


Air Quality Field Inspection Report

Company Name (Responsible Party (RP)): Minerals Research, Inc.	Inspection Report No.: 476643
Place Name: Minerals Research – CWTD Plant Place ID No.: 172594 (137664)	Inspector(s): Kelsey Mccumber , David Demchik
County: Yavapai	Arrival Date and Time: 8/28/2025 9:15 AM
Physical Location: 705 E Birch St., Cottonwood, AZ, 86326	Reason for Inspection: <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.:
Mailing Address: 4620 S Coach Dr, Tucson, AZ, 85714	
Coordinates (for new locations): N/A	
Permit No.: Pending Air Permit Application LTF: 100924	Was Inspection Announced? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Responsible Corporate Official (RCO) (Name (Person) & ID #): 110981 – Michael Vick Onsite Contact Person(s) (Name, Title, phone, email): Stephan Gosselin – Plant Operations Manager 520-692-2272; Stephan.gosselin@mineralsresearch.com Chelsea Wagner – Plant Coordinator 928-862-0192	Operational Status: Not Operating  Source: Copper Slag Processing – Recycling
Other Names for Site/Facility: Cottonwood Slag Crushing-Recycling	Last Inspection: 12/18/2024 by McKenna Ellicott
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. <input type="checkbox"/> No compliance determination made during inspection, information requested. If applicable, ADEQ documents its initial determination per A.R.S. § 41-1009E 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.	

FILE REVIEW:

File Review Conducted: August 26, 2025

Crushing and Screening – Nonmetallic Mineral Processing

Contact: Chelsea Wagner - Plant Coordinator 928.862.0192 chelsea.wagner@mineralsresearch.com;

Permit Issuance: Pending Air Permit Application LTF: 100924

Previous Inspections:

1. McKenna Ellicott on December 18, 2024
2. Cameron Collins on October 7, 2024
3. Cameron Collins on September 10, 2024
4. Cameron Collins on August 20, 2024
5. Rob Verville on July 17, 2024
6. Rob Verville on May 6, 2024
7. Cameron Collins on January 18, 2024
8. Rob Verville on January 10, 2024
9. Rob Verville on December 11, 2023
10. Rob Verville on November 7, 2023

Previous Deficiencies:

- 214846 - Failure to operate spray bars adequately
- 213422 - Failure to obtain a permit or permit revision
- 212764 - Failure to operate spray bars adequately

Complaint History: Several complaints received throughout 2024 for fugitive dust concerns, with the last one received on December 9, 2024 and responded to by McKenna Ellicott on December 18, 2024.

Source Description and General Source Requirements:

1. Complaint / Enforcement History: See File Review
2. Certified Method 9 observer available on site. Yes No NA
3. Reasonable Controls for Fugitive Dust Yes No NA

Comments: No visible emissions exceeding opacity limitations and unpaved areas visibly crusted or have a layer of non-erodible elements

4. Dust Control Plan available Yes No

Comments: Source in Yavapai County

Summary of On-site Inspection:

Arizona Department of Environmental Quality (ADEQ) Air Quality Inspector, [redacted] McCumber, arrived on site on Thursday, August 28, 2025 at approximately 09:15am accompanied by [redacted] Performance Tester, David Demchik.

Prior to entering the site, I conducted observations for visible emissions. I observed no visible emissions exceeding opacity limitations.

I met with Plant Coordinator, Chelsea Wagner, and Plant Operations Manager, Stephan Gosselin, on site. I presented the Notice of Inspection Rights to Mr. Gosselin, which he signed.

ON-SITE RECORD REVIEW:

Ms. Wagner provided the following records, which I reviewed on site at the time of inspection:

- The EPA Method 9 certification cards for the following on-site or on-call individuals. All EPA Method 9 certification cards were received on April 24, 2025, and expire on October 23, 2025.
 - Chelsea Wagner
 - Karl Harris
 - Cory Carroll
 - Paul Jones
 - Jesse Bauer
- Daily opacity monitoring surveys were provided for all operating days from January 2025 to August 2025. I observed no exceedances of opacity limitations for monitoring performed in August 2025.

