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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)

Reference No.:	20240222-RALAP
Fee:	Small (C2) – US \$1,600 (2 years), i.e. US \$800 per year
Fees Paid:	USD 1,600 (October 2024 – September 2026)

Addressee(s):

Mr. Rondhall Anthony Lewis

Proprietor

RL Contracting

Lot 131, Area H, Church Street

Albion, Corentyne

Berbice

Activity:

Operation of an Asphalt Drum Mix Plant (Asphalt Plant)

RL Contracting, 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 an Asphalt Plant, situated at Track B, Tarlogie, Corentyne, Berbice, hereinafter referred to as the "Project" in a manner indicated in the Application for Environmental Authorisation submitted on February 22, 2024, and subject to the terms and conditions set forth herein under the Environmental Protection Act, Cap. 20:05, existing and/or forthcoming regulations made under the said Act, and/or any applicable laws, best practices, guidelines, and standards relevant to this Project.

Terms and Conditions for the operation to be adhered to by the Permit Holders, his servant(s), agent(s), and/or sub-contractor(s):

1.0 GENERAL:

1.1. The Permit Holder shall make an application to the Agency to vary this Environmental Permit in instances where it becomes necessary to:

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

- 1.1.1. Change the construction, operation, structure, or layout of the facility and all associated buildings;
- 1.1.2. Change equipment, machine, apparatus, mechanism, system, or technology serving the facility;
- 1.1.3. Change the position and design of any outlet at the point or points of discharge of effluents; or
- 1.1.4. Affect any other change outlined in 20(3) of the Environmental Protection (Authorisations) Regulations.
- The Permit Holder shall designate an employee to the role of an Occupational Health and Safety (OHS)/Environmental Officer to be responsible for the implementation and coordination of all safety requirements, and terms and conditions stipulated in this Permit, as well as compliance monitoring with the preparation of all required reports. The Agency shall be notified **within 21 days** of any change in representative.
- The Permit Holder shall submit an **Environmental Assessment and Management Plan (EAMP)** for the operation of the Asphalt Plant to the EPA for approval by **January 31**, **2025**. The Plan shall also include but not be limited to the following:
 - 1.3.1 Environmental Policies and Guidelines
 - 1.3.2 Environmental Training and Awareness Plan
 - 1.3.3 Environmental Compliance Training
 - 1.3.4 Environmental Supplier/Contractor Engagement Plan
 - 1.3.5 Environmental Monitoring and Reporting Plan.
 - 1.3.6 A Grievance Mechanism
- 1.4. The Permit Holder <u>shall</u> comply with all of the guiding principles and measures submitted as a component of the required <u>Environmental Assessment and Management Plan (EAMP)</u>, in keeping with <u>Condition 1.3</u> above; and/or any revised <u>EAMPs</u> or <u>Best Management Practices</u> recommended by the EPA from time to time.
- 1.5. The Permit Holder <u>shall</u> as a component of his Grievance Mechanism, a reporting mechanism (Forms, etc.) to allow stakeholders to register their concerns regarding the operation of the Project. A copy of the reporting mechanism shall be submitted to the Agency by **January 31, 2025.**
- 1.6. The Permit Holder shall 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,
 - 1.6.1. 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.

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- 1.6.2. All firefighting equipment MUST be regularly maintained and/or serviced and training, on the use of all equipment, MUST be provided to all employees.
- 1.7. Maintain a vegetative buffer zone around the perimeter of the Project to mitigate the impacts of noise and dust on the surrounding environment.
- 1.8. The Permit Holder shall install and maintain post-hazard and warning information in the work area.
- 1.9. The Permit Holder shall submit, for the entire operation in keeping with **Conditions 5.7 and 6.10**, monitoring plans for Air Quality and Water Quality assessments the Best Available Technology (BAT), to the EPA by **January 31, 2025.**
- 1.10. The Permit Holder shall ensure that all equipment used in the Project shall be monitored and maintained in accordance with the manufacturer's specifications. A monitoring checklist shall be established, maintained, and submitted to the Agency as a component of the Project's **Annual Report**.
- 1.11. The Permit Holder shall submit to the EPA a completed updated and approved standard (dimensions 34 inches x 24 inches) engineer's site plan showing the layout of the entire operation by **January 31, 2025.**

2.0 TRAFFIC MANAGEMENT, TRANSPORTATION AND PUBLIC SAFETY

- 2.1 The Permit Holder shall make all necessary precautions to minimise potential adverse impacts on Public Health and the Environment in the transport, storage, and handling of aggregates (including crusher run, siftings, and sand that will emanate as a result of the Operation of the Asphalt Plant.
- 2.2 The Permit Holder shall ensure that Contractors adhere to a site-specific Traffic Management Plan, to ensure that suitable provisions are made to accommodate all vehicular and pedestrian traffic safely with a minimum of inconvenience through and around the construction works.
- 2.3 The Permit Holder shall notify the member of the public or community of the estimated duration of the project, estimated times of works, and expected difficulties that may occur as a result of construction activities (eg. road construction) at least **two (2) weeks** in advance.
- 2.4 The Permit Holder shall ensure that access is provided to all properties adjacent to the work site for the duration of construction-related activities.
- 2.5 The Permit holder shall ensure that the treys of all trucks are covered at all

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times during the transportation of aggregate stockpiles to the facility to eliminate fugitive dust emissions.

