



**Environmental
Protection
Agency**

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Environmental 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.:	20170307-LPSRM
Fees:	Small (C1) - US\$500 for Five (5) years (i.e., US\$100 per year)
Fees Paid:	US\$500 (May 2022 to April 2027)

Addressee(s): **Mr. Lachmie Persaud Doobay
and Mr. Rajiv Doobay**
Lachmie and Rajav Doobay Rice Milling Complex
19-23 Doorn Haag,
Leguan, Essequibo River

Activity: **Operation of a Rice Mill**

Lachmie Persaud Doobay and Rajiv Doobay, trading and operating under the name, Lachmie and Rajav Doobay Rice Milling 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 19-23, Doorn Haag, Leguan, Essequibo, hereinafter referred to as the "Project", in a manner indicated in the application submitted on March 07, 2017, and subject to the terms and conditions set forth herein and any existing or forthcoming regulations under the said Environmental Protection Act and/or any other applicable laws, best practices and standards relevant to this project.

Terms and Conditions for Operation to be adhered to by the Permit Holder, His Servants and Agents:

1.0 OPERATION

- 1.1 Make an application to the Agency to vary this Environmental Permit in instances where it becomes necessary to:
 - (a) Change the construction, operation, structure, or layout of the facility and all associated buildings;
 - (b) Change equipment, machine, apparatus, mechanism, system or

- technology serving the facility;
- (c) Change the position and design of any outlet at the point or points of discharge of effluents; or effect any other change outlined in Regulation 20(3) of the Environmental Protection (Authorisations) Regulations.
- 1.2 Utilize the land in accordance with the Central Housing and Planning Authority (CH&PA) approved site plan submitted to the Agency. All specifications of location, pathways, reserve and boundary lines must be adhered to, unless otherwise authorized.
- 1.3 Ensure the facility is adequately secured to prevent unauthorized persons from entering the premises.
- 1.4 Ensure that all concrete surfaces are thoroughly swept and dust is collected prior to any wash down procedure in an effort to minimise the discharge of sediment.
- 1.5 Ensure that staff does not work for prolonged periods in areas where high levels of heat is emitted. Ensure that staff has adequate access to drinking water supplies for rehydration.
- 1.6 Ensure that staff does not work for prolonged periods in areas where high levels of heat are emitted. These exposures should be in keeping with Guyana's Occupational Health Safety and Labor laws.
- 1.7 Employ a Health and Safety or Environmental Officer who would be responsible for the implementation, monitoring and reporting on the conditions of this Permit.
- 1.8 Develop a maintenance schedule to reduce dust accumulation on ledges, floors and other exposed surfaces and submit to the Agency within **three (3) months** of the issuance of the permit.
- 1.9 Make all employees aware of the conditions of the Environmental Permit and provide training on good environmental management practices inclusive of emergency response.
- 1.10 Obtain approval from the Guyana Fire Service and provide fire protection measures such as fire extinguishers and sand buckets in accordance with the service's criteria for the facility. Additionally, ensure that all employees are trained in the use of the firefighting equipment that they understand the firefighting protocols for using same.
- 1.11 Practice integrated pest control management. Ensure that all pest control applications are conducted either by a Pest Control Operator (PCO) who is registered and certified by Pesticides and Toxic Chemicals Control Board

(PTCCB) or an employee of the Rice Mill who is certified by the PTCCB as a Pest Control Operative. Please note, if the employee is selected as the Pest Control Operative, then the Rice Mill should be licensed to conduct the pest control activity. In the case of an employee as a Pest Control Operative, the following should be adhered to:

- (a) Ensure the Pest Control Operative is equipped with Personal Protective Equipment (PPE) according to the Material Safety Data Sheets (MSDS) during the mixing and application of pesticide including the spraying and rinsing operations.
- (b) Use only pesticides, roach, fly, ant and rat baits that are approved for use in Guyana by the Pesticides and Toxic Chemicals Control Board. Pesticides should be mixed in accordance with the pesticides label directions.
- (c) Keep up-to-date records concerning the stocking and usage of such chemicals.
- (d) Ensure Phostoxin (Aluminum Sulphide tablets) is used in accordance with guidelines of Guyana Rice Board.