- Daily production records were provided. The highest amount of material produced in one day was 286 tons on July 11, 2025, which is less than 300 tons which was requested in the most recent permit application.
- Daily operating information was provided which included the pressure differential information for each baghouse. On the most recent operating day, August 27, 2025, the baghouse differential for baghouse 356 was 0.52, and for baghouse 484 was 0.32. During the inspection, Mr. Gosselin informed me that baghouse 356 is connected to the dryer and baghouse 484 is used to capture dust from throughout the plant. Mr. Gosselin informed me that suction lines throughout the plant had been changed in the last few months.
- Daily water truck logs were provided.

Mr. Gosselin accompanied us for the inspection.

Mr. Gosselin informed me that the plant was not operating on the day of inspection, August 28, 2025 because of maintenance that needed to be performed on the plant. Mr. Gosselin informed me that crushing and screening with Superstition Crushing ceased in May 2024 and has not resumed since.



SITE INSPECTION:

The plant was not operating at the time of inspection. I observed the following:

- No visible emissions exceeding opacity limitations
- Unpaved areas visibly crusted or with a layer of non-erodible elements
- Material piles that appeared visibly crusted
- A water truck
- Water sprays mounted throughout the wet process of the plant

I concluded the inspection at approximately 10:00am.

Regulated Emissions Units / Processes:

1. Source has requested a produc  300  .

Exit Debrief:

The ADEQ inspector conducted an Exit Debrief with Mr. Gosselin at the time of inspection. An Exit Debrief was emailed to Mr. Gosselin and Ms. Wagener on Thursday, August 28, 2025 at 03:09pm. The following information was provided during that Exit Debrief.

1. No deficiencies were noted at the time of inspection.

Attachments:

- Notice of Inspection Rights
- Small Business Bill of Rights
- Photograph Log



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY NOTICE OF INSPECTION RIGHTS

FACILITY INFORMATION	ADEQ INFORMATION
Facility Name (Customer): Minerals Research – CWTD Plant	Date of Inspection: 8/28/2025 9:00 AM
Facility Location (Place): 705 E Birch St., Cottonwood, AZ, 86326	County: Yavapai
	Inspector: Kelsey Mccumber
Mailing Address: 4620 S Coach Dr, Tucson, AZ, 85714	Telephone: (602) 480-0601
	Accompanied by: David Demchik
Responsible Party: Minerals Research, Inc.	ADEQ Follow-up Contact: Sean Sandy - Air Compliance Unit
On-Site Representative: Stephan Gosselin	
Title: Plant Operations Manager	
Telephone: 520-692-2272	Telephone: (602) 785-3194
Email: Stephan.gosselin@mineralsresearch.com	Email: sandy.sean@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: 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: <https://www.azleg.gov/arsDetail/?title=49> while the Arizona Administrative Code (A.A.C.) can be found at <https://azsos.gov/rules/arizona-administrative-code>

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.


 _____ 8/28/2025
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 authorized on-site representative was not present at the facility.

Inspection completed by: 
 _____ 8/28/2025
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 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 during 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 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

Site Name: Minerals Research – CWTD Plant - 705 E Birch St., Cottonwood, AZ, 86326	Photographer: Kelsey McCumber	Camera: iPhone 14
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Weather: Scattered Clouds

Photo No. 1	Date: 8/28/2025
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Direction Facing when Photo Taken:
Down

Photo Description (Process, unit, operating condition, etc.):
 Most recent daily opacity monitoring performed on site on August 27, 2025. I observed no opacity monitoring that exceeded opacity limitations. This opacity monitoring survey was performed by Cory Carroll.

