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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 Environmental Protection (Authorisations) Regulations, 2000)

Reference No.:	20250128 - SRMSM	
Fees:	Small (C1) US\$500 (5 years) i.e., US\$ 100 per year	
Fees Paid:	US\$ 500 (May 2025 – April 2030)	
Addressee (s):	Ms. Saudia Raffik Director, RA Medical Center Inc Lot 1A, ½ B, South Public Road Rose Hall Town, Corentyne, Berbice.	
Activity:	Operation of a Medical Facility	

RA Medical Center Inc., 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, for the Operation of a Medical Facility at Lot 1A, Half B, South Public Road, Rose Hall Town, Corentyne, Berbice, hereinafter referred to as the "Project", in a manner indicated in the Application for Environmental Authorisation submitted on January 26, 2025 subject to the terms and conditions set forth herein under the Environmental Protection Act, Cap. 20:05, Laws of Guyana, existing and/or forthcoming Regulations made under the said Act, and/or any applicable laws, 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 OPERATION

- 1.1 Make an application to the Agency to vary this Permit in instances where it becomes necessary to:
  - i. Change the construction, operation, structure, or layout of the facility, plant, or building;

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- ii. Change and/or install new equipment, machine, apparatus, mechanism, system, or technology serving the facility or operation;
- iii. 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 (Authorisation) Regulations.
- 1.2 All employees and third parties under the Project's direction shall be made aware of the conditions of the Environmental Authorisation.
- 1.3 The Permit Holder shall adhere to the requirements of the Occupational Safety and Health Act, Cap. 99:06, Laws of Guyana.
- A register of the types and quantities of chemical reagents managed at the Project shall be established and maintained. The registered information shall be summarised and made available for inspection by the EPA upon request.
- 1.5 Chemical Reagents shall be stored in accordance with the manufacturer's directions or Safety Data Sheet (SDS) instructions.
- 1.6 Material and Safety Data Sheets (MSDS)/Safety Data Sheets (SDS) for all chemicals used at the Clinic shall be stored at a central location.
- 1.7 All employees and third parties (where practical) shall receive training on good environmental practices.
  - 1.7.1 Employees involved in the management of hazardous materials (pharmaceutical and laboratory chemicals) shall be trained on Hazardous Material Communication and Emergency Preparedness Response.
  - 1.7.2 Training records shall be maintained on-site and made available to the EPA upon request.

### 2.0 STORAGE & USE OF RADIOACTIVE DEVICES

- 2.1 Adhere to "Part IV Diagnostic Imaging Facilities" of Guyana's Health Facilities Regulations.
- 2.2 The Project shall obtain and submit the Ministry of Health's License to operate annually, along with supporting findings.
- 2.3 All personnel using or responsible for the use of the X-ray equipment shall have prescribed qualifications and/or training.

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- 2.4 Signage to indicate the use of radiation-emitting devices shall be placed in or around areas where such devices are operated, for identification, safety, and security.
- 2.5 The X-ray room shall be set up to avoid the direct incidence of the X-ray beam on the access doors.
- 2.6 Doors to radiography rooms shall provide protective shielding for Secondary. Radiation.
- 2.7 Access Doors shall be closed when the X-ray beam is on.
- 2.8 Occupational radiation exposures shall be recorded via personal dosimeters. Dosimeters can be supplied and processed through a commercial dosimeter service.
- 2.9 Occupational radiation exposure shall not exceed an annual dose of 20 mSv (millisievert) as recommended by the International Atomic Energy Agency.
- 2.10 Personal Protective Equipment (PPE) such as leaded aprons; leaded glasses and protective gloves shall be provided for all employees working in Radiology.
- 2.11 X-ray equipment shall be correctly used and maintained according to the Manufacturer's specifications, by competently trained personnel.
- 2.12 Maintain a consistent power supply. An uninterruptible power supply or battery backup system should be installed to gather active information during an outage and regulate the shutdown of any software.
- 2.13 Signs and Warning lights shall be positioned at eye level and placed at the entrances of controlled and supervised areas to prevent inadvertent entry.

