

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Dockets TG-220243 and TG-220215

BDI DATA REQUEST NO. 027:

Describe Jammie's prior experience "disposing of industrial wastes" as pleaded in paragraph 22 of Jammie's Answer to Basin Disposal's Complaint. Include in your description the following:

- (A) the legal name of each generator of industrial waste for which Jammie's has provided disposal services;
- (B) the location at which Jammie's provided such services, including its physical address;
- (C) the categories of Solid Waste that Jammie's collected, transported and disposed; (e.g., ordinary Solid Waste, hazardous waste, special waste); and
- (D) the type, make, model and year of vehicle or vehicles used to collect, transport and dispose of the waste described in response to Data Request No. 27(b).

Response:

Jammie's Environmental, Inc. ("Jammie's") objects to BDI Data Request No. 027 as overbroad and unduly burdensome because BDI's request is completely devoid of any reasonable time period or scope and is neither relevant to the issues in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence where the subject of this case is Jammie's disposal of OCC Rejects. Without waiving