



Arizona Department of Environmental Quality



AIR QUALITY FIELD INSPECTION REPORT

Company Name: Minerals Research, Inc. RP: 37790	Inspection Report No.: 502984
Place Name: Cottonwood Slag Crushing-Recycling Place ID No.: 137664 (172594 portable place of air)	Inspector(s): Rob Verville, Feng Mao, Miguel Sandoval, Jordy Yepiz
County: Yavapai	Arrival Date and Time: 8/31/2026 1:00 PM
Physical Location: 705 E Birch St., Cottonwood, AZ 86326	Reason for Inspection: ☐ Complaint Complaint No.: ☐ Full Inspection ☒ Partial Inspection ☐ Follow-Up Original Inspection Report No.:
Mailing Address: 4620 S Coach Dr., Tucson, AZ 85714	
Coordinates (for new locations): Latitude: Longitude:	
Permit No.: Air Permit Application (LTF: 100924) Permit Expiration Date: Was Inspection Announced? ☐ Yes ☒ No	Permit Classification: ☐ Major ☐ SM80 ☐ Minor Title V Designation: ☐ Title V ☐ Non-Title V Permit Type: ☐ Individual ☐ General
RCO (Name & ID #): Onsite Contact Person(s): Stephan Gosselin, Manager	Operational Status: Not Operating
	Type of Source: Copper Slag Processing-Recycling
Other Names for Site/Facility:	Last Inspection: 6/15/26, Insp ID: 497007
Results of Inspection: ☒ No alleged deficiencies were noted during the course of the inspection. No ADEQ action will result from this inspection. ☐ 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. ☐ Alleged deficiencies were noted during the course of the inspection. Additional correspondence regarding this inspection may be forthcoming. ☐ 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: ☐ Committed intentionally. ☐ Not correctable within a reasonable period of time as determined by the agency. ☐ 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. ☐ 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, Air Quality Inspector, Feng Mao, Miguel Sandoval, Jordy Yepiz, Air Permit Engineers, (ADEQ Inspectors).

Prior to entering the site, the ADEQ Inspector conducted observations for visible emissions and odors. The ADEQ Inspector did not observe any visible emissions or odors from east and west of the property.

At the site, the ADEQ Inspector parked and walked to the front office. At the office, the ADEQ inspector met Stephan Gosselin, Manager. An in-briefing was held with Mr. Gosselin to discuss the inspection and providing the permit engineers information regarding operations. The Notice of Inspection Rights was presented to and signed by

Mr. Gosselin. Mr. Gosselin stated the plant was not operating. The plant operator was out sick.

Mr. Gosselin stated the Soilworks, Durasoil product has been working. Mr. Gosselin stated the area has had rain every week for the past few weeks and the rain has been helping with dust control.

While walking around the plant, the ADEQ inspector observed wetted ground through the plant.

Mr. Gosselin explained the process from primary crushing & screening, secondary screening and crushing, drying process and final products and the air pollution control systems.

Over-the-road trucks were being loaded. A skidster was cleaning on the east side of the plant. No opacity issues were observed.

The inspector requested the water sprays be activated on the crusher and Mr. Gosselin turned on the water valve and the sprays began operating.

Throughput for Primary C&S up to 2,200 TPD. Limit in the revised application dated March 6, 2025.	The primary C&S operation is not currently at the facility. Superstition Crushing conducted the primary crushing January 2026 through March 2026. The ADEQ inspector looked through the production records. Mr. Gosselin stated MRI limits Superstition to 2,000 TPD. The largest production amount produced was 1,996.0 TPD, on 2/19/26 & 3/5/26.
Throughput for Secondary C&S up to 300 TPD Limit in the permit application dated March 6, 2025.	The source maintains a Daily Production Report that indicates the amount of material processed daily. The single largest production day in August was 8/19, 296 tons.
Daily operating hours and total daily material processed (TPD), as measured using a calibrated weigh scale.	The source has two reports that indicate daily material processed and operating hours. The report provide has total daily operating hours.