2.0 WATER QUALITY

- 2.1 Do not discharge nor dump solid waste (such as paddy husk, paddy ash, etc.) and/or trade effluent directly into the receiving waters.
- 2.2 Sweep, shovel or vacuum spilt ingredients prior to cleaning. Solid material should NOT be washed into surrounding drains.
- 2.3 Install and maintain mesh/sieve at the end of the drains discharging wastewater from the Rice Mill into the canal. Recovered solid waste should be properly disposed in the Solid Waste Pit.
- 2.4 Implement a treatment system for wastewater from the soaking tanks. Do not release such wastewater into surface drains without prior treatment. Treatment would include discharging the wastewater into the holding tanks to allow for sedimentation, adding flocculation agents to allow for coagulation of organic matter, and putting a screening mechanism in place to prevent rice husks from entering the waterway.
- 2.5 Maintain drainage systems capable of handling the probable maximum precipitation storm event.
- 2.6 Ensure the drainage network is kept free of debris and vegetation.

- 2.7 Ensure that the soaking tank is regularly cleaned and that fresh clean water is used during the soaking and rinsing processes.
- 2.8 Promote conservation of water resources by minimising water consumed in the production processes and reusing where possible.
- 2.9 Avoid soil and water contamination from fuel, grease, waste oils and other petroleum products. Store all oils, fuel, paints and chemicals in a designated area, 10 m away from watercourses on an impervious base to minimize adverse impacts to the environment in the event of spillage.
- 2.10 Conduct equipment refueling and maintenance on an impervious base to prevent fuel spills/leaks. Oil spills should be cleaned-up by the best practicable means, to prevent runoff into the waterways.

3.0 AIR QUALITY AND NOISE MANAGEMENT:

- 3.1 Comply with the World Health Organisation (WHO) Air Quality Guidelines for Particulate Matter in the Environment, not exceeding the limits below:
 - (a) **PM_{2.5}**: 10 µg/m³ annual mean
25 µg/m³ 24-hour mean
 - (b) **PM₁₀**: 20 µg/m³ annual mean
50 µg/m³ 24-hour mean
- 3.2 Conduct monitoring of PM 2.5 and PM 10 parameters upwind and downwind of the Rice Mill, during one milling season and submit data to the Agency within your Annual Report. Additionally, the Agency reserves the right to request additional monitoring upon receipt of the presented report.
- 3.3 Comply with the *Guyana National Bureau of Standards (GNBS) Guidelines for the Measurement and Assessment of Noise in the Environment*, not exceeding the limits below at a distance of 15 m (50 ft) from the source or at the property boundary, whichever is closer.
 - (a) Residential Limits **75 dB** (Day-time (06:00 h -18:00 h))
60dB (Night-time (18:00 h - 06:00 h))
- 3.4 Ensure that the operation is appropriately enclosed to minimize the impact of dust and ash on the receiving environment. An adequate and efficient dust/ash collection system with extractor and containment bin(s) with the capacity to store

approximately seventy-five percent (75%) of all paddy waste (paddy husks, soot, etc.) shall be installed, until such time for disposal.

- 3.5 Employ wet suppression methods such as watering to control dust emissions from material stockpiles and other components of the development that would generate dust.
- 3.6 Ensure all equipment and machinery is placed on foundation properly designed to ensure effective damping of vibrations.
- 3.7 Ensure all significant noise-producing equipment, e.g. generators, etc. are equipped with appropriate silencers or mufflers and/or are enclosed in suitable acoustic enclosures where necessary to reduce noise levels impacting the surrounding environment to achieve compliance with GNBS requirement.
- 3.8 Ensure that truck trays are covered to minimize particulate emissions along transporting routes during movement of grains to the milling complex.
- 3.9 Plant and maintain a row of trees or other suitable vegetation at least 26 m on the eastern boundary of the facility to act as a buffer against dust and other air emissions from the operation.
- 3.10 Use paddy husk as an energy source in the dryers. All efforts should be made for paddy husks to be recovered and appropriately disposed of at a suitable location away from residents or re-used where practical.