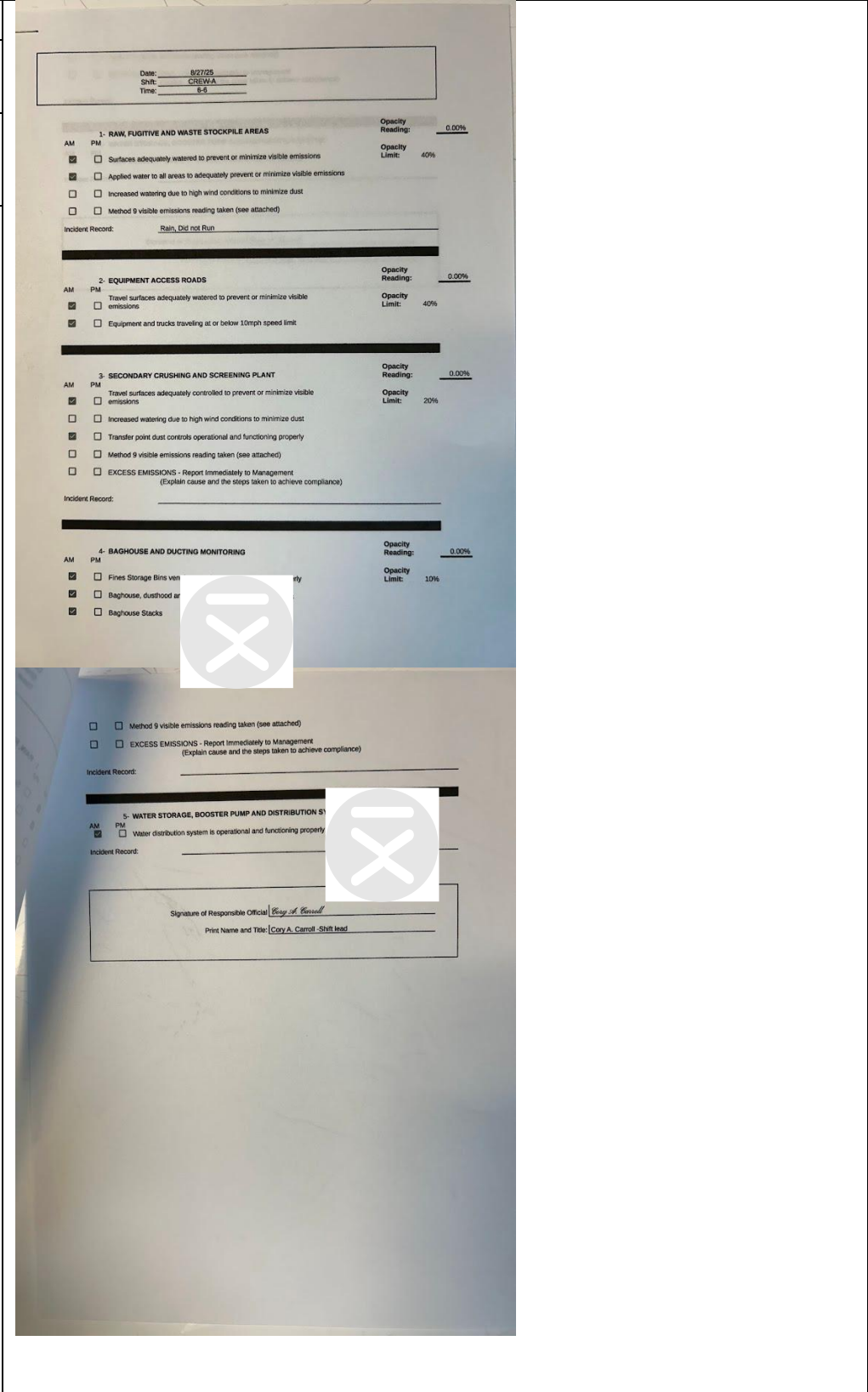


Photo No.
2

Date:
8/28/2025

Direction Facing when Photo Taken:
Down

Photo Description (Process, unit, operating condition, etc.):
Production records for August 2025 including the highest amount produced in August 2025 on August 27, 2025 at 248 tons, which is under the limit of 300 tons requested in the permit application. I observed no other values exceeding 240 tons.