	The source has a calibrated Truck Scale and a front-end loader bucket scale. Documentation provided during previous inspection.
Daily Plant Inspections and Clean-Up. Permit application dated March 6, 2025.	
Fluorescent dye testing. Requirement not in permit application dated March 6, 2025.	Fluorescent testing conducted on 5/9/26 for BH-600, and 5/16/26 on BH-601.
Differential pressure (dP) monitoring. Requirement not in permit application dated March 6, 2025.	The baghouse manufacturer is Donaldson Filtration Solutions. Donaldson Filtration Solutions and its contractor conducted initial inspections on 11/18/23 and finished the inspection on 11/20/23. Donaldson determined the range to be 2-8 inches of water.
Baghouse inspections and maintenance.	Mr. Gosselin provided the current filter Inspection / Maintenance log that indicated 20 bags were replaced in BH-601 (356) on 8/20/26. The baghouse contains 356 bags. BH-600 (484) had no bags replaced on 8/20/26. The baghouse contains 484 bags.
Visible Emission Observations 10% from permitted plant equipment. 20% from miscellaneous point source. 40% from miscellaneous plant activities, equipment, off-road machinery or roadway and site cleaning. From permit application submitted March 6, 2025.	The source provided daily VE monitoring records for review. During the physical inspection, no opacity issues were observed. During the inspection, the ground is saturated from continually wetting and recent monsoon rains.
Daily Visible Emission Monitoring and Plant Inspections.	The source provided daily VE monitoring records, for each shift. Mr. Gosselin stated no instantaneous visible emission monitoring has required a Method 9.
Certified EPA Reference Method 9 visible emissions observer.	Source has 5 Method 9 certified observers. Training was conducted on multiple days in April 2026. EPA Method ALT-152A virtual smoke school via Aeromet.
Fugitive Dust Control Dust suppressants, • Adhesive soil stabilizer, • Cover, • Water or approved wetting agents,	Source provide copies of the water truck wetting log. The source has hand held hoses throughout the internal portions of the plant to wet the areas.

• Detour traffic from the area, • Bar access to the area, or • Other means as deemed appropriate	Mr. Gosselin stated they have started testing Durasoil dust control product on the entrance road, around the truck scale and to the truck turn-around area. Mr. Gosselin stated the product appears to be working.
Excess Emissions or Deviations	Mr. Gosselin stated no excess emissions or deviations.

Exit Debrief:

1. Please provide last weeks production reports, pressure monitoring, visible emissions monitoring, daily inspection reports and baghouse replacement dates in 2026.

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): Cottonwood Slag Crushing-Recycling	Date of Inspection: 8/31/2026 1:00 PM
Facility Location (Place): 705 E Birch St., Cottonwood, AZ 86326	County: Yavapai
	Inspector: Rob Verville
Mailing Address: 4620 S Coach Dr., Tucson, AZ 85714	Telephone: (602) 320-1814
	Accompanied by: Feng Mao, Miguel Sandoval, Jordy Yepiz,
Responsible Party: Minerals Research, Inc. RP: 37790	
On-Site Representative: Stephan Gosselin	ADEQ Follow-up Contact:
Title: Manager	Rob Verville
Telephone:	Telephone: (602) 320-1814
Email:	Email: 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: 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: 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 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

8/31/2026

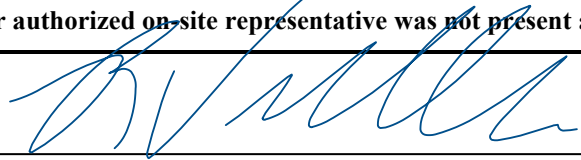
☐ **The regulated person or authorized on-site representative refused to sign.**

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

8/31/2026

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) 234-5677, extension, 771-4322); or the Arizona Ombudsman-Citizens' Aid office at (602) 277-7292 (toll free at (800) 872-2879);
 - If I have any questions concerning my rights to appeal an administrative order or permit decision, I may contact ADEQ's Office of Administrative Counsel at (602) 771-2212 (toll free inside Arizona at (800) 234-5677, extension 771-2212).

