

	<b>D. RAMPERSAD &amp; COMPANY (GUYANA) INC</b>	<b>ENVIRONMENTAL AND WASTE MANAGEMENT PLAN</b>	<b>DOC#: DRCGI- HSE-P-EMP-2025-REVO</b>
<b>HSE MANAGEMENT SYSTEM</b>	<b>Issue Date: MAY 2025</b>	<b>Revision Date: MAY 2025 Next Revision: MAY 2028</b>	

# 1 Introduction

## 1.1 Background

The Environmental Management Plan (EMP) for D. Rampersad & Company (Guyana) Inc. identifies the principles, approach, procedures and methods used to control and minimize the environmental impacts of any activity. DRCGI is one of the region’s foremost providers of engineering services. Our approach is risk based and we act guided by this risk identification to avoid any negative impacts or consequences.

DRCGI believes that an effective environmental plan can add to business performance by:

- Recognising that management is responsible for identifying environmental impacts by first conducting impact assessments.
- Keeping a register of the organisation’s significant aspects as a result of impact assessments. Using this information to mitigate environmental risk.
- Demonstrating a proactive commitment to environmental preservation to bolster stakeholder confidence.
- Documenting all findings and recognising that only defined procedures of work can help eliminate or reduce adverse environmental impacts while ensuring that our objectives are maintained, and targets are met.
- Obtaining advice from external sources as necessary.
- Ensuring a systematic approach to the reduction of environmental impacts.
- Defining the scope of our environmental management system and the allocation of resources to control same.
- Ensuring that the management system is supported by all levels of the organisation and that there is adequate manpower to maintain it.
- Reinforcing that a culture supportive of the Company’s policies is necessary to achieve personal responsibility for the environment.
- Making it understood that within every process there is always room for improvement and an opportunity to learn and grow.
- Directing quality initiatives aimed at continuous improvement.
- Supporting human resource development.
- Communicating with workers and solicitation of feedback.
- Adopting an all-inclusive approach to HSE objectives and compliance.
- Adequately implementing the Company’s process of assurance.
- Promoting a Company-wide “environmental attitude.”

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## 1.2 EMP structure and Organization

This EMP is designed as an overriding document in a hierarchy of control plans and sets out the overarching framework of environmental management principles that will be applied to DRCGI operations.

The EMP contains guiding environmental principles and procedures for communication, reporting, training, monitoring and plan review to which all DRCGI staff, contractors and subcontractors are required to comply with throughout any operation. The main sub-plan of the EMP is the Environmental Monitoring Plan which incorporates the effluent discharge monitoring program, ambient and indoor air quality monitoring program and noise monitoring program. The objective of the program is to maintain regulatory compliance for air, effluent and noise discharges and to monitor changes in process operations at the facility located in Guyana.

The regulations, upheld by the Environmental Protection Agency (EPA) of Guyana, which are to be complied with are ‘*Environmental Protection Act, 1996 of Guyana (EP Act)*. In addition, *the United States Occupational Health and Safety Administration (OSHA)*, *World Health Organisation (WHO)*, *United States Environmental Protection Agency (USEPA)* and *American Conference of Governmental Industrial Hygienists (ACGIH)* parameters would be used as comparisons for indoor air quality monitoring where there are no local standards. Each regulation stipulates the substances which industries need to control and the levels that these substances that are permissible into different receiving environments. The regulations also stipulate the analytical and sampling methods which must be used in order for the sampling and analysis programs to be valid.

## 2 Site Facilities Description

DRCGI focuses on specialized engineering solutions. DRCGI operations include:

1. Machine shop services
2. Pump/Valve services
3. Rotating Equipment services
4. Motor Rewinding Services
5. Metaline Coatings
6. Fabrications
7. Mechanical works
8. Specialized welding

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9. OEM Support for Machinery of Manufacturers (Supply of equipment, maintenance and spares)

Critical activities which form the basis of these operations are:

1. Electrical work
2. Heavy equipment operations
3. Working at heights

The facility comprises the following areas:

1. General – Administration
2. Industrial and Rotating
3. Reception
4. Stores
5. Security booth & car park

## 2.1 Rotating Equipment

Some services in this category are:

1. Vertical milling on coupling
2. Dynamic balancing of a multistage compressor rotor
3. Refurbishment of recovery turbine buckets
4. Refurbishment of auxiliary steam turbine rotor
5. NDT on intermediate diffuser
6. Refurbishment of a multi-stage gas turbine

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### 3 Key Environmental Impacts

The Environmental Impact Assessment conducted for DRCGI forms the basis for the monitoring and mitigation measures outlined in this EMP. The following key environmental impacts have been identified in daily operations. These are identified in Table 1.

