



Government of the Cooperative Republic of Guyana
Environmental Protection Agency



October 11, 2024

Reference#: 20181101-TMCMF

Ms. Zabeeda Ferouz
Director
Twins Manufacturing Chemists
31 Industrial Estate, Ruimveldt,
Georgetown



Dear Ms. Ferouz,

**Re: Environmental Permit (Renewed) for the Manufacturing of
Pharmaceuticals, Cosmetics and Household Products**

The Environmental Protection Agency (EPA) has prepared an Environmental Permit (Renewed) for the Manufacturing of Pharmaceuticals, Cosmetics and Household Products at 31 Industrial Site, Ruimveldt, Georgetown.

Please sign the Environmental Permit (Renewed) to indicate your acceptance of its terms and conditions and agreement to comply with the statutory requirements of the Environmental Protection Act, Cap. 20:05, Laws of Guyana, the Environmental Protection (Amendment) Act, 2005, and the Environmental Protection (Authorisations) Regulations, 2000.

The cost for the Permit is **US\$7500 for Five (5) years (i.e., US\$1500 per year)**. You are required to pay this fee or its equivalent in Guyana Dollars (GYD) using the Bank of Guyana daily exchange rate. Payment can also be made to the Environmental Protection Agency (EPA) in cash, Manager's or Personal Cheque in Guyana Dollars (GYD). Please note that Personal Cheques written in United States Dollars (USD) will not be accepted.

Should you have any questions or require further information or clarifications, please make contact with **Ms. Cindy Persaud – Environmental Officer, Industry and Manufacturing Unit**, on telephone number 225-0506 (Ext. 2365) or email – industry@epaguyana.org.

Yours sincerely,

Kemraj Parsram
Executive Director



Ganges St., Sophia, Georgetown, GUYANA.

Tel: (592) 225-5467/5471-5472/6044/6048 | Fax: 225-5481

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ENVIRONMENTAL PROTECTION AGENCY

U.S. EPA
WASHINGTON, D.C.

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**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 Regulations, 2000.

Reference No.:	20181101-TMCMF
Fees:	Large (C1) i.e., US\$1500 per year
Fee Paid:	US\$7500 for Five (5) years (October 2024 to September 2029)
Addressee:	Ms. Zabeeza Ferouz Director Twins Manufacturing Chemists 31 Industrial Estate, Ruimveldt, Georgetown
Activity:	Manufacturing of Pharmaceuticals, Cosmetics and Household Products

Twins Manufacturing Chemists, 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, for the Manufacturing of Pharmaceuticals, Cosmetics and Household Products at 31 Industrial Site, Ruimveldt Georgetown, hereinafter referred to as the “Project”, in a manner indicated in the Application for Renewal of Environmental Authorisation submitted on March 11, 2024, 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, guidelines, best practices, and standards relevant to this project.

This is a Renewal of Operation Permit Ref.#: 20181101-TMCMF issued in March 2019 and expired in February 2024.

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

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 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

Signature

- effluents; or
- iv. effect any other change outlined in 20(3) of the Environmental Protection (Authorisations) Regulations.
- 1.2 Employees and third parties under the Project's direction shall be made aware of the conditions of the Environmental Authorisation. Annual training records shall be maintained and made available for inspection by EPA upon request.
- 1.3 Fire prevention and control equipment shall be maintained in accordance with this **Guyana Fire Service Approval**.
- 1.4 Adhere to the requirements of the **Occupational Safety and Health Act, Cap. 99:01, Laws of Guyana**.