41-1001.01. Regulatory bill of rights; small businesses

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

1. Is eligible for reimbursement of fees and other expenses if the person prevails by adjudication on the merits against an agency in a court proceeding regarding an agency decision as provided in section 12-348.
2. Is eligible for reimbursement of the person's costs and fees if the person prevails against any agency in an administrative hearing as provided in section 41-1007.
3. Is entitled to have an agency not charge the person a fee unless the fee for the specific activity is expressly authorized as provided in section 41-1008.
4. Is entitled to receive the information and notice regarding inspections and audits prescribed in section 41-1009.
5. May review the full text or summary of all rulemaking activity, the summary of substantive policy statements and the full text of executive orders in the register as provided in article 2 of this chapter.
6. May participate in the rulemaking process as provided in articles 3, 4, 4.1 and 5 of this chapter, including:
 - (a) Providing written comments or testimony on proposed rules to an agency as provided in section 41-1023 and having the agency adequately address those comments as provided in section 41-1052, subsection D, including comments or testimony concerning the information contained in the economic, small business and consumer impact statement.
 - (b) Filing an early review petition with the governor's regulatory review council as provided in article 5 of this chapter.
 - (c) Providing written comments or testimony on rules to the governor's regulatory review council during the mandatory sixty-day comment period as provided in article 5 of this chapter.
7. Is entitled to have an agency not base a licensing decision in whole or in part on licensing conditions or requirements that are not specifically authorized by statute, rule or state tribal gaming compact as provided in section 41-1030, subsection B.
8. Is entitled to have an agency not make a rule under a specific grant of rulemaking authority that exceeds the subject matter areas listed in the specific statute or not make a rule under a general grant of rulemaking authority to supplement a more specific grant of rulemaking authority as provided in section 41-1030, subsection C.
9. May allege that an existing agency practice or substantive policy statement constitutes a rule and have that agency practice or substantive policy statement declared void because the practice or substantive policy statement constitutes a rule as provided in section 41-1033.
10. May file a complaint with the administrative rules oversight committee concerning:
 - (a) A rule's, practice's or substantive policy statement's lack of conformity with statute or legislative intent as provided in section 41-1047.
 - (b) An existing statute, rule, practice alleged to constitute a rule or substantive policy statement that is alleged to be duplicative or onerous as provided in section 41-1048.
11. May have the person's administrative hearing on contested cases and appealable agency actions heard by an independent administrative law judge as provided in articles 6 and 10 of this chapter.
12. May have administrative hearings governed by uniform administrative appeal procedures as provided in articles 6 and 10 of this chapter and may appeal a final administrative decision by filing a notice of appeal pursuant to title 12, chapter 7, article 6.
13. May have an agency approve or deny the person's license application within a predetermined period of time as provided in article 7.1 of this chapter.
14. Is entitled to receive written notice from an agency on denial of a license application:
 - (a) That justifies the denial with references to the statutes or rules on which the denial is based as provided in section 41-1076.
 - (b) That explains the applicant's right to appeal the denial as provided in section 41-1076.
15. Is entitled to receive information regarding the license application process before or at the time the person obtains an application for a license as provided in sections 41-1001.02 and 41-1079.
16. May receive public notice and participate in the adoption or amendment of agreements to delegate agency functions, powers or duties to political subdivisions as provided in section 41-1026.01 and article 8 of this chapter.
17. May inspect all rules and substantive policy statements of an agency, including a directory of documents, in the office of the agency director as provided in section 41-1091.
18. May file a complaint with the office of the ombudsman-citizens aide to investigate administrative acts of agencies as provided in chapter 8, article 5 of this title.
19. Unless specifically authorized by statute, may expect state agencies to avoid duplication of other laws that do not enhance regulatory clarity and to avoid dual permitting to the extent practicable as prescribed in section 41-1002.
20. May have the person's administrative hearing on contested cases pursuant to title 23, chapter 2 or 4 heard by an independent administrative law judge as prescribed by title 23, chapter 2 or 4.

