



# Arizona Department of Environmental Quality



## AIR QUALITY FIELD INSPECTION REPORT

<b>Company Name:</b> Minerals Research, Inc. RP: 37790	<b>Inspection Report No.:</b> 460065
<b>Place Name:</b> Cottonwood Slag Crushing-Recycling <b>Place ID No.:</b> 137664 (172594 portable place of air)	<b>Inspector(s):</b> Rob Verville, Justin Legg
<b>County:</b> Yavapai	<b>Arrival Date and Time:</b> 3/9/2026 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 (explosive blast) <input type="checkbox"/> Follow-Up Original Inspection Report No.:
<b>Mailing Address:</b> 4620 S Coach Dr., Tucson, AZ 85714	
<b>Coordinates (for new locations):</b> Latitude: Longitude:	
<b>Permit No.:</b> Pending Air Permit Application (LTF: 100924) <b>Permit Expiration Date:</b> <b>Was Inspection Announced?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>Permit Classification:</b> <input type="checkbox"/> Major <input type="checkbox"/> SM80 <input type="checkbox"/> Minor <b>Title V Designation:</b> <input type="checkbox"/> Title V <input type="checkbox"/> Non-Title V <b>Permit Type:</b> <input type="checkbox"/> Individual <input type="checkbox"/> General
<b>RCO (Name &amp; ID #):</b> <b>Onsite Contact Person(s):</b> Stephan Gosselin, Manager – Mike Vick, President Carl Harris, Operations Mgr.	<b>Operational Status:</b> Not Operating  <b>Type of Source:</b> Copper Slag Processing-Recycling
<b>Other Names for Site/Facility:</b>	<b>Last Inspection:</b> 8/28/25, Insp ID: 476643 by KM
<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. <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.	

## **CURRENT OPERATIONS**

During the inspection, ADEQ Air Quality was represented by Robert Verville, Justin Legg, Cameron Rasmussen, Air Quality Inspectors (ADEQ Inspectors) and Hazel Cox, Waste Programs Division.

Prior to entering the site, the ADEQ Inspectors conducted observations for visible emissions and odors. The ADEQ Inspectors did not observe any visible emissions or odors. The ADEQ inspectors observed a water sprinkler operating on top of the slag pile and wetted roads at the entrance.

At the site, the ADEQ Inspectors parked and walked to the front office. The door was lock and the ADEQ inspectors proceeded to the back office trailer and met Carl Harris, Operations Manager. Mr. Harris escorted the ADEQ inspectors up to the blasting area.

At the blast area, the ADEQ inspectors spoke with the WESCO Blasting Contractor foreman. WESCO is a professional explosive blasting contractor. The area to be blasted had orange safety cones at each corner. The blast holes had been loaded with explosives, detonators/boosters and the blast cord was visible attaching each hole.

The ADEQ inspectors observed Superstition Crushing is conducting primary crushing operations. The crushing plant was south east of the blast area on the slag pile. While speaking with the WESCO foreman, Mr. Gosselin, Plant Manager arrived and greeted the group. The group discussed the blast schedule and the WESCO foreman indicated it could be pushed up to 9:30am from the original schedule of 10:30am. Mr. Gosselin stated the blast would stay as scheduled.

The ADEQ inspectors discussed the possibility of collecting a Digital Opacity Compliance System (DOCS) observation. The group discussed the safe areas, where blockers are positioned and the correct sun angle for a valid visible emissions observation. ADEQ inspectors were informed, no one is permitted in the facility during a blast, except for the blasting contractors. It was determined an ADEQ inspector could be escorted and positioned with the blasting contractor employee on the southeast berm and conduct the DOCS observation. The remainder of the group could watch from a safe location in the southwest corner. The southwest corner is not the correct position to evaluate visible emissions.

Mr. Gosselin stated he had deal with some manager issues and the ADEQ inspectors retreated back to the front office. When Mr. Gosselin returned to the office, he walked with the ADEQ inspectors around the processing plant explaining the operations. The processing plant was not operating during the inspection. The plant ground was saturated wet. The Notice of Inspection Rights was presented to and signed by Mr. Gosselin.