*Table 1: Summary of Key Environmental Impacts*

<b>Environmental Aspect</b>	<b>Issue</b>	<b>Impact</b>
<b>NOISE</b>	Industrial Noise from Processes, Equipment and Power Tools	Excessive Noise levels, Impacting DRCGI and Neighboring business places
<b>WATER POLLUTION</b>	Effluent Run off from DRCGI's compound	Used Motor Oil, Diesel Fuel, Solvent etc. getting into drains, negative impact on fauna, flora and eco-system, marine life, beach damage/destruction, contamination of ground water
<b>AIR POLLUTION</b>	Industrial Air Pollution from Equipment, Machinery and Vehicles	Air borne Particulates/Contaminants being emitted from Carbon Monoxide emissions from Equipment and Vehicles
<b>CHEMICALS SPILLS/ACCIDENTAL RELEASE INTO THE AIR</b>	From stored chemicals, Diesel Fuel, Used Motor Oil, Paints, Solvents	Chemical Fumes emissions contaminating air or drains from chemical storage area during transfer process or equipment colliding with chemical bond area causing an adverse effect on flora, fauna and eco-system, ground water pollution, marine life and beach damage/destruction
<b>SOLID WASTE</b>	(Bio-degradable & Non-biodegradable). Materials from Scrap Metal, General office waste, Kitchen waste	Metal Scraps, paper etc. getting into the drains and waterways restricting free flow which in turn causes flooding, non-biodegradable materials e.g. plastic washing out to sea and consumed by marine wildlife, damage/destruction of marine fauna, flora and beaches, adverse effect on eco-system, hydrogen sulphide gas emission from rotten bio-degradable kitchen waste, fowl stench in the air affecting surrounding business places

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## 4 Legal and Other Requirements

The Company has established an environmental procedure for the purpose of identifying, accessing and communicating legal and other requirements that are applicable to DRCGI's operations. Additional information is also available through legal publications communicated via Guyana's Environmental Protection Agency's website. Legal requirements will be reviewed on an annual basis to ensure that the Company is in compliance. Some of these materials are:

- a) Environmental Protection Act (EPA) 1996 of Guyana
- b) Environmental Protection (Control of Pollution) Regulations 2000
- c) Water Pollution (Control) Regulations 2000
- d) Waste Management and Disposal Regulations 2015
- e) Environmental Protection (Air Quality) Regulations 2000
- f) ISO 9001:2015 Quality Management Systems.

## 5 Training and Awareness

The Company's OSHE department will identify, plan, monitor and record training for personnel whose work activities may create a significant impact on the environment. The environmental procedure dictates that employees are to be educated and sensitized to our processes before any work activity is conducted where said work may impact negatively on the environment. The environmental policy's main focus is to bring about awareness through education and training in an effort to minimize or eliminate DRCGI's impact on the environment. Appropriate records are maintained, monitored and reviewed on a scheduled basis. An environmental awareness training plan is a part of the overall employee training needs analysis, and will be included in the HSE Awareness and Competency Procedure.

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## 6 EMP Roles and Responsibilities

This section describes the organizational structure and responsibilities of the EMP as shown in table below.

