



**Environmental
Protection
Agency**

Ganges Street, Sophia,
Georgetown, GUYANA.
Tel.: (592)-225-5467 / 5468 / 5469
Fax: (592) 225-5481
Email: epa@epaguyana.org
Website: www.epaguyana.org

Operation Permit

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

Reference No.:	20190521-NHRMD
Fees:	Medium (C2)-US\$800 for one (1) year
Fees Paid:	US\$4,000 - (Five (5) years (February, 2021 to January, 2026))

Addressee(s): Mr. Nafeezul Hakh
Manager
Abdool Hakh & Sons Rice Milling & Marketing Complex
R-Harlem
West Coast Demerara.

Activity: Operation of a Rice Mill



Mr. Nafeezul Hakh, trading and operating under the name, 'Abdool Hakh & Sons Rice Milling & Marketing Complex', 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 Rice Mill, located at R-Harlem, West Coast Demerara, hereinafter referred to as the "Project", in the manner indicated in the Application submitted on May 21, 2019, the approved Environmental Management Plan (AEMP, 2020) submitted on July 28, 2020, subject to the terms and conditions set forth herein under the Environmental Protection Act, existing and/or forthcoming Regulations made under the said Act, and/or any other applicable laws, best practices, guidelines and standards relevant to this project.

The Permit Holder, His Servants, Agents and/or Sub-Contractors shall comply with the following Terms and Conditions:

1.0 OPERATION

- 1.1 Notify the Agency in writing and obtain its approval for **ANY** proposed changes to the operation **at least fourteen (14) days** prior to making the change. The

Operation Permit - Ref. No.:20190521-NHRMD

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

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** this Permit has been made and the application contains a description of the proposed change. In this condition '**change in operation**' means a change in the nature or functioning, or an extension, or any additional installation, which may have consequences for the environment. Changes to operation may include but not be limited to the following:

- a) Changes in construction, structure, or layout of the facility, plant or building;
 - b) Installation of new and/or changes to equipment, machine, apparatus, mechanism, system or technology serving the facility or operation;
 - c) Any technology used or installed at the facility from which effluent may be discharged from.
 - d) Any other variance prescribed by Regulation 20(3) of the Environmental Protection (Authorisations) Regulations.
- 1.2 Ensure that all mechanical equipment, for example; the furnace, milling apparatus and separator are operated in accordance with the respective manufacturer's specifications. Additionally, **all** mechanical equipment and vehicles shall be regularly maintained and operated at their optimal levels.
 - 1.3 Ensure that all pest control applications are conducted by a pest control operative who has been **certified** by the Pesticides and Toxic Chemicals Control Board (PTCCB). Use **only** pesticides approved for use in Guyana by the Pesticides and Toxic Chemicals Control Board.
 - 1.4 The pest control operative must be equipped with Personal Protective Equipment (PPE) according to the Safety Data Sheet (SDS) during the application of pesticides and/or decontamination of spraying equipment.
 - 1.5 Use **only** fumigants approved for use by Guyana Rice Development Board (GRBD) and PTCCB and ensure all relevant staff are trained by GRDB on their use, for example, application of the correct/effective concentrations at the relevant time.
 - 1.6 Decontaminate **all** empty agro-chemical containers by complying with the decontamination procedures in accordance with their respective Safety Data Sheet (SDS), or where such procedures are not prescribed, the containers shall be decontaminated by triple-rinsing (rinsing three times). All rinsate/effluent generated during the decontamination process must be disposed by placing into a spray can and sprayed on vegetation or weeds in an area at least 10 metres away from any waterway.

Operation Permit - Ref. No.:20190521-NHRMD

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

2.0 EMPLOYEES AND OCCUPATIONAL HEALTH AND SAFETY

- 2.1 All employees must be equipped with and trained in the use of personal protective equipment (PPE) to fit their job specification such as: hi-visibility vests, respirator (N95 filters or N95 mask), hard hats, gloves, and appropriate footwear. The Permit Holder shall ensure appropriate utilisation of these gears. A log for the distribution of PPE to employees must be maintained. Evidence of distribution log must be presented to officers of the Agency upon request during compliance inspections.
- 2.2 A first aid kit equipped according to the Guyana Red Cross standards must be located on site at times. Additionally, communication and transportation systems must be in place to respond to emergencies.
- 2.3 Ensure that all employees are trained in the use of the fire extinguishers and firefighting protocols.
- 2.4 Make all employees/third party contractors aware of the Conditions of the Operation Permit and provide training on good environmental management practices. Prepare and maintain a training file for employees which must be available upon Officers' request during a Compliance Inspection. A summary of such activities must be included in the **Annual Report**.

