



Mike DeWine, Governor  
Jon Husted, Lt. Governor  
Laurie A. Stevenson, Director

December 29, 2021

**Transmitted Electronically**

Mr. Behrouz Kavarizadeh  
Circuit Board Mining LLC  
23546 State Route 224  
Alvada, Ohio 44082

Re: Hancock County  
Circuit Board Mining LLC  
Facility ID # 0332012073  
Response to Information Received by Email on 11/4/2021

Dear Mr. Kavarizadeh:

Ohio EPA has reviewed the information that was submitted by email on 11/4/2021. The company has defined three processes that occur at the facility: (1) Process 1 – Manual Separation and Dissolution of Circuit Boards (cupric chloric and hydrogen chloride tanks); (2) Process 2 – Line A (processing of bare circuit boards – wet grinding and shaker table) and Line B (packaging of electronic components such as chips, resistors, and capacitors); and (3) Process 3 – Line C (wastewater processing). It appears that air emissions are generated from Process 1 from the dissolution of circuit boards and from Process 2 – Line A. The calculations indicate that both of these processes qualify for the “de minimis” exemption under OAC rule 3745-15-05 because the emissions are below 10 pounds per day. By qualifying for this exemption, the facility does not need to acquire air permits for these processes. It should be noted that the facility should ensure that they understand any recordkeeping requirements from OAC rule 3745-15-05 that may be required as part of meeting this exemption.

If you have any questions or concerns, I can be reached by phone at (419) 373-3129 or by email at [andrea.moore@epa.ohio.gov](mailto:andrea.moore@epa.ohio.gov).

Sincerely,

Andrea Moore  
Ohio EPA, DAPC, Northwest District Office

/wla

ec: Jennifer Kellermeier, DAPC-NWDO  
Julie Budge, DAPC-NWDO  
Jeremy Scoles, OCAPP-NWDO