



Environmental Protection Agency

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Environmental Permit (Renewed)

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.

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| Reference No.: | 20050923 - BCPFSO |
| Fees: | Medium (C2) US\$800 per year |
| Fee Paid: | US\$2400: Three (3) Years (April, 2024 to March, 2027) |

Addressee(s): Mr. Mohindra Chand
General Manager
Barama Company Limited
Land of Canaan
East Bank Demerara.

Activity: Operation of a Plywood Factory and Sawmill Complex

Barama Company Limited, 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 Plywood Factory and Sawmill Complex, located at Land of Canaan, East Bank Demerara, hereinafter referred to as the "Project", in the manner indicated in the Renewal Application submitted on December 15, 2023, subject to the terms and conditions set forth herein under the Environmental Protection Act, Cap. 20:05, Laws of Guyana, and/or any existing or forthcoming regulations made under the said Environmental Protection Act and/or any other applicable laws, best practices, guidelines and standards relevant to this project.

This Environmental Permit (Renewed) is issued pursuant to the Environmental Protection (Authorisations) Regulations, 2000.

Terms and Conditions for Operation to be adhered to by the Permit Holder, His Servants, Agents and/or Sub-Contractor(s):

1.0 OPERATION

- 1.1 Make an application to the Agency to vary this Environmental Permit (Renewed) in instances where it becomes necessary to:
 - i. Change the construction, operation, structure, or layout of the facility and all associated buildings;
 - ii. Change equipment, machine, apparatus, mechanism, system or technology serving the facility;
 - iii. Change the position and design of any outlet at the point or points of discharge of effluents; or
 - iv. Affect any other change outlined in 20(3) of the Environmental Protection (Authorisations) Regulations.
- 1.2 Ensure Fire Safety Certificate is renewed yearly and all firefighting equipment are maintained and serviced regularly. The Fire Safety Certificate should be submitted (a) on request, to Officers during Compliance Inspections and (b) in **Environmental Annual Reports**.
- 1.3 Provide adequate fire protection measures such as fire extinguishers and sand buckets in accordance with the Guyana Fire Service (GFS) approval.
- 1.4 Ensure that the transport of logs, lumber and plywood to and from your operation does not impede river and road traffic. Logs, lumber and plywood must be contained within the boundaries of the Project site.
- 1.5 Discharge logs safely through the use of appropriate equipment i.e. log extractor at the facility to ensure logs do not free fall from haulers to the ground causing vibration and excessive damage to soils and/or vegetation.
- 1.6 Ensure all river operations are in accordance with the Transport & Harbours' Department requirements.
- 1.7 Maintain proper signage and security on site; to keep unauthorized persons from accessing restricted and high-risk areas and to promote Occupational Health & Safety regulations and compliance.
- 1.8 Ensure that activities as they relate to operation of this facility result in minimal impact on public health and the environment.
- 1.9 Ensure that adequate provisions are in place for ingress to and egress from the Project site.
- 1.10 Where the land surface has been disturbed during/after construction, expansion, modification or repair of the operation or any portion of the operation, the Permit Holder shall reclaim/rehabilitate the surface of the land to its former state; except

where it is not possible, the Permit Holder may reclaim and/or rehabilitate unused land to an equivalent standard.

- 1.11 Ensure that trucks are equipped with the necessary reflective signage to warn the public of impending danger of parked/moving trucks with logs on public thoroughfares.

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: chaps for chainsaw operators, high-visibility vests, respirator, hard hats, gloves, and appropriate footwear and ensure appropriate utilisation of these gears. A log for the distribution of Personal Protective Equipment to employees must be maintained. Evidence of distribution log must be presented to officers of the Agency upon request during a compliance inspection, and a summary must be included in the **Environmental Annual Report**.

- 2.2 An equipped first aid kit must be located on site at times. Additionally, communication and transportation systems must be in place to respond to emergencies.

- 2.3 All employees must be trained in the use of fire extinguishers and firefighting protocols.

- 2.4 Make all employees/third party contractors aware of the Conditions of the Environmental Permit (Renewed) and provide training on good environmental management practices. Prepare and maintain a training file for employees which should be available upon Officers' request during a Compliance Inspection, and a summary of such training must be included in the **Environmental Annual Report**.

3.0 WASTE MANAGEMENT

- 3.1 Adhere to the provisions of the **Environmental Protection (Litter Enforcement) Regulations, 2013**.

- 3.2 Maintain good housekeeping, sanitary and hygienic practices, and the aesthetic quality of your surroundings.