## 3.0 BIO-HAZARDOUS WASTE MANAGEMENT

- 3.1 Adhere to the provisions of the Environmental Protection (Hazardous Waste Management) Regulations, 2000.
- 3.2 All waste mixed or contaminated with medical waste shall be treated as biohazardous waste.
- 3.3 An Occupational Safety, Health, and Environmental Management Training Schedule for staff involved in the collection, storage, and handling of biohazardous waste shall be maintained and made available for inspection by the EPA upon request.
- 3.4 Bio-hazardous wastes shall be identified and segregated according to category at

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the point of generation.

- 3.5 Bio-hazardous wastes shall be properly labelled and colour-coded. Labelling can include words such as "Infectious Substances", "Bio Hazardous Waste" and "Bio Hazard".
- 3.6 Putrescible medical waste shall be refrigerated at 40°f (4 °c) or below.
- 3.7 Disposal of sharps shall **NOT** incorporate cutting, breaking, bending, or any other manipulation.
- 3.8 Staff are **STRICTLY PROHIBITED** from washing/cleaning sharps before disposal.
- 3.9 Used sharps shall be placed in containers that meet the following requirements:
  - i. Rigid;
  - ii. Puncture resistant;
  - iii. Impervious to moisture, leak, and shatterproof;
  - iv. Displays the universal bio-hazard symbols and a clear label of its contents; and
  - v. Can be sealed, preferably with a self-closing lid and/or a lid that prevents persons from removing sharps from the container.
- 3.10 The use of mercury-based medical devices (e.g., thermometers and blood pressure devices) shall be avoided and replaced with digital alternatives. In instances where mercury waste is generated, the waste shall be segregated for disposal.
- 3.11 Bio-hazardous waste containers shall adhere to the following particulars of appropriate labelling:
  - i. Name (location);
  - ii. Date;
  - iii. Type of Waste;
  - iv. List of Content; and
  - v. Quantity.
- 3.12 Storage of Bio-hazardous waste shall not exceed thirty (30) days. The thirty-day period commences when the first item is placed into the designated storage container.
- 3.13 Bio-hazardous waste shall be collected, treated, and disposed of by an EPA-authorised waste disposal facility.
- 3.14 The transportation of biohazardous waste for treatment and disposal shall be documented on a **Waste Manifest Form.** Completed waste manifest forms must be made available for observation by the EPA upon request.

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- 3.15 All Bio-hazardous Waste Storage areas shall be clearly labelled, secured, and well-illuminated when not in use. The following warning signs shall be clearly posted:
  - i. "Biohazardous Waste Storage Area"
  - ii. Danger- "Authorized Personnel Only"
  - iii. No Smoking
  - iv. No Eating or Drinking
- 3.16 The Biohazardous waste storage area shall be maintained in accordance with the following conditions:
  - i. The area shall be bunded to provide 100% containment;
  - ii. The area shall be secure and access restricted to authorised personnel only;
  - iii. Warning signs and biohazard symbols shall be posted on the facility;
  - iv. The area shall have a hard, impermeable floor with drainage, and designed to withstand cleaning/disinfection, without cracking, breaking, or other damage which would prevent effective disinfection;
  - v. The area shall have easy access to waste collection vehicles; and
  - vi. The area shall be protected from contamination and contact with water, rain, wind, and animals.
  - vii. Measures shall be taken to ensure the area does not become a breeding ground for vermin.
- 3.17 Waste streams shall be segregated as follows and disposal records shall be submitted as a component of the Annual Report:
  - 3.17.1 Tissue Waste shall be stored in a mortuary and disposed of by burial or cremation.
  - 3.17.2 Medical waste shall be incinerated.
  - 3.17.3 Liquid waste shall be channelled through the wastewater treatment system.
  - 3.17.4 Laboratory/hazardous waste shall be disposed of by an EPA-authorised facility.
- 3.18 Each disposal of expired and recalled drugs shall be recorded on a Waste Manifest Form and shall be submitted as a component of the **Annual Report.**

# 3.0 WATER QUALITY AND SOIL MANAGEMENT

Adhere to the provisions of the Environmental Protection (Water Quality) Regulations, 2000.

