, the ADEQ Inspectors observed emissions from the Cottonwood Park which is adjacent to the MRI facility. The ADEQ Inspectors did not observe any visible emissions emanating from the Minerals Research plant so they proceeded to enter the facility at approximately 8:40am. Upon entering the facility, the ADEQ Inspectors immediately observed the plant operating. The ADEQ Inspectors then met with Chelsea Wagner and Carl Harris. Cameron Collins, Lead Inspector, explained to Ms. Wagner and Mr. Harris that they were at the facility to conduct an air quality inspection and presented Ms. Wagner with the Notice of Inspection Rights (NOIR) to which Ms. Wagner signed.

Following the introductory process, Mr. Collins explained to Ms. Wagner that he wanted to observe the plant operating since almost all compliance inspections conducted in 2024 were conducted on days when the plant was not operating. The ADEQ Inspectors along with Ms. Wagner and Mr. Harris exited the office to tour the plant. The ADEQ Inspectors observed multiple areas throughout the plant with no areas of concern noted. The ADEQ Inspectors observed water controls on the slag storage pile, cone crusher, and inside the interior of the plant. All ducting leading to the baghouse and around the equipment was observed by the ADEQ Inspectors to be in working order. The ADEQ Inspectors did not observe any fugitive emissions emanating from the haul roads or equipment working areas of the plant. While on the east side of the plant, Mr. Collins decided to conduct two EPA Alternative Method 82 (ALT-082) digital opacity compliance system (DOCS) observations. While the observations were being taken, Mr. Collins observed emissions emanating from one of the two secondary screens for the plant. Mr. Harris also observed the emission from the secondary screen and commented to Mr. Collins that they would need to install some new baffling on the screen to prevent any more leakage. After the DOCS observations were complete, the ADEQ inspectors walked back into the office.

Once back in the Office, The ADEQ Inspectors reviewed daily production records from September 6, 2024 through September 30, 2024. The highest daily production observed was 234.2 tons which occurred on September 11, 2024. Following the production records review, the ADEQ Inspectors concluded the inspection at approximately 9:50am.

After uploading and analyzing the DOCS Observations, the results showed 25.83 percent opacity for the secondary screen observation and 0.21 percent opacity for the cone crusher observation. The secondary screen observation was compared to the A.A.C. R18-2-614 non-point source emission limit of 40% due to a lower confidence in the DOCS observation. The lower confidence in the secondary screen observation was due to the path length of dust cloud extending with the wind away from the camera along with multiple emission points that could have possibly been included in the observation. The cone crusher observation was well below opacity limits. The full DOCS observation report is attached below for a more detailed review.

**Exit Debrief:**

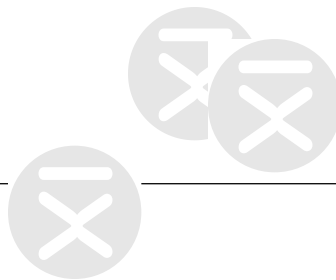
- Secondary screen baffling/flashing needs repair.
- DOCS observations were observed to be with applicable limits.

For air quality permit concerns and assistance, please contact Karla Murrieta, ADEQ, Air Permits Manager at office (602) 771-2283 or [Murrieta.Karla@azdeq.gov](mailto:Murrieta.Karla@azdeq.gov).

Air permit documents and questions can also be submitted to [airpermits@azdeq.gov](mailto:airpermits@azdeq.gov).

**Attachments:**

Notice of Inspection Rights  
Photograph Log  
DOCS Observation





# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

## NOTICE OF INSPECTION RIGHTS

FACILITY INFORMATION	ADEQ INFORMATION
<b>Facility Name (Customer):</b> Minerals Research Inc.	<b>Date of Inspection:</b> 10/1/2024 12:00 AM
<b>Facility Location (Place):</b> 705 E Birch St., Cottonwood, AZ 86326	<b>County:</b> Yavapai
	<b>Inspector:</b> Cameron Collins
<b>Mailing Address:</b> 4620 S Coach Dr., Tucson, AZ 8714	<b>Telephone:</b> (602) 540-9735
	<b>Accompanied by:</b> Allie Kubiak Sydni Nedza
<b>Responsible Party:</b> Minerals Research Inc.	<b>ADEQ Follow-up Contact</b> Cameron Collins
<b>On-Site Representative:</b> Chelsea Wagner	
<b>Title:</b> Plant Coordinator	
<b>Telephone:</b> (520) 748-9362	<b>Telephone:</b> (602) 540-9735
<b>Email:</b> <a href="mailto:stephan.gosselin@mineralsresearch.com">stephan.gosselin@mineralsresearch.com</a>	<b>Email:</b> <a href="mailto:collins.cameron@azdeq.gov">collins.cameron@azdeq.gov</a>