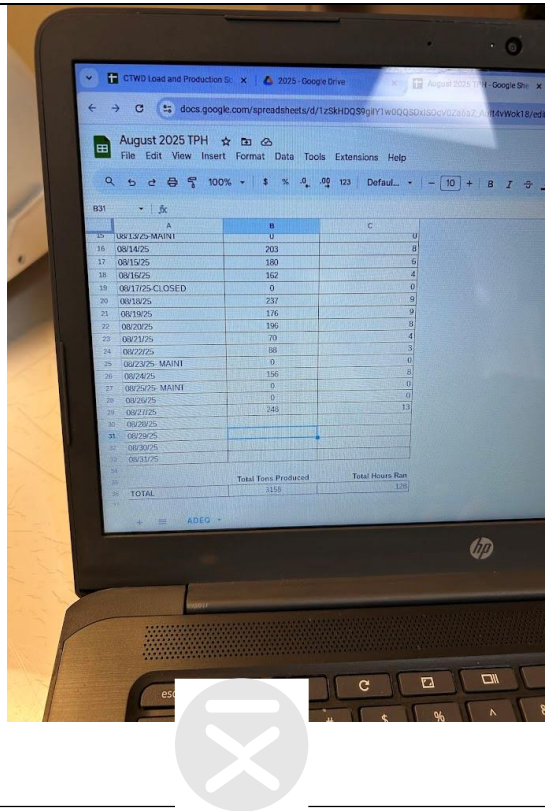


Photo No.
3

Date:
8/28/2025

Direction Facing when Photo Taken:
Down

Photo Description (Process, unit, operating condition, etc.):
Production records for July 2025 including the highest amount produced in July 2025 on July 11, 2025 at 286 tons, which is under the limit of 300 tons requested in the permit application. I observed no other values exceeding 240 tons.

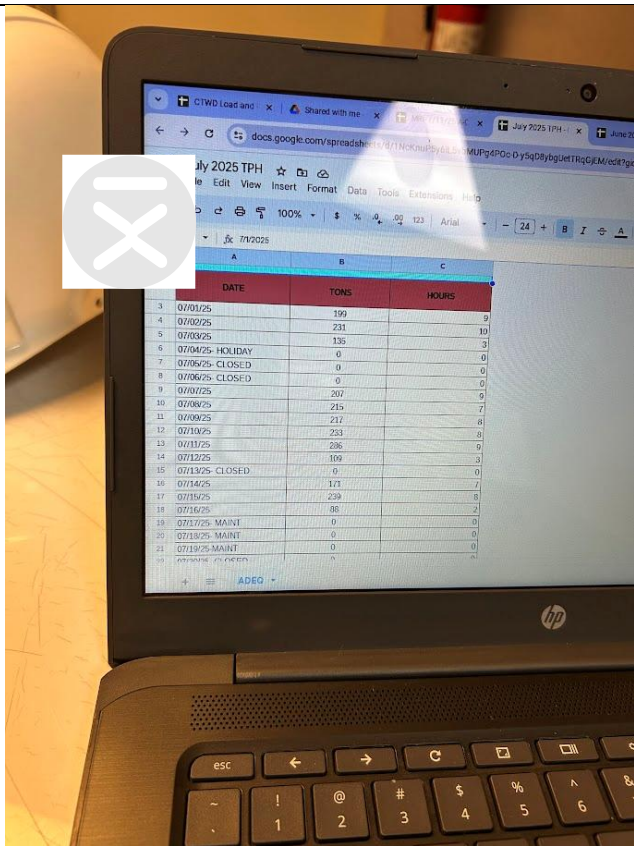


Photo No.
4

Date:
8/28/2025

Direction Facing when Photo Taken:
Down

Photo Description (Process, unit, operating condition, etc.):
Daily dust control and baghouse differential pressure records for the most recent operating day on August 27, 2025. Baggouse differential for baghouse 356 was 0.52, and for baghouse 484 was 0.32.