3.1 Discharges from the holding tank shall be in accordance with the Guyana National Bureau of Standards Interim Guidelines for Industrial Effluent Discharge into the Environment, whose limits are listed below. Further, effluent from the holding tank shall be tested before discharge into the environment according to the parameters listed **below**:

July 3/6/2020

(Issued under the Environmental Protection Act, Cap. 20: 05, Laws of Guyana, the Environmental Protection (Amendment) Act, 2005, and Environmental Protection Regulations. 2000)

Parameter	Daily Maximum Concentration	Units	Sample Type	Frequency of Analysis
рН	5.0 - 9.0		Grab	
Temperature	40	°C	Grab	
Oil and Grease	< 10	mg/L	Grab	
COD	<250	mg/L	Grab	Before each discharge
Chlorine	<0.2	mg/L	Grab	-
Coliform	<400	MPN per 100mL	Grab	

- 3.2 Grab samples of effluent from the holding tank shall be collected and processed by a certified laboratory before each discharge into the environment.
- 3.3 The results of each analysis shall be submitted to the EPA upon receipt. The frequency of effluent analysis shall be amended upon the EPA's determination that there is consistency with the results submitted.
- 3.4 Direct discharge of untreated effluent, including biohazardous waste such as bodily fluids into the environment is **STRICTLY PROHIBITED**.
- 3.5 Radioactive decontaminated or infectious liquids shall not be disposed of in the waterways.
- 3.6 Only non-radioactive decontaminated/non-infectious liquids that have been treated shall be disposed of into the environment.
- 3.7 Solid waste shall not be disposed of in the surface drain. All surrounding drains shall be maintained to ensure the free flow of water.
- 3.8 Chemicals used in the treatment of wastewater shall be properly stored. Additionally, such chemicals shall be used in the recommended quantity to prevent excess discharge into the waterways.
- 3.9 Construct and maintain drainage capable of handling the probable maximum precipitation event.
- 3.10 Avoid water contamination from fuel, grease, waste oils, and other petroleum products that might be used at the facility.

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### 4.0 AIR QUALITY AND NOISE MANAGEMENT

Strictly comply with the Environmental Protection (Air Quality) Regulations, 2000 and the Environmental Protection (Noise Management) Regulations 2000.

- 4.1 The exhaust stack for the generator shall be at least 2 meters above the tallest building.
- 4.2 Best Available Practices shall be implemented to manage odour nuisances.
- 4.3 Refrigerant (CFC) gases shall be handled in accordance with the Material Safety Data Sheet (MSDS) during installation, maintenance, and decommissioning to protect the ozone layer.
- 4.4 The Permit Holder shall comply with the Guyana National Bureau of Standards (GNBS) Guidelines for Noise Emission into the Environment at a distance of 15 m (50 ft) from the source or at the property boundary, whichever is closer.

### Commercial Limits: 80 dB (Day-time (06:00 h -18:00 h)) 65 dB (Night-time (18:00 h - 06:00 h))

- 4.5 The generator shall be serviced in accordance with the manufacturer's specifications to ensure efficiency and reduce the level of noise produced. A summarised maintenance report shall be submitted to the Agency as a component of the Annual Report.
- 4.6 All significant noise-producing equipment, such as generators, shall be equipped with silencers or mufflers and/or be enclosed in suitable acoustic enclosures where necessary.
- 4.7 The Best Available Technologies or measures, e.g., silencers, mufflers, enclosures, or other appropriate devices, shall be utilised to mitigate adverse noise impacts from heavy machinery and generators on the environment.