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

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

Air Quality Field Inspection Photograph Log

Site Name: Cottonwood Slag Crushing-Recycling - 705 E Birch St., Cottonwood, AZ 86326		Photographer: Rob Verville	Camera: Samsung Cell Phone
Weather: clouds			
Photo No. 1	Date: 8/31/2026		
Direction: West			
Photo Description: Moisture visible in the soil from front office to main gate. Area had Durasoil applied several month ago.			

Photo No. 2	Date: 8/31/2026	
Direction: Northeast		
Photo Description: Overall plant from slag pile access road. Panoramic with #3.		

Photo No. 3	Date: 8/31/2026
Direction: Northeast	
Photo Description: Overall plant and current material stockpile of crushed material south of plant.	

A wide-angle photograph of an industrial processing facility, likely a coal or mineral processing plant. The foreground is dominated by a large, dark, conical stockpile of crushed material, with some lighter-colored rocks scattered on its surface. In the middle ground, the plant's infrastructure is visible, including large cylindrical storage silos, complex metal frameworks, and several conveyor belts that transport material across the site. A small white vehicle is parked near the base of the plant. The background shows a flat, arid landscape under a heavy, overcast sky. A small American flag is visible on a pole to the left of the main plant structure.

Photo No. 4	Date: 8/31/2026	
Direction: Southeast		
Photo Description: Current material, in background, being used in process.		

Photo No. 5	Date: 8/31/2026
Direction: East	
Photo Description: Main screen on right. Two screens on left. Wet material conveyor on right not covered. Dry material conveyor on left covered.	

A photograph of a complex industrial conveyor system. The structure is made of dark metal frames and supports. Several large, dark, flexible conveyor belts are visible, some running diagonally upwards and others horizontally. A prominent red hopper or bin is situated in the center-right of the frame. The background shows a clear blue sky with some light clouds and distant hills or mountains. The overall scene depicts a large-scale material handling operation, likely in a mining or industrial setting.

Photo No. 6	Date: 8/31/2026
Direction: Northeast	
Photo Description: Fluid bed dryer and heater on right.	

A large industrial fluid bed dryer and heater unit, a large cylindrical metal structure with a platform and stairs, situated in a dark industrial facility. The unit is made of heavy metal and has a complex structure with various pipes, valves, and a yellow ladder. It is located in a large, dark industrial building with a high ceiling and other equipment visible in the background. The floor is dark and appears to be covered in a layer of material, possibly coal or ash. The overall scene is industrial and somewhat dimly lit.

Photo No. 7	Date: 8/31/2026	
Direction: East		
Photo Description: Secondary crusher.		

Photo No. 8	Date: 8/31/2026
Direction: North	
Photo Description: Previous location of primary crushing plant on slag pile.	



Photo No. 9	Date: 8/31/2026
Direction: South	
Photo Description: Granular material on top of conveyor covers. Material falls from screens above.	

A photograph of an industrial conveyor system. The scene shows a complex arrangement of metal frames, pipes, and conveyor belts. A large, dark, granular material is piled up on top of the conveyor covers. In the foreground, there is a large, dark, cylindrical roller. To the right, a large, corrugated metal pipe is visible. The background shows more of the industrial structure, including a staircase and various pipes. The overall scene is industrial and somewhat cluttered.

Photo No. 10	Date: 8/31/2026
Direction: South	
Photo Description: Bag pallet stacking unit.	

A photograph taken through a metal safety grid, showing an industrial bag pallet stacking unit in a warehouse. The unit consists of a large metal frame with a grid of horizontal and vertical bars. In the center, a stack of brown bags is being moved by a yellow crane arm. The bags are labeled "PREMIUM ABRASIVES". To the left, a wooden pallet is visible on the ground. The background shows the interior of a large warehouse with high ceilings and structural beams.

