



**Environmental
Protection
Agency**

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Operation Permit

Issued under the Environmental Protection Act, Cap. 20:05, Laws of Guyana, the Environmental Protection (Amendment) Act, 2005, and the Environmental Protection (Authorisations) Regulations, 2000.

Reference No.:	20191104- GSDIP
Fees:	Medium (C2) US\$4000 (5 years) i.e. US\$ 800 per year
Fees Paid:	US \$ 4000 (June 2020- May 2025)

Addressee(s): Mr. Kerwin Grant
Global Seafoods Distributors Inc
Lot 397-398, King Street
Republic Park
East Bank Demerara

Activity: Operation of a Fish Processing Plant

Global Seafoods Distributors Inc, hereinafter referred to as the "Permit Holder", is hereby authorised in accordance with the Environmental Protection Act, Cap. 20:05, Laws of Guyana, the Environmental Protection (Amendment) Act, 2005, and the Environmental Protection (Authorisations) Regulations, 2000, to operate a Fish Processing Plant located at W 1/2 of E 1/2 Lot 76 Adelaide & Evans Streets, Charlestown, Georgetown hereinafter referred to as the "Project", in a manner indicated in the Application dated November 04, 2019, subject to the terms and conditions set forth herein under the Environmental Protection Act, or in any forthcoming regulations made under the said Environmental Protection Act and/or any other applicable laws, best practices, guidelines and standards relevant to this project.

Terms and Conditions for the Operation to be adhered to by the Permit Holder:

I. SPECIAL CONDITIONS

A. DEFINITIONS

1. **“Daily maximum”** effluent concentration means the highest reading of any daily determination of concentration.
2. **“Dissolved Air Flotation Unit (DAF)”** means a water treatment process that clarifies wastewater (or other water) by the removal of suspended matter such as oil or solids.
3. **“Effluent”** means waste material (such as smoke, liquid industrial refuse, or sewage) discharged into the environment especially when serving as a pollutant.
4. **“Grab Sample”** means an individual sample or measurement collected in less than 15 minutes and taken at a specific time at one location.
5. **“Outfall”** means the location where effluent is discharged into receiving waters.
6. **“Permit Holder”** means an individual or organization holding a discharge permit issued by the EPA.
7. **“Persistent foam”** means foam that does not dissipate within half an hour of point of discharge.
8. **“Sampling Point”** means the effluent sampling location in the outfall line(s) downstream from the last addition point or as otherwise specified.
9. **“Waste”** means substance or objects which are disposed of or are intended to be disposed of, or are required to be disposed of, by the provisions of National Law.
10. **“Non-Hazardous Waste”** means wastes which does not exhibit hazardous characteristics but is still potentially harmful to the environment.
11. **“Hazardous Waste”** means wastes which exhibit hazardous characteristics and are potentially harmful to human health or the environment.

B. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. The Permit Holder is authorised to discharge treated effluent from a Dissolved Air Flotation Unit (DAF unit). Treated effluent shall be discharged in accordance with the Guyana National Bureau of Standards (GNBS) *Interim Guidelines for Industrial Effluent Discharges into the Environment* and the *IFC Environmental, Health and Safety Guidelines* and within the allowable limits for a Fish Processing Facility as specified in the table below:



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Parameter	Daily Maximum concentration	Units	Sample type	Frequency of Analysis
pH	(5.0-9.0)		Grab	Quarterly
Total Suspended Solids	<50	mg/L	Grab	
Biological Oxygen Demand	<50	mg/L	Grab	
Oil and Grease	<10	mg/L	Grab	
Total Nitrogen	<10	mg/L	Grab	
Total Phosphorous	<2	mg/L	Grab	
Total Coliform	<400MPN	mg/L	Grab	

There shall be no discharge of floating solids or persistent foam in the effluent other than trace amounts.

2. Only treated effluent from the DAF unit shall be discharged via outfall pipe 001 into the Princess Street Drainage canal at GPS coordinates **21N 0371686 UTM 0752026**.
3. Grab Samples of the treated effluent shall be collected **at the sample port (21N 0371708 UTM 0752023) located after the DAF Unit**.
4. Grab Samples are to be taken at such times as to be representative of the quality of the effluent.