The Permit Holder shall ensure that adequate traffic control devices, signage, guardrails, and warning tape, are installed at work sites. Additionally, ensure that a speed limit is enforced to control traffic speed within construction zones and operation areas of the Asphalt Plant.

3.0 EMPLOYEES' SAFETY AND HEALTH

- 3.1 The Permit Holder shall ensure there are qualified emergency responders on duty during every shift.
- The Permit Holder shall adhere to the requirements of the Occupational Health and Safety Act, Cap 99:10, Laws of Guyana.
 - 3.2.1 The Permit Holder shall maintain restrooms/areas, waste disposal, and sanitary facilities for workers.
 - 3.2.2 Employees shall be equipped with Personal Protective Equipment relevant to occupational tasks. The following Personal Protective Equipment should include but not be limited to:
 - i. Safety helmets;
 - ii. Protective respiratory devices that meet requirements of U.S OSHA Respiratory Protection Standard or local equivalent;
 - iii. Safety boots with ankle support;
 - iv. Gloves with reinforced palms and fingers;
 - v. Non-snag outer clothing appropriate to the prevailing weather conditions and high-visibility clothing; and
 - vi. Eye protection; tightly fitted safety goggles.

5.0 AIR QUALITY MANAGEMENT AND NOISE ABATEMENT

The Permit Holder shall strictly comply with the Environmental Protection (Air Quality) Regulations, 2000, and the Environmental Protection (Noise Management) Regulations 2000.

The Permit Holder shall monitor noise emissions to determine compliance with the **Guyana National Bureau of Standards (GNBS)** Guidelines for Noise Emissions into the Environment. Sound levels from noise-making devices shall not exceed the limits below, at a distance of 15 metres (50 ft) from the source or 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))

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- 5.2 The Permit Holder shall locate generators away from communal areas to minimise adverse fumes/soot impacts on the contiguous areas.
- 5.3 The Permit Holder shall ensure that all sound-making devices such as generators, machines, etc., are suitably equipped with silencers or mufflers to reduce noise emission levels and are placed on a foundation properly designed to ensure effective damping of vibrations. Additionally, ensure adequate equipment maintenance is provided and obsolete tools and equipment are replaced.
- The Permit Holder shall ensure that emissions from equipment/ generators are in accordance with the World Health Organization (WHO) Air Quality Guidelines for Particulate Matter in the Environment, not exceeding the limits below:
 - **PM**_{2.5}: 10 μ g/m³ annual mean 25 μ g/m³ 24-hour mean
 - **PM**₁₀: 20 μg/m³ annual mean 50 μg/m³ 24-hour mean
- 5.5 Comply with the World Health Organisation (WHO) Air Quality Guidelines for Air Pollutants in the Environment, not exceeding the limits below, and not limited to the list of pollutants:
 - CO 9 ppm (8h)
 - $H_2S 10 \text{ ppm } (8h)$
 - NO₂ 0.1 ppm
 - VOC 100 ppm
- 5.6 Conduct Air Quality Monitoring as per **conditions 5.5 and 5.6** quarterly.
 - 6.7.1 All results from quarterly assessments shall be submitted to the EPA for review and feedback **within 30 days** following completion of assessments.
- 5.7 The Permit Holder shall ensure that aggregate stockpiles are protected, by tarpaulin and/or permanent cover and windbreaker from wind dispersal throughout the project site and beyond.
- 5.8 The Permit Holder shall ensure that all vehicles transporting raw materials to the site and finished materials from the site are covered.
- The Permit Holder shall ensure that measures to prevent pollution that shall include but not limited to:
 - 5.9.1 Good housekeeping practices to avoid or minimize the accumulation of dusty materials that have the potential to become airborne, and

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prompt immediate cleanup of spilled or accumulated materials.

- 5.9.2 Ensuring that all production machinery and equipment is serviced on a regularly scheduled basis per manufacturer's specifications and upgraded, if necessary, in order to meet minimum particulate emission criteria levels; and,
- 5.9.3 Ensuring implementation of operational procedures for equipment and maintenance operator training are provided to ensure efficient performance of the equipment.