2.0 WATER QUALITY

- 2.1 Adhere with the provisions of the **Environmental Protection (Water Quality) Regulations, 2000**.
- 2.2 Perimeter drains maintained on-site shall be adequately sloped to collect storm flow. Storm water must be directed away from manufacturing operations.
- 2.3 Discharges from the Chemical Storage Bond is **strictly prohibited**.
- 2.4 Discharge of untreated liquid effluent into the surrounding waterways is **strictly prohibited**.
- 2.5 Chemical spills occurring during handling and loading of Pharmaceutical Chemicals **shall be** immediately cleaned as guided by the respective Safety Data Sheet and disposed at an EPA authorised disposal facility.
- 2.6 Discharges 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 limits for the general environment and should not be exceeded:

Parameter	Maximum Concentration	Units
pH	5.0-9.0	
Temperature	<40	°C
Chemical Oxygen Demand (COD)	<150	mg/L
Total Suspended Solids (TSS)	50	mg/L
Total Dissolved Solid (TDS)	< 250	mg/L

Oil and Grease	<10	mg/L
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Water Quality monitoring shall be conducted at the discharge points, (GPS coordinate: 21 N 031495 UTM 0750799) **biannually** in accordance with the parameters listed above by trained personnel utilizing calibrated equipment. Records of each monitoring exercise shall be maintained and results submitted to the Agency as a component of the Project's **Annual Report**.

3.0 AIR QUALITY MANAGEMENT

- 3.1 Adhere to the provisions of the **Environmental Protection (Air Quality) Regulations, 2000**.
- 3.2 Generators shall use retrofit emission controls to reduce particulate matter emissions to the atmosphere.
- 3.3 Generators shall be equipped with stacks that extend two (2) meters above the tallest building within a 500m radius of the development, to minimize adverse fumes/soot impacts to the contiguous areas.
- 3.4 Ambient air quality monitoring shall be conducted at the boundary of the property during normal operations to assess the levels of the following air pollutants in accordance with the World Health Organization (WHO) 2021 Air Quality Guidelines:

Air Pollutant	Averaging Time	Maximum Permissible Level
PM _{2.5}	24h	15 µg/m ³
PM ₁₀	24h	45 µg/m ³
Carbon Monoxide	8h	4 mg/m ³
Nitrogen Dioxide	8h	25 µg/m ³
Sulphur Dioxide	24h	40 µg/m ³

- 3.5 Air quality monitoring shall be conducted **annually** in accordance with the parameters listed above by trained personnel utilizing calibrated equipment. Records of each monitoring exercise shall be maintained and results submitted to the Agency as a component of the Project's **Annual Report**.
- 3.6 Mechanical equipment shall be operated and maintained in accordance with the manufacturer's specifications.

- 3.7 In the event of equipment malfunction or **inefficiencies** which may result in visible emissions into the air or, in the event of the malfunction leads to abnormal emissions, the operator shall:
- i. Investigate and undertake remedial action **immediately**;
 - ii. Adjust the process or activity to minimize those emissions; and
 - iii. Record the events and actions taken. This shall be submitted in the annual report.

4.0 NOISE MANAGEMENT

- 4.1 Adhere to the provisions of the **Environmental Protection (Noise Management) Regulations, 2000.**
- 4.2 Noise emissions shall be monitored 15 meters away from the source of noise (at the Project's boundary) **annually** to determine compliance with Guyana National Bureau of Standards (GNBS) *Guidelines for Noise Emissions into the Environment*, not exceeding the industrial limits listed below:

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

- 4.3 Noise Quality monitoring shall be conducted **annually** in accordance with the parameters listed above by trained personnel utilizing calibrated equipment. Records of each monitoring exercise shall be maintained and results submitted to the Agency as a component of the Project's **Annual Report.**
- 4.4 All machines/equipment 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 maintained on-site and made available to the EPA upon request.
- 4.5 Significant noise-producing equipment, such as generators, shall be equipped with silencers or mufflers and/or be enclosed in suitable acoustic enclosures where necessary to reduce noise levels impacting the surrounding environment to achieve compliance with Guyana National Bureau of Standards (GNBS) Noise Emission Guidelines.

5.0 STORAGE OF PHARMACEUTICAL CHEMICALS

- 5.1 Adhere to the **Pesticides and Toxic Chemicals Control Act 2000.**
- 5.2 A register of the quantities of Chemicals stored at the Project shall be established and maintained. Registered information shall be maintained on site and made available to the EPA upon request.

