

[REDACTED]

From: McAree, Mark [REDACTED]
Sent: 04 October 2023 16:58
To: Daniel, Naomi
Cc: Nicola Telcik
Subject: RE: Application Bespoke PP3409MHA001 Banbury BAT14

Naomi

Can I just query something in the question, as risk-based is being used in context of the abatement solution at the site, i.e. as to whether it should be linked to the biogas system or odour control unit or similar, based on an assessment of whether the tanks are active. Which is where the risk based approach is being proposed, the risk is around whether this is biomethane at elevated levels, or other compounds. The commitment to covering open top tanks is in the first sentence.

Mark

Mark McAree MCIWM; CRWM | Jacobs | Associate Director Sustainability | Water, Energy and Environment |

[REDACTED]



Please consider the environment before printing this e-mail

From: Daniel, Naomi [REDACTED]
Sent: 04 October 2023 14:46
To: McAree, Mark [REDACTED]
Subject: [EXTERNAL] Application Bespoke PP3409MHA001 Banbury BAT14

Hi Mark,

I hope all is well.

I have gone through the response to the RFI, and we accept the reasoning provided not to model the two smaller boilers at the installation.

I have one further requirement to duly make this application in relation to BAT14d.
We need a commitment in full to BAT14d.

In the BAT assessment for this application, it is stated
“Thames Water commits to covering permitted open top tanks at the facility in accordance with the IED and BAT14. Thames Water will take a risk-based approach, including use of PAS110, to determine our approach to abatement if required for individual tanks at Banbury. Thames Water confirm that our approach to abatement includes use of biogas system if required.”

Your response does not clarify what you mean by “a risk-based approach”. It does not commit to implement BAT 14d and indicates the use of other techniques instead. If alternative approaches to BAT are sought, detailed proposals and designs must be submitted with your application. We cannot permit proposals which consider novel methods without assessment. This response does not provide us with the confidence that you will meet the requirements of BAT14d.

Please can you respond and advise of full commitment to BAT14d for this application.

I appreciate you need sign of for this commitment, so I will provide a deadline of Wednesday 11 October to provide this.

After this date I will be in the position of returning this application.

Please let me know if you have any questions or need anything further.

Many thanks
Naomi

Naomi Daniel

Senior Permitting Officer Ops-RMC-Permitting-Installations

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