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: Pending Air Permit Application LTF: 100924

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: Pending Air Permit Application LTF: 100924

That the state shall not be barred by the statutes of limitations 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 watercourses. According to 28 U.S.C. § 2462, the U.S. government must commence an action 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](http://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](http://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

\_\_\_\_\_ 10/1/2024  
 Signature of Regulated Person or Authorized On-Site Representative

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

\_\_\_\_\_ Title  
 Name of Regulated Person or Authorized On-Site Representative

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. If 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 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 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 determined 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 license application:
  - (a) That justifies the denial with references to the statutes or rules
  - (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

<b>Site Location:</b> Northern Pit - 705 E Birch St., Cottonwood, AZ 86326		<b>Photographer:</b> Cameron Collins	<b>Camera:</b> Samsung Cell Phone
<b>Weather:</b> Clear			
<b>Photo No.</b> 1	<b>Date:</b> 10/1/2024		
<b>Direction Photo Taken:</b> Southwest			
<b>Photo Description:</b> View of Plant from Cottonwood Park prior to entry.			



<b>Photo No.</b> 2	<b>Date:</b> 10/1/2024	
<b>Direction Photo Taken:</b> Southwest		
<b>Photo Description:</b> View of cone crusher with water controls. (Operating)		

<b>Photo No.</b> 3	<b>Date:</b> 10/1/2024
<b>Direction Photo Taken:</b> East	
<b>Photo Description:</b> View of Baghouse Fan outlet. (Operating)	



<b>Photo No.</b> 4	<b>Date:</b> 10/1/2024
<b>Direction Photo Taken:</b> West	
<b>Photo Description:</b> View of east facing view of the plant. Emissions were observed to be emanating from the secondary screen on the right of the photo.	



<b>Photo No.</b> 5	<b>Date:</b> 10/1/2024
<b>Direction Photo Taken:</b> West	
<b>Photo Description:</b> Worker manually wetting interior of the plant.	



<b>Photo No.</b> 6	<b>Date:</b> 10/1/2024
<b>Direction Photo Taken:</b> South	
<b>Photo Description:</b> Front end loader loading haul truck.	



# VISIBLE EMISSION OBSERVATION FORM

Form Number					Page	of
Continued on VEO Form Number						

Method Used Method 9		
Equipment Owner Start Stephan Gosselin		
Facility Name Minerals Research		
EO Street Address 705 E. Birch Street		
EO City Cottonwood	EO Region US-AZ	EO Zip 86326

Observation Date 10/1/2024	Time Zone USMST	Start Time 08:56:39	End Time 09:03:54
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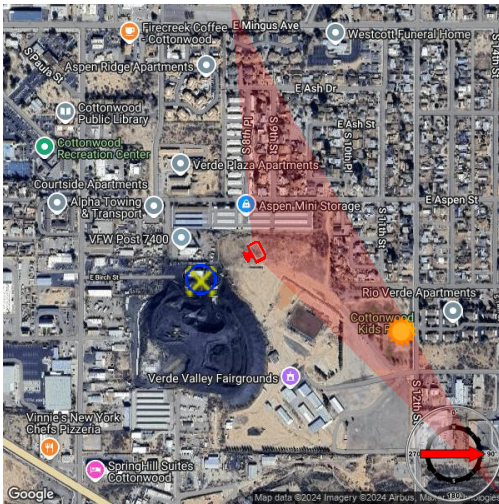
Process N/A	Unit N/A	Operating Mode N/A
Control Equipment N/A	Operating Mode N/A	

Describe Emission Point N/A			
Height of Emiss. Pt Start 40 End Same		Height of Emiss. Pt. Rel. to Observer Start 35 End Same	
Distance to Emiss. Pt Start 451.69 End Same		Direction to Emiss. Pt (Degrees) Start 243.8 End Same	

Vertical Angle to Obs. Pt. Start 3.96 End Same		Direction to Obs. Pt. Start 241.64 End Same	
Distance and Direction to Observation Point from Emission Point Start 19.34 / 179.96 End Same			
Describe Emissions Start N/A End Same			
Emission Color Start Dust End Same		Water Droplet Plume Attached: ( ) Detached: ( ) N/A: ( X )	