B. PROTECTION OF WATER QUALITY

1. It is a violation of this Permit to discharge any substance not otherwise listed under Section IB "Effluent Limitations and Monitoring Requirements" at a level which could cause or contribute to any exceedance of the numerical water quality standards in Guyana National Bureau of Standards (GNBS) *Interim Guidelines for Industrial Effluent Discharges into the Environment* and the *IFC Environmental, Health and Safety Guidelines*. If a discharge regulated by this Permit causes or contributes to an exceedance of the water quality standards, the Agency is authorized to modify, suspend or revoke this Permit or take enforcement action to address unlawful discharges of pollutants.

C. CHEMICAL AND ADDITIVES

1. If water potentially containing chlorine or chlorine compounds (that have been used for disinfection of aquatic organisms holding tanks or any other equipment) is to be

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discharged via outfall 001, the water shall be chemically DE chlorinated or held for twenty-four (24) hours before being discharged.

POLLUTION PREVENTION & CONTROL PLAN

1. The permit holder shall develop a **Pollution Prevention and Control Plan** which must be submitted to the Agency **within thirty (30) days of issuance of this Permit**. This plan shall describe and ensure the implementation of practices which are to be used to reduce pollutants to the environment of the facility.
 - i. The Pollution Prevention Plan shall include the following:
 - a. A description of all activities and materials that may have significant pollution sources.
 - b. A section on the management and control measures in place for all hazardous materials and chemicals stored and used on site and copies of the Material Safety Data Sheets (MSDS) for these products.
 - c. A site map indicating the flow of process water through the facility, the floor drainage system, and all points of stormwater and treated effluent discharge to the surrounding surface water bodies.
 - d. Accident prevention procedures.
 - e. First person response.
 - f. Notification procedures.
 - g. Location of clean-up equipment.
 - ii. The plan shall also contain **Pollution Management Controls** and shall address the following:
 - a. A general maintenance program that involves timely inspection and maintenance of facility equipment and of systems in place to uncover conditions that could cause failures resulting in discharge of pollutants to the environment.
 - b. Management and controls in place for all hazardous materials and chemicals stored and used on site and copies of the Material Safety Data Sheets (MSDS) from these products.
 - c. Good Housekeeping that requires that maintenance of a clean orderly facility these include practices such as:
 - i. Water conservation and
 - ii. Efficient use of energy.
 - d. Spill prevention and response procedures including training and provision of requisite clean-up equipment for clean-up shall also be made available to the appropriate personnel.

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- e. Maintenance of records on spills or other discharge incidents shall be recorded, and a logbook maintained on site to be reviewed upon request by the Agency.
- f. Maintenance of Drainage systems.
- g. DAF unit Maintenance activities shall be documented and recorded and a logbook of such maintained on site for Agency review.
- h. Identification of specific individuals who are responsible for the implementation, maintenance and revision of the plan.
- i. Site inspections, including their frequency, and identification of designated personnel. An annual visual site inspection of the plant by the plant manager and designated personnel shall be taken to ensure that the **Pollution prevention controls and plan** is adequately implemented. The appropriate personnel shall be designated to update the **Pollution Prevention Plan** as necessary to reflect any operational changes. This may include such things changes to drainage
- j. Employee training programs shall inform personnel at all levels of responsibility of the components of the pollution prevention plan. Training should address topics such as spill response, safety, material management and good housekeeping.
- k. The Facility shall have the necessary security systems to prevent accidental or intentional entry which could cause discharge of a pollutant. Security systems shall be described in the plan to address fencing, lighting, vehicular traffic control, securing of equipment and buildings.
- l. Provide adequate fire protection measures such as fire extinguishers and sand buckets in accordance with the Guyana Fire Service approval.
- m. Maintain a valid Fire Safety Certificate from the Guyana Fire Service. **All** firefighting equipment must be maintained and serviced on a regular basis. The Fire Safety Certificate must be presented to officers of the Agency upon request during compliance inspections and reported on in **Annual Reports**, required in condition E.7.

D. AIR QUALITY AND NOISE MANAGEMENT

The permit holder shall adhere to the applicable provisions of the Environmental Protection (Air Quality) Regulations, 2000 and the Environmental Protection (Noise Management) Regulations, 2000.

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Stack heights and configurations must accord with Good Engineering Practice Stack Height formula $H_{GEP} = H + 1.5 L$ to avoid excessive ground level concentrations of contaminants where:

- H_{GEP} is good engineering practice stack height, measured from the ground-level elevation at the base of the stack;
- H =height of nearby structure(s) measured from ground-level elevation at the base of the stack; and
- L =lesser dimension, height (H) or projected width, of nearby structure(s).

