Alabama Department of Environmental Management

SYNTHETIC MINOR OPERATING PERMIT

PERMITTEE: PEAK RENEWABLES BIOENERGY (DOTHAN), LLC

FACILITY NAME: PEAK RENEWABLES BIOENERGY (DOTHAN), LLC

LOCATION: DOTHAN, HOUSTON COUNTY, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
607-S007-X005	Dry Material Receiving which includes: 1. Truck Dumper 2. Dry Fiber Storage Building

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: DRAFT

Alabama Department of Environmental Management

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.

2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.

3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.

5. Each point of emission, which requires testing, will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.

6. All air pollution control equipment shall be operated at all times while this process is operational. In the event of scheduled maintenance, unscheduled maintenance, or a breakdown of the pollution control equipment, the process shall be shut down as expeditiously as possible (unless this act and subsequent re-start would clearly cause greater emissions than continuing operations of the process for a short period). The Department shall be notified of all such events **that exceed 1 hour** within 24 hours. The notification shall include all pertinent facts, including the duration of the process operating without the control device and the level of excess emissions which have occurred. Records of all such events, regardless of reporting requirements, shall be made and maintained for a period of five years. These records shall be available for inspection.

7. This process, including all air pollution control devices and capture systems for which this permit is issued, shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.

8. Deviations from permit requirements shall be reported within 48 hours or 2 working days of such deviations, including those attributable to upset conditions as defined in the permit. The report shall include the probable cause of the said deviations, and any corrective actions or preventative measures that were taken.

9. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.

10. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.

11. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.

12. Unless otherwise stated in this permit or an applicable regulation, the Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

    To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

    (a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.

    (b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).

    (c) A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.

    (d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

    A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

    All test reports must be submitted to the Air Division within 30 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

13. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.

14. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions

shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.

15. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:

(a) by the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;

(b) by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;

(c) by paving;

(d) by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.

16. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.

17. In accordance with ADEM Admin. Code. r. 335-3-4-.01(1), any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.

18. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.

19. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.

Synthetic Minor Limits

20. The permittee shall not cause or allow the plant wide total emissions of any individual hazardous air pollutant (HAP) to be > 9.5 tons and any combined HAP to be > 24.5 tons during any consecutive 12-month period.

Emission Monitoring

21. While the processes are operating, someone familiar with the processes shall observe the visible emissions from the processes a minimum of once daily (during daylight hours).

22. Whenever greater than normal visible emissions (as determined by previous observations) are observed from a process, the permittee shall initiate corrective action as soon as practicable but no longer than 24 hours from the time of observation, followed by an additional observation to confirm that visible emissions have been reduced to normal.

23. Within 20 days of the end of each month, the permittee shall calculate and record HAP emissions from the facility to verify emissions of any individual HAP are not > 9.5 TPY and any combined HAP are not > 24.5 TPY, on a 12-month rolling total basis, utilizing the calculation methodology outlined in Appendix C of Peak Renewables' Synthetic Minor Operating Permit application dated June 8, 2026.

Recordkeeping and Reporting

24. The permittee shall maintain records, including the dates and times, of all daily observation results, corrective actions taken, and emission-related maintenance performed. The records shall be retained in a permanent form suitable and readily available for inspection for a period of five (5) years from the date of generation of each record.

25. The permittee shall maintain records of the amount of dry fiber stored and the calculated HAP emissions on a monthly and a 12-month rolling total basis. The permittee shall maintain these records onsite and make these records available for inspection upon request. These records shall be retained for a period of five (5) years from the date of generation of each record.

26. Should this facility, at any time, exceed any emission limit, the permittee shall notify the Air Division within two (2) days of determining that the exceedance/excursion occurred.

27. The permittee shall submit a Semiannual Monitoring Report for the Dry Material Receiving process to the Air Division no later than 60 days after the end of each semiannual reporting period (January 1st – June 30th and July 1st – December 31st). This report shall provide the following:

    (a) Certification that all emission monitoring, proper maintenance, and operating practices were accomplished as required during the reporting period, and if not, describe the date and reason any required action was not accomplished.

(b) Certification whether the daily visual observations were accomplished as required and note the nature and date of any greater than normal emissions observed, and corrective actions taken to eliminate the emissions.