Describe Plume Background Start Sky End Same			
Background Color Start Blue End Same		Sky Conditions Start Scattered End Same	
Wind Speed Start 10.13 End Same		Wind Direction Start 268 End Same	
Ambient Temp. Start 96.67 End Same	Wet Bulb Temp. Start 40.1 End Same	RH Percent Start 14 End Same	

					Comments
1	15	5	15	25	
2	15	30	20	25	
3	20	15	15	25	Avg Opacity = 25.83
4	55	40	15	15	
5	20	20	25	40	
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Longitude 112.01.06.091.W	Latitude 34.44.04.902.N	Declination
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Notes RGV
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Observers Name (Print) Cameron Collins	
Observers Signature <i>Cameron Collins</i>	Date 10/1/2024
Organization AZDEQ	
Certified By Rob Verville	Date 10/2/2024

## Source

Name: Cottonwood Plant  
Address: 705 E. Birch Street  
City: Cottonwood  
Region: US-AZ  
Zip: 86326  
Phone: 5209090226  
Local ID:

## Regulatory

Permit ID: 100924  
Condition:  
Regulatory Reference:

## Process

Process: N/A  
Unit: N/A  
Operating Mode: N/A

## Complaint

Name:  
Address:  
City:  
Region: -  
Zip:

## Equipment

Name: N/A

## Type of Inspection

Type of Inspection: Surveillance

## Sun

Altitude: 29.6  
Azimuth: 117.6  
Data Source: Calculated



## Map Information

Map Type: Google  
Map Width: 4013

## Analysis

Averaging Type: Automatic  
Method: Method 9  
Number of Images: 24  
Rolling High Count: 24  
Seconds Between Images: 15  
Who Created: DOCS II  
Creation Date: 10/1/2024

Analysis Name: Shawn Dolan  
Affiliation: Virtual Technology LLC 05  
Comments: Path length of dust cloud is extending with the wind away from camera.





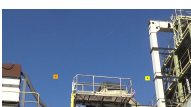

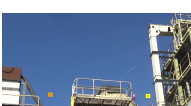

Image	Opacity	Coordinates	Date Taken	Camera Information															
 <p>Image004.jpg</p>	25	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>397</td><td>970</td><td>415</td><td>991</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>405</td><td>381</td><td>423</td><td>402</td></tr> </table>	T	L	B	R	397	970	415	991	T	L	B	R	405	381	423	402	<b>Date Taken:</b> 2024-10-01 08:57:24.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
397	970	415	991																
T	L	B	R																
405	381	423	402																
 <p>Image005.jpg</p>	15	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>525</td><td>991</td><td>543</td><td>1012</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>525</td><td>396</td><td>543</td><td>417</td></tr> </table>	T	L	B	R	525	991	543	1012	T	L	B	R	525	396	543	417	<b>Date Taken:</b> 2024-10-01 08:57:39.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
525	991	543	1012																
T	L	B	R																
525	396	543	417																
 <p>Image006.jpg</p>	30	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>360</td><td>963</td><td>378</td><td>985</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>374</td><td>373</td><td>392</td><td>394</td></tr> </table>	T	L	B	R	360	963	378	985	T	L	B	R	374	373	392	394	<b>Date Taken:</b> 2024-10-01 08:57:54.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
360	963	378	985																
T	L	B	R																
374	373	392	394																
 <p>Image007.jpg</p>	20	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>418</td><td>974</td><td>436</td><td>995</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>365</td><td>345</td><td>383</td><td>366</td></tr> </table>	T	L	B	R	418	974	436	995	T	L	B	R	365	345	383	366	<b>Date Taken:</b> 2024-10-01 08:58:09.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
418	974	436	995																
T	L	B	R																
365	345	383	366																
 <p>Image008.jpg</p>	25	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>450</td><td>974</td><td>468</td><td>995</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>439</td><td>349</td><td>457</td><td>370</td></tr> </table>	T	L	B	R	450	974	468	995	T	L	B	R	439	349	457	370	<b>Date Taken:</b> 2024-10-01 08:58:24.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
450	974	468	995																
T	L	B	R																
439	349	457	370																
 <p>Image009.jpg</p>	20	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>370</td><td>963</td><td>388</td><td>984</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>389</td><td>321</td><td>407</td><td>342</td></tr> </table>	T	L	B	R	370	963	388	984	T	L	B	R	389	321	407	342	<b>Date Taken:</b> 2024-10-01 08:58:39.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
370	963	388	984																
T	L	B	R																
389	321	407	342																
 <p>Image010.jpg</p>	15	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>545</td><td>978</td><td>563</td><td>999</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>536</td><td>314</td><td>554</td><td>335</td></tr> </table>	T	L	B	R	545	978	563	999	T	L	B	R	536	314	554	335	<b>Date Taken:</b> 2024-10-01 08:58:54.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
545	978	563	999																
T	L	B	R																
536	314	554	335																
 <p>Image011.jpg</p>	15	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>423</td><td>972</td><td>441</td><td>993</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>412</td><td>332</td><td>430</td><td>353</td></tr> </table>	T	L	B	R	423	972	441	993	T	L	B	R	412	332	430	353	<b>Date Taken:</b> 2024-10-01 08:59:09.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
423	972	441	993																
T	L	B	R																
412	332	430	353																