6.0 SOIL AND WATER QUALITY MANAGEMENT

- 6.1 Strictly adhere to the provisions of the **Environmental Protection (Water Quality) Regulations**, 2000.
- 6.2 Store temporary stockpiles of construction materials including excavated waste in a secured, designated area, and protected from wind and water erosion. Materials should not be placed within 10 m of a watercourse or drain.
- Avoid soil and water contamination from fuel, grease, waste oils, and other petroleum products. Store all oils, fuel, paints, 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.
- 6.4 Maintain all surface drains ensuring that it is clear and free flowing and monitor regularly for blockage of same and immediately clean drain/canal if the blockage is discovered.
- 6.5 The Permit Holder shall not discharge effluent directly into receiving waters without prior treatment.
- 6.6 The Permit Holder shall maintain the sediment pond on site to collect sediments from the operations.
- 6.7 A freeboard of 0.5 metres shall be maintained at the storage reservoir to prevent the direct discharge of grout into the environment.
- 6.8 The Permit Holder shall install and maintain oil-water separators at strategic locations on the storage facility through which all effluents shall pass before the final discharge.
- 6.9 The Permit Holder shall maintain the integrity of the existing waterways at all times. Discharges into the environment shall be in accordance with the Guyana National Bureau of Standards (GNBS) *Guidelines for Industrial Effluent Discharge into the Environment*. The following are the allowable limits for this type of project and shall not exceed:

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- i. Total Suspended Solid (TSS) < 100 mg/L;
- ii. Oil and Grease < 10 mg/L; and
- iii. Total Petroleum Hydrocarbon (TPH) <40 mg/L.
- 6.10 Monitor the parameters above on an annual basis and submit the results to the Agency as a component of the Annual Report. Samples shall be taken from a point after the oil-water separator but before the drainage system. Samples shall be analyzed by a certified laboratory.

7.0 FUEL, WASTE OIL, AND HAZARDOUS WASTE/MATERIAL MANAGEMENT/GENERAL WASTE MANAGEMENT

- 7.1 The Permit Holder shall strictly adhere to the provisions of the Environmental Protection (Hazardous Waste Management) Regulation 2000.
- 7.2 The Permit Holder shall submit recent copies of the **Guyana Energy Agency Licence** and **Petroleum Licence** for fuel storage at the location, to the EPA as a component of its Annual Report or upon request.
- 7.3 The Permit Holder shall ensure that waste oils recovered from the oil-water separator or the servicing of generators are stored in a covered bunded area to minimize adverse impacts on the environment in the event of a spillage.
- 7.4 The Permit Holder shall ensure that all chemicals used as part of the process are handled, stored, and disposed of in accordance with the Material Safety Data Sheet (MSDS)/ Safety Data Sheet (SDS) and that copies of MSDS/SDS sheets are located in central areas accessible to all staff on site and employees are aware of same.
- 7.5 The secondary containment (bunded area) shall be maintained to minimise the spread/ release of liquid material spillage occurring within the storage area. The secondary containment wall shall possess the following characteristics:
 - i. The capacity of the secondary containment facility shall be equal to 110% of the greatest volume of liquid stored within the largest storage container.
 - ii. The walls of the secondary containment facility shall be constructed of earth, steel, concrete or solid masonry.
 - iii. Cracks and seams shall be sealed to prevent leakage.
- 7.6 Secondary containment, drip trays, or other overflow and drip containment measures shall be installed and maintained at connection points or other possible overflow points.

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- 7.7 The Permit Holder shall ensure that oil/fuel-contaminated absorbent materials are appropriately stored by double wrapping them in heavy-duty garbage bags. All contaminated absorbent materials shall be disposed of at an authorized Hazardous Waste Disposal Facility.
- 7.8 The Permit Holder shall store all fuel away from ignition sources and have "**No Smoking**" signs posted where fuel is handled or stored.
- 7.9 The Permit Holder shall ensure that fuel/lubricants including waste oils shall not be drained from the equipment onto the ground or into waterways.
- 7.10 The Permit Holder shall keep on-site books, documents, records, or things showing, as the case may be:
 - The amount of hazardous wastes generated stored, treated, transported, or disposed of.
 - The dates are pertinent to the activities referred to above.
 - Signed copies of manifests.
 - Records of test results and/or waste analyses.
 - And any information the Agency may require from time to time.
- 7.11 The Permit Holder shall ensure that all hazardous waste shall be treated and/ or disposed of by an Agency authorised Hazardous Waste Disposal Facility. All hazardous waste treatment and disposal shall be documented on a Waste Manifest Form which shall be submitted to the Agency as a component of the Annual Report.
- 7.12 The Permit Holder shall maintain a septic system on-site at all times. The septic tank should not be located within 1.5 m of a building or property boundary and should be accessible for cleaning and de-sludging. Any modification to the Septic tank 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.
- 7.13 The Permit Holder shall promote waste minimization and the reuse and/or recycling of waste materials and other suitable materials where practical. Topsoil/overburden and other inert construction waters/materials should be reused, e.g. for reclamation/landscaping after construction works are completed.