1. Conduct baseline air quality monitoring to assess background levels of air pollutants identified in the table below:

Air Pollutant	Averaging Time	Maximum Permissible Level	Type of Monitoring	Monitoring Frequency
Carbon Monoxide	1 h	35ppm	Ambient	Annual
Nitrogen Dioxide	1 h	200µg/m ³	Ambient	Annual
Sulphur Dioxide	24 h	20 µg/m ³	Ambient	Annual
Ammonia	-	1mg/m ³	Ambient	Quarterly
Hydrogen Sulphide	-	2mg/m ³	Ambient	Quarterly

2. Monitor air quality to determine compliance with the World Health Organisation Air Quality Guidelines and the IFC Environmental, Health and Safety Guidelines. Monitoring should be conducted at the property boundary and within the St Stephen's School Compound.
3. All air quality sampling and analysis shall be done in accordance with US EPA methods of sample collection and analysis. Ensure personnel conducted monitoring are trained and the equipment is properly calibrated and maintained.
4. Monitor noise emissions in accordance with the Guyana National Bureau of Standards (GNBS) Guidelines for Noise Emissions into the Environment, not exceeding the residential limits listed below, at a distance of 15 metres (50 feet) from the source or property boundary, whichever is closer.

Residential Limits: 75 dB Daytime Limits (6:00 h- 18:00 h)

60 dB Nighttime limits (18:00h -6:00h)

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5. Ensure all significant noise-producing equipment, e.g., refrigeration systems wastewater treatment plant, are equipped with appropriate silencers or mufflers and/or are enclosed in suitable acoustic enclosures to reduce noise levels impacting the surrounding environment to achieve compliance with Guyana National Bureau of Standards (GNBS) requirement.
6. Ensure that all equipment and machinery are placed on a foundation properly designed to ensure effective damping of vibrations.
7. Ensure that machines/equipment are regularly serviced to ensure efficiency and reduce the level of noise produced.

E. PROTECTION OF AIR QUALITY

1. It is a violation of this Permit to discharge any substance not otherwise listed under this permit at a level which could cause or contribute to any exceedance of the World Health Organization Air Quality Guidelines and the IFC Environmental, Health and Safety Guidelines. If a discharge regulated by this permit causes or contributes to an exceedance of the air quality standards, the Agency is authorized to modify, suspend or revoke this permit or take enforcement action to address unlawful discharges of pollutants.

F. ODOUR CONTROL

1. The permit holder shall take all necessary measures to minimise malodour arising from the processing of raw material, storage, treatment or disposal of by products and waste. The Permit holder shall have in place plans for facility improvement and appropriate housekeeping measures to minimise any mal-odour.
2. Reduce the stock of raw materials, waste, and by-products and store them only for short periods of time in a cold, closed, well-ventilated place to eliminate or reduce mal-odour that may emanate from the operation.
3. Keep all working and storage areas clean and empty and clean fat traps on a regular basis; all wastewater drains must be covered to reduce the escape of malodour.
4. Avoid processing batches of raw material that are of considerably lower than average quality in order to reduce malodour.
5. Seal by-products in covered, leak-proof containers. Keep all working and storage areas clean and remove waste products immediately from the production line.



Empty and clean fat traps on a regular basis.

I. GENERAL CONDITIONS

A. OPERATION

Notify the Agency in writing and obtain its approval for **ANY** proposed changes to the facility or operation at least **fourteen (14)** days before making the change. The notification shall contain a description of the proposed change in operation. It is not necessary to make such a notification if an Application to vary the Permit has been made and the Application contains a description of the proposed change. Condition "**change in operation**" means a change in the nature or functioning or an expansion of the installation which may have consequences for the environment which may include but is not limited to:

- Changes in construction, structure, or layout of the facility, plant or building;
 - a. Installation of new and/or changes to equipment, machine, apparatus, mechanism, system or technology serving the facility or operation; or
 - b. Any technology used or installed at the facility from which effluent may be discharged.
- 2. Make **all** employees aware of the conditions of this Operation Permit and provide training on best environmental management practices.
- 3. Promote the conservation and efficient use of energy. Options for energy efficiency include but are not limited to those listed below:
 - a. Install Energy Star labeled appliances and;
 - b. Implement switch-off programs and install sensors to turn off or power down lights and equipment when not in use; and
 - c. Improve insulation on heating or cooling systems and pipe work.
- 4. **All** employees must be equipped with and trained in the use of Personal Protective Equipment (PPE's) relevant to their job description during operating hours.

