



ODOR CONTROL – AIR PERMITTING GUIDANCE

THIS GUIDANCE DOES NOT APPLY TO DEODARANTS AND MASKING AGENTS WHICH ARE STRICTLY PROHIBITED. DEODORANTS AND MASKING AGENTS COVER UP POTENTIALLY HARMFUL EMISSIONS, SUCH AS H₂S, AND MAY RESULT IN ADDITIONAL OFFSITE ODORS THEMSELVES AND AIR POLLUTION.

1. USE OF ODOR NEUTRALIZERS AT LANDFILLS

This section provides guidance on evaluating the use of odor neutralizers at landfills and how to include their potential emissions on the air permit application. These neutralizers must be applied directly to the surface of the landfill and must be used in large droplets instead of aerosols.

Applications not involving large droplets (e.g., aerosols or gas form) will be reviewed on a case-by-case basis. The Applicant must demonstrate, to the satisfaction of the Department, that these applications will not result in offsite odors or health effects.

Option A – Stationary Sources (fixed)

Example: permanently installed spray system,

- **Significant Source (as defined in N.J.A.C. 7:27-8.2 and N.J.A.C. 7:27-22.1 - Items 6 and/or 16)**
 1. Must be included in Equipment Inventory
 2. Must have an Operating Scenario under the Landfill Emission Unit
 3. A typical compliance plan will include
 - a. Emission limits
 - b. Monitoring and recordkeeping requirements
 - c. Chemical application restrictions
 4. Will require short-term and long-term health risk assessment (if applicable)
 5. The neutralizers may not cause offsite odors
- **Insignificant Source**
 1. Permit as Insignificant Source in Title V permit RADIUS Application
 2. A typical compliance plan will include monitoring and recordkeeping requirements
 3. Will require cancer health risk assessment (if applicable)
 4. The neutralizers may not cause offsite odors
- **Specific Permit Application Requirements for Odor Neutralizers**
 1. Identify in the Raw Material list – Trade Name not acceptable – Safety Data Sheets (SDSs - formerly known as Material Safety Data Sheets or MSDSs) or specific breakdown
 2. Explain the chemistry of the agent being applied – what compounds are being targeted for treatment and how does the reaction work?
 3. Propose emission limits as appropriate
 - a. Limits for agent being used
 - b. Limits for result of reactions



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Option B – Mobile Sources

Example: Trailer units, trucks

1. Permit as Non-source Fugitive source (FG) in Title V permit RADIUS Application
2. A typical compliance plan will include monitoring and recordkeeping requirements
3. Will require cancer health risk assessment (if applicable)

2. USE OF ODOR NEUTRALIZERS AT OTHER FACILITIES

This section provides guidance on evaluating the use of odor neutralizers at facilities other than landfills.

The odor neutralizers must be applied directly to the surface of the source of odors and must be used in large droplets instead of aerosols.

Applications not involving large droplets (e.g., aerosols or gas form) will be reviewed on a case-by-case basis. The Applicant must demonstrate, to the satisfaction of the Department, that these odor neutralizer applications will not result in offsite odors or health effects. The Applicant must submit their plans for using odor neutralizers as a part of an air permit application for review and approval by the Department.