(c) The monthly and 12-month rolling totals of HAP emissions from all sources.

SYNTHETIC MINOR OPERATING PERMIT

PERMITTEE: PEAK RENEWABLES BIOENERGY (DOTHAN), LLC

FACILITY NAME: PEAK RENEWABLES BIOENERGY (DOTHAN), LLC

LOCATION: DOTHAN, HOUSTON COUNTY, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
607-S007-X006	Pelletizing Process with Process Filtration Unit (Baghouse) (E-01) and Regenerative Catalytic Oxidizer (E-02) which includes: 1. Two (2) Hammermills 2. Five (5) Pellet Mills 3. Five (5) Pellet Coolers 4. Pellet Shaker Screen

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: DRAFT

Alabama Department of Environmental Management

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.

2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.

3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.

5. Each point of emission, which requires testing, will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.

6. All air pollution control equipment shall be operated at all times while this process is operational. In the event of scheduled maintenance, unscheduled maintenance, or a breakdown of the pollution control equipment, the process shall be shut down as expeditiously as possible (unless this act and subsequent re-start would clearly cause greater emissions than continuing operations of the process for a short period). The Department shall be notified of all such events **that exceed 1 hour** within 24 hours. The notification shall include all pertinent facts, including the duration of the process operating without the control device and the level of excess emissions which have occurred. Records of all such events, regardless of reporting requirements, shall be made and maintained for a period of five years. These records shall be available for inspection.

7. This process, including all air pollution control devices and capture systems for which this permit is issued, shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.

8. Deviations from permit requirements shall be reported within 48 hours or 2 working days of such deviations, including those attributable to upset conditions as defined in the permit. The report shall include the probable cause of the said deviations, and any corrective actions or preventative measures that were taken.

9. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.

10. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.

11. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.

12. Prior to a date to be specified by the Chief of the Air Division in the authorization to operate, emission tests are to be conducted on the RCO stack (E-02) in accordance with 40 CFR Part 60, Appendix A, Method 5 or 40 CFR Part 51, Appendix M, Method 201A for the following pollutants. Written tests results are to be reported to the Air Division within 60 days of completion of testing.

Particulates* ..... (X)

*PM10 and PM2.5

13. Emissions tests are to be conducted on the RCO exhaust (E-02) for the following pollutants at intervals not to exceed five (5) years following the date of initial compliance testing. All test reports must be submitted to the Air Division within 30 days of completion of testing.

Particulates* ..... (X)	Acrolein ..... (X)
Acetaldehyde ..... (X)	Formaldehyde ..... (X)
Methanol ..... (X)	Phenol ..... (X)
Propionaldehyde ..... (X)	Volatile Organic Compounds** ..... (X)

*PM10 and PM2.5

**To include DRE across RCO

14. Unless otherwise stated in this permit or an applicable regulation, the Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

(a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.

(b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).

(c) A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.

(d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

All test reports must be submitted to the Air Division within 30 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

15. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.

16. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.

17. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:

(a) by the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;

(b) by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;

(c) by paving;

(d) by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.

18. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.

19. In accordance with ADEM Admin. Code. r. 335-3-4-.01(1), any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.

20. The permittee shall not cause or allow the emission of particulate matter (as TSP) in any one hour from any process in excess of the amount determined by the following equations:

$$\mathbf{E=17.31P^{0.16}\ (P\geq 30\ TPH)}$$

$$\mathbf{E=3.59P^{0.62}\ (P<30\ TPH)}$$

Where:

E = Emissions (in pounds per hour)
P = Process weight (in tons per hour)

21. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.

22. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.

Synthetic Minor Limits

23. The permittee shall not cause or allow the plant wide total emissions of any individual hazardous air pollutant (HAP) to be > 9.5 tons and any combined HAP to be > 24.5 tons during any consecutive 12-month period.

24. The permittee shall not cause or allow the production of finished wood pellets to exceed 31.46 tons per hour or 275,625 U.S. tons during any consecutive 12-month period.

25. The total VOC destruction efficiency across the RCO shall be at least 95 percent.

26. The permittee shall not cause or allow emissions of volatile organic compounds from this process in excess of 8.56 lb/hr (as propane).