# 5.0 EMERGENCY MANAGEMENT

- 5.1 An **Emergency Response Plan (ERP)** shall be established and maintained for the Project. The ERP shall contain, but may not be restricted to the following:
  - i. Spill detection and mitigation procedures;
  - ii. An escape, evacuation, and rescue plan and assessment;
  - iii. A list of responsible parties and duties;
  - iv. A list of regulatory agencies to be notified;
  - v. Names and addresses of response organisations;
  - vi. Training procedures;

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- vii. A list of equipment to be utilised:
- viii. Testing procedures to ensure that the equipment to be used remains in working condition; and
  - ix. Clean up and hazardous waste disposal procedures.
- 5.2 The Permit Holder shall obtain and maintain fire prevention and control equipment in accordance with the Guyana Fire Service Approval and shall submit a copy of maintenance records as a component of the Annual Report. Further,
  - 5.2.1 Maintain adequate fire protection measures such as the placement of fighting equipment e.g. fire extinguishers and sand buckets, at visible locations on site, in accordance with the guidelines established by the Guyana Fire Service.
  - 5.2.2 All firefighting equipment MUST be regularly maintained and/or serviced and training on the use of all equipment MUST be provided to all employees.
- 5.3 Submit to the Agency, within **thirty 30 working days** of issuance of this Permit, a written Emergency Evacuation Plan for the constructed building.
- Maintain an updated **evacuation plan** for the facility. The evacuation floor plan MUST be posted on each floor of the facility in a conspicuous location.
- 5.5 Install an alarm system and ensure that all employees are aware of the emergency response protocol and their duties and responsibilities according to the evacuation plan.
- 5.6 The fire escape routes shall be clearly defined and emergency lighting shall be installed in accordance with the requirements of the Guyana Fire Service.

### 6.0 COMPLIANCE MONITORING AND REPORTING

- 6.1 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 discovery of the incident occurring.
- 6.2 Monitor the implementation of the conditions of this Permit, insofar as they involve adherence by your employees and all third parties under your direction.
- 6.3 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.

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- 6.4 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.
- 6.5 Maintain and submit to the Agency records of the type, composition and quantity of contaminant released (i.e., any solid, liquid, gas, odour, sound, vibration, radiation, heat or combination of any of them).
- 6.6 Submit an **Annual Report** to the EPA on your compliance with this Environmental Permit on or before **March 31**, **each year**.
- 6.7 Report to the Agency of non-compliance with the 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.
  - 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.
- 6.8 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.
- 6.9 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.

# 7.0 INSTITUTIONAL AUTHORITY/ LIABILITIES

- 7.1 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.
- 7.2 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.
- 7.3 The Permit Holder shall be liable for any activity that causes or is likely to cause

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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.

- 7.4 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 under s. 19 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.
- 7.5 The Permit Holder shall be liable to compensate any person who suffers any loss or damage as a result of contravening conditions 7.3 and 7.4 of this Environmental Permit, pursuant to s. 19 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.
- 7.6 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.
- 7.7 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.
- 7.8 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.
- 7.9 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.
- 7.10 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.
- 7.11 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

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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.

- 7.12 The EPA has the right to modify, cancel or suspend this Permit for breach of any of the terms and conditions contained herein.
- 7.13 This Environmental Permit is not the final consent; all relevant Permissions should be obtained from other regulatory bodies for continued operation.
- 7.14 The Environmental Permit is effective for the period stipulated herein from May 2025 to April 2030.
- 7.15 This Environmental Permit shall remain valid until **April 30, 2030,** unless otherwise suspended, cancelled, 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.
- 7.16 This Permit shall be renewed by submitting a completed Application Form for Environmental Authorisation (Environmental Permit) to the Agency at least six months before this Permit expires, that is, no later than **October 31**, **2029**.
- 7.17 Any late submission of renewal application(s) after the specified date as stated above, may require the Permit Holder to pay, in addition to the renewal fee, a late penalty fee (accruing at the time such obligation was first owed for renewal) at a rate of **two thousand dollars (\$2,000.00) per 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.
- 7.18 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.

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Signed by Shanidak Raya Proper behalf of the Environmental Protection Agency.

Kemraj Parsram
Executive Director

Date 2095-05-19

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, the Environmental Protection (Amendment) Act, 2005, and the Environmental Protection Regulations, 2000, and any forthcoming regulations and standards made under this Act.

NAME	SAUDIA RAFFIK
DESTINATION	CHEF EXECUTIVE OFFICER
SIGNATURE	Dane
DATE	5/6/2025

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