Photo No. 11	Date: 8/31/2026
Direction: Northeast	
Photo Description: Mud and puddled water in driveway on northwest side.	

A photograph showing a large, dark, muddy puddle on a paved driveway. The mud is thick and has a rough, uneven texture. In the background, there are several wooden pallets stacked on the left side of the driveway. To the right, a white semi-truck is parked. The background also features green trees and a clear blue sky.

Photo No. 12	Date: 8/31/2026
Direction: Down	
Photo Description: Water truck wetting log.	

Water Truck Hourly Log 2025

Date	Time	Driver
8/31	12:00	SA
8/31	12:05	SA
8/31	12:10	SA
8/31	12:15	SA
8/31	12:20	SA
8/31	12:25	SA
8/31	12:30	SA
8/31	12:35	SA
8/31	12:40	SA
8/31	12:45	SA
8/31	12:50	SA
8/31	12:55	SA
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8/31	1:05	SA
8/31	1:10	SA
8/31	1:15	SA
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8/31	11:20	SA
8/31	11:25	SA
8/31	11:30	SA
8/31	11:35	SA
8/31	11:40	SA
8/31	11:45	SA
8/31	11:50	SA
8/31	11:55	SA
8/31	12:00	SA

Photo No. 13	Date: 8/31/2026	
Direction: Down		
Photo Description: Daily operating hours for August 2026.		

Photo No. 14	Date: 8/31/2026	
Direction: Down		
Photo Description: Plant inspection report.		

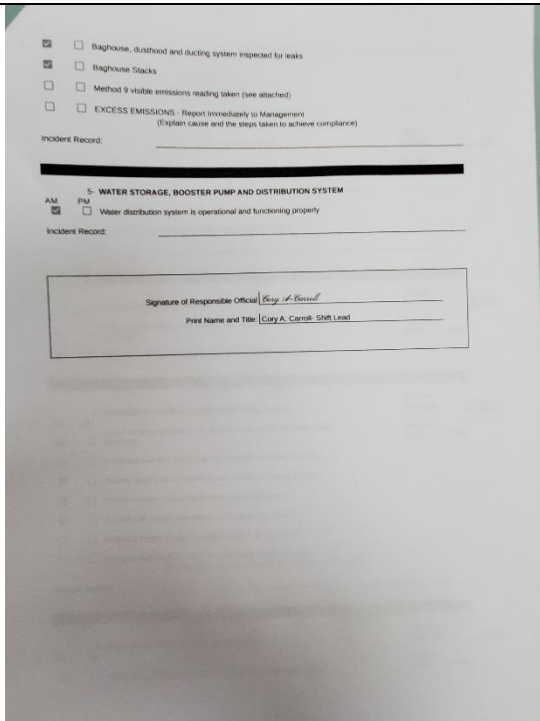
Photo No. 15	Date: 8/31/2026	
Direction: Down		
Photo Description: Inspection report continued.		

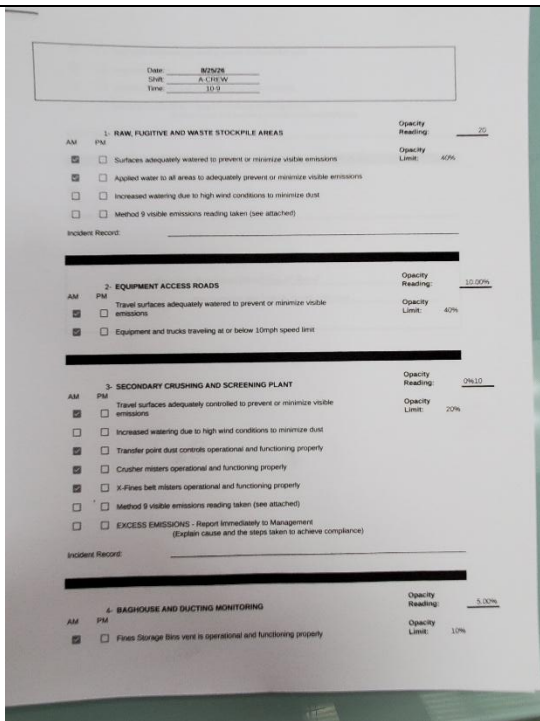
Photo No. 16	Date: 8/31/2026	
Direction: Down		
Photo Description: Plant inspection report.		