27. The permittee shall not cause or allow emissions of particulate matter less than 10 microns (PM10) from this process in excess of 6.58 lb/hr.

28. The permittee shall not cause or allow emissions of particulate matter less than 2.5 microns (PM2.5) from this process in excess of 6.58 lb/hr.

29. The permittee shall not cause or allow emissions of acetaldehyde from this process in excess of 0.34 lb/hr.

30. The permittee shall not cause or allow emissions of acrolein from this process in excess of 0.06 lb/hr.

31. The permittee shall not cause or allow emissions of formaldehyde from this process in excess of 0.64 lb/hr.

32. The permittee shall not cause or allow emissions of Methanol from this process in excess of 0.10 lb/hr.

33. The permittee shall not cause or allow emissions of phenol from this process in excess of 0.15 lb/hr.

34. The permittee shall not cause or allow emissions of propionaldehyde from this process in excess of 0.03 lb/hr.

35. The permittee shall not cause or allow emissions of total hazardous air pollutants from this process in excess of 1.32 lb/hr.

Emission Monitoring

36. The permittee shall install, operate, and maintain equipment to monitor the firebox/combustion chamber temperature of the regenerative catalytic oxidizer. The monitoring system shall be designed in such a manner as to be capable of compliance with the monitoring design criteria of §64.3 of 40 CFR Part 64, *Compliance Assurance Monitoring*. Each thermocouple shall be inspected for proper operation and calibrated at least annually.

37. The permittee shall operate the RCO at a minimum firebox/combustion chamber temperature, as averaged over a 3-hour block period, as recommended by the manufacturer or established during emission testing if that value is lower. If established during emission testing, the minimum RCO operating temperature shall be equal to the average of the average temperatures calculated for the three compliance test runs. If the permittee determines through emission testing that an indicator value other than that specified above is more appropriate, the permittee shall submit a notification of the fact to the Air Division within 30 days of determining that a new indicator value(s) should be established. The notification shall include the data supporting the validity of the newly established indicator value(s). If any reading is outside of the normal operating range, an excursion would be indicated and immediate action shall be initiated to determine the cause of the excursion and return the device to its normal operating parameters.

38. When the RCO is operating, it shall be operated with an active and properly functioning catalytic bed. The permittee shall check the activity level of a representative sample of the catalyst at least every 12 months and take any necessary corrective action to ensure that the catalyst is performing within its design range.

39. While the process and RCO are operating, the permittee shall monitor and record the firebox/combustion chamber temperature of the RCO, at a minimum, at least 4 times per hour (i.e. every 15 minutes). From these data points, 3-hour block averages shall be calculated and recorded. The temperature may be measured in multiple locations (e.g. one location per burner) within the combustion chamber, however, the multiple temperature measurements must be reduced to a single average temperature.

40. While the processes are operating, the permittee shall observe the visible emissions from the RCO exhaust (E-02), a minimum of once daily (during daylight hours).

41. Whenever visible emissions are observed from the RCO exhaust, the permittee shall initiate corrective action as soon as practicable but no longer than 24 hours from the time of observation, followed by an additional observation to confirm that visible emissions from the RCO have been eliminated.

42. The baghouse and RCO shall be physically inspected to assure that the devices have been properly maintained and operate as designed at least annually, but more frequently whenever visible emissions are observed. If the results of the inspection indicate that cleaning and/or maintenance is needed, such action shall be initiated within 24 hours of completing the inspection.

43. Within 20 days of the end of each calendar month, the permittee shall calculate and record the total wood pellet production for the previous month and 12-month period.

44. Within 20 days of the end of each month, the permittee shall calculate and record HAP emissions from the facility to verify emissions of any individual HAP are not > 9.5 TPY and any combined HAP are not > 24.5 TPY, on a 12-month rolling total basis, utilizing the calculation methodology outlined in Appendix C of Peak Renewables' Synthetic Minor Operating Permit application dated June 8, 2026.

Recordkeeping and Reporting

45. The permittee shall maintain records, including the dates and times, of all daily observation results, annual baghouse and RCO inspections, corrective actions taken, and emission-related maintenance performed.

46. The permittee shall maintain records of the amount of wood pellets produced and the calculated HAP emissions on a monthly and a 12-month rolling total basis.

