



Arizona Department of Environmental Quality



AIR QUALITY FIELD INSPECTION REPORT

Company Name: Minerals Research, Inc.	Inspection Report No.: 488747
Place Name: Minerals Research – CTWD Plant Place ID No.: 172594 (137664)	Inspector(s): Kelsey Mccumber, Emily Tribby
County: Yavapai	Arrival Date and Time: 2/17/2026 4:30 PM
Physical Location: 705 E Birch St., Cottonwood, AZ, 86326	Reason for Inspection: <input checked="" type="checkbox"/> Complaint Complaint No.: 23045 and 23049 <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): Not applicable	Was Inspection Announced? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Permit No.: Pending Air Permit Application Licensing Time Frame (LTF): 100924	Operational Status: Not Operating
Responsible Corporate Official (RCO) (Name & ID #): 110981 – Michael Vick Onsite Contact Person(s): Stephan Gosselin – Plant Operations Manager 5 2272; Stephan.gosselin@mineralsresearch.com Chelsea Wagner – Plant Coordinator 928-862-0	Type of Source: Copper Slag Processing - Recycling
Other Names for Site/Facility: Cottonwood Sla Recycling	
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 date 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:

Minerals Research

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

Carl Harris - Plant Superintendent

Permit Issuance: Pending Air Permit Application LTF: 100924

Previous Inspections:

1. Kelsey McCumber on August 28, 2025
2. McKenna Ellicott on December 18, 2024
3. Cameron Collins on October 7, 2024
4. Cameron Collins on September 10, 2024
5. Cameron Collins on August 20, 2024
6. Rob Verville on July 17, 2024
7. Rob Verville on May 6, 2024
8. Cameron Collins on January 18, 2024
9. Rob Verville on January 10, 2024
10. Rob Verville on December 11, 2023
11. 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.

General Source Requirements:

1. Method 9 observer certification available on site. Yes No NA
Comments: EPA Method 9 certification card requested via email (See Records Request).
2. Reasonable Controls for Fugitive Dust Yes No NA
Comments: Unpaved areas appeared visibly crusted from the perimeter of the site. I observed no visible emissions exceeding opacity limitations at the time of inspection.
3. Dust Control Plan available Yes No NA
Comments: Source in Yavapai County.

Summary of Inspection:

Arizona Department of Environmental Quality (ADEQ) Air Quality Inspector, Kelsey McCumber, arrived off-site but in an area to view the source on Tuesday, February 17, 2026 at approximately 04:30pm accompanied by Air Quality Inspector, Emily Tribby, for a complaint-response inspection (See Complaints 23045 and 23049). One of the complaints indicated that visible emission concerns occur at 5pm during weekdays.

From the off-site location, I, Kelsey McCumber, conducted observations for visible emissions. I observed no visible emissions exceeding opacity limitations.

At approximately 05:00pm on Tuesday, February 17, 2026, I drove to the main entrance of the site, and observed the fence to be closed. The source did not appear to be operating. I called Plant Operations Manager, Stephan Gosselin, regarding the inspection and complaint, and left a voicemail. Inspector Tribby and I then called Chelsea Wagner, Plant Coordinator, regarding the inspection and complaint. Ms. Wagner informed me that the source last operated the day of inspection, February 17, 2026, but likely had already ceased operations for the day since the source typically ceases operations at 03:00pm daily. Ms. Wagner confirmed that Superstition Crushing was back on site for crushing and screening operations. Ms. Wagner added that Superstition Crushing returned on site a couple weeks prior to the date of inspection. Ms. Wagner informed me that the source has performed two explosive blasting events and plans to perform explosive blasting twice more.

I informed Ms. Wagner that a records request would be emailed soon.

I concluded the inspection at approximately 05:30pm.

RECORDS REQUEST:

The following records were requested via email on Wednesday, February 18, 2026 at 05:28pm with a due date of Friday, February 20, 2026:

1. The most recent date explosive blasting occurred on site.
2. The EPA Method 9 certification card for the on-site or on-call opacity observer.
3. Any opacity monitoring from the week of February 8, 2026 to February 14, 2026. If opacity monitoring was not conducted that week, please provide the most recent opacity monitoring records.
4. Hours of operation for crushing and screening performed by Superstition Crushing for each day the week of February 8, 2026 to February 14, 2026.

