

Submission

Submitter:	Anonymous
Submission Title:	Submission
Submission Reference No.:	S011100
Submission Received:	26 April 2023

Application

Applicant:	Arrow Group Limited
Reg. No.:	P0812-02

See below for Submission details.

Attachments are displayed on the following page(s).



Co. Kildare.
12th April 2023.

Environment Protection Agency,
Licensing Unit,
Johnstown Castle Estate,
Co. Wexford,
Y35 W821.

RE: SUBMISSION FOR THE REVIEW OF THE ARROW GROUP LICENCE

Dear Sir/Madam,

Please see attached my submission in relation to the review of the Arrow Group Licence 812-02.

Please note I request that this is treated as an anonymous submission.

Thanking you

Yours faithfully



I have lived close to the Arrow Group Naas for 26 years. I am aware that there is an EPA IPPC licence which was issued in 2008 and I have been complaining to the EPA for the last number of years over noise, vibration and odour issues. Since we purchased our home in The Arrow Group has changed and grown hugely. The licence has no limits and this has unfortunately been the case with massive growth and production. Growth of production is in itself a good thing but not at the expense of the people living beside these factories.

The negative impact that this business has had and continues to have upon my family and I is immeasurable, to the extent that two of my children have moved out of our home and close relatives are unable to stay over because of the unbearable noise and vibration levels that we are exposed to. I on many occasions over the years have had to leave my home for sleep and rest away from the noise and air pollution. The noise we experience is humming, droning, buzzing, beeping, crashing, compressor, fan noise and vibration. It is very difficult to express how horrendous the noise is and bear in mind we are exposed to this noise on a 24 hours basis 7 days a week. Please refer to my complaints that are registered with the EPA enforcement section. I would ask the inspector reviewing the licence and the Directors signing off on the licence to look at my complaints while reviewing the licence. I would ask them to consider how they would feel coming home from work on a Friday evening to the sound of factories operating at full belt as Friday night is a busy night for these factories. How they would feel to come home and not be able to open their windows because of the odours and not being able to sleep because of noise disturbance. Being a 24 hour 7 days a week facility means that there is no breather from the noise. I understand that these are working factories but there is no green belt or distance between the factories and the residents. I understand that the Arrow Group have installed noise screens but unfortunately they have not been of any real benefit.

The noise management plan looks very good on paper but the reality is that the plan has not and does not keep the noise at compliance levels. Given the level and content of complaints I would ask that more noise monitoring by the EPA is necessary as self policing (in house monitoring) has not and does not work in this case.

Noise Measurement – I am asking the EPA has there been noise measurements of all equipment and emission points that emit noise. If not I would ask that noise measurement of equipment that produces noise, compressor facility that has no roof, all emission points (fans) silos, compressors and all exposed rooftop noise producing equipment is making that calibrations should take place. There is a

concentrated effort to control truck traffic and reversing beepers, closing doors etc. which is important in a noise management plan but the measurement levels of industrial equipment, compressors, fans and emission points needs to be addressed which a noise management plan cannot cover.

Planning - As this review licence is seen as a new licence and planning permission is checked in original licences I am asking the EPA to request and check all planning on the site and in addition to buildings exposed equipment, silos, compressors and exposed rooftop compressor buildings, fan emission points and exposed rooftop equipment. I am aware that the EPA are not the responsible planning authority however the planning permission of the entire campus of factories should be checked before a licence is issued.

Under the 2008 EPA licence our environment that we live and breathe in has not been protected in any shape or form. The enforcement inspectors have come to know me and I them and I am aware that they have all worked diligently in trying to bring these factories into compliance to the extent that they have brought them to court three times and continuously on the priority list. I am aware and grateful for their dedicated work over the years and the amount of work it takes to bring a company to court and to place them on the priority list. Unfortunately the result was small fines for a company of this calibre and we the residence returning home to continued air and noise pollution. I know that the inspectors have been and are doing their jobs to the best of their ability but it is now time for the Directors of the EPA who sign off on these licences to step up and deal with this licence in a manner that will resolve the level of pollution we are experiencing.

Noise and Vibration – Overall in terms of the noise and vibration levels I can see no lowering of levels in the last number of years but unfortunately the noise and vibration levels have increased. I do not know if it is because of increased production or increased emission points or additional equipment. I am sorry to have to say this but living in my home is a constant endurance test. A new piece of equipment or a piece of equipment breaking or needing servicing can have a terribly negative impact on our days and nights.

Odour – Overall odour pollution has improved due to the continuous monitoring and visits of the EPA inspectors but we continue to have issues with odours. It is difficult in that we never know when we are going to suffer the odours – it depends on what is being processed – if odour abatement is in working order and if we are downwind of the factories in question. I should not be aware of any or all of these reasons but because of the horrendous level of pollution we have and are suffering I am aware of this. As the EPA is aware odour pollution ruins quality of life, you cannot open windows, you cannot enjoy your garden, you cannot breathe without feeling

physically sick. For most people in Ireland a good weather forecast means enjoying your home and your garden, for us we have other factors to consider for example what are the factories producing at this time? Are we downwind of the factories? Are we going to have a sickening number of hours or days ahead of us. If I lived in Charles Dickens era I would have compassion for the people of that time suffering this level of pollution and should think that we the people living in the 21st century know the damage that pollution causes to our health and well being and have environment laws to protect us but imagine how I and my neighbours feel that we are living in 2023 in Naas and are suffering this level of pollution from a company with an environment IPPC licence.

I have written above from my personal experience which sadly has been awful. Looking forward I hope that the review of this licence will have the relevant details such as emissions levels which will protect our environment. The contents and the enforcement of the review licence will have the power to have a profound positive or negative effect on the next twenty years of my life, my family's life and my neighbours lives.