



**Environmental
Protection
Agency**

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Environmental Permit (Interim)

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.:	20220314-CTISL
Fee:	Medium(C2) i.e., US \$ 800 Per Year
Fee Paid:	US\$ 800 for One (1) Year (September 2022- August 2023)
Addressee:	Mr. Sayeed Ali President Chemtech Inc. 251 Thomas Street South Cummingsburg Georgetown
Activity:	Interim Environmental Permit for Preliminary Works Design & Baseline Assessments for The Proposed Integrated Post Petrochemical Manufacturing Complex.

Chemtech 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 preliminary works design & baseline assessments for the proposed Integrated Post Petrochemical Manufacturing Complex at Parcels 52 and 54, Plantation York, Soesdyke Linden Highway hereinafter referred to as the "Project", in a manner indicated in the Application for Environmental Authorisation, Project Summary and Risk Assessment submitted on March 14, 2022, & June 22, 2022, respectively 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 guidelines, best practices, and 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 GENERAL

- 1.1 This Interim Permit is issued pursuant to Regulation 18(3) of the Environmental Protection (Authorisations) Regulations 2000, for a period of one (1) year commencing September 2022 to August 2023.
- 1.2 The Permit Holder is required to submit to the Agency, the requisite approvals upon obtaining such approvals from the Central Housing and Planning Authority (CH&PA), the relevant Municipality, or any other

authority with jurisdiction and oversight over the operations.

- 1.3 The Agency may cancel, suspend or modify this Permit, in accordance with Regulation 14 of the Environmental Protection (Authorisations) Regulations, for any reason thereunder, or as included herein.**
- 1.4 Any modification, suspension or cancellation of the aforementioned approvals in Condition 1.2 relevant to the execution of the Project, may result in the modification, suspension or cancellation of this Interim Environmental Permit by the Agency. Any such modification, suspension and/or cancellation of any of these approvals shall be communicated in writing to the Agency within three (3) days of receipt by the Permit Holder.**
- 1.5 Failure to submit the assessments, data, studies, plans, and such further environmental information referred to in this Interim Permit, or required by the EPA after its issuance, within the timelines stipulated herein or by the EPA, may result in the modification, suspension or cancellation of this Interim Environmental Permit by the Agency.**
- 1.6 Upon expiration of this Permit, or its cancellation by the Agency, activities may only commence or resume upon the issuance of a full, valid Environmental Permit by the Agency, subject to the procedures stipulated by Section 11 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana, for which the Agency provides no guarantees or assurances.**
- 1.7 All activities outlined under this Interim Environmental Permit should be conducted by qualified experts utilizing calibrated equipment where applicable.**
- 1.8 The Permit Holder accepts, concedes, and agrees unequivocally that under no circumstances whatsoever shall the Agency assume any liability for expenses incurred, loss of revenues, delays, or any other losses or damages whatsoever, related to the activities undertaken by the Permit Holder hereunder, and that the Agency provides no guarantees or assurances that a full valid Environmental Permit will be issued upon the expiry or cancellation of this Interim Permit. The Permit Holder agrees to indemnify the Agency against any and all liabilities, including but not limited to judgements, costs, and legal fees, and proceeds with this Project in accordance with this Interim Permit in full acknowledgment and agreement with the foregoing.**

2.0 SUBMISSION OF DOCUMENTS

The Permit Holder shall provide the following documentation within **eight (8) months** of the issuance of this Interim Environmental Permit:

- 2.1 A detailed benchmarking study (inclusive of baseline data to determine the ambient water**

quality within the project area of influence) on effluent generated, treated, and discharged by the project including but not limited to flow rate, effluent constituents, quantity discharged, and discharge limits/standards for parameters in accordance with the Guyana National Bureau of Standards (GNBS) *Interim Guidelines for Industrial Effluent Discharge into the Environment*.

- 2.2 A detailed benchmarking study (inclusive of baseline data to determine the ambient water quality within the project area of influence) with respect to specific emissions by the project including but not limited to criteria pollutants such as Particulate Matter 2.5 and 10, VOC, NO_x, SO_x, Carbon Monoxide, and carbon dioxide equivalent. Emissions Standards should be in accordance with WHO Air Quality Guidelines 2005.
- 2.3 Report on stakeholder consultation(s) conducted with residents of surrounding communities of the proposed project site.
- 2.6 The Permit Holder shall submit a detailed site map of the proposed site showing the following:
 - i. All land zones as they are currently used including access roads, land ownership, nearby water source, closest residence, buffer zones. The maps shall continue a north indicator, a scale, and location marking (UTM- Universal Transverse Mercator Coordinates) Provisional South American.
 - ii. The exact location, specifications, and layout of the proposed Integrated Post Petrochemical Manufacturing Complex. This must include the following:
 - Boundaries of the site;
 - Buffer zones;
 - Access road to the Proposed Site;
 - Tank Farm;
 - Storage yard for logs;
 - Six Processing plants (Formaldehyde chemical plant, Resin chemical plant, Para-Formaldehyde chemical plant, Nitrogen fertilizer plant, Veneer plant, and Oriented Strand board plant);
 - Three warehouses (Chemical Warehouse, NPK Fertilizer warehouse, Veneer & OSB products Warehouse);
 - Evaporation & Detention Plant;
 - Wastewater Treatment System;
 - Drainage Systems (Internal and External);
 - Power Supply.
- 2.7 The Permit Holder shall also include in the benchmarking studies required under 2.1 and 2.2 above to include identification and analysis of impacts associated with air quality emissions, effluent discharges, actual volume and composition of wastes for all project phases, mechanisms for compensation to any affected party, and the manner of acquisition of private land, government reserve for the project, including site access road.
- 2.8 The Permit Holder shall submit to the agency an Environmental Management Plan which

must include, but are not limited to:

- i. Air Quality
- ii. Noise Quality
- iii. Surface Water Quality
- iv. Chemical storage
- v. Pressure and leak sensors
- vi. Maintenance activities
- vii. Leaks & Explosion
- viii. Emergency Response Plan
- ix. Waste Management Plan
- x. Public Involvement and Community Outreach
- xi. Recycling and Treatment Options
- xii. Storage of Finished products; Veneer & OSB Boards, NPK Fertilizers, and Para-formaldehyde.