47. The permittee shall maintain records of the 3-hour block averages of the firebox/combustion chamber temperature of the RCO.

48. Should this facility, at any time, exceed any emission limit, the permittee shall notify the Air Division within two (2) days of determining that the exceedance/excursion occurred.

49. The permittee shall not allow utilization of the abort stack on this unit except during emergencies.

50. Within ten (10) days of the end of each calendar month, the permittee shall calculate and record the operating hours of the abort stack for the previous calendar month and previous 12-month period. The records shall include the date, time, length of operation, and reason the abort stack was utilized.

51. The permittee shall retain all required records in a permanent form suitable and readily available for inspection for a period of five (5) years from the date of generation of each record.

52. The permittee shall submit a Semiannual Monitoring Report for the Pelletizing Process to the Air Division no later than 60 days after the end of each semiannual reporting period (January 1st – June 30th and July 1st – December 31st). This report shall provide the following:

    (a) Certification that all emission monitoring, proper maintenance, and operating practices were accomplished as required during the reporting period, and if not, describe the date and reason any required action was not accomplished.

    (b) Certification whether the daily visual observations were accomplished as required and note the nature and date of any emissions observed, and corrective actions taken to eliminate the emissions.

    (c) The date, time, duration, and magnitude of any instance that the RCO had an excursion from an established operating parameter (i.e. 3-hour block average firebox/combustion chamber temperature).

    (d) The nature and date of any corrective actions taken or preventative measures adopted following an excursion.

    (e) The monthly and 12-month rolling totals of HAP emissions from all sources.

    (f) The monthly and 12-month rolling totals of abort stack operation calculated during the reporting period.

Alabama Department of Environmental Management

SYNTHETIC MINOR OPERATING PERMIT

PERMITTEE: PEAK RENEWABLES BIOENERGY (DOTHAN), LLC

FACILITY NAME: PEAK RENEWABLES BIOENERGY (DOTHAN), LLC

LOCATION: DOTHAN, HOUSTON COUNTY, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
607-S007-X007	Finished Pellet Storage (PSB-1 and PSB-2) and Railcar Loadout (RL-1/RL-2)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: DRAFT

Alabama Department of Environmental Management

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.

2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.

3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.

5. Each point of emission, which requires testing, will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.

6. All air pollution control equipment shall be operated at all times while this process is operational. In the event of scheduled maintenance, unscheduled maintenance, or a breakdown of the pollution control equipment, the process shall be shut down as expeditiously as possible (unless this act and subsequent re-start would clearly cause greater emissions than continuing operations of the process for a short period). The Department shall be notified of all such events **that exceed 1 hour** within 24 hours. The notification shall include all pertinent facts, including the duration of the process operating without the control device and the level of excess emissions which have occurred. Records of all such events, regardless of reporting requirements, shall be made and maintained for a period of five years. These records shall be available for inspection.

7. This process, including all air pollution control devices and capture systems for which this permit is issued, shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.

8. Deviations from permit requirements shall be reported within 48 hours or 2 working days of such deviations, including those attributable to upset conditions as defined in the permit. The report shall include the probable cause of the said deviations, and any corrective actions or preventative measures that were taken.

9. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.

10. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.

11. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.

12. Unless otherwise stated in this permit or an applicable regulation, the Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

    To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

    (a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.

    (b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).

    (c) A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.

    (d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

    A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

    All test reports must be submitted to the Air Division within 30 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

13. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.

14. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions

shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.

15. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:

(a) by the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;

(b) by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;

(c) by paving;

(d) by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.

16. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.

17. In accordance with ADEM Admin. Code. r. 335-3-4-.01(1), any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.

18. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.

19. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.

Synthetic Minor Limits

20. The permittee shall not cause or allow the plant wide total emissions of any individual hazardous air pollutant (HAP) to be > 9.5 tons and any combined HAP to be > 24.5 tons during any consecutive 12-month period.

21. The permittee shall not cause or allow the total amount of finished wood pellets stored in the Finished Pellet Storage process to exceed 275,625 U.S. tons during any consecutive 12-month period.

Emission Monitoring

22. While the processes are operating, someone familiar with the processes shall observe the visible emissions from the processes a minimum of once daily (during daylight hours).

