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Tuesday, February 22, 2022

The Environmental Assessment Board
C/o Executive Director– Environmental Protection Agency
Ganges Street,
Sophia, Georgetown,
Guyana.

Dear Sir/Mam,

RE: Appeal against the Non-Destructive Testers Limited (Guyana) Inc.
Environmental Impacts Screening Report -
– Storage of Sealed Radioactive Sources, to be located at Lots 1 and 2, Thuiste Te
Coverden, East Bank Demerara Guyana

I am once again, strongly protesting against the Environmental Protection Agency's Environmental screening and judgement as stated on your website: www.epaguyana.org

Please note following serious concerns, stated in bold in the parentheses below:

1. BACKGROUND TO THE PROJECT

Non-Destructive Testers Limited (Guyana) Inc. (NDTL) has submitted an application for Environmental Authorization to operate and store Industrial X-Ray and Gamma Ray Equipment. The tools are used to examine subsurface discontinuities (such as voids, cracks, porosity and inclusions, etc.) in castings and weldments, by using the technique of radiographic exposure and interpretation (**When was this application submitted, or resubmitted? Were Coverden residents and those of neighboring villages consulted about this “new” proposal?**)

2. SITE DESCRIPTION

The source storage facility will be located at 1-2 Coverden, East Bank, Demerara. The area is generally flat and is within the developed compound of the 112, 774 sq ft facility that currently houses Guyana Oil and Gas operations as well as operations of Guyana National Hardware. The facility has several bonds that support various activities associated with the oil & gas industry. The source storage facility is at least 100 ft away from the East Bank Demerara main access road. The site requires no major infrastructure and utility development as well as no

major earthworks and waterworks prior to commencing the **project**. **(Is this location “proposed” because there is no plan for developmental for infrastructural development of any sort at Coverden or on the East Bank of Demerara? What are the “benefits” to Coverden Residents and our surrounding neighboring villages?)**

3. ENVIRONMENTAL IMPACT SCREENING

- a. The EPA’s screening concludes that the primary risk of this project is radiation exposure **(Is this Primary risk not serious enough not to consider a proposed Coverden location?)**
- b. Persons at risk to radiation exposure include radiation workers and other employees working nearby. **(Who shall be the people “nearby”)**
- c. Radiation exposure is not significant since adequate mitigation measures will be implemented to protect employees and the public. **(How “insignificant” is this radiation exposure proposed to be?)**
- d. These mitigation measures were clearly documented in the Radiation Safety Manual that was submitted along with the application and Project Summary as required by the EPA **(Clear to whom?)**
- e. NDTL will have an emergency response plan, a traffic management plan and a Radiation Safety Officer **(What shall be the emergency and traffic management plan for the only public road leading to and from Georgetown, our only International Airport, Linden; the Demerara River, the residents of Coverden and the neighboring districts?)**
- f. Environmental impacts are not significant since there are no direct discharges or releases to air, soil or water from the operation. **(Please provide the necessary evidence to assure Coverden residents and our neighbors)**
- g. The lead-lined source storage facility is within a built-up area and very far away from the closest protected area. **(Please explain “far away” in this context?)**
- h. No risk to flora and fauna is foreseen. **(Please provide the requisite evidence, and associated case studies?)**
- i. The Demerara River is approximately 0.32 kilometers away from the source storage facility. The operation will not release any effluent in this waterway **(Where shall waste from this plant be disposed? What happens during rainy weather and persistent flooding that this location is known for – do note that this zone is “flat”)**
- j. Transportation of the radioactive materials will be done based on job requirements and at no time sources will be left at a job site. **(What time of the day? What happens during traffic congestions?)**

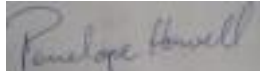
- k. Standard procedure will allow for the source to be returned to the source storage facility on the same day. **(What are the standard procedures referred to here?)**
- l. The vehicles transporting radioactive sources will be conspicuously marked with radiation warning signs at all times. **(Such high commodity visibility may be crime targeted?)**
- m. Noise produced during the activities will be low, intermittent and localized. **(Low to whom? How measured?)**
- n. The operation is not expected to negatively impact the local air quality. **(Expected?????)**

4. EPA CONCLUSION AND RECOMMENDATIONS

- a. The EPA concludes that there are no significant impacts to human health and the environment that will result from the operation of the Source Storage Facility. **(What sort of dialogue was held with the Coverden residents in this regard)**
- b. The potential impact of radiation exposure was thoroughly assessed and the proposed safety and security risk and measures along with monitoring and emergency response procedures were deemed adequate and in keeping with international standards and best practices. **(Concerned Coverden residents asked for the referenced “international standards and best practices” at our meeting with Members of the EPA and Non-Destructive Testers Limited (Guyana) Inc at our lone September 2021 meeting unsuccessfully, and have had no follow up since)**

Fellow Guyanese of the EPA, please do not to permit Non-Destructive Testers Limited (Guyana) Inc. to set up any Storage of Sealed Radioactive Sources at Lots 1 and 2, Thuiste Te Coverden, East Bank Demerara Guyana for the health, safety and wellbeing of all Guyana.

Yours sincerely,



Penelope Howell.