- 3.3 Ensure effective management of recoverable materials and all waste generated by the project is in accordance with the EP Act, Cap 20:05 part V s. 19(1)(2)(3)(4): s. 20(1)(2).

- 3.4 Maintain an appropriate area designated for the storage of derelict equipment,

unused materials and scrap metals until such time for disposal and/or reuse.

- 3.5 Promote proper solid waste management practices at Project site. Covered garbage receptacles must be placed at strategic locations, both in and outside of plywood facility and sawmill. All solid waste collected in these receptacles must be disposed of in a Solid Waste Pit. Reuse, recycle and/ or compost waste materials as far as practicable.
- 3.6 Construct and maintain a dust containment bin with the capacity to store all wood waste (sawdust and shavings, etc.) generated during a typical milling season/ year.
- 3.7 For mills that are not equipped to be attached to an extractor system, collect/bag and remove sawdust from the mill floor in a timely manner. Sawdust should not be allowed to accumulate to more than 15 cm (6 inches) on the mill floor at any given time.
- 3.8 Maintain the dust extraction system to ensure there is no escape of fugitive dust and employ wet suppression methods such as sprinklers where suitable on the premises to control fugitive dust.
- 3.9 Dispose of any additional unused sawdust, wood shaving, wood ends and any other solid waste at an approved waste disposal site. In event that sawdust, wood shaving and/ or wood ends accumulate on site, it must be placed in heaps not exceeding two (2) meters high.
 - 3.9.1 Options for reuse include but are not limited to:
 - a. Poultry Bedding.
 - b. Mulching.
- 3.10 Ensure that the wood waste removed from the containment bin is placed in large polystyrene bags and tightly secured before disposal at an approved waste disposal site.
 - 3.10.1 Waste Management Records including Disposal Manifest (information with regards to time, quantity and method of disposal, Disposal Company used and site of Disposal) must be included in the Annual Report.
 - 3.10.2 The Manifest should be used for every disposal activity and should be signed by Disposal Site Managers and the Disposal Company Manager.
- 3.11 Maintain a septic tank system on site. The septic tank should not be located within 1.5 m of a building or property boundary and should be accessible for cleaning and

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de-sludging. Any modification to the Septic tanks 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*.

4.0 HAZARDOUS WASTE/ MATERIALS MANAGEMENT

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

4.1.1 There shall be no release of any pollutants (i.e., fuel, waste oil, wood preservatives) to ground water or soil from the permitted installation. Any accidental release of pollutants to soil and/or ground water must be recorded and reported **within twenty-four (24) hours** to the Agency for further investigation.

4.1.2 Take the necessary precautionary measures, such as, leak-proofing of containers used for the transport of fuel to Project site. Appropriate measures should also be taken during the handling and use of all Hazardous Waste at Project site.

4.1.3 Store waste oil in tightly covered drums or barrels to avoid spillage. It is an offence to drain fuel/lubricants including waste oils of any quantity from equipment onto the ground, drains or in waterways.

4.1.4 Promote the reuse of waste oil, for example, as lubricant for equipment, where practical.

4.1.5 Label all waste oil, used batteries, oily rags, filters and oil containers, and store them in a containment bund with an impervious surface until reuse or sale to an authorised dealer.

4.2 Ensure that oil/fuel containment adsorbent materials are appropriately stored in slop tanks and disposed of in a manner approved by the EPA.

4.3 Store used oil in a covered, banded area to minimise adverse impacts to the environment in the event of spillage. The banded area must be able to provide containment for the maximum volume of used oil stored on site.

4.4 Construct an impervious secondary containment wall that should have the capacity to provide at least 110 per cent of the total volume of fuel, creating a temporary holding area in the event of accidental spillage.

4.5 Ensure that an appropriate spill containment kit is located at the Facility. The kit should contain absorbent material to absorb split oil and other split liquids.

- 4.6 In the event of spillage of chemicals used in the Plywood manufacturing process, adhere to spill clean-up procedures outlined in Material Safety Data Sheets (MSDS) for specified chemical spilt. The MSDS should be kept on-site and be readily accessible to all employees at all times.
- 4.7 Construct an area with an impervious base and berm for refueling of equipment, heavy duty machineries and vehicles, etc. This area must be banded to minimize the negative impact on the environment in the event of spillage.
- 4.8 Ensure that all wastes are sorted in order to separate reusable/recyclable materials. Hazardous wastes must be properly stored in segregated, leak proof containers at an appropriate on-site facility until ready for disposal. Disposal of hazardous waste shall be done in a manner approved by the EPA.
- 4.9 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 waste generated.
 - (c) 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.
 - (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 your facility for hazardous waste.
 - (g) 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.