23. Whenever greater than normal visible emissions (as determined by previous observations) are observed from a process, the permittee shall initiate corrective action as soon as practicable but no longer than 24 hours from the time of observation, followed by an additional observation to confirm that visible emissions have been reduced to normal.

24. Within 20 days of the end of each calendar month, the permittee shall calculate and record the amount of finished wood pellets stored in the Finished Pellet Storage process during the previous month and 12-month period.

25. Within 20 days of the end of each month, the permittee shall calculate and record HAP emissions from the facility to verify emissions of any individual HAP are not > 9.5 TPY and any combined HAP are not > 24.5 TPY, on a 12-month rolling total basis, utilizing the calculation methodology outlined in Appendix C of Peak Renewables' Synthetic Minor Operating Permit application dated June 8, 2026.

Recordkeeping and Reporting

26. The permittee shall maintain records, including the dates and times, of all daily observation results, corrective actions taken, and emission-related maintenance performed. The records shall be retained in a permanent form suitable and readily available for inspection for a period of five (5) years from the date of generation of each record.

27. The permittee shall maintain records of the amount of wood pellets stored and the calculated HAP emissions on a monthly and a 12-month rolling total basis. The permittee shall maintain these records onsite and make these records available for inspection upon request. These records shall be retained for a period of five (5) years from the date of generation of each record.

28. Should this facility, at any time, exceed any emission limit, the permittee shall notify the Air Division within two (2) days of determining that the exceedance/excursion occurred.

29. The permittee shall submit a Semiannual Monitoring Report for the Finished Pellet Storage and Railcar Loadout process to the Air Division no later than 60 days after the end of each semiannual reporting period (January 1st – June 30th and July 1st – December 31st). This report shall provide the following:

    (a) Certification that all emission monitoring, proper maintenance, and operating practices were accomplished as required during the reporting period, and if not, describe the date and reason any required action was not accomplished.

    (b) Certification whether the daily visual observations were accomplished as required and note the nature and date of any greater than normal emissions observed, and corrective actions taken to eliminate the emissions.

    (c) The monthly and 12-month rolling totals of HAP emissions from all sources.

Alabama Department of Environmental Management

SYNTHETIC MINOR OPERATING PERMIT

PERMITTEE: PEAK RENEWABLES BIOENERGY (DOTHAN), LLC

FACILITY NAME: PEAK RENEWABLES BIOENERGY (DOTHAN), LLC

LOCATION: DOTHAN, HOUSTON COUNTY, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
607-S007-X008	317 BHP, Diesel-Fired Emergency Fire Water Pump Engine (NSPS IIII)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: DRAFT

Alabama Department of Environmental Management

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.

2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.

3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.

5. Each point of emission, which requires testing, will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.

6. All air pollution control equipment shall be operated at all times while this process is operational. In the event of scheduled maintenance, unscheduled maintenance, or a breakdown of the pollution control equipment, the process shall be shut down as expeditiously as possible (unless this act and subsequent re-start would clearly cause greater emissions than continuing operations of the process for a short period). The Department shall be notified of all such events **that exceed 1 hour** within 24 hours. The notification shall include all pertinent facts, including the duration of the process operating without the control device and the level of excess emissions which have occurred. Records of all such events, regardless of reporting requirements, shall be made and maintained for a period of five years. These records shall be available for inspection.

7. This process, including all air pollution control devices and capture systems for which this permit is issued, shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.

8. Deviations from permit requirements shall be reported within 48 hours or 2 working days of such deviations, including those attributable to upset conditions as defined in the permit. The report shall include the probable cause of the said deviations, and any corrective actions or preventative measures that were taken.

9. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.

10. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.

11. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.

12. Unless otherwise stated in this permit or an applicable regulation, the Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

    To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

    (a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.

    (b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).

    (c) A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.

    (d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

    A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

    All test reports must be submitted to the Air Division within 30 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

13. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.

14. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions

shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.

15. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:

(a) by the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;

(b) by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;

(c) by paving;

(d) by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.

16. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.

17. In accordance with ADEM Admin. Code. r. 335-3-4-.01(1), any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.

18. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.

19. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.

New Source Performance Standards

20. This unit is subject to the applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustions Engines, 40 CFR 60, Subpart IIII.