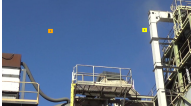
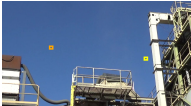


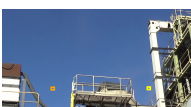



Image	Opacity	Coordinates	Date Taken	Camera Information															
 Image012.jpg	25	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>441</td><td>974</td><td>459</td><td>995</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>415</td><td>377</td><td>433</td><td>398</td></tr> </table>	T	L	B	R	441	974	459	995	T	L	B	R	415	377	433	398	<b>Date Taken:</b> 2024-10-01 08:59:24.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
441	974	459	995																
T	L	B	R																
415	377	433	398																
 Image013.jpg	55	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>466</td><td>978</td><td>484</td><td>1000</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>471</td><td>366</td><td>489</td><td>387</td></tr> </table>	T	L	B	R	466	978	484	1000	T	L	B	R	471	366	489	387	<b>Date Taken:</b> 2024-10-01 08:59:39.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
466	978	484	1000																
T	L	B	R																
471	366	489	387																
 Image014.jpg	40	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>455</td><td>976</td><td>473</td><td>998</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>442</td><td>289</td><td>460</td><td>311</td></tr> </table>	T	L	B	R	455	976	473	998	T	L	B	R	442	289	460	311	<b>Date Taken:</b> 2024-10-01 08:59:54.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
455	976	473	998																
T	L	B	R																
442	289	460	311																
 Image015.jpg	15	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>213</td><td>946</td><td>231</td><td>967</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>219</td><td>297</td><td>237</td><td>319</td></tr> </table>	T	L	B	R	213	946	231	967	T	L	B	R	219	297	237	319	<b>Date Taken:</b> 2024-10-01 09:00:09.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
213	946	231	967																
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 Image016.jpg	15	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>383</td><td>963</td><td>401</td><td>985</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>388</td><td>291</td><td>406</td><td>313</td></tr> </table>	T	L	B	R	383	963	401	985	T	L	B	R	388	291	406	313	<b>Date Taken:</b> 2024-10-01 09:00:24.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
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 Image017.jpg	20	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>387</td><td>966</td><td>405</td><td>987</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>336</td><td>304</td><td>354</td><td>326</td></tr> </table>	T	L	B	R	387	966	405	987	T	L	B	R	336	304	354	326	<b>Date Taken:</b> 2024-10-01 09:00:39.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
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 Image018.jpg	20	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>482</td><td>975</td><td>500</td><td>997</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>494</td><td>319</td><td>512</td><td>340</td></tr> </table>	T	L	B	R	482	975	500	997	T	L	B	R	494	319	512	340	<b>Date Taken:</b> 2024-10-01 09:00:54.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
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482	975	500	997																
T	L	B	R																
494	319	512	340																
 Image019.jpg	25	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>428</td><td>970</td><td>446</td><td>998</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>435</td><td>332</td><td>453</td><td>353</td></tr> </table>	T	L	B	R	428	970	446	998	T	L	B	R	435	332	453	353	<b>Date Taken:</b> 2024-10-01 09:01:09.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
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428	970	446	998																
T	L	B	R																
435	332	453	353																