<b>Responsible Parties</b>	<b>Impact</b>	<b>Responsibility</b>
Operations Manager/HSE Officer/Workshop Supervisor	NOISE	<ul style="list-style-type: none"> <li>• Conducting indoor and outdoor noise monitoring.</li> <li>• Compare noise monitoring results to Environmental Protection (Control of Pollution) Regulations 2000 parameters.</li> <li>• Ensure equipment is used indoors within the confines of the workshop areas to minimize noise level.</li> <li>• Ensure noise buffering devices installed on tools and equipment are utilized as per manufactures design, e.g. silencer exhaust system</li> <li>• Drive education and awareness training for employees regarding noise.</li> <li>• Implement any additional mitigation measures</li> </ul>
Operations Manager/HSE Officer/Workshop Supervisor	WATER POLLUTION	<ul style="list-style-type: none"> <li>• Conduct effluent discharge monitoring.</li> <li>• Compare results to the EPA's Water Pollution (Control) Regulations 2000.</li> <li>• Clearly identify chemical storage and bond areas.</li> <li>• Ensure Chemical Storage area is utilized properly i.e. bonded area is used per the design.</li> <li>• Proper labeling of chemicals containers in use.</li> <li>• Ensure Material Safety Data Sheets (MSDS) available for all chemicals used at DRCGI.</li> <li>• Ensure that there is a proper inventory of all chemicals at DRCGI.</li> <li>• Ensure adequate spill contained equipment is available.</li> <li>• Drive education and environmental awareness training of employees.</li> <li>• Implement any additional mitigation measures.</li> </ul>
Operations Manager/HSE	AIR POLLUTION	<ul style="list-style-type: none"> <li>• Compare indoor air quality monitoring results to relevant standards e.g. USEPA, OSHA, USEPA, etc.</li> </ul>

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<b>Officer/Workshop Supervisor</b>		<ul style="list-style-type: none"> <li>• Ensure all processes are conducted within the confines of the designated area for the particular job task e.g. Sand Blasting should only be done in the area assigned for Sand Blasting, where adequate controls are placed to minimize impact on the environment.</li> <li>• Routine maintenance are conducted on all vehicles i.e. fuel filter change etc to minimize carbon emissions.</li> <li>• Conduct education and awareness training of employees regarding indoor air pollution.</li> <li>• Work Procedure are in place to guide employees.</li> <li>• Implement any additional mitigation measures.</li> </ul>
<b>Operations Manager/HSE Officer/Workshop Supervisor</b>	<b>CHEMICALS SPILLS/ACCIDENTAL RELEASE INTO THE AIR</b>	<ul style="list-style-type: none"> <li>• Ensure that chemical storage is adequate and practical.</li> <li>• Industrial standard containers used for the storage, transfer and use of chemicals.</li> <li>• Chemical bond area is checked regularly.</li> <li>• Residual chemicals are pumped out and disposed of properly.</li> <li>• Drive education and training for employees in chemical handling, Hazardous Communication (HAZCOM).</li> <li>• Ensure chemical bond area is properly designed.</li> <li>• Implement any additional mitigation measures.</li> </ul>
<b>Operations Manager/HSE Officer/Workshop Supervisor</b>	<b>SOLID WASTE</b>	<ul style="list-style-type: none"> <li>• Ensure all garbage is removed and disposed of promptly.</li> <li>• Ensure that there is adequate garbage containment receptacles for metals, wood, paper. Ensure kitchen waste is separated.</li> <li>• Drive education and waste segregation training for employees.</li> <li>• Ensure waste management complies with Waste Management and Disposal Regulations 2015.</li> <li>• Implement DRCGI's Environmental Management System (EMS) policy.</li> <li>• Ensure disposal bins are not placed near to any drains or water-ways.</li> <li>• Ensure scrap iron dealer removes recyclable metal scraps in a timely manner.</li> </ul>

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## 7 Plan Components and Structure

This chapter discusses the specific components of each of the various Environmental Monitoring Plans, their structure, objectives, timing and responsibility for implementation.

### 7.1 Environmental Monitoring Plan responsibilities

*Table 2: Primary responsibilities of the DRCGI EMP*

Plan	Sub-plan	Primary Responsibility for Implementation	
		DRCGI	Contractor
Environmental Monitoring Plan	Indoor Air Quality Monitoring Plan	✓	✓
	Ambient Air Quality Monitoring Plan	✓	✓
	Noise Monitoring Plan	✓	✓
	Effluent Discharge Monitoring Plan	✓	✓
	Oversight	✓	

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## 7.2 Environmental Monitoring Plan content