After walking the plant, the group returned to the front office. The ADEQ inspectors inquired about when Superstition Crushing started crushing operations. Mr. Gosselin stated Superstition Crushing started the custom crushing operations on January 8, 2026. Mr. Gosselin stated Superstition Crushing has approximately 2 weeks remaining to manufacture the product. While in the office, Mike Vick, President, showed up to observe the blast. The group then proceeded to the safe area to observe the blast. One ADEQ inspector proceeded to the southeast berm with the escort to collect the DOCS opacity observation.

## **PERMIT APPLICATION BLASTING**

The source indicated in the air permit application they would conduct specific activities for monitoring blasting.

Source Stated: Water will be used for dust control for blasting.

During the inspection, Mr. Gosselin stated he sprayed the blast area on Sunday afternoon. The water truck was observed wetting all the piles and haul roads around the plant.

Source Stated: MRI will follow 40% opacity requirement for blasting.

The company has not reported any blast over 40% opacity. On March 9, 2026, during the blast, ADEQ collected a DOCS opacity observation. The opacity observation was uploaded, analyzed and finalized. The Method 9 opacity was determined to be 9.17% opacity. The permit limit for fugitive emissions is 40% opacity.

Source Stated: MRI will complete an EPA Method 9 if visible emissions are detected.

Due to safety concerns the view of the blast is limited. The blast contractor has all non-blasting contractors leave the facility. ADEQ was provided with an escort up on the southeast berm to collect an opacity observation. The blasting area is below the berm and has no direct line of site.

Source Stated: Monitor blasting hole design and layout.

The source uses WESCO, a professional blasting contractor to conduct the blasting operations. Based on WESCO's expertise in blasting, an 8X8 blast hole pattern is best for slag and the blast area is limited.

Source Stated: Monitor to ensure the contractor is consistently producing a maximum amount of fractured crushable rock and a minimum amount of fly rock dust during blasts.

Mr. Gosselin stated the 8X8 blast hole pattern is the best pattern to fracture and prevent dust. The blasting contractor source also conducts smaller blasts to reduce dust. While drilling blast holes, the drillers identify any issues in the slag that require additional planning, (i.e., voids, excessive hardness).

**Exit Debrief:**

1. Provide the ADEQ inspector with the blast log for the March 9, 2026, explosive blast.

**Exit Debrief Response**

On March 11, 2026, Stephan Gosselin sent an email to ADEQ with the blast information.

Explosives: ANFO 1,850 lbs.

Blast area: Approximately 2,400 square feet

Number of blast holes: 53

**Attachments:**

Notice of Inspection Rights

Small Business Bill of Rights

Photograph Log

DOCS observations



## ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY NOTICE OF INSPECTION RIGHTS

FACILITY INFORMATION	ADEQ INFORMATION
<b>Facility Name (Customer):</b> Cottonwood Slag Crushing-Recycling	<b>Date of Inspection:</b> 3/9/2026 8:00 AM
<b>Facility Location (Place):</b> 705 E Birch St., Cottonwood, AZ 86326	<b>County:</b> Yavapai
	<b>Inspector:</b> Rob Verville
<b>Mailing Address:</b> 4620 S Coach Dr., Tucson, AZ 85714	<b>Telephone:</b> (602) 320-1814
	<b>Accompanied by:</b> Justin Legg Cameron Rasmussen
<b>Responsible Party:</b> Minerals Research, Inc. RP: 37790	<b>ADEQ Follow-up Contact:</b> Rob Verville
<b>On-Site Representative:</b> Stephan Gosselin	
<b>Title:</b> Manager	
<b>Telephone:</b>	<b>Telephone:</b> (602) 320-1814
<b>Email:</b>	<b>Email:</b> verville.rob@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: [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.**

