




**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

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|-----------------------|---|
| Reference No.: | 20210715-ARDOP |
| Fee: | Medium (C1) - US\$ 500 per year |
| Fee Paid: | US\$2500 (5 years – February 2022 to January, 2027) |
| Addressee: | Eliyah Yehudah Chief Executive Officer IMEX Inc. 11 University Gardens Cummings Lodge Greater Georgetown  |
| Activity: | Asbestos Removal, Transportation and Disposal |

IMEX Inc. hereinafter referred to as the “Permit Holder”, is hereby authorised in accordance with the Environmental Protection Act, Cap. 20:05, the Environmental Protection (Amendment) Act, 2005, and the Environmental Protection (Authorisations) Regulations, 2000, to conduct Removal, Transportation and Disposal of Asbestos across Guyana hereinafter referred to as the “Project”, in a manner indicated in the Application for Environmental Authorisation submitted on September 30, 2021, and 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 applicable laws, best practices, guidelines or standards relevant to this project.

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

1.0 OPERATION

- 1.1** Make an application to the Agency to vary this Permit in instances where it becomes necessary to:
- change the construction, operation, structure, or layout of the facility and all associated buildings;
 - change equipment, machine, apparatus, mechanism, system or technology serving the facility;
 - change the position and design of any outlet at the point or points of discharge of effluents; or

- iv. effect any other change outlined in 20(3) of the Environmental Protection (Authorisations) Regulations.
- 1.2 Adhere to the requirements **of the Occupational Safety and Health Act, Cap. 99:01, Laws, of Guyana.**
- 1.3 All Employees involved in the removal, transportation, and disposal of asbestos **must be** qualified/certified to handle the removal and disposal of asbestos contaminated material.
- 1.4 Security signs and notices must be established around the asbestos removal site and the temporary asbestos storage site. Notices must be constructed of durable material and placed at strategic points around the site to reflect the following:

DANGER
Asbestos
Cancer and Lung Disease Hazard
Authorized Personnel Only
Use Respirators and Protective Clothing when working in this area

- 1.5 All human activity in and around the removal area containing asbestos must be restricted. "No entry" signs must be prominently mounted outside the entrances and exits to the project. An outer barrier must also be erected around the premises to prevent unauthorized entry and exit.
- 1.6 All materials, equipment, etc., within the area containing asbestos must be covered with impermeable material or plastic sheeting secured by duct tape or any other suitable material to prevent contamination.
- 1.7 The cradle to grave approach must be employed (whereby the Permit Holder is primarily responsible for the proper management of the hazardous waste on site from removal to disposal). Asbestos removal, transportation and burial shall be done in accordance with procedures indicated and outlined in sections 2.0 to 4.0 below.
- 2.0 **ASBESTOS REMOVAL**
- 2.1 Removal of asbestos waste must be in accordance with removal plan included in the project summary and submitted to the EPA on **January 19, 2022.**
- 2.2 All employees involved in the removal of the asbestos waste must be equipped with disposable coveralls and either an N-100 or P-100 respirator or a HEPA- particle mask suitable for asbestos work.
- 2.3 Wet dust-suppression methods must be employed, before and during removal of the

asbestos, in order to minimize the probability of fibres breaking, and entering the atmosphere.

- 2.4 The entire surface of the asbestos waste must be saturated with the wetting agent and runoff should be minimal. The asbestos waste shall remain wet throughout the entire removal process.
- 2.5 Power tools shall not be used to cut or remove the asbestos, except when removing screws or fastenings.
- 2.6 Contaminated coveralls and particle masks must be disposed of with the asbestos waste.

3.0 **ASBESTOS STORAGE**

- 3.1 Asbestos waste must be double-wrapped in a minimum of 0.2 mm thick, durable construction plastic material following its removal, so as to ensure security and prevent any dispersion of the material into the surrounding environment.
- 3.2 Asbestos waste stored must not commingled with other wastes, and the storage must allow for inspection between secured asbestos.
- 3.3 Access to the asbestos storage area shall be restricted to employees with asbestos training.
- 3.4 The area designated for temporary storage of asbestos waste shall be clearly identified, demarcated and secured and all packaged asbestos waste shall be clearly labelled.