*Table 3: Summary of the Environmental Monitoring Plan*

Environmental Monitoring Plan
<p><b>Objectives:</b></p> <p>The objectives of the environmental monitoring plan are to:</p> <ol style="list-style-type: none"> <li>a) Ensure project components are compliant with all laws and approval conditions</li> <li>b) Measure the success of the proposed mitigation measures</li> <li>c) Facilitate a continual review of activities</li> </ol>
<p><b>Description:</b></p> <p>Details of the Environmental Monitoring Plan are presented in Section 9 of this EMP. Environmental monitoring will be conducted by a competent Independent Environmental Monitoring Consultant (IEMC). Specific aspects to be monitored are:</p> <ul style="list-style-type: none"> <li>• Indoor air (if unable to be controlled, or upward trend seen)</li> <li>• Ambient air (if unable to be controlled, or upward trend seen)</li> <li>• Noise (in-house)</li> <li>• Effluent (if unable to be controlled, sample is able to be taken, or upward trend seen)</li> <li>• Solid Waste</li> <li>• Chemical storage (through audits)</li> </ul>
<p><b>Timing /Schedule:</b></p> <p>Environmental monitoring will be reviewed once a year and performed at the discretion of DRCGI in line with the relevant regulations of Guyana.</p>
<p><b>Responsibility:</b></p> <ul style="list-style-type: none"> <li>• Monitoring will be scheduled and managed by DRCGI.</li> <li>• DRCGI will be responsible for ensuring that the surrounding environment is protected from DRCGI activities</li> <li>• The IEMC will be responsible for competent performance of all environmental monitoring.</li> </ul>

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## 8 Environmental Policy

The Company’s HSE policy is endorsed by the Chairman, the Technical/Strategic Advisor and the Country Manager. This policy covers all activities at the facility. The policy includes a commitment to continual improvement and prevention of pollution, as well as a commitment to meet or exceed relevant environmental legislation, regulations and other requirements. The environmental policy is the frame work for setting and reviewing environmental objectives and targets. The policy will be communicated to all employees and made available to stakeholders.

## 9 Environmental Monitoring Framework

The Environmental Framework (EMF) outlines the responsibilities for monitoring the environmental mitigation measures of DRCGI. The table below outlines the framework.

**Table 4: Environmental Monitoring Framework**

<b>Issue</b>	<b>Responsibility: Who will monitor?</b>	<b>Duration: When is monitoring done?</b>	<b>Parameter: What is being tracked?</b>	<b>Location: Where does monitoring occur?</b>	<b>Procedure: How is the issue recorded?</b>
Noise	IEMC/DRCGI	Annually / as needed	Occupational Noise Environmental Noise Personnel Noise (as necessary)	Defined areas within the DRCGI compound	Auditory  Portable noise monitoring equipment  Reporting forms
Indoor Air Quality	IEMC/DRCGI	As needed	Relative Humidity (RH) – Indoor only  Temperature (T) – Indoor only  Carbon Dioxide (CO <sub>2</sub> )	Defined areas within the DRCGI compound	Visual  Portable air monitoring equipment  Reporting forms
Ambient Air Quality	IEMC/DRCGI	As needed	Particulate Matter (PM10)	Defined areas within the DRCGI compound	Visual  Portable air monitoring equipment  Reporting forms

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			Total Suspended Particle (TSP) – Ambient only  Total Volatile Organic Compounds (TVOC)		
Water Quality	IEMC/DRCGI	As needed	Temperature (T)  Hydrogen Ion (pH)  Total Suspended Solids (TSS)  Total Petroleum Hydrocarbons (TPH)	Two (2) discharge points	Visual  On-site water sampling  Laboratory analysis  Reporting forms
Solid Waste	DRCGI / Waste Contractor	Daily / As needed	Segregation of Waste streams	Waste temporary storage site	Visual
Chemical Storage	DRCGI	Daily / Monthly Audit / As needed	Analysis of storage container and installation  MSDS	Chemical storage area	Visual

Site supervision and inspections, as well as monitoring for compliance, are important aspects to ensure proper implementation of EMP requirements. The HSE Manager and or subordinates will carry out site audits and inspections. The Manager / Supervisor within each section would carry out supervisory exercises on the various installations within the facility on a regular basis.

Identification of problematic issues during site inspections is the responsibility of the Manager and or Supervisors of the section. In the case of any deviations from the EMP requirements, corrective actions and mitigation measures are applied.

Additionally, the DRCGI Significant Environmental Risk Register & Plan will be used for monitoring impacts and the providing the recommended control measures.