The EMP shall identify and describe mitigation measures and implementation framework. Mitigation measures should be described in detail and be accompanied by designs, equipment descriptions, and operating procedures where applicable. The technical aspects of implementing the mitigation measures should be described. The description of mitigation actions should include how they will be achieved, by whom, by when, with what resources, with what monitoring/verification, and to what target or performance level. Mechanisms must also be provided to address changes in the project implementation, emergencies or unexpected events, and the associated approval processes.

2.9 The Permit Holder shall submit a **Health and Safety Manual** for the Integrated Post Petrochemical Manufacturing Complex to the Agency for approval, which shall include but not limited to the safety codes in the following areas: -

- i. Heating & Cooling Operation;
- ii. Steam Generation;
- iii. Air Pressurization;
- iv. Wastewater treatment and Evaporation & Detention Pond;
- v. Electrical Power; Compressor;
- vi. Formaldehyde chemical plant, Resin chemical plant, Para-Formaldehyde chemical plant, Nitrogen fertilizer plant, Veneer plant, and Oriented Strand board plant;
- vii. Tank Farm;
- viii. Pumps, pipes, and valves.

2.10 The health & safety plan shall clearly outline and identify Mechanisms, protocols and implementation schedules, responsibilities, and associated costs. The safety policy for this refinery must be clearly articulated by the company.

2.11 Protocols for the Integrated Post Petrochemical Manufacturing Complex's Health and Safety plan shall provide details in the following areas; evacuation plans; firefighting capability; fast alert systems; safety equipment; personal and protective gear, and safety features of the complex (valve mechanisms, system redundancy, etc.); safety and health

training; safety manual; community alert systems; emergency alert systems; internal and external firefighting systems; security features; and spill prevention and clean up responses.

3.0 COMPLIANCE MONITORING AND REPORTING

- 3.1 Notify the Environmental Protection Agency within one (1) hour of the discovery of the occurrence of environmental emergencies (e.g., oil spills, hazardous materials/wastes spill, 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). Notification as prescribed by Section 19(3)(a) of the Environmental Protection Act, shall be submitted to the EPA within twenty-four (24) hours of the discovery of the incident occurring.
- 3.2 Monitor the implementation of the conditions of this Permit, insofar as they involve adherence by your employees and all third parties under your direction.
- 3.3 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.
- 3.4 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.
- 3.5 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).
- 3.6 Report to the Agency on non-compliance with the Environmental Permit (Interim):
 - i. 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.
 - 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.
- 3.7 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.
- 3.8 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.

4.0 INSTITUTIONAL AUTHORITY/ LIABILITIES.

- 4.1 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.
- 4.2 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.
- 4.3 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.
- 4.4 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.
- 4.5 The Permit Holder shall be liable to compensate any person who suffers any loss or damage as a result of contravening conditions 4.3 and 4.4 of this Environmental Permit, pursuant to s. 19 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.
- 4.6 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.
- 4.7 The Permit Holder shall be liable of any gross negligence or wilful 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.
- 4.8 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.
- 4.9 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.

- 4.10 The EPA reserves the right to conduct regular inspections of the Permit Holder's activities as part of its monitoring and enforcement requirements under the Environmental Protection Act, Cap 20:05, the Environmental Protection (Amendment) Act, 2005, and Environmental Protection (Authorisations) Regulations, 2000.
- 4.11 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.
- 4.12 The EPA has the right to modify, cancel or suspend this Permit for breach of any of the terms and conditions contained herein.
- 4.13 **This Interim Permit is not the final consent. All relevant Permissions should be obtained from other regulatory bodies for continued operation.**
- 4.14 This Environmental Permit (Interim) is effective for the period stipulated herein from **September 2022 to August 2023.**
- 4.15 This Environmental Permit (Interim) shall remain valid until **August 31, 2023**, unless otherwise suspended, canceled, modified, or varied in accordance with the provisions of this Permit or the Environmental Protection Act, Cap. 20:05, the Environmental Protection (Amendment) Act, 2005, and the Environmental Protection (Authorisations) Regulations, 2000.
- 4.16 This Permit shall be renewed by submitting a completed *Application Form for Renewal of Environmental Authorization* to the Agency at least six months before this Permit expires, that is, no later than **February 31, 2023.**
- 4.17 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


Kemraj Parsram
Executive Director
Executive Director

on behalf of the Environmental Protection Agency.

Date

8.9.2022

Environmental Permit (Interim)-Ref. 20220314-CTISL
(Issued under the Environmental Protection Act, Cap. 20:05, Environmental Protection
(Amendment) Act, 2005, and the Environmental Protection (Authorisations) Regulations, 2000)

I hereby accept the above terms and conditions upon which this Environmental Permit (Interim) is granted and agree to abide by the Environmental Protection Act, Cap. 20:05, the Environmental Protection (Amendment) Act, 2005, and the Environmental Protection (Authorisations) Regulations, 2000, and any forthcoming regulations, guidelines, best practices and standards made under this Act.

NAME	SAYEED ALI
DATE	8 TH /9/2022
SIGNATURE	<i>Sayed Ali</i>
DESIGNATION	PRESIDENT