4.0 **ASBESTOS TRANSPORTATION**

- 4.1 Transportation of asbestos waste shall be in accordance with the Transportation Plan submitted to the EPA on **January 19, 2022**.
- 4.2 Off-site transportation of asbestos shall be conducted within twenty-four (24) hours of the removal of the asbestos so as to prevent releases, and exposures to employees and the public.
- 4.3 Asbestos waste designated for off-site shipment must be loaded, enclosed and secured on the transport vehicles prior to leaving the site.
- 4.4 All bags/containers containing asbestos must be labelled and should include the following information:

**Danger
Contains Asbestos**



Cancer and Lung Disease Hazard

4.0 DISPOSAL

- 4.1 Asbestos wastes must be disposed at a Disposal Site designated and approved by the Local Authority or the Ministry of Local Government and Regional Development (MLGRD).
- 4.2 The Permit Holder must monitor the disposal of asbestos wastes to ensure burial is conducted in an environmentally sound manner. In no instance should asbestos be removed off-site, or given to residents or any person for reuse.
- 4.3 The Permit Holder must ensure during its monitoring as per Condition 4.1 above, that the following minimum environmental standards are implemented:
 - 4.3.1 A separate cell away from other waste must be prepared for the burial of the asbestos waste at the approved Disposal Site.
 - 4.3.2 Once deposited, waste must be covered immediately at a depth of at least 250 mm. By the end of the working day at least one metre of cover should be placed on all flanks and surfaces. The objective of cover in these cells is to ensure that no asbestos or waste containing asbestos is left exposed. This should prevent the aerial dispersion of asbestos fibres from the zone of deposit.
 - 4.3.3 The final top cover must be placed on the landfill/cell in order to avoid dispersion of fibres. This must consist of at least two metres of suitable material. Suitable material must be used for all covering purposes. This must be incombustible, granular material, free from any objects capable of disrupting the waste or any packaging.
 - 4.3.4 **The Permit Holder must submit signed (by the Disposal Site personnel) copies of the Waste Delivery Note to the EPA, within one (1) week of disposal of the asbestos waste.**
- 4.4 The Permit Holder shall immediately notify the Agency of any contravention or deviation from the standards prescribed by Condition 4.2.

5.0 AIR QUALITY MANAGEMENT

- 5.1 Adhere to the provisions of the **Environmental Protection (Air Quality) Regulations, 2000.**
- 5.2 Indoor air quality must be monitored by the Permit Holder to determine the presence of asbestos fibre, **subsequent** to the removal and disposal of asbestos waste. Results of monitoring must be submitted to the EPA upon receipt.

- 5.3 Methods of **dry** sweeping or shoveling of dust and debris containing asbestos shall not be employed. Use water as is required to keep dust levels at a minimum.
- 5.4 The Best Available Technologies or measures; e.g. HEPA filters or other appropriate devices, shall be utilized to mitigate adverse air impacts from the removal process.
- 6.0 **WATER QUALITY MANAGEMENT**
- 6.1 Adhere to the provisions of the **Environmental Protection (Water Quality) Regulations, 2000**.
- 6.2 **Untreated effluent discharge** from the decontamination process into the surrounding environment is **strictly prohibited**.
- 6.3 All effluent generated from the decontamination process shall be directed to HEPA filters prior to release into the Environment.
- 6.4 All fibres collected from the decontamination process must be disposed of with asbestos waste.
- 7.0 **COMPLIANCE MONITORING AND REPORTING**
- 7.1 Notify the Environmental Protection Agency within one (1) hour of the occurrence of any environmental emergencies (e.g. oil spills, hazardous materials/wastes spills, sudden onset disaster, natural, technological or human- induced factors that cause or threaten to cause severe environmental damage as well as harm to human health or livelihood).
- 7.2 Make all employees, and third parties under your direction, aware of the conditions of the Environmental Authorisation and provide training on good environmental practices. Annual training schedule shall be submitted in the **Annual Report**.
- 7.3 Monitor the implementation of the conditions of this Permit, insofar as they involve adherence by your employees and all third parties under your direction.
- 7.4 Notify the Agency in writing of any change of name or ownership of the Permit Holder's facility within thirty (30) days after the change occurs.
- 7.5 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.
- 7.6 Maintain and submit to the Agency records of the type, composition and quantity of

contaminant released (i.e., any solid, liquid, gas, odor, sound, vibration, radiation, heat or combination of any of them).