Image	Opacity	Coordinates	Date Taken	Camera Information															
 <p>Image020.jpg</p>	40	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>186</td><td>954</td><td>204</td><td>976</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>193</td><td>314</td><td>211</td><td>336</td></tr> </table>	T	L	B	R	186	954	204	976	T	L	B	R	193	314	211	336	<b>Date Taken:</b> 2024-10-01 09:01:24.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
186	954	204	976																
T	L	B	R																
193	314	211	336																
 <p>Image021.jpg</p>	30	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>368</td><td>963</td><td>386</td><td>984</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>293</td><td>319</td><td>311</td><td>340</td></tr> </table>	T	L	B	R	368	963	386	984	T	L	B	R	293	319	311	340	<b>Date Taken:</b> 2024-10-01 09:01:39.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
368	963	386	984																
T	L	B	R																
293	319	311	340																
 <p>Image022.jpg</p>	20	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>498</td><td>978</td><td>516</td><td>1000</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>441</td><td>358</td><td>459</td><td>379</td></tr> </table>	T	L	B	R	498	978	516	1000	T	L	B	R	441	358	459	379	<b>Date Taken:</b> 2024-10-01 09:01:54.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
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T	L	B	R																
441	358	459	379																
 <p>Image023.jpg</p>	15	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>421</td><td>974</td><td>439</td><td>995</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>446</td><td>323</td><td>464</td><td>345</td></tr> </table>	T	L	B	R	421	974	439	995	T	L	B	R	446	323	464	345	<b>Date Taken:</b> 2024-10-01 09:02:09.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
421	974	439	995																
T	L	B	R																
446	323	464	345																
 <p>Image024.jpg</p>	45	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>518</td><td>983</td><td>536</td><td>1004</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>520</td><td>330</td><td>538</td><td>351</td></tr> </table>	T	L	B	R	518	983	536	1004	T	L	B	R	520	330	538	351	<b>Date Taken:</b> 2024-10-01 09:02:24.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
518	983	536	1004																
T	L	B	R																
520	330	538	351																
 <p>Image025.jpg</p>	40	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>361</td><td>963</td><td>379</td><td>985</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>370</td><td>341</td><td>388</td><td>362</td></tr> </table>	T	L	B	R	361	963	379	985	T	L	B	R	370	341	388	362	<b>Date Taken:</b> 2024-10-01 09:02:39.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
361	963	379	985																
T	L	B	R																
370	341	388	362																
 <p>Image026.jpg</p>	35	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>412</td><td>970</td><td>430</td><td>991</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>379</td><td>334</td><td>397</td><td>355</td></tr> </table>	T	L	B	R	412	970	430	991	T	L	B	R	379	334	397	355	<b>Date Taken:</b> 2024-10-01 09:02:54.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
412	970	430	991																
T	L	B	R																
379	334	397	355																
 <p>Image027.jpg</p>	15	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>450</td><td>972</td><td>468</td><td>993</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>397</td><td>353</td><td>415</td><td>375</td></tr> </table>	T	L	B	R	450	972	468	993	T	L	B	R	397	353	415	375	<b>Date Taken:</b> 2024-10-01 09:03:09.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.67 <b>Wind Speed/Dir:</b> 10.13 W <b>Rel Humidity:</b> 14 <b>Wet Bulb Temp:</b> 40.1
T	L	B	R																
450	972	468	993																
T	L	B	R																
397	353	415	375																



## Source

Name: Cottonwood Plant  
Address: 705 E. Birch Street  
City: Cottonwood  
Region: US-AZ  
Zip: 86326  
Phone: 5209090226  
Local ID:

## Regulatory

Permit ID: 100924  
Condition:  
Regulatory Reference:

## Process

Process: N/A  
Unit: N/A  
Operating Mode: N/A

## Complaint

Name:  
Address:  
City:  
Region: -  
Zip:

## Equipment

Name: N/A

## Type of Inspection

Type of Inspection: Surveillance

## Sun

Altitude: 28.3  
Azimuth: 116.2  
Data Source: Calculated



## Map Information

Map Type: Google  
Map Width: 2007

## Analysis

Averaging Type: Automatic  
Method: Method 9  
Number of Images: 24  
Rolling High Count: 24  
Seconds Between Images: 15  
Who Created: DOCS II  
Creation Date: 10/1/2024

Analysis Name: Shawn Dolan  
Affiliation: Virtual Technology LLC 05  
Comments: VE puffs under the unit, in shaded area.









Image	Opacity	Coordinates	Date Taken	Camera Information															
 Image004.jpg	0	<b>Foreground Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>397</td><td>605</td><td>415</td><td>626</td></tr> </table> <b>Background Coordinates</b> <table border="1"> <tr><td>T</td><td>L</td><td>B</td><td>R</td></tr> <tr><td>392</td><td>334</td><td>410</td><td>355</td></tr> </table>	T	L	B	R	397	605	415	626	T	L	B	R	392	334	410	355	<b>Date Taken:</b> 2024-10-01 08:50:05.000 <b>Camera Mfg/Model:</b> SONY/CX440 <b>Temperature:</b> 96.49 <b>Wind Speed/Dir:</b> 1.01 E <b>Rel Humidity:</b> 15 <b>Wet Bulb Temp:</b> 41.72
T	L	B	R																
397	605	415	626																
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