3.0 WATER QUALITY MANAGEMENT

Comply with the provisions of the Environmental Protection (Water Quality) Regulations, 2000.

- 3.1 Maintain the integrity of water receiving bodies adjacent to rice milling operation. Effluent discharges from Final discharge point – **WQ1 (21No365503 UTM 0755122) identified in AEMP, 2020**, should be in accordance with the Guyana National Bureau of Standards (GNBS) Interim Guidelines for Industrial Effluent Discharge into the Environment not exceeding the parameter limits below:
 - Temperature (<40° C);
 - pH (5.0-9.0);
 - Total Suspended Solids (TSS <50 mg/L);
 - Oil and Grease (<10 mg/L);
 - Biological Oxygen Demand (BOD <50 mg/L); and
 - Turbidity (<30 NTU).

The Parameters listed above must be monitored on a biannual basis (once during the dry season and once during the dry season). Results from such monitoring must be submitted to the Agency as part of **annual report**.

Operation Permit - Ref. No.:20190521-NHRMD

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

- 3.2 **At no time** should paddy husk, paddy ash or any other solid waste be disposed of in surrounding drains and/or waterways.
- 3.3 Maintain drainage network to ensure the free flow of water from the compound which should be kept free of debris and/or vegetation.
- 3.4 Promote conservation of water resources by minimising water consumption as best as practicable.

4.0 EMERGENCY MANAGEMENT

- 4.1 Obtain and maintain approval from the Guyana Fire Service. Provide and locate adequate fire protection and safety measures such as fire extinguishers and sand buckets in accordance with this approval.
- 4.2 Ensure all firefighting equipment are maintained and serviced regularly.
- 4.3 Ensure that the fire escape route is clearly defined and has emergency lighting in accordance with the requirements of the Guyana Fire Service.

5.0 WASTE MANAGEMENT

Comply with the provisions of the Environmental Protection (Litter Enforcement) Regulations, 2013, where applicable.

- 5.1 Maintain good house-keeping, sanitary and hygienic practices. The good aesthetic quality of your surroundings **must** be maintained at all times.
- 5.2 Promote proper solid waste management practices at the project site. Covered garbage receptacles must be placed at strategic locations, both in and outside of the operation. All solid waste generated by employees must be collected in these receptacles and disposed of at an approved waste disposal facility. Reuse, recycle and/or compost waste materials as far as practical.
- 5.3 Maintain the dust extraction system to ensure there is no escape of fugitive dust. Wet suppression methods such as sprinklers should be employed where practicable to control fugitive dust.
- 5.4 Dispose of unused paddy husk/impurities and any other solid waste in accordance with measures outlined in the **AEMP, 2020**. Reuse these materials in a timely manner and do not allow them to accumulate on site for excessive periods of time to the adverse effect of the environment or human health.

5.4.1 In the event that paddy husks/chaff accumulates on site, heaps shall be

Operation Permit - Ref. No.:20190521-NHRMD

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

kept at a height not exceeding two (2) metres, unless otherwise directed by the Agency.

5.4.2 The Permit Holder shall ensure sufficient mitigation measures are employed to prevent the dispersion of paddy husks/chaff into the environment, failing which he shall be liable under Section 19(1)(a) of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.

5.4.3 Options for reuse of paddy husk and its impurities include:

- Poultry bedding;
- Landfill material (where practical); and
- Fuel for furnaces to generate energy at the rice mill.

5.5 Maintain a septic system on site at all times. The septic tank must be located one hundred (100) metres away from waterways, at least 1.5 m away from a building or property boundary and be accessible for cleaning and 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*.

6.0 AIR QUALITY AND NOISE MANAGEMENT

Comply with the provisions of the Environmental Protection (Air Quality) Regulations, 2000 and the Environmental Protection (Noise Management) Regulations, 2000.

6.1 Ensure all significant noise-producing equipment, e.g. generators, milling equipment, etc., are enclosed in suitable acoustic enclosures where necessary and the generator is fitted with appropriate silencers or mufflers to reduce noise levels impacting the surrounding environment to achieve compliance with the Guyana National Bureau of Standards (GNBS) requirement.

6.2 Comply with the Guyana National Bureau of Standards (GNBS) Guidelines for noise emission into the environment, not exceeding the limits below at a distance of 15m (50 ft) from the source or property boundary, whichever is closer.

- **Residential Limit 75 dB** (Day-time (08:00 h - 17:00 h))

6.4 Ensure all equipment and machinery are placed on foundations properly designed to ensure effective damping of vibrations.

6.5 Conduct regular maintenance to ensure that all vents and openings are sealed around the milling and drying area in an effort to minimise/prevent escape of fugitive dust into the environment.