- 5.3 Chemical Storage Areas shall be clearly labeled with ***“Danger, Chemical Storage Area- Authorized Personnel Only”*** where applicable as a spill control measure.
- 5.4 Flammable materials shall be stored away from ignition sources. **‘No Smoking’** signs shall be posted where these materials are handled and stored.
- 5.5 Secondary containment (bund area) shall be maintained around storage areas of all liquid chemicals. The secondary containment shall have:
- i. A volume equivalent to the volume of liquid stored within the largest storage container and;
 - ii. Walls constructed of impermeable materials.
- 5.6 Chemicals shall be stored following the manufacturer's directions or Safety Data Sheet instructions.
- 5.7 Safety Data Sheets for all Chemicals shall be readily available and easily accessible at all times in Chemical Storage Areas.
- 5.8 Chemicals shall be segregated as indicated below to reduce the risk of mixed spillage and fire:
- i. Bases separate from Flammables;
 - ii. Corrosives separate from Flammables;
- Any other stipulated standards for the storage or segregation of chemicals
- 5.9 Chemical storage containers shall be clearly labeled in accordance with the Globally Harmonized System of Classification and Labeling. The following must be evident:
- i. Signal Word;
 - ii. GHS Symbols- (Hazard Pictograms);
 - iii. Manufacturer Information;
 - iv. Precautionary Statements/ First Aid;
 - v. Hazard Statements; and
 - vi. Product Name or Identifiers.
- 5.10 Chemical storage containers shall be inspected for signs of leakage or corrosion and damaged containers **must be** replaced **immediately**. Inspection reports shall be maintained on-site and made available to the EPA upon request.
- 5.11 Chemicals **shall not** be stored on damaged or inadequately secured racking or on damaged pallets to minimize the risk of spills.
- 5.12 Liquid Chemicals stored within polyethylene containers shall:
- a) Be placed within bunded storage to ensure any leaks or spills are immediately contained;
 - b) Be clearly marked with their contents, and any appropriate warning symbols;

- c) Be regularly inspected to detect rust, leaks or other damage.
- 5.13 Emergency spill clean-up kits shall be maintained for response to spills. Kits shall contain absorbent materials, drain seals and other appropriate tools for clean-up, and shall be readily available and clearly identified.
- 5.14 Employees involved in the management of chemicals shall be trained on Hazardous Material Communication and Emergency Preparedness Response. Training reports shall be maintained on site and made available to the EPA upon request.
- 5.15 Third party contractor(s) utilised for transport of chemicals to and from the Facility shall be authorised by the EPA.

6.0 HAZARDOUS WASTE MANAGEMENT

- 6.1 Adhere to the provisions of the **Environmental Protection (Hazardous Waste Management) Regulation 2000.**
- 6.2 Empty chemical/material containers or drums shall be managed as outlined below and are subjected to the Safety Data Sheets (SDSs) for each material:
 - 6.2.1 Empty containers contaminated with hazardous material shall be destroyed prior to disposal at a landfill authorised by the EPA or reused, provided that the empty containers are not a hazard to human health or the environment.
 - 6.2.2 Empty containers may be reused to store the same hazardous material and/or waste.
 - 6.2.3 Containers may be reused to store non-hazardous material and/or waste, if all hazardous waste residuals have been removed and the container thoroughly cleaned.
- 6.3 Hazardous waste containers shall be labelled with the following:
 - i. The words "**Hazardous Waste**"
 - ii. The type of waste
 - iii. Beginning accumulation date i.e., date when the container was first placed in the Hazardous Waste Storage Area. Should the hazardous waste container be reused, the date hazardous waste was first placed in the container shall be recorded on the container.
- 6.4 Hazardous waste shall be stored in a covered, bunded area. This area shall include the following:
 - i. Signage- "Hazardous Waste Storage Area"
 - ii. Low traffic
 - iii. No floor drains

iv. Bunded area shall provide 110% containment of the largest volume stored therein.