4.0 WASTE MANAGEMENT

- 4.1 Ensure that excess paddy husk is captured via a dust exhaust shoot, discharged into a containment bin and stored there until time of reuse. The dust containment bin should be built to store 75% of paddy husk accumulated by the Rice Mill.
- 4.2 Clean the indoor and outdoor areas such as floors, roofs and decks to prevent the accumulation of chaff, dust and bird faeces that can be blown around the facility.
- 4.3 Clean and maintain the facility's compound, driveway, internal access pathways, internal drains, surrounding ditches and curbs, as needed, to prevent the accumulation of grain chaff and drain dust that can be blown around.
- 4.4 Construct a waste containment bin, with adequate ventilation to prevent spontaneous combustion from occurring, for the storage of paddy waste generated from the milling processes, as well as the installation of a containment trap to prevent paddy husk in the soaking tanks from entering the internal drain and external ditches.

- 4.5 Re-use/recycle recovered paddy husk as bedding for poultry operations, land filling purposes or energy generation.
- 4.6 Ensure that in the event of paddy husk/chaff accumulating on site, the heap shall be kept at a height of four (4) meters and wet suppression methods is used to reduce dust pollution on site and during the transport of paddy chaff to surrounding areas.
- 4.7 Promote proper solid waste management practices in the operation. Provide covered garbage receptacles at strategic locations, both within and outside the Rice Mill and ensure that all solid waste materials are appropriately stored until such time of disposal.
- 4.8 Maintain records of waste produced within the Rice Mill in unit quantity (kilograms/tones) on a monthly basis. This information should be included in the Annual Report submitted to the Agency.
- 4.9 Maintain a septic tank system at all times which should 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*.

5.0 HAZARDOUS MATERIALS/WASTES MANAGEMENT

- 5.1 Establish and maintain a register of hazardous materials or chemicals used or generated by your operation. Submit to the Agency **twice yearly** (June and December) a report relating to the activities for the previous six months including:
 - (a) The name, location and type of facility.
 - (b) Types and quantities (in metric units) of hazardous chemicals stored.
 - (c) Manner of storage, use, any applied treatment standards/methods and disposal of these substances.
 - (d) A summary of any accidents that may have occurred and any action taken.
 - (e) Any waste minimization efforts undertaken by your facility for hazardous Chemicals.
 - (f) Any other matter the Agency may require.

The Agency considers all materials listed in Schedule 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.

- 5.2 Take the necessary precautionary measures such as leak proof and tightly closed lid containers during the transport of fuel to the Rice Mill. Appropriate measures should also be taken during handling and use on all Hazardous Waste at the Rice Mill.
- 5.3 Construct a fuel containment bund with 110 percent containment capacity of the largest storage tank/container, which must have an impervious surface for the handling of all oils, lubricants and fuels.
- 5.4 Ensure that appropriate clean-up equipment such as spill trays, oil spill clean-up recover pump, oil spill dispersant spray system of sorbent pads are readily accessible during refueling exercise.
- 5.5 Ensure that oil/fuel containment absorbent materials are appropriately stored and disposed of in a manner approved by the NDC.
- 5.6 Refrain from draining fuel/lubricants including used oils of any quantity from equipment onto the ground or into waterways.
- 5.7 Store used oil in a covered, bunded area to minimize adverse impacts to the environment in the event of spillage. The bunded area must be able to provide containment for the maximum volume of used oil on site. It is an offence to drain fuel/lubricants including used oils of any quantity from equipment onto the ground, drains or water ways. Promote the reuse of used oil, for example lubrication of equipment, where practical.

6.0 COMPLIANCE MONITORING & REPORTING

- 6.1 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.
- 6.2 Monitor the implementation of the conditions of this Environmental Permit (Renewed), insofar as they involve adherence by your employees and all third parties under your direction.
- 6.3 Submit to the EPA, the **Environmental Annual Reports** 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*).
- 6.4 Conform to all terms and conditions under which this Environmental Permit (Renewed) is granted and shall be liable for any loss or damage which arises from the project as a result of the Permit Holder's activities or breach of any term or condition of this Permit.

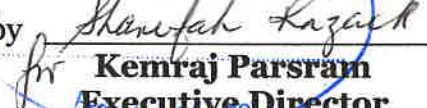
- 6.5 Inform the Agency prior to or **within thirty (30) days** of any change of name or ownership of the operation.
- 6.6 Notify the Agency **within twenty-one (21) days** in event of death, bankruptcy, liquidation or receivership of the Permit Holder or if the Company becomes a party to an amalgamation.
- 6.7 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.
- 6.8 Report to the Agency any non-compliance(s) with this Environmental Permit within **twenty-four (24) hours** of the time the Holder of the Environmental Permit becomes aware of the non-compliance outlining the anticipated manner in which human health or the environment may be impacted.
- 6.9 Within **seventy-two (72) hours** of the time the Holder of the Environmental Permit becomes aware of the non-compliance, submit to the Agency a written report containing a description of the non-compliance, its cause, the period of non-compliance including exact dates and time and the anticipated time it is expected to continue if the non-compliance(s) has not been corrected.