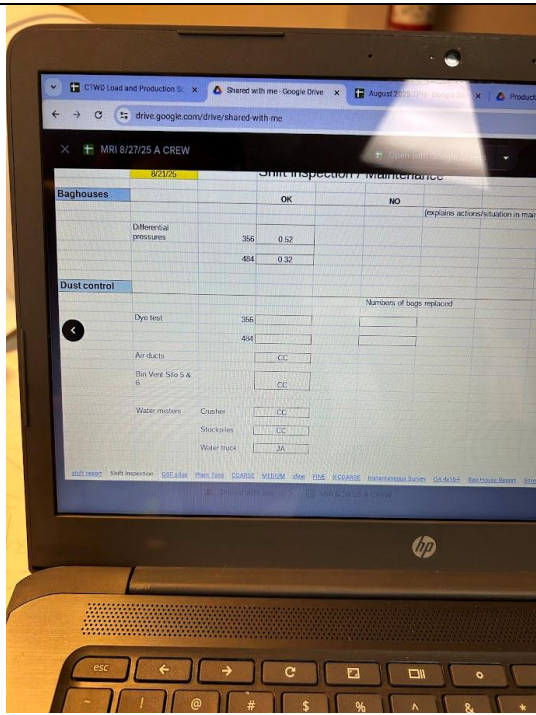


Photo No.
5

Date:
8/28/2025

Direction Facing when Photo Taken:
Down

Photo Description (Process, unit, operating condition, etc.):
Baghouse maintenance records from June 17, 2025 and July 31, 2025. Baghouses were replaced on both days in baghouse 356.

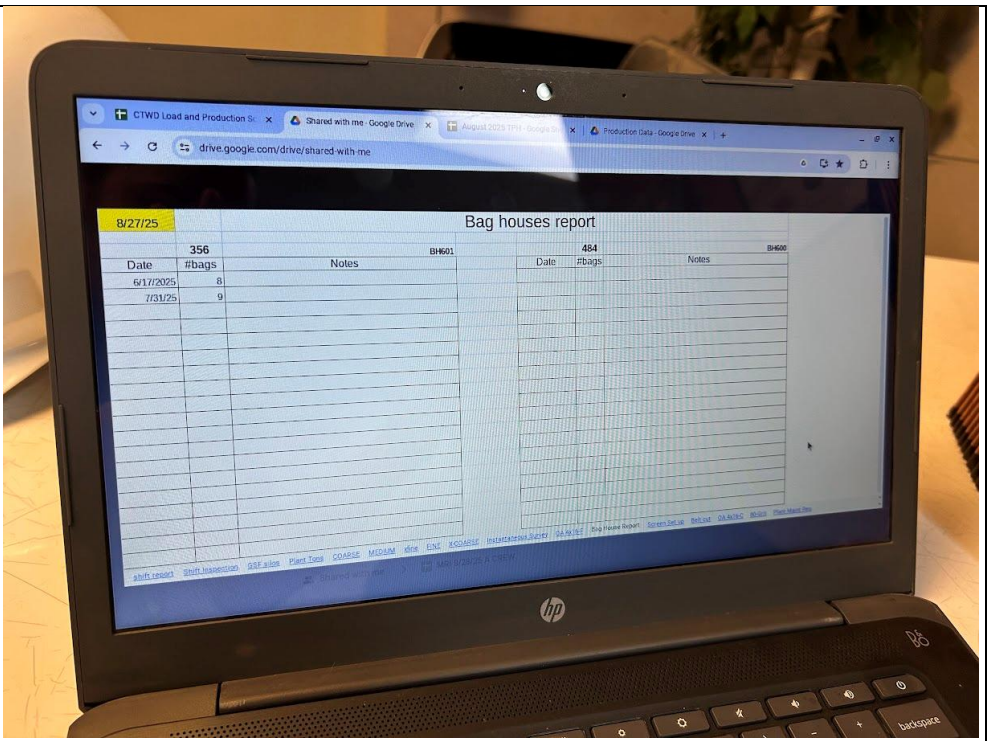


Photo No. 6	Date: 8/28/2025
Direction Facing when Photo Taken: Down	
Photo Description (Process, unit, operating condition, etc.): EPA Method 9 certification cards for on-site or on-call observers including Chelsea Wagner, Paul Jones, Karl Harris, Jesse Bauer, and Cory Carroll.	