7.7 Submit Annual Reports to the EPA on the progress of the operation and compliance with the conditions under which this Permit was granted on or before March 31, each year.

7.8 Report to the Agency any non-compliance(s) with the Environmental Permit:

- i. Within twenty-four (24) hours of the time the Holder of the Environmental Authorisation for Operation becomes aware of the non-compliance outlining the anticipated manner in which human health or the environment may be impacted.
- ii. 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.

7.9 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.

7.10 It is the responsibility of the Permit Holder to ensure the permitted activity and premises are secured and that all practicable steps necessary to prevent fires, explosions, leaks or suspected leaks and spills at the permitted premises are taken.

8.0 INSTITUTIONAL AUTHORITY/ LIABILITIES

8.1 The Permit Holder shall 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.

8.2 The Permit Holder shall 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.

8.3 The Permit Holder shall be liable for any activity that causes or is likely to cause pollution of the environment unless all reasonable and practicable measures are taken to prevent or minimize any resulting adverse effect, pursuant to s. 19 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.

8.4 The Permit Holder shall 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.

- 8.5 The Permit Holder shall be liable to compensate any person who suffers any loss or damage as a result of contravening conditions 8.3 and 8.4 of this Environmental Permit, pursuant to s. 19 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.
- 8.6 The Permit Holder shall 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.
- 8.7 The Permit Holder shall be liable of 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.
- 8.8 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.
- 8.9 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.
- 8.10 The EPA reserves the right to conduct regular inspections of the Permit Holder's construction activities as part of its monitoring and enforcement requirements under the Environmental Protection Act, Cap 20:05, and the Environmental Protection (Amendment) Act, 2005, and Environmental Protection (Authorisations) Regulations, 2000.
- 8.11 The Permit Holder, His Servants and/or Agents 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.

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- 8.12 The EPA has the right to modify, cancel or suspend this Permit for breach of any of the terms and conditions contained herein.
- 8.13 **This Environmental Permit is not the final consent; all relevant Permissions should be obtained from other regulatory bodies for continued operation.**
- 8.14 This Environmental Permit is effective for the period stipulated herein; **February, 2022 to January, 2027.**
- 8.15 This Environmental Permit shall remain valid until **January 31, 2027** unless otherwise suspended, cancelled, modified or varied, in accordance with the provisions of this Permit or the Environmental Protection Act, Cap. 20:05, Laws of Guyana, Environmental Protection (Amendment) Act, 2005, and the Environmental Protection (Authorisations) Regulations, 2000.
- 8.16 This Permit must be renewed by submitting a completed Renewal Application Form for Environmental Authorisation to the Agency at least six months before this Permit expires, that is, no later than **July 31, 2026.**
- 8.17 Any late submission of renewal application (s) 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 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.
- 8.18 Failure to comply with the requirements of this Permit or with applicable laws and regulations, whether existing or forthcoming, shall render the Permit Holder liable to prosecution and to penalties, inclusive of civil penalties, injunctive relief and imprisonment, as prescribed under the Environmental Protection Act, Cap. 20:05, Laws of Guyana, the Environmental Protection Regulations and other applicable laws of Guyana.

Signed by Sharifah Razack on behalf of the Environmental Protection Agency


 **Kemraj Parsram**
Executive Director

Date: 2022.02.17

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I 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, Environmental Protection (Amendment) Act, 2005, the Environmental Protection (Authorisations) Regulations, 2000, and any existing or forthcoming regulations, guidelines, best practices and standards made under this Act.

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| NAME: | ELIJAH YEHUDAH |
| DESIGNATION: | C.E.O |
| SIGNATURE: |  |
| DATE: | 17 FEB 2022 |