Photo No. 17	Date: 8/31/2026	
Direction: Down		
Photo Description: Plant inspection report continued.		

Photo No. 18	Date: 8/31/2026	
Direction: Down		
Photo Description: Plant inspection report.		

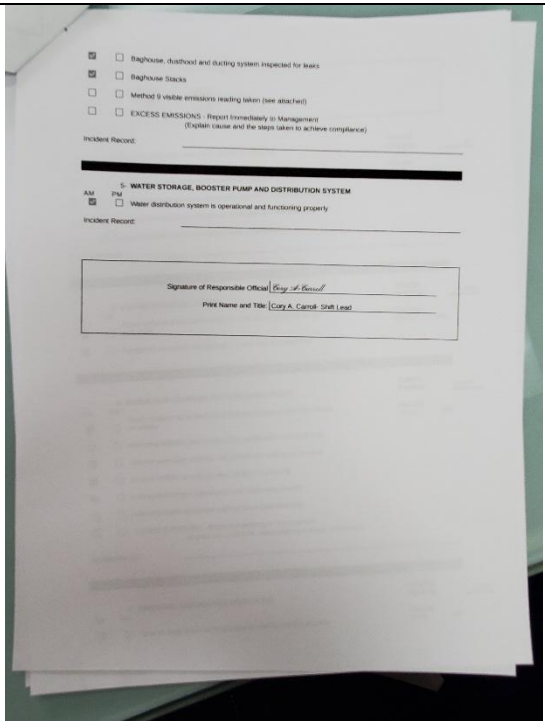
Photo No. 19	Date: 8/31/2026	
Direction: Down		
Photo Description: Plant inspection report continued.		

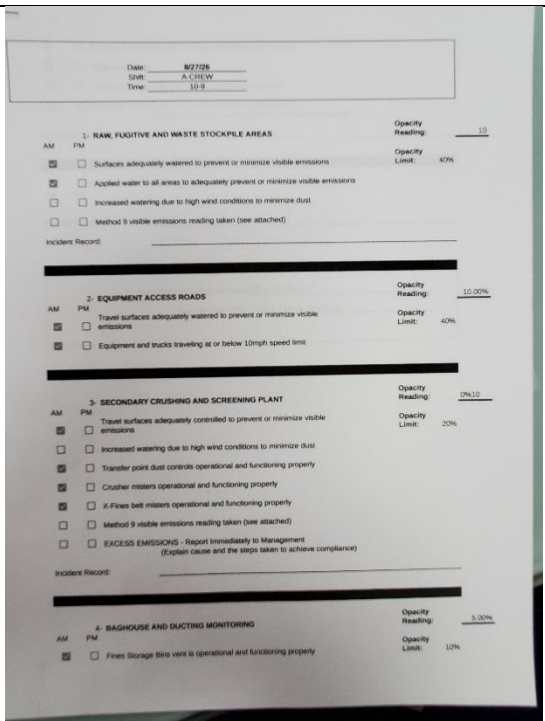
Photo No. 20	Date: 8/31/2026	
Direction: Down		
Photo Description: Plant inspection report.		

