

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Dockets TG-220243 and TG-220215

BDI DATA REQUEST NO. 023:

Produce all documents that support your contention that OCC Rejects “when stockpiled in large quantities, are a fire and safety hazard,” as pleaded in paragraph 18 of Jammie’s Answer to Basin Disposal’s Complaint.

Response:

Jammie’s Environmental, Inc. (“Jammie’s”) objects to BDI Data Request No. 023 to the extent that it seeks documents or information not within Jammie’s possession, custody, control or knowledge. Jammie’s is not in possession of documents related to the fire and safety hazard of stockpiled OCC Rejects. The statement in paragraph 18 of its Answer to BDI’s Complaint is based in part on Jammie’s professional knowledge and experience and oral statements made by PCA to Jammie’s where PCA expressed concern over the growing stockpile of OCC Rejects that were not being transported by BDI for disposal.