Illinois Environmental Protection Agency
Bureau of Air, Permit Section

Project Summary for a Construction Application from Pepperidge Farm, Inc. for a Construction Permit for a New Baking Line and Catalytic Oxidizer at its Baking Facility in Downers Grove, Illinois

Source Identification No.:	043030ADW
Application No.:	26020013
Schedule:	
Public Comment Period Begins:	June 5, 2026
Public Comment Period Closes:	July 6, 2026
Illinois EPA Contacts:	
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1. INTRODUCTION

Pepperidge Farm, Inc ("Pepperidge Farm") has applied for a construction permit that would allow for the construction of a new baking line consisting of a natural gas-fired, direct-fired tunnel baking hearth oven with associated proofing. In addition, the construction permit would allow for the construction of a new catalytic oxidizer.

The Illinois EPA has reviewed the construction permit application submitted by Pepperidge Farm and made a preliminary determination that the application meets applicable requirements. Accordingly, the Illinois EPA has prepared a draft of the construction permit that it would propose to issue. However, prior to issuing this permit, the Illinois EPA is holding a public comment period providing the public with an opportunity to review and comment on this proposed action and the terms and conditions of the draft permit.

2. BACKGROUND

Pepperidge Farm owns and operates a baking facility in Downers Grove, Illinois, DuPage County. Operation of Pepperidge Farm's baking facility is currently addressed by the Clean Air Act Permit Program (CAAPP), Permit Number 96030050 (the "CAAPP Permit"). The majority of emissions from baking operations are volatile organic material (VOM), mainly ethanol, as it is formed biologically by the yeast that is used to leaven the dough. VOM is emitted when the dough is proofed within a proofer and baked within an oven.

3. PROPOSED PROJECT

This permit addresses the construction of a new baking line consisting of a natural gas-fired, direct-fired tunnel baking hearth oven and associated proofing operation. In addition, the construction permit would allow for the construction of a new catalytic oxidizer. The new oven would replace an existing Baking Line 2 oven.

VOM emissions from the oven for the new baking line would be controlled by the new catalytic oxidizer. The proofing operation associated with the new baking line would be uncontrolled. The new baking line would replace existing Baking Line 2.

4. APPLICABLE EMISSION STANDARDS

All emission units in Illinois must comply with applicable Illinois Pollution Control Board (Board) emission standards. The Board's emission standards represent the basic requirements for emission units in Illinois. In addition, emission units must comply with applicable federal emission standards.

The new baking line would be subject to requirements from 35 IAC Part 218, Organic Emission Standards and Limitations for the Chicago Area. The baking line would also be subject to 35 IAC Part 212, Visible and Particulate Matter Emissions.

5. APPLICABILITY OF NEW SOURCE REVIEW

Pepperidge Farm is located in Downers Grove which is located in DuPage County. DuPage County is designated as serious nonattainment for ozone. Accordingly, the applicability of Illinois' rules for Major Stationary Source Construction and Modification (MSSCAM), 35 IAC Part 203, were considered for the proposed project.

For emissions of nitrogen oxides (NOx), the source is not a major stationary source for purposes of MSSCAM. This is because the potential NOx emission from the source are less than 50 tons per year.

For emissions of VOM, the source is considered a Major Stationary Source for purposes of MSSCAM because the potential VOM emissions from the source are greater than 50 tons per year, as provided by 35 IAC 203.206(b)(1)(B). However, the project would not be a major modification because the net emission change of the project, when aggregated with all other net increases in emissions of VOM from the source over the period of 5 consecutive years that includes the year in which the increase occurs, would not exceed 25 tons/year of VOM. See summary below:

Table 1:
Evaluation of the Aggregate VOM Net Emissions Changes for Purposes of MSSCAM (Tons/Year)

Unit/Operation	Year	VOM
Proofing Operation	2026	29.2
Oven Baking	2026	13.3
Oven Natural Gas Firing	2026	0.16
Catalytic Oxidizer Natural Gas Firing	2026	0.03
Existing Line 2 Process (Shutdown)	2026	-56.79
Existing Line 2 Natural Gas (Shutdown)	2026	-0.01
Net Emission Change:	-	-14.11
De Minimis Emission Rate:	-	25
De Minimis? (Yes/No)	-	No

For purposes of the above table, the decrease in emissions from the shutdown of the existing line is based on the average of the actual emissions from this line over the last two calendar years (2024 and 2025). It should also be noted that there were no other projects occurring at the source resulting in any increases in VOM over the previous 4 calendar years or during 2026.

The applicability of Illinois' rules for Prevention of Significant Deterioration (PSD), 35 IAC Part 204, were considered for the proposed project. The project would not be a major project for purposes of PSD because the emissions from the source, including this project, would be less than the major source threshold under PSD rules (i.e., less than 250 tons/year per pollutant).

6. DRAFT PERMIT

The Illinois EPA has prepared a draft of the construction permit that it proposes to issue to address the proposed project. The draft permit would set operating limits, control requirements, emission limits for VOM and HAPs and appropriate monitoring, testing, sampling, recordkeeping and reporting requirements to demonstrate compliance with these applicable limits and other requirements set forth by this permit.

7. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that Pepperidge Farm's application meets all applicable state and federal air pollution requirements, subject to the conditions in the draft permit. The Illinois EPA is therefore proposing to issue the construction permit.

Comments are requested on this proposed action by the Illinois EPA and the conditions of the draft permit.