



CERTIFICATION OF REPORTS BY A RESPONSIBLE OFFICIAL

Received
JAN 14 2026
ORCAA

- 1. Facility/Source Name: Aquatic Co
- 2. Company Name (if different): American Bath Group
- 3. ORCAA Source ID #: 18RFC1287 Facility SIC Code 3088
- 4. Unified Business Identification Number: _____
- 5. Company Owner: American Bath Group LLC
- 6. Parent Company: American Bath Group LLC

7. Environmental Contact for this submittal:

Paul Kimble	Plant Manager	1-800-444-5126
Name	Title	Phone #

8. Mailing Address:
801 Northern Pacific Road SE Yelm, WA 98597

9. **Identification of Report Covered by this Certification:** *Identify the exact report that is certified as being true and accurate under this certification. Please identify the period of time covered by the report and specify any extraneous materials that are not covered by the certification.*

a. Specify the period of time covered by the report: N/a - application

b. Specify the Type or Name of Report:

- Annual Compliance Certification
- Semiannual Monitoring Report
- Permit Deviation Report
- Annual Emissions Inventory (must include calculations and supporting data)
- Stack Testing Results
- Other. Specify: Data request - application revision

c. Please specify by page number any sections of the report not covered by this certification which are provided as background information and are not necessary to support the statements and information which are certified: NA

10. **Certification:**
By my signature below, I certify that all information and statements in the accompanying report, which is identified in item #9 above, including all attachments are true, accurate, and complete to the best of my knowledge.

	1-12-26
Signature	Date
Plant Manager	
Title	
Paul Kimble	
Printed Name	

Meets Responsible Official Definition per WAC 173-401-200(29)

“Responsible official” means one of the following:

- (a) **For a corporation:** A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions of the corporation, or a duly authorized representative of such person if the representative is responsible for the overall production of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - i. The facilities employ more than two hundred fifty persons or have gross annual sales or expenditures exceeding forty-three million in 1992 dollars; or
 - ii. The delegation of authority to such representative is approved in advance by the permitting authority.
- (b) **For a partnership or sole proprietorship:** A general partner or the proprietor, respectively.
- (c) **For a municipality, state, federal, or other public agency:** Either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a regional administrator of EPA).

To: Lauren Whybrew, Olympic Region Clean Air Agency

From: Paul Kimble, Aquatic Bath

Date: January 9th, 2026

RE: 25NOC1746 Data Request #1
Aquatic Company
Yelm, WA

Introduction

U.S. Compliance has prepared this technical memorandum on behalf of Aquatic Company in response to a letter from the Olympic Region Cleaner Air Agency (ORCAA) dated December 11, 2025, which indicates that a Notice of Construction (NOC) application that was submitted by Aquatic Company has been deemed incomplete and requires further data / clarifications. The NOC application, which ORCAA has designated 25NOC1746, is a request to replace a HVAC heating unit in the facility.

Information Request Responses

1. Air Pollutant Emissions Assessment: The emissions calculations have been updated to align with Form 11 stating the maximum heat rate of the new HVAC heater is 7.00 MMBtu/hr. The hard copy is being submitted with this letter (see attachment A) and a follow up email of electronic spreadsheet will be sent to lauren.whybrew@orca.org.

2. Toxic Air Pollutant Analysis: The planned changes to the facility are not expected to increase emissions of any toxic air pollutants (TAPs). Because TAP emissions will not increase, no demonstration of compliance with the regulations in WAC 173-460 is required.

3. Ambient Air Quality Analysis: As shown in attachment A, the total PTE for the planned equipment changes to the facility are less than the new source review emissions exemption thresholds provided in WAC 173-400-110(5). Please refer to Attachment B from the manufacturer stating the burners are Low NOx burners. While we understand that these thresholds have not been adopted by ORCAA, we believe that a project with PTE less than those thresholds can be assumed to be de minimis. With this understanding, we


believe that an air dispersion modeling analysis to predict increases in ambient pollutant concentrations and to demonstrate that the planned changes do not have the potential to cause or contribute to violation of an ambient air quality standard is not necessary.

4. Best Available Control Technology: Based on the specifications of the burners used (Attachment B), as well as the exemption from NSR, Aquatic Bath proposes presumptive BACT for this natural gas combustion equipment.

5. Applicable Requirements: The proposed equipment and emission activity are not applicable to any federal NESHAP or NSPS.