- 6.5 All obsolete and expired chemicals shall be returned to source for treatment and/or disposal.
- 6.6 Hazardous waste shall be treated and/ or disposed by an EPA authorised Hazardous Waste Disposal Facility. All hazardous waste treatment and disposal shall be documented on a Waste Manifest Form which must be submitted to the EPA as a component of the **Annual Report**.
- 6.7 Hazardous waste storage containers shall be inspected weekly for signs of leakage, deterioration, or corrosion and damaged containers **must be replaced immediately**. A summarised inspection report shall be compiled and made available for inspection by the EPA upon request.

7.0 WASTE MANAGEMENT

- 7.1 In accordance with the **Environmental Protection (Litter Enforcement) Regulations, 2013**, promote good sanitation and solid waste disposal practices on site.
- 7.2 Covered garbage receptacles shall be placed upon impervious bases at strategic locations, both within and outside the facility.
- 7.3 Burning of waste is **strictly prohibited**. Solid waste shall be disposed by an EPA Authorised Waste Disposal Company.
- 7.4 Promote waste minimisation and the reuse and/or recycling of waste and other materials where practical.
- 7.5 Good housekeeping, sanitary, and hygienic practices shall be maintained at all times. The facility's drains and surroundings shall be kept free of vegetation and litter.
- 7.6 Waste collection areas shall be kept clean. Dry methods shall be used when cleaning around waste handling and disposal areas (e.g., sweeping, use of absorbents).
- 7.7 Maintain the septic tank system onsite. Septic Tanks at all times shall be accessible for cleaning and de-sludging. Septic tanks should be installed with a sand and charcoal filter bed, or other appropriate design for further treatment. This must be in accordance with the Guyana National Bureau of Standards Code of Practice for the Design and Construction of Septic Tanks and Associated Secondary Treatment and Disposal Systems.

- 7.8 Any modification to the Septic Tank (s) 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.

8.0 COMPLIANCE MONITORING AND REPORTING

- 8.1 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.
- 8.2 Monitor the implementation of the conditions of this Permit, insofar as they involve adherence by your employees and all third parties under your direction.
- 8.3 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.
- 8.4 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.
- 8.5 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).
- 8.6 Submit an **Annual Report** to the EPA on your compliance with this Environmental Permit on or before **March 31, each year**.
- 8.7 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.
- 8.8 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.

- 8.9 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.

9.0 INSTITUTIONAL AUTHORITY/ LIABILITIES

- 9.1 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.
- 9.2 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.
- 9.3 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.
- 9.4 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.
- 9.5 The Permit Holder shall be liable to compensate any person who suffers any loss or damage as a result of contravening conditions 9.3 and 9.4 of this Environmental Permit, pursuant to s. 19 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.
- 9.6 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, ultrahazardous substances, chemicals or otherwise, and shall be rendered liable to prosecution and to penalties prescribed under the Environmental Protection Act and Regulations.
- 9.7 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.
- 9.8 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.

- 9.9 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.
- 9.10 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, and the Environmental Protection (Amendment) Act, 2005, and Environmental Protection (Authorisations) Regulations, 2000.
- 9.11 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.
- 9.12 The EPA has the right to modify, cancel or suspend this Permit for breach of any of the terms and conditions contained herein.
- 9.13 **This Environmental Permit is not the final consent; all relevant Permissions should be obtained from other regulatory bodies for continued operation.**
- 9.14 This Environmental Permit is effective for the period stipulated herein; **October 2024 to September 2029.**
- 9.15 This Environmental Permit (renewed) shall remain valid until **September 30 2029**, 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.
- 9.16 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 **March 31, 2029.**
- 9.17 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.

Environmental Permit (Renewed) -Ref No. 20181101-TMCMF

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

- 9.18 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  on behalf of the Environmental Protection Agency.

Kemraj Parsram
Executive Director

Date

24.10.24

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

NAME:	Saudia Ferouz
DATE:	18-03-2025
SIGNATURE:	Saudia Ferouz
DESIGNATION:	Manager





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