B. WASTE MANAGEMENT

- 1. In accordance with the Environmental Protection (Litter Enforcement) Regulations, 2013, provide covered garbage receptacles for domestic waste at strategic locations at the facility which should be emptied, cleaned and maintained. Waste shall be disposed at an authorised solid waste disposal facility.
- 2. Maintain Septic Tank System(s) at all times which should be accessible for cleaning and

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de-sludging. Any modification to the Septic Tank (s) must be in accordance with the Guyana National Bureau of Standards (GNBS) *Code of Practice for the Design and Construction of Septic Tanks and Associated Secondary Treatment and Disposal Systems*.

C. REMOVED SUBSTANCES

1. The permit holder shall ensure that wastes from the seafood processing operation (i.e. viscera, fins, scales and fish heads and carapace, etc.) are collected and stored in covered, leak-proof containers at all times.
2. The sludge generated from the DAF treatment system shall be stored and disposed of in such a manner that any solids or run-off from the sludge shall not enter any surface water bodies.

D. HAZARDOUS MATERIALS/WASTES MANAGEMENT

1. Comply with the provisions of the Environmental Protection (Water Hazardous Waste Management) Regulations, 2000.
2. Establish and maintain a register of hazardous materials or chemicals used or generated by your operation. Submit to the Agency (soft and hard copies) no later than forty-five (45) days after the end of the operating year, a report relating to the activities for the previous calendar year including:
 - a. the name, location and type of facility;
 - b. types and quantities (in metric units) of hazardous waste generated;
 - c. manner of storage, use, any applied treatment standards/methods and disposal of these substances;
 - d. data concerning off-site shipments of waste, i.e. local disposal facility utilized, country to which hazardous waste is shipped, purpose of shipment and amount of waste shipped;
 - e. a summary of any accidents that may have occurred and any action taken;
 - f. any waste minimisation efforts undertaken by your facility for hazardous material/waste; and
 - g. Any other matter the Agency may require.

E. COMPLIANCE MONITORING AND REPORTING

1. The following information shall be recorded and submitted in the **Quarterly Water Quality Monitoring report** and the **Air Quality Monitoring report** for each suite of sampling done in accordance with this permit.

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- 5.1.1 The exact place, date and time of sampling;
 - 5.1.2 The person(s) who performed the sampling;
 - 5.1.3 The results of all the Analyses;
 - 5.1.4 Copies of original Laboratory analytical reports
2. All laboratory analyses are to be done in accordance with the **Environmental Protection (Water Quality) Regulations, 2000 Part VIII section 24. Third schedule** and or any other method approved by the EPA prior to use.
 3. All records and information from the monitoring activities required by this Permit are to be retained at the facility for a minimum of five years.
 4. The Permit Holder shall monitor the monthly consumption of water and provide the data to the EPA as a component of the **Annual Environmental Report** required in condition E.14.
 5. The monthly volumes of sludge generated from the DAF treatment system shall be measured and provided in the **Quarterly Water Quality Monitoring report**.
 6. A manifest recording the name of disposal service, date, and time of disposal of such sludge shall be keep by the facility.
 7. Notify the EPA **within twenty-four (24) hours** of the occurrence of any environmental emergencies.
 8. Notify the Agency in writing of any change of name or ownership of the Permit holder's facility **within thirty (30) days** after the change occurs.
 9. Report to the Agency of non-compliance with the Operation Permit:
 - (i) Within **forty-five (45)** minutes of the time the Holder of the Operation Permit becomes aware of the non-compliance, the anticipated manner in which it may endanger human health or the environment.
 - (ii) Within **seventy-two (72)** hours submit to the Agency a written report containing a description of the non-compliance, its cause and the period of non-compliance including exact dates and time.
 - (iii) Submit a report to the Agency indicating the reasons and the anticipated time it is expected to continue if the non-compliance has not been corrected within **seventy-two (72)** hours.
 10. Monitor the implementation of the conditions of this Permit, in-so-far as they involve adherence by your employees and all third parties associated with the operation of the Project.
 11. Comply with any lawful directions given by the EPA from time-to-time in furtherance of the implementation of any international or other obligations for the environmental

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protection of Guyana.