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**List of Responsible Parties and Roles**

- Technical/Strategic Advisor (TSA)
- Country Manager (CM)
- ~~Operations Manager (OM)~~
- Administration Manager (AM)
- HSE Officer (HSE)
- Workshop Supervisor (WS)
- Administrations Officer (AO)
- Human Resources Officer (HRO)
- Machinists (M)
- Welders (W)
- Mechanical Technicians (MT)

The table below is a summary of the DRCGI Significant Environmental Risk Register & Plan.

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*Table 5: DRCGI Significant Environmental Risk Register & Plan*

SIGNIFICANT ENVIRONMENTAL ASPECTS IDENTIFIED	RESPONSIBLE PARTY	DEPARTMENT	ENVIRONMENTAL IMPACT	Control Measures
BLACK WATER	WS	ALL	Soil, Water. Potential for contamination of surface and ground water. Severe human and fauna impacts from pathogen load.	Proper maintenance of septic systems. Timely disposal by third party disposal contractor.
CARBON STEEL 836 PARTICLES	WS/OM	INDUSTRIAL	Particulate dusts contaminating air, heavy particles settling in soil and filtering into waterways.	Proper collection and segregation of wastes. Recycling by appropriate third party.
DIESEL EMISSIONS/SPILLS	OM	ALL	Possibility of spilled material entering waterways and contaminating surface and ground water.	Establish a maintenance schedule for vehicles to ensure that leaks etc are kept in check. Establish proper storage methods and spill containment structures. Spill control procedure where any spilled diesel is appropriately collected and disposed of.
ENERGY CONSUMPTION	ALL EMPLOYEES	ALL	Overutilization of depleting natural resources	Employee sensitivity to energy use and consumption. Utilize energy saving devices and modes. HVAC system set to 'sleep' overnight and over weekends. Ensure equipment is maintained properly.

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HEAT PRODUCED FROM PROCESS	OM/WS	ROTAT/INDUS	Release of radiant energy into atmosphere.	Fans places near workstations. Turbines on roof. Open design of workshop.
PAINT FUMES	WS	ROTAT/INDUS	Volatile/ toxic compounds emitted into atmosphere as mists and aerosols.	Extraction system for paint booth. Control of painting times. Maintenance schedule for filtration system to ensure efficiency.
PRINTER TONERS	HSE/AO/AM	ADMIN/ROTAT/INDUS	Solid wastes generated by disposal. Loss of containment of environmentally hazardous liquids and solids.	Disposal in regular garbage bins.
STAINLESS STEEL 316,416 PARTICLES	WS/M/MT	ROTAT/INDUS/FAB	Particulate matter contaminating waterways and settling on soil.	Proper collection and segregation of wastes. Recycling by appropriate third party.
LACQUER THINNERS	WS	STORES/ROTAT/INDUS/ADMIN/	Volatile/ toxic compounds emitted into atmosphere as mists and aerosols. Liquid contaminants for ground and surface water.	Ensure adequate containment, usage and disposal methods for these materials.
WELDING RODS	WS/W	SPECIALIZED WELDER	Solid wastes	Disposal in Metallic waste bins.
ZINC PARTICLES	WS	ROTAT/INDUS/	Particulate matter contaminating air, waterways and settling on soil.	Collection and segregation of wastes for appropriate disposal.



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USED OILY RAGS	WS/MT/M	ROTAT/ INDUS/	Hydrocarbon contaminated materials with potential to transfer to soils, landfills and waterways	Collection and segregation of wastes for appropriate disposal.
GREY WATER	ALL	ALL	Transfer of pathogens into environment. Release of bacteria and nutrients down drains. Eutrophication.	Limit grey water sources to handwashing
FLUORESCENT LIGHTBULBS	WS / HSE	INDUS/ ROTAT	Residual source of mercury which causes acute toxic effects.	Segregation and disposal by appropriate third party.
DYE PENETRANT AERSOL	WS	INDUS/ ROTAT	Release of VOC'S and flammable chemicals into atmosphere, which may also enter soil and waterways.	Use of minimal amounts for testing. Employ appropriate spill containment and cleanup methods.
ACIDS USED IN SURFACE PREPARATION	WS	INDUS/ ROTAT	Contaminant for ground and surface water.	Appropriate storage and containment methods.
NOISE	WS	INDUS/ ROTAT	Effects on hearing of persons inside the workshop. Nuisance to neighboring companies.	Aggressive preventative maintenance/ lubrication regime for machinery.
VOC's	WS	INDUS/ ROTAT	Potentially toxic/ carcinogenic vapours entering atmosphere or waterways.	Appropriate storage and containment methods.
DOMESTIC WASTES	ALL	ALL	Aesthetic effects of littered waste. Attraction of pathogen bearing pests.	Collection and disposal of wastes by appropriate third party contractor.
STORM AND SURFACE RUNOFF	WS	WORKSHO P	Transfer of harmful materials to waterways and soil water.	Appropriate cleanup of spills. Testing to ensure parameters are within statutory limits.