21. This unit is subject to the General Provisions 40 CFR §60.1 through §60.19 (as applicable) as outlined in Table 8 to 40 CFR Part 60, Subpart IIII.

22. The Permittee shall not cause or allow the emissions from this unit to exceed the applicable emission standards in Table 4 to Subpart IIII, specifically:

    (a) The sum of the emissions of non-methane hydrocarbons (NMHC) and nitrogen oxides (NO_x) shall not exceed 4.0 g/kW-hr (3.0 g/HP-hr);

    (b) Particulate matter (PM) emissions shall not exceed 0.20 g/kW-hr (0.15 g/HP-hr).

23. The Permittee shall not burn any diesel fuel in this unit that does not meet the following per-gallon standards of 40 CFR §80.510(b):

    (a) Sulfur content shall not exceed 15 parts per million (ppm); and

    (b) Cetane index shall be a minimum of 40 or the aromatic content shall not exceed 35 volume percent.

24. The permittee shall only operate this unit as specified below:

    (a) Emergency situations;

    (b) Maintenance checks and readiness testing not to exceed 100 hours per year; and

    (c) 50 hours per year during non-emergency situations provided the non-emergency utilization hours are counted towards the 100 hours per year provided for maintenance checks and readiness testing.

    (d) The permittee shall not cause or allow this engine to operate more than 500 hours during any 12-month consecutive period.

25. If the permittee does not install, configure, operate, and maintain this unit according to the manufacturer's emission-related written instructions, or changes emission-related settings in a way that is not permitted by the manufacturer, the Permittee must demonstrate compliance by the following:

    (a) Keeping a maintenance plan and records of conducted maintenance and, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions; and

    (b) Conducting an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after the unit is no longer installed, configured, operated, and maintained in accordance with the manufacturer's

emission-related written instructions, or within 1 year after emission-related settings are changed in a way that is not permitted by the manufacturer.

Synthetic Minor Limits

26. The permittee shall not cause or allow the plant wide total emissions of any individual hazardous air pollutant (HAP) to be > 9.5 tons and any combined HAP to be > 24.5 tons during any consecutive 12-month period.

Emission Monitoring

27. The permittee shall install and operate a non-resettable hour meter on this unit.

28. The permittee shall operate and maintain this unit according to the manufacturer's written instructions over the life of the engine or in accordance with 40 CFR §60.4211(g).

29. Within 20 days of the end of each month, the permittee shall calculate and record HAP emissions from the facility to verify emissions of any individual HAP are not > 9.5 TPY and any combined HAP are not > 24.5 TPY, on a 12-month rolling total basis, utilizing the calculation methodology outlined in Appendix C of Peak Renewables' Synthetic Minor Operating Permit application dated June 8, 2026.

Recordkeeping and Reporting

30. To demonstrate compliance with the operational limitations, the permittee shall maintain records of the date, time, duration, and purpose of operation each time this unit is operated. These records shall be maintained in a permanent form suitable for inspection and shall be readily available for inspection upon request.

31. Should this facility, at any time, exceed any emission limit, the permittee shall notify the Air Division within two (2) days of determining that the exceedance/excursion occurred.

32. To demonstrate compliance with the fuel limitations, the permittee shall maintain records of the sulfur content and fuel delivery receipts of the diesel fuel that is burned in this unit. These records shall be maintained in a permanent form and submitted upon request. Records demonstrating that the fuel limitation requirements are being met shall be maintained on-site and readily available for inspection upon request.

33. The permittee shall retain all required records in a permanent form suitable and readily available for inspection for a period of five (5) years from the date of generation of each record.

34. The permittee shall submit a Semiannual Monitoring Report for the Fire Water Pump Engine to the Air Division no later than 60 days after the end of each semiannual reporting

period (January 1st – June 30th and July 1st – December 31st). This report shall provide the following:

(a) Whether the unit was operated during the reporting period;

(b) The date, time, duration, and purpose of operation each time this unit was operated during the reporting period;

(c) Written documentation that the fuel used during the reporting period met the requirements of 40 CFR §80.510(b) for non-road diesel.

(d) The monthly and 12-month rolling totals of HAP emissions from all sources.