Operation Permit - Ref. No.:20190521-NHRMD

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

6.6 Comply with the World Health Organisation (WHO) *Air Quality Guidelines for Particulate Matter in the Environment*, not exceeding the limits below:

PM_{2.5}: 10 µg/m³ annual mean
25 µg/m³ 24-~~annual~~ mean

PM₁₀: 20 µg/m³ annual mean
50 µg/m³ 24-~~annual~~ mean

6.6.1 Monitor particulate matter (PM_{2.5} & PM₁₀) at **All** sampling location identified in **AEMP, 2020** on a **bi-annual basis** (once during the dry and once during the rainy season). The results of such monitoring must be submitted to the Agency as part of your **Annual Report**.

7.0 HAZARDOUS MATERIALS/WASTE MANAGEMENT

Comply with the provisions of the Environmental Protection (Hazardous Waste Management) Regulations, 2000, as follows:

- 7.1 Maintain a fuel containment bund for all fuel storage tanks. The containment bund must have the capacity to store 110% of the volume of fuel stored in the tanks.
- 7.2 There shall be no release of any pollutants (i.e. fuel, waste oil, pesticides) to ground water or soil from the permitted installation. Any accidental release of pollutants to soil and ground water must be recorded and reported **within twenty-four (24) hours** to the Agency for further investigation.
- 7.3 Take the necessary precautionary measures such as the use of leak-proof and tightly closed containers during the transport of fuel to the Rice Mill. Appropriate measures should also be taken during the handling and use of all Hazardous Wastes at the Rice Mill.
- 7.4 Store waste oil in tightly covered drums or barrels to avoid spillage. It is considered an offence under Section 19(1)(a) of the Environmental Protection Act and contrary to the Environmental Protection (Water Quality) Regulations, to drain fuel/lubricants including waste oils of any quantity from equipment onto the ground, drains or in water ways.
- 7.5 Promote the reuse of waste oil, for example, as lubricant for equipment, where practical.
- 7.6 Waste oils, used batteries, oily rags, filters and oil containers must be appropriately labelled, and stored in a containment bund with an impervious

Operation Permit - Ref. No.:20190521-NHRMD

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

surface until such time for reuse or sale to an authorised dealer.

- 7.7 Keep on site books, documents, records or things showing, as the case may be:
- a) The amount of hazardous wastes generated stored, treated, transported or disposed of.
 - b) The dates pertinent to the activities referred to above.
 - c) Signed copies of manifests.
 - d) Records of test results, waste analyses, permit and standard conditions required by any authorisation.
 - e) And any information as the Agency may require.
- 7.8 Prepare and submit to the Agency no later than **forty-five (45) days** after the end of the operating year, a report relating to the activities for the previous year. The report shall include:
- a) The identification information of the facility.
 - b) Type and quantities of hazardous waste generated.
 - c) Data concerning off-site shipments of waste.
 - d) Any applied treatment standards.
 - e) A summary of any accidents that may have occurred and any action taken.
 - f) Any waste minimisation efforts undertaken by the generator.
 - g) A pollution prevention plan for the facility.
 - h) Any other matter the Agency may require.

The Agency considers all materials listed in Schedules I and II of the Environmental Protection (Hazardous Wastes Management) Regulations, 2000, to be hazardous. Please see attached list of Hazardous Wastes to be controlled.

8.0 COMPLIANCE MONITORING & REPORTING

- 8.1 Comply with any lawful directions given by the EPA from time-to-time in furtherance of the implementation of any international or other obligation for the environmental protection of Guyana.
- 8.2 Monitor the implementation of the conditions of this Operation Permit, insofar as they involve adherence by your employees and all third parties under your direction.
- 8.3 Submit to the EPA an **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.

Operation Permit - Ref. No.:20190521-NHRMD

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

- 8.4 Conform to all terms and conditions under which this Operation Permit is granted. The Permit Holder, His Agents, and/or Sub-contractors shall be liable for any loss or damage which arises from the project as a result of the activities attributable to the project or breach of any term or condition of this Permit.
- 8.5 Inform the Agency prior to or **within thirty (30) days** of any change of name or ownership of the operation.
- 8.6 Notify the Agency **within twenty-one (21) days** in event of death, bankruptcy, liquidation or receivership of the Permit Holders or if the Company becomes a party to an amalgamation.
- 8.7 Notify the EPA **within one (1) hour** of the occurrence of any environmental emergencies such as a sudden onset disaster, accident, natural, technological or human induced factors that cause or threaten to cause severe environmental damage as well as harm to human health or livelihood.
- 8.8 Report to the Agency any non-compliance(s) with the Operation Permit as follows:
- 8.8.1 Within **twenty-four (24) hours** of the time the Permit Holder becomes aware of the non-compliance, the anticipated manner in which it may endanger human health or the environment.
- 8.8.2 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.
- 8.8.3 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.