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MACHINE AND CUTTING OILS	WS/MT/M	WORKSHOP	Potential for spilled oils to enter soil and waterways harming wildlife and persons.	Aggressive preventative maintenance/ lubrication regime for machinery. Ensure cutting oils are recovered and ensure spills are dealt with in the appropriate manner.
OFFICE AND ELECTRONIC WASTES	HSE	ALL OFFICES	Residual source of toxic materials from computers, monitors, toner cartridges, print cartridges etc. which can potentially enter waterways and atmosphere causing harm.	Donation of obsolete computers to persons in need.

## 10 Communications

The Company has established and will maintain a procedure for ensuring pertinent information as it relates to DRCGI’s environmental aspects is communicated to all employees, sub-contractors, clients and customers. The HSE department will ensure employee involvement and consultation within the communication process.

## 11 Capacity Building and Training

A key component of the EMP success depends on effective capacity building. This involves the training of DRCGI staff and all others involved in the EMP. These efforts can be assisted by the implementation of technical assistance from outside consultants. All those responsible for the management, implementation and operation of any aspect of the EMP shall be adequately trained for their role. Training records shall be maintained on site, for each employee / contractor to provide evidence for auditing / inspection purposes.

Specific training which should be provided to DRCGI staff are as follows:

- Principles and procedures for environmental impact assessment
- Fundamentals of environmental management

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- Compliance assessment, monitoring and follow up
- Environmental audits

**Table 6: HSE training plan showing responsible party by department**

<b>DRCGI HSE Training Plan</b>									
Type of Training	Responsible Person								
	OM	AM	HSE	WS	AO	HRO	M	W	MT
HSE Induction	X	X	X	X	X	X	X	X	X
HSE Policy & Procedures	X	X	X	X	X	X	X	X	X
Emergency Response/Evacuation Procedure	X	X	X	X	X	X	X	X	X
Basic First Aid			X	X			X		X
Incipient Fire Fighting			X	X				X	X
Risk Assessment	X	X	X	X	X	X	X	X	X
Task Risk Assessment	X		X	X			X	X	X
Equipment/Tools Inspection			X	X			X	X	XX
Safe Systems of Work	X	X	X	X			X	X	X
HAZCOM	X	X	X	X			X	X	X

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Waste Management	X	X	X	X					
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The DRCGI HSE Plan and HSE Awareness and Competency procedure documents the schedule for HSE training.

The HSE manager / supervisor shall have environmental staff that are trained to ensure contractor compliance with EMP requirements. Alternatively, the HSE manager / HSE supervisor can subcontract this responsibility to adequately trained personnel.

Specific training which should be with IEMC / Contractor staff are:

- Principles and procedures for environmental impact assessment
- Fundamentals of environmental management
- Compliance assessment, monitoring and follow up
- Air, water and noise sampling procedures
- Waste management, if applicable
- Fuel and hazardous materials management, if applicable
- Environmental audits

## 12 Document and Record Control

The data / reports generated for this monitoring program are considered controlled documents. They are filed with the HSE Department. The reports should not leave the confines of the company unless a request has been made through the proper channels.

## 13 EMP Monitoring and Review

The HSE Department will periodically review, monitor and audit the effectiveness of the EMP, including all sub-plans. The audit program shall adequately cover the scope, audit frequency and methods that are typically required. The frequency of audits shall reflect the intensity of activities and severity of environmental impacts and non-compliances raised in prior audits.

### 13.1 Review of the EMP

The HSE Department shall review the EMP to assess its effectiveness and relevance as follows:

- A full review shall be undertaken annually
- Following a reportable incident, or a significant non-compliance