On Thursday, February 19, 2026 at 09:47am, Mr. Gosselin requested an extension for sending the requested records. I extended the deadline until the end of business, Tuesday, February 24, 2026.

RECORD REVIEW:

I received the following records via email from Mr. Gosselin on Friday, February 20, 2026 at 02:43pm:

1. Daily opacity monitoring records from February 9, 2026 to February 14, 2026. I observed no visible emissions observations exceeding opacity limitations during this time frame. Visible emission observations were conducted by Shift Leads, Jesse Bauer or Cory C
2. The EPA Method 9 certification cards for the full te or on-call individuals. All EPA Method 9 certification cards were received on October 16, xpire on April 16, 2026.
 - a. Paul Jones
 - b. Lisa Sanford
 - c. Jesse Bauer
 - d. Cory Carroll
 - e. Karl Harris
3. Mr. Gosselin indicated that Superstition Crushing employees worked the week of February 8, 2026 as follows:
 - a. Monday to Thursday: 6:00am – 6:30pm
 - b. Friday: 6:00am – 3:00pm
4. Mr. Gosselin indicated that the most recent explosive blasting event was performed on January 9, 2026.
PLEASE NOTE: After further correspondence, it was confirmed that the most recent explosive blasting event was on February 9, 2026, not January 9, 2026 (Refer to Modeling Record Review below).

ADDITIONAL RECORDS REQUEST:

The following records were requested via email on Monday, February 23, 2026 at 10:48am with a due date of end of business, Wednesday, February 25, 2026:

1. Daily amounts of material produced through primary crushing and screening operations for each day between February 8, 2026 to February 14, 2026.
2. Daily amounts of material produced through secondary crushing and screening operations for each day between February 8, 2026 to February 14, 2026.

ADDITIONAL RECORD REVIEW:

I received the following records via email from Mr. Gosselin on Monday, February 23, 2026 at 11:31am:

1. Daily amounts of material produced via primary crushing and screening operations for each day between February 8, 2026 to February 14, 2026. The highest amount of material produced in one day via primary

crushing and screening operations was 1,760 tons on February 12, 2026, which is less than the requested production limit of 2,200 tons per day.

2. Daily amounts of material produced via secondary crushing and screening operations for each day between February 8, 2026 to February 14, 2026. The highest amount of material produced in one day via secondary crushing and screening operations was 213 tons on February 13, 2026, which is less than the requested production limit of 300 tons per day.

MODELING RECORDS REQUEST:

The following information regarding the most recent explosive blast event was requested via email on Monday, February 23, 2026 at 02:25pm with a due date of end of business, Wednesday, February 25, 2026:

1. The blasting date and time;
2. Total amount of ANFO (Ammonium Nitrate/Fuel Oil) used in the blast, measured in tons;
3. Total horizontal area of the blast zone, measured in square feet;
4. A Google Earth map clearly depicting the blasting perimeter and location

MODELING RECORD REVIEW:

The following records were received from Stephan Gosselin via email on Wednesday, February 25, 2026 at 12:08pm:

1. Blasting Date and Time: February 9, 2026, at 10:09 AM.
2. Total Amount of ANFO Used: 0.95 tons (1,900 lbs).
3. Total Horizontal Area of the Blast Zone: approx. 3,840 square feet.
4. Blasting Perimeter and Location

A discrepancy was observed between the dates reported for the most recent explosive blast event. Air Compliance Manager, Sean Sandy, replied to Mr. Gosselin on Thursday, February 26, 2026 at 12:12pm to confirm the date of the most recent blast event.

Mr. Gosselin confirmed that the most recent explosive blast event occurred on February 9, 2026.

The blast event information was reviewed by Air Dispersion Modeler, Feng Mao. The amount of Ammonium Nitrate/Fuel Oil (ANFO) and the blast area were both lower than originally assumed in the Potential to Emit (PTE) calculation and modeling conducted for the source as shown below.

	PTE & Modeling	2/9/2026 event
Amount of ANFO per blast (tons)	1.741	0.95
Horizontal Area of Blast (Square Feet)	6,412	3,840

Regulated Emissions Units / Processes:

1. Source has requested a production limit of 300 tons per day for the secondary crushing/screening plant and 2,200 tons per day for the primary crushing/screening plant.