Photo No. 7	Date: 8/28/2025
Direction Facing when Photo Taken: West	
Photo Description (Process, unit, operating condition, etc.): Entrance to the site on E Birch St and facility's storage of bagged products.	



Photo No. 8	Date: 8/28/2025
Direction Facing when Photo Taken: South	
Photo Description (Process, unit, operating condition, etc.): Slag pile observed from the northwest side of the office. Unpaved areas were visibly crusted and had a layer of non-erodible elements.	



Photo No. 9	Date: 8/28/2025
Direction Facing when Photo Taken: East	
Photo Description (Process, unit, operating condition, etc.): Water truck observed on site.	

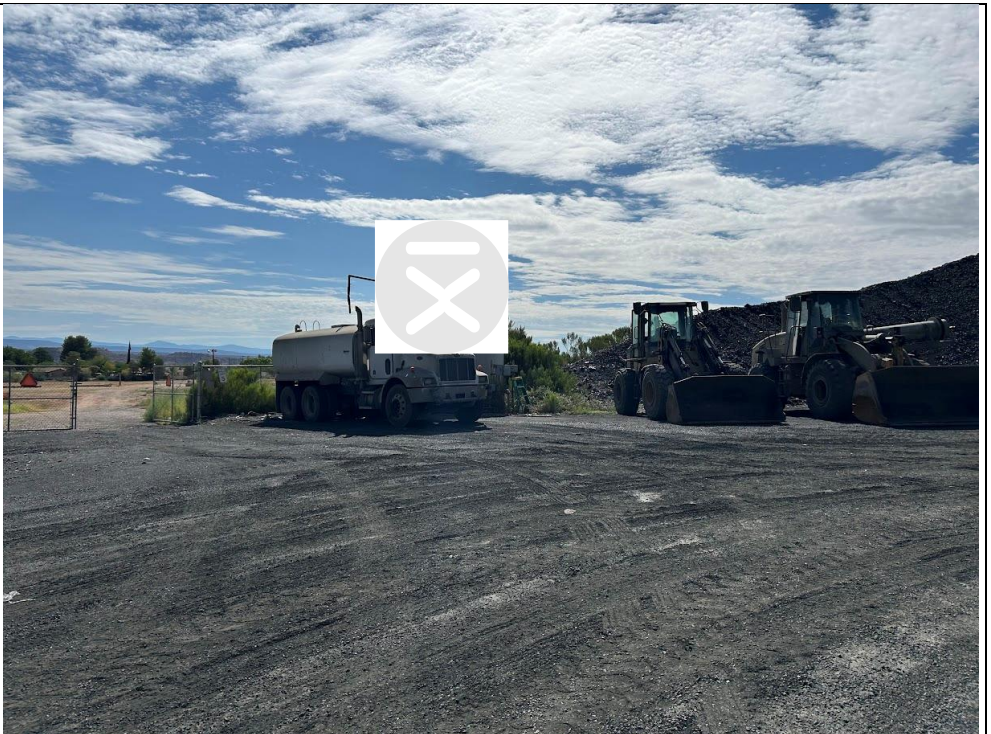


Photo No. 10	Date: 8/28/2025
Direction Facing when Photo Taken: Southwest	
Photo Description (Process, unit, operating condition, etc.): Slag processing plant and slag pile observed on site. Operations were not active at the time of inspection.	



Photo No. 11	Date: 8/28/2025
Direction Facing when Photo Taken: South	
Photo Description (Process, unit, operating condition, etc.): Slag pile observed on site for secondary feed product.	



Photo No.
12

Date:
8/28/2025

**Direction Facing when
Photo Taken:**
Southwest

Photo Description (Process,
unit, operating condition,
etc.):
Wet process of the slag
processing plant observed
on site. Operations were
not active at the time of
inspection but water was
available for the process.