If you have any questions, please reach out to Zack Rabas of U.S. Compliance at 541-671-7977 or via email at zrabas@uscompliance.com

Sincerely,



Paul Kimble
Aquatic Company

ATTACHMENT A
Emission Calculations

Aquatic Company

Yelm, WA

Natural Gas Combustion Emission Calculations

Status			Active	
Emission Unit			New HVAC heater	
Emission Unit ID			001	
Max Firing Rate	(Btu/hr)	7,000,000		
	(MMCF/hr)	0.01		
Annual Fuel Usage	Hours	8,760		
	(MMCF/yr)	60.12		
Pollutant	Emission Factor ⁽¹⁾ (lbs/MMCf)	Potential Emissions		Actual Emissions (tons/yr)
		(lbs/hr)	(tons/yr)	
NO _x	50	0.34	1.50	1.50
CO	84	0.58	2.52	2.52
PM	7.6	0.05	0.23	0.23
PM ₁₀ /PM _{2.5}	7.6	0.05	0.23	0.23
SO ₂	0.6	0.004	0.02	0.02
VOC	5.5	0.04	0.17	0.17
CO ₂	120,000	823.53	3,607.06	3,607.06
CH ₄	2.3	0.02	0.07	0.07
N ₂ O	2.2	0.02	0.07	0.07
CO _{2e} ^[2]	120,713	828.42	3,628.49	3,628.49
Ammonia	3.2	0.02	0.10	0.10
Total HAPs	1.89	0.01	0.06	0.06

[1] Emission Factors are from AP-42 Chapter 1.4 "Natural Gas Combustion"

[2] GWP: CH₄ = 25, N₂O = 298

ATTACHMENT B
Low NOx Burner

January 12, 2026

To whom it may concern,

Greenheck Model's DGX 100% outside air configurations are listed to bear an ETL seal. To obtain this authorization to mark through Intertek, Greenheck must follow many stringent guidelines to include the following ANSI standard: Z83.4.

Please keep in mind that for commercial Make-up air applications this standard is used throughout the industry as ANSI standard: Z83.4 dictates the type and levels (PPM) of combustion containments that can be introduced into the space.

To clarify, NOx is not a combustion containment that is regulated under ANSI standard: Z83.4. Yet, as previously noted this standard does include a testing procedure and states that the combustion levels during testing shall not produce in excess of the following values when operated in an controlled atmosphere with normal oxygen content:

- Carbon Dioxide – 4000 ppm
- Carbon Monoxide – 5 ppm
- Aliphatic Aldehydes – 1.0 ppm
- Nitrogen Dioxide – 0.5 ppm

Intertek is always present during testing for certification, and our ETL listing indicates that Greenheck's Model DGX did not exceed these levels.

OSHA Limitations for exposure show that the levels produced by a direct gas unit are significantly below OSHA requirements. The link below shows tables at the right showing exposure limits based on hours (see Table Z-1).

<https://www.osha.gov/dsg/annotated-pels/>

Sincerely,



Travis Gabriel
Greenheck Kitchen Ventilation Systems
Application Engineer Senior
travis.gabriel@greenheck.com
Cell: 715.393.5953



SCOTT LEE
AQUATIC
801 NORTHERN PACIFIC ROAD

ACTWGT: 1.00 LB
CAD: 102591025/INET4535

YELM, WA 98597
UNITED STATES US

BILL SENDER

TO **ATTN: LAUREN WHYBREW**
ORCAA
2940-B LIMITED LANE NW

Received
JAN 14 2026

OLYMPIA WA 98502

ORCAA

(350) 538-7610
INV:
PO:

REF: INV 20646 10/01/17

DEPT:



FedEx
Express



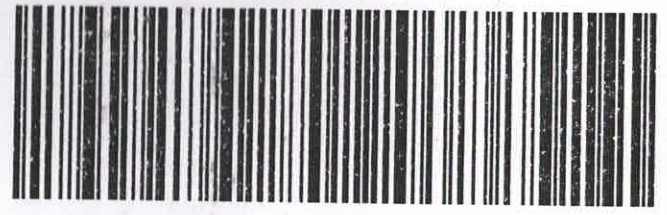
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TUE - 13 JAN 5:00P
STANDARD OVERNIGHT

TRK#
0201 8878 4163 8212

85 OLYMG

HQMA 98502
WA-US SEA



0986 WED 01/14/04 48 6517211
ORCAA 2940 LIMITED LN NW
STE B OLYMPIA WA 98502-6503-74
110-4020
ETP: 1 SP: PD: 100-Y
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