12. Assign an individual responsible for coordinating environmental management, monitoring for compliance, reporting to the EPA, implementing the conditions of this Permit, ensuring employees are trained in environmental management and emergency response procedures.
13. Submit to the EPA the **Environmental Annual Report** on the status of the project, progress of the implementation of the monitoring activities and compliance with the conditions contained herein by **March 31** every year (Please see attached the *Guidelines for the preparation of Environmental Annual Reports*).
14. Notify the Agency **within twenty-one (21) days** in event of death, bankruptcy, liquidation or receivership of the Permit Holder or if the Company becomes a party to an amalgamation.
15. The Operation Permit is not the final operational consent; permission must be obtained and maintained throughout the time period of this Permit, from other relevant regulatory bodies, such as **Ministry of Agriculture –Department of Fisheries, and Ministry of Health – Veterinary Public Health**.
16. Submit to the Agency, proof of the Well registration from the **Ministry of Agriculture–Hydrometeorological Department** within **thirty (30) working days** of issuance of this Permit.

F. INSTITUTIONAL AUTHORITY/LIABILITIES

1. The EPA reserves the right to conduct regular inspections of the Permit Holder's operation as part of its monitoring and enforcement requirements under the Environmental Protection Act, Cap.20:05, the Environmental Protection (Amendment) Act, 2005, and the Environmental Protection Regulations, 2000.
2. The Permit Holder shall, at all times, allow entry to the Permitted facility to any Officer designated by the EPA for the purposes of conducting inspections or any other legitimate business of the Agency. Pursuant to s.38 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana, it is an offence to assault, obstruct or hinder an authorized person in the execution of his/her duty under the said Act or its Regulations and the Permit Holder shall be liable to penalties prescribed under paragraph (c) of the Fifth Schedule for doing so.
3. The EPA reserves the right to review and/or amend the conditions and fees attached to this Permit, which also includes the review and/or amendment of Permit Fees in consideration of any changes in fee structure as determined by the Agency for projects of this nature. The EPA shall have the right to cancel or suspend this Permit for breach of any of the terms and conditions contained herein.

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4. The Permit Holder shall be strictly liable for any loss or damage to the environment through any act caused intentionally or recklessly, through the adverse effect of any discharge or release, or cause or permit the entry of pollution, contaminant in any amount, concentration or level in excess of that prescribed by the regulations or stipulated by any Environmental Authorisation which are attributed to the Project, s. 19 (1) Environmental Protection (EP) Act, Cap. 20:05, Laws of Guyana.
5. Where it appears to the Agency that the Permit Holder is engaged in any activity that may pose serious threat to natural resources or serious pollution of the Environment or any damage to public health, issue to the Permit Holder a Prohibition Notice Order to immediately cease the offending activity. S 27 EP Act, Cap. 20:05, Laws of Guyana.
6. This Operation Permit is effective for the period stipulated herein **June 2020 to May 2025**.
7. This Operation Permit shall remain valid until **May 31, 2025**, unless otherwise suspended, cancelled, modified or varied in accordance with the provisions of this Permit or the Environmental Protection Act, Cap 20:05, Laws of Guyana, Environmental Protection (Amendment) Act, 2005, and the Environmental Protection (Authorisations) Regulations, 2000.
8. This Permit must be renewed, by submitting a completed Application Form for Renewal of Environmental Authorisation to the Agency at least six months before this Permit of Environmental Authorisation expires, that is, no later than **December 31, 2024**.
9. Any late submission of renewal application (s) after the specified date as stated above, shall require the Permit Holder to pay, in addition to renewal fee, a late penalty fee (accruing at the time such obligation was first owed for renewal) at a rate of **two thousand dollars (GY\$2000.00) per day** for every day late, until such renewal application is submitted to the Agency, without prejudice to any other rights of the Permit Holder in connection therewith.
10. Failure to comply with the requirements of this Permit shall render the Permit Holder liable to prosecution and to penalties prescribed under the Environmental Protection Act, Cap.20:05, the Environmental Protection (Amendment) Act, 2005, and the Environmental Protection Regulations, 2000, including civil penalties and injunctive relief.

Signed by  on behalf of the Environmental Protection Agency.

Dr. Vincent Adams
Executive Director

Date

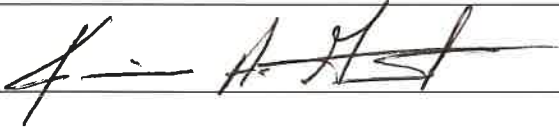
June 15, 2020


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I hereby accept the above terms and conditions upon which this Operation Permit is granted and agree to abide by the Environmental Protection Act, Cap20:05, the Environmental Protection (Amendment) Act, 2005, and the Environmental Protection Regulations, 2000, and any existing or forthcoming regulations and standards made under this Act.

NAME	Kerwin A. Grant
DESIGNATION	CEO
SIGNATURE	
DATE	06-16-2020



KHG