8.0 SPILLS AND EMERGENCY MANAGEMENT

8.1 The Permit Holder shall 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).

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- 8.2 All near misses, spills, and unwanted/accidental discharges, **amounting to less than imperial five (5) gallons**, must be recorded and reported to the Agency as a component of the Annual Report.
- 8.3 Discharges of contaminants amounting to **five (5) imperial gallons or more** must be reported to the Agency by submitting an "Incident Notification Form for Spills in Onshore Operations" using the most recent template provided by the Agency, **within forty-eight (48) hours** of the incident. A follow-up incident notification form shall be submitted **within seventy-two (72) hours** of the submission of the initial notification form (a total of five days) after the discharge of the contaminants.
- 8.4 The Permit Holder shall establish procedures for analysing accidents and failures to determine the causes of the failure and minimize the possibility of a recurrence. This information shall be made available to the Agency upon request.
- 8.5 An electronic shutdown system shall be maintained as a primary emergency response mechanism, along with one or more suitable leak detection mechanisms.
- 8.6 The Permit Holder shall provide a fully equipped first aid kit at all primary work sites and ensure that functional communication and transportation systems are in place to respond to emergencies.
- 8.7 The Permit Holder shall submit an Emergency Response Plan (ERP) for the entire facility, inclusive of the pipeline system. The ERP shall contain, but may not be restricted to the following:
 - i. Spill detection and mitigation procedures;
 - ii. 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 organizations;
 - vi. Training procedures;
 - vii. A list of equipment to be utilized;
 - viii. Testing procedures to ensure that the equipment to be used remains in working condition; and
 - ix. Clean up and hazardous waste disposal procedures.
- 8.8 The Permit Holder shall annually simulate the entire ERP with relevant stakeholders as directed and/or approved by the Agency. The Agency reserves the right to attend any exercise organised in accordance with this Condition.
- 8.9 The Permit Holder shall produce appropriate documentation, to the EPA, evidencing the conduct of the exercises required by Condition 8.8. The documentation must be submitted no later than thirty (30) calendar days

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following the emergency response exercise and shall include information detailing the:

- i. Type of exercises;
- ii. Date and time of the exercises;
- iii. Description of the exercises;
- iv. Objectives met; and
- v. Lessons learned.

9.0 COMPLIANCE MONITORING AND REPORTING

- 9.1 The Permit Holder shall 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.
- 9.2 The Permit Holder shall notify the Agency within **twenty-one (21) days** in the event of death, bankruptcy, liquidation or receivership of the Permit Holder or if the Company becomes a party to an amalgamation.
- 9.3 The Permit Holder shall 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).
- 9.4 The Permit Holder shall submit an **Annual Report** to the Agency containing the information required under this Environmental Permit on or before **March 31**, of each year.
- 9.5 The Permit Holder shall report to the Agency any non-compliance with the Environmental Permit:
 - 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.

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10.0 INSTITUTIONAL AUTHORITY/LIABILITIES

- 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.
- 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.
- 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 minimise any resulting adverse effect, pursuant to s. 19 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.
- 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 (Renewed), pursuant to s. 19 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.
- The Permit Holder shall be liable to compensate any person who suffers any loss or damage as a result of the contravention of the conditions of this Environmental Permit (Renewed), pursuant to s. 19 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.
- 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.
- 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.
- 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.
- 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

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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.

- 10.10 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 its regulations.
- 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.
- 10.12 The EPA has the right to modify, cancel or suspend this Permit for breach of any of the terms and conditions contained herein.
- This Environmental Permit (Renewed) is not the final consent; all relevant Permissions should be obtained from other regulatory bodies for continued operation.
- 10.14 This Environmental Permit is valid for the period stipulated herein (October 2024 September 2026).
- This Environmental Permit shall remain valid until **September 30**, **2026**, unless otherwise suspended or revoked 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.
- 10.16 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 **March 31**, 2026.
- Any late submission of renewal application after the specified date as stated above, the agency 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 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.

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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 any other applicable Laws of Guyana.

Signed by	on behalf of the Environmental Protection Agency. Kemraj Parsram
	Executive Director
	Executive Divertor
Date	22-10.2024

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

NAME:	RONDHALL LEWIS
DESIGNATION:	OWNER
SIGNATURE:	Pei
DATE:	2024.10.5 RIL



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Suyana Identification Card

Forenames RCNDHALL ANTHONY

Sex IN Date of Birth 14 Dec. 1984
Nationality
GUYANESE
Date of Issue 13 Oct 2015

Signature Residuelt A. Francisconity No. 15772411

Environmental Protection Agency
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Replacement

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Distinguishing Merks

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