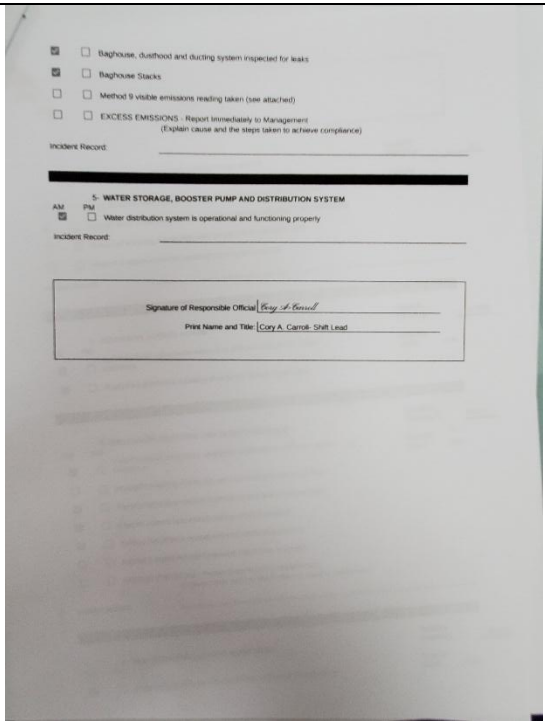
Photo No. 21	Date: 8/31/2026	
Direction: Down		
Photo Description: Plant inspection report continued.		

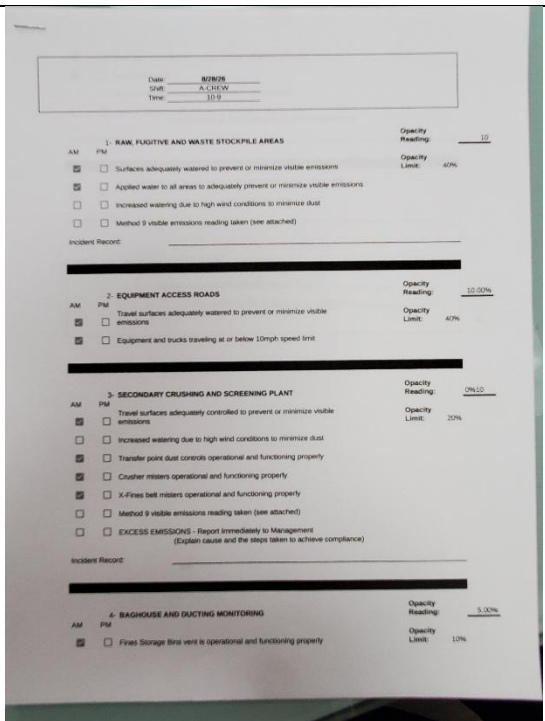
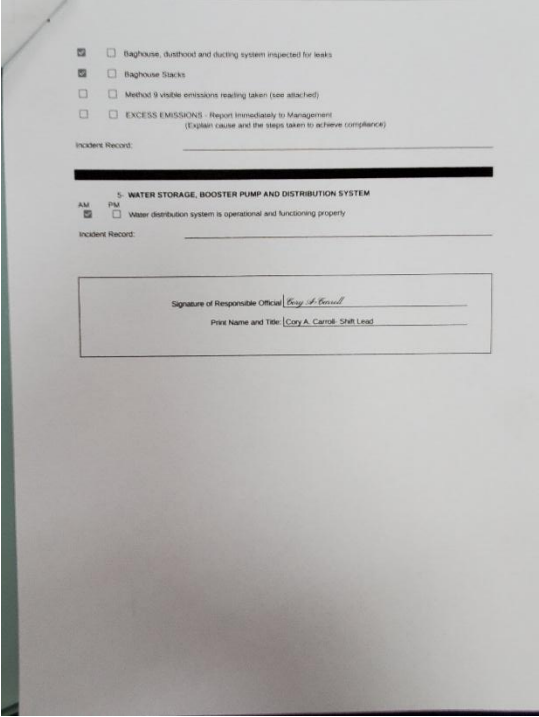
Photo No. 22	Date: 8/31/2026	
Direction: Down		
Photo Description: Plant inspection report.		

Photo No. 23	Date: 8/31/2026	
Direction: Down		
Photo Description: Plant inspection report continued.		