Exit Debrief:

The ADEQ Inspector conducted an exit debrief with Chelsea Wagner, Plant Coordinator, via a phone call at the time of inspection. An Exit Debrief was emailed to Stephan Gosselin, Plant Operations Manager, and Ms. Wagner, and Responsible Corporate Official, Michael Vick on Tuesday, February 17, 2026 at 06:54pm. The following information was provided during that exit debrief.

1. Provide the ADEQ inspector with requested records (See Records Request above).
2. 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 – CTWD Plant	Date of Inspection: 2/17/2026 4:30 PM
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: Emily Tribby
Responsible Party: Minerals Research, Inc.	ADEQ Follow-up Contact: Sean Sandy – Air Compliance Manager
On-Site Representative: NOT-ON-SITE Stephan Gosselin	
Title: Plant Operations Manager	Telephone: (602) 785-3194
Telephone: 520-692-2272	
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

Licensing Time Frame (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

Licensing Time Frame (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 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

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

Name of Regulated Person or Authorized On-Site Representative

Stephan Gosselin

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

Inspection completed by:

Signature of ADEQ Representative

2/17/2026

INSPECTION RIGHTS

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

41-1001.01. Regulatory bill of rights; small businesses

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

1. Is eligible for reimbursement of fees and other expenses if the person prevails by adjudication on the merits against an agency in a court proceeding regarding an agency decision as provided in section 12-348.
2. Is eligible for reimbursement of the person's costs and fees if the person prevails against any agency in an administrative hearing as provided in section 41-1007.
3. Is entitled to have an agency not charge the person a fee unless the fee for the specific activity is expressly authorized as provided in section 41-1008.
4. Is entitled to receive the information and notice regarding inspections and audits prescribed in section 41-1009.
5. May review the full text or summary of all rulemaking activity, the summary of substantive policy statements and the full text of executive orders in the register as provided in article 2 of this chapter.
6. May participate in the rulemaking process as provided in articles 3, 4, 4.1 and 5 of this chapter, including:
 - (a) Providing written comments or testimony on proposed rules to an agency as provided in section 41-1023 and having the agency adequately address those comments as provided in section 41-1052, subsection D, including comments or testimony concerning the information contained in the economic, small business and consumer impact statement.
 - (b) Filing an early review petition with the governor's regulatory review council as provided in article 5 of this chapter.
 - (c) Providing written comments or testimony on rules to the governor's regulatory review council during the mandatory sixty-day comment period as provided in article 5 of this chapter.
7. Is entitled to have an agency not base a licensing decision in whole or in part on licensing conditions or requirements that are not specifically authorized by statute, rule or state tribal gaming compact as provided in section 41-1030, subsection B.
8. Is entitled to have an agency not make a rule under a specific grant of rulemaking authority that exceeds the subject matter areas listed in the specific statute or not make a rule under a general grant of rulemaking authority to supplement a more specific grant of rulemaking authority as provided in section 41-1030, subsection C.
9. May allege that an existing agency practice or substantive policy statement constitutes a rule and have that agency practice or substantive policy statement declared void because the practice or substantive policy statement constitutes a rule as provided in section 41-1033.
10. May file a complaint with the administrative rules oversight committee concerning:
 - (a) A rule's, practice's or substantive policy statement's lack of conformity with statute or legislative intent as provided in section 41-1047.
 - (b) An existing statute, rule, practice alleged to constitute a rule or substantive policy statement that is alleged to be duplicative or onerous as provided in section 41-1048.
11. May have the person's administrative hearing on contested cases and judge as provided in articles 6 and 10 of this chapter.
12. May have administrative hearings governed by uniform administrative 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 article 7, chapter 7, article 6.
13. May have an agency approve or deny the person's license application within a prescribed 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 Name: Minerals Research – CTWD Plant - 705 E Birch St., Cottonwood, AZ, 86326		Photographer: Kelsey Mccumber	Camera: iPhone 14
Weather: Cloudy			
Photo No. 1	Date: 2/17/2026		
Direction: South			
Photo Description: Overall site view from the northern fence line of the site. I observed no visible emissions exceeding opacity limitations at the time of inspection and the source was not in operation.			

Photo No. 2	Date: 2/17/2026	
Direction: East		
Photo Description: Overall site view from the site's main entrance on the western side of the site. I observed no visible emissions exceeding opacity limitations at the time of inspection and the source was not in operation.		