Moig South Askeaton Co Limerick 2 6 SEP 2011

21st September 2011

To The IPPC Licensing division:

Re: License no: P0395-02/03 Pfizer Pharmaceuticals Askeaton.

Dear Sir or Madam,

I understand this license is under review and that the agency is accepting submissions on this review.

Please consider this as a formal submission under the act.

Over the last number of years the noise nuisance from this operation has been increasing to where I have been, and continue to be, subjected to an unacceptable level of constant noise over extended periods. This is having a very negative affect on my quality of life. Also it has significantly affected my animals causing them serious distress. At this point I have been forced to relocate most of my greyhounds and find on numerous occasions I seriously consider abandoning the house because the noise disturbance is causing me increasing irritation. I have made this known to the factory management and it must have informed the agency of my complaints because an EPA technician called one day to take noise level readings. Recently I had a qualified environmental scientist carry out some preliminary noise level assessment. The indications from the data generated are that the noise levels at night are above the limits set in the company SIPPC License. Of greater concern is that the constant tonal noise I am being subjected to appears very high at times with LzeqT measurements at the 31.5Hz frequency detected greater than 80.00 dB detected. This under any circumstances must be considered an unacceptable level for anyone to be subjected to

I request that the agency review the original license and determines if, in fact, the company did submit its planned proposal to reduce its noise emissions significantly as per the terms of its license and if, in fact, the company's proposals were carried out.

It appears to me that the noise nuisance emanates from machines that are operating at noise levels, which indicate that there could be a maintenance issue, or otherwise the noise emitted is dependent on the rate at which these machines run. At meetings with the factory management to discuss my noise complaints one of the factory engineers explained to me that certain machines had been running at vibration levels way above the recommended levels. He also stated that they had commissioned a firm of noise consultants (System) who had identified specific problems, which he promised the company was addressing However if the engineers have addressed some of these problems any improvement achieved is of little benefit to me because there are still significant periods when the noise out of those machines is very loud. There are times when the tonal component of the noise is not particularly discernable yet at other times, when the noise

from the factory is loudest, the tonal component is easily recognised within the overall noise. Measurements taken confirm this. These measurements were taken beside my residence after 20.00hrs at night when the LAeqT was greater than the 45 db permitted. An increase of 2-3 dB in LAeqT broadband measurements can accompany a 20 dB increase in coincidental measurements of LZeqT at 31.5 Hz. This indicates that it is possible that the noise level is controlled by the rate at which these machines are programmed to operate.

If what I suspect is true, that the plant operators can adjust the noise levels by adjusting the operation levels of the plant, any pre-announced independent monitoring of noise in, or around, the plant will be very unlikely to generate data which relates to the worst case scenario of which I feel the brunt of. I ask the agency to bear this in mind if it decides to investigate.

Therefore I formally request that the agency considers the question of noise pollution being emitted by this plant in its review determination. I ask that it considers assessing, whether or not there is a historical question of non-compliance. I also ask that the agency investigate the tonal nature of this noise pollution with a view to ordering the company to eliminate or reduce this type of noise.

I was unaware of this previously but I know now that any noise level measurements made where I live should be taken according to the published EPA standard methods. I refer to equipment used and to the chosen sampling points. I wish to point out that the measurements made by the EPA representative from Ennis, who called to me some time ago, were not representative measurements with relevance to the site where I am affected.

Yours sincerely

Declan Prendiville