9.0 INSTITUTIONAL AUTHORITY/LIABILITIES

- 9.1 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, Laws of Guyana, the Environmental Protection (Amendment) Act, 2005, and the Environmental Protection Regulations, 2000.
- 9.2 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.
- 9.3 The EPA shall have the right to cancel or suspend this Permit for breach of any of

Operation Permit - Ref. No.:20190521-NHRMD

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

the terms and conditions contained herein.

- 9.4 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 Section 38 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana, it is an offence to assault, obstruct or hinder an authorised 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.
- 9.5 This Operation Permit is not the final consent; all relevant permissions should be obtained and maintained from other regulatory bodies for continued operation.
- 9.6 The Permit Holder, his Servants, Agents and/or Sub-Contractors shall be strictly jointly and severally liable as follows:
- a. For any activity that causes, or is likely to cause pollution of the environment, unless all reasonable and practicable measures were taken to prevent or minimize any resulting adverse effect, in accordance with Section 19(1)(a) of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.
 - b. For any activity which results in the discharge, release or entry into the environment of any contaminant in any amount, concentration or level in excess of that prescribed by the regulations or stipulated by this Permit, in accordance with Section 19(1)(b) of the Environmental Protection Act, Cap. 20:05 Laws of Guyana.
 - c. The discharge or release of contaminants, such as sludge, wastewater, hydraulic fluids, lubricants, fuel, chemicals, hazardous materials or other wastes relative to the Project, which are not regulated herein, or permitted to be discharged herein, are strictly prohibited. Any such discharge or release shall be deemed a violation of Section 19(1)(a) and/or Section 19(1)(b) of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.
 - d. For the compensation of any Party who suffers any loss or damage as a result of the project. (s.19(3)(e)) Environmental Protection Act, Cap. 20:05, Laws of Guyana.
 - e. For any material or serious environmental harm caused by pollution of the environment intentionally or recklessly in accordance with section 39 (1), (2), (3) and (4) of the Environmental Protection Act, 20:05, Laws of Guyana.

Operation Permit - Ref. No.:20190521-NHRMD

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

- f. Any gross negligence or willful misconduct resulting in serious risk, or adverse effects to the marine environment, biodiversity, protected species and natural habitat with respect to any release or discharge, spill, contaminant fluids, oil, or lubricants from any facilities permitted under this project.
 - g. For the payment of all costs and expenses related to the assessment of damage and investigations required, as result of any pollution incidents attributable or likely to be attributable to the activity for which this Permit has been issued.
- 9.7 The Agency (EPA) shall notify the Permit Holder immediately of any written claim or notice sent by any complainant seeking loss or damage for negligence as a result of the Permit Holder lack of due care and diligence.
- 9.8 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, the EPA may issue to the Permit Holder a Prohibition Notice Order to immediately cease the offending activity in accordance with Section 27 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.
- 9.9 Should the Permit Holder contravene or is likely to contravene any condition of this Permit, the Agency (EPA) may serve on him an Enforcement Notice in accordance with Section 26 of the EP Act, Cap. 20:05, Laws of Guyana.
- 9.10 This Operation Permit is effective for the period stipulated herein **February 04, 2021 to January 31, 2026**. This Operation Permit shall remain valid until **January 31, 2026**, unless otherwise modified, cancelled, suspended or revoked 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 Regulations, 2000.
- 9.11 This Permit must be renewed by submitting a completed *Application Form for Renewal of Environmental Authorisation* to the Agency at least six (6) months before this Permit expires, that is, no later than **July 31, 2025**.
- 9.12 Any late submission of renewal application 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 business day late**, until such renewal application is submitted to the Agency, without prejudice to any other rights of the Permit Holder in connection therewith.

Operation Permit - Ref. No.:20190521-NHRMD

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


9.13 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 Sharifah Razack on behalf of the Environmental Protection Agency.

Ms. Sharifah Razack
Executive Director (A.g)

Date 2021.02-05

I hereby accept the above Terms and Conditions upon which this Operation Permit is granted and agree to abide by the Environmental Protection Act, Cap.20:05, Laws of Guyana, the Environmental Protection (Amendment) Act, 2005, the Environmental Protection Regulations, 2000, and any forthcoming regulations and standards made under this Act.

NAME	NAFEEZUL HAKH.
DESIGNATION	Manager
SIGNATURE	
DATE	15 02 2021