3/9/2026

*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:**

*Signature of ADEQ Representative*

3/9/2026

## 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 appealable agency actions heard by an independent administrative law judge as provided in articles 6 and 10 of this chapter.
12. May have administrative hearings governed by uniform administrative appeal procedures as provided in articles 6 and 10 of this chapter and may appeal a final administrative decision by filing a notice of appeal pursuant to title 12, chapter 7, article 6.
13. May have an agency approve or deny the person's license application within a predetermined period of time as provided in article 7.1 of this chapter.
14. Is entitled to receive written notice from an agency on denial of a license application:
  - (a) That justifies the denial with references to the statutes or rules on which the denial is based as provided in section 41-1076.
  - (b) That explains the applicant's right to appeal the denial as provided in section 41-1076.
15. Is entitled to receive information regarding the license application process before or at the time the person obtains an application for a license as provided in sections 41-1001.02 and 41-1079.
16. May receive public notice and participate in the adoption or amendment of agreements to delegate agency functions, powers or duties to political subdivisions as provided in section 41-1026.01 and article 8 of this chapter.
17. May inspect all rules and substantive policy statements of an agency, including a directory of documents, in the office of the agency director as provided in section 41-1091.
18. May file a complaint with the office of the ombudsman-citizens aide to investigate administrative acts of agencies as provided in chapter 8, article 5 of this title.
19. Unless specifically authorized by statute, may expect state agencies to avoid duplication of other laws that do not enhance regulatory clarity and to avoid dual permitting to the extent practicable as prescribed in section 41-1002.
20. May have the person's administrative hearing on contested cases pursuant to title 23, chapter 2 or 4 heard by an independent administrative law judge as prescribed by title 23, chapter 2 or 4.


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

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

## Air Quality Field Inspection Photograph Log

<b>Site Name:</b> Cottonwood Slag Crushing-Recycling - 705 E Birch St., Cottonwood, AZ 86326		<b>Photographer:</b> Rob Verville	<b>Camera:</b> Samsung Cell Phone
<b>Weather:</b> Clear			
<b>Photo No.</b> 1	<b>Date:</b> 3/9/2026		
<b>Direction:</b> East			
<b>Photo Description:</b> Shot pattern between orange safety cones.  Blast holes loaded with explosives, boosters and connected with blast cord.			

<b>Photo No.</b> 2	<b>Date:</b> 3/9/2026	
<b>Direction:</b> Down		
<b>Photo Description:</b> The ground around the blast area showed evidence of wetting.		


<b>Photo No.</b> 3	<b>Date:</b> 3/9/2026		
<b>Direction:</b> Northeast			
<b>Photo Description:</b> Water sprinkler operating around blast area.  Incorrect sun angle to evaluate visible emissions.			

<b>Photo No.</b> 4	<b>Date:</b> 3/9/2026		
<b>Direction:</b> Northeast			
<b>Photo Description:</b> Water sprinkler operating, and blast initiated. Visible emission observed in the sprinkler spray.  Incorrect sun angle to evaluate visible emissions.			

<b>Photo No.</b> 5	<b>Date:</b> 3/9/2026		
<b>Direction:</b> Northeast			
<b>Photo Description:</b> Visible emission from the blast and water sprinkler still operating.  Incorrect sun angle to evaluate visible emissions.			

<b>Photo No.</b> 6	<b>Date:</b> 3/9/2026		
<b>Direction:</b> Northeast			
<b>Photo Description:</b> Blast visible emission dispersing and water sprinkler operating.  Not correct sun angle to evaluate visible emissions.			

<b>Photo No.</b> 7	<b>Date:</b> 3/9/2026		
<b>Direction:</b> Northeast			
<b>Photo Description:</b> Visible emissions dispersing and water sprinkler operating.  Incorrect sun angle to evaluate visible emissions.			

<b>Photo No.</b> 8	<b>Date:</b> 3/9/2026		
<b>Direction:</b> Northeast			
<b>Photo Description:</b> Visible emissions dispersing and water sprinkler operating.  Incorrect sun angle to evaluate visible emissions.			