5.0 WATER QUALITY

- 5.1 Maintain the Integrity of the existing waterways at all times. Discharges from the Ply Mill into the environment should be in accordance with the Guyana National Bureau of Standards (GNBS) *Interim Guidelines for Industrial Effluent Discharge into the Environment*. The following are the allowable

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limits and should not be exceeded:

- pH 5.0-9.0,
- Temperature < 40 °C;
- Total Suspended Solid (TSS) < 100 mg/L;
- Oil and Grease < 20 mg/L; and
- Total Dissolved Solid (TDS) < 40 mg/L.

Further, monitor any discharge from the operation for the above parameters and submit the results **biannually** to the Agency.

5.2 Not discharge waste water effluent directly into receiving waters without prior treatment. Maintain oil/water separator on site, through which all effluent must pass before final discharge. Recovered oil must be stored and disposed of in a manner approved by the EPA.

5.3 Avoid soil and water contamination from fuel, grease, waste oils and other petroleum products. Store all oils, fuel 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.

6.0 AIR QUALITY NOISE MANAGEMENT

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

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.

- **Industrial Limits 100 dB** (Day-time (06:00 h - 18:00 h))

6.3 Ensure that all sound-making devices, e.g., generators are suitably enclosed in structures constructed with materials of good noise insulation properties (e.g. hollow concrete blocks, insulation boards, solid clay bricks) and are equipped with silencers or mufflers to reduce the noise level.

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

6.5 Implement all possible measures such as, ensuring equipment is serviced and operated according to manufacturer's recommendations to minimise the impact of sound levels on the environment.

6.6 Take all reasonable precautions to prevent wood dust from becoming airborne.



7.0 COMPLIANCE, MONITORING AND REPORTING

- 7.1 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.
- 7.2 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.
- 7.3 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.
- 7.4 Conform to all terms and conditions under which this Environmental Permit (Renewed) is granted and the Permit Holder 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.
- 7.5 Inform the Agency prior to or **within thirty (30) days** of any change of name or ownership of the operation.
- 7.6 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.
- 7.7 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.
- 7.8 Report to the Agency any non-compliance(s) with the Environmental Permit (Renewed) as follows:
- 7.8.1 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.
 - 7.8.2 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.
 - 7.8.3 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.

8.0 INSTITUTIONAL AUTHORITY/LIABILITIES

8.1 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.

8.2 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.

8.3 The EPA shall have the right to cancel or suspend this Permit for breach of any of the terms and conditions contained herein.

8.4 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 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.

8.5 The Permit Holder, his Servants, Agents and/or Sub-Contractors while executing the activities attributable to the project 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 wood waste, industrial chemicals, 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

- d. discharge or release shall be deemed a violation of Section 19(1)(a) and/or Section 19(1)(b) of the Environmental Protection Act.
- e. 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.
- f. 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.
- g. Any gross negligence or wilful 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.
- h. 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.

8.6 This Environmental Permit (Renewed) is not the final consent; all relevant permissions, approvals and supporting documentations must be obtained from other regulatory bodies for continued operation, and subsequently maintained.

8.7 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's lack of due care and diligence.

8.8 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 to immediately cease the offending activity, in accordance with Section 27 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.

8.9 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 Environmental Protection Act, Cap. 20:05, Laws of Guyana.

8.10 This Environmental Permit (Renewed) is effective for the period stipulated herein **April, 2024 to March, 2027**. This Environmental Permit (Renewed) shall remain valid until **March 31, 2027**, 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.

Environmental Permit (Renewed) - Ref. No.: 20050923 - BCPFSO

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8.11 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 **September 30, 2026**.

8.12 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 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.

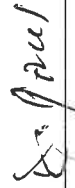
8.13 Failure to comply with the requirements of this Permit shall render the Permit Holder liable to prosecution and to penalties prescribed under the Environmental Protection Act, Cap. 20:05, the Environmental Protection (Amendment) Act, 2005, and the Environmental Protection Regulations, 2000, including civil penalties and injunctive relief.

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



Date *2024.04.25*

I hereby accept the above Terms and Conditions upon which this Environmental Permit (Renewed) 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.

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| NAME: | Denzil Jones |
| DESIGNATION: | Manager |
| SIGNATURE: |  |
| DATE: | 23 May 2024 |