7.0 INSTITUTIONAL AUTHORITY AND LIABILITIES

- 7.1 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 and the Environmental Protection Regulations.
- 7.2 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.
- 7.3 The EPA shall have the right to cancel or suspend this Permit for breach of any of the terms and conditions contained herein.
- 7.4 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.
- 7.5 The Permit Holders, his Servants, Agents and/or Sub-Contractors while executing the activities attributable to the project shall:

- (a) be liable for any material environmental harm caused by polluting the environment, pursuant to s. 39 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana;
 - (b) be liable for any serious environmental harm caused by polluting the environment, pursuant to s. 39 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana;
 - (c) be liable for discharging, causing or permitting the entry into the environment, of any contaminant in any amount, concentration or level excess of that prescribed by the regulations or stipulated by this Environmental Permit, pursuant to s. 19 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana;
 - (d) be liable to compensate any person who suffers any loss or damage as a result of contravening condition 7.5 (c) of this Environmental Permit, pursuant to s. 19 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana;
 - (e) not be indemnified by the Agency for any activity that causes or is likely to cause pollution to the environment, resulting from adverse effects through the discharge, any contaminant in any amount, concentration, ultra-hazardous substances, chemicals or otherwise, and shall be rendered liable to prosecution and to penalties prescribed under the Environmental Protection Act and Regulations;
 - (f) be liable for any gross negligence or willful misconduct caused by the Permit Holder, his Servants and/or Agents, to the environment, biodiversity, protected species and natural habitat with respect to any release, discharge, or spill, of contaminant fluids, oil or lubricants; and
 - (g) be liable for the cost of any independent investigation into any discharge caused.
- 7.6 Should the Permit Holder contravene or be 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 Environmental Protection Act, Cap. 20:05, Laws of Guyana.
- 7.7 Where it appears to the Agency that the Permit Holder is engaged in any activity that may pose a serious threat to natural resources or the environment, or a risk of serious pollution of the environment or any damage to public health, the EPA may issue to the Permit Holder a Prohibition Notice, which may order him to immediately cease the offending activity, in accordance with Section 27 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.

- 7.8 All relevant permissions must be obtained and maintained from other regulatory bodies for continued operation.
- 7.9 All relevant permissions, approvals and supporting documentations must be obtained from other regulatory bodies for continued operation, and subsequently maintained.
- 7.10 This Environmental Permit is effective for the period stipulated herein **May 2022 to April 2027**. This Environmental Permit shall remain valid until **April 30, 2027**, unless otherwise varied, modified, cancelled or suspended in accordance with the provisions of this Permit or the Environmental Protection Act, Cap. 20:05, Laws of Guyana and the Environmental Protection (Authorisations) Regulations, 2000.
- 7.11 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 expires, that is, no later than **October 30, 2026**.
- 7.12 Any submission of renewal application after the specified date as stated above, may 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 business 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.
- 7.13 Failure to comply with the requirements of this Permit shall render the Permit Holder liable to prosecution and to civil penalties and/or injunctive reliefs prescribed under the Environmental Protection Act, Cap. 20:05, Laws of Guyana and its regulations, including under any existing and forthcoming regulations made under the said Act or any other applicable Laws of Guyana.

Signed by  on behalf of the Environmental Protection Agency. **Kemraj Parsram**
Executive Director

Date 2022-05-16

We hereby accept the above Terms and Conditions upon which this Environmental Permit is granted and agree to abide by the Environmental Protection Act, Cap. 20:05, Laws of Guyana and any existing and forthcoming regulations, best practices, guidelines and standards made under this Act.

NAME:	LALAMIE PERSEUS DORSEY
DESIGNATION:	OWNER
SIGNATURE:	L. P. Dorsey
DATE:	2022 / 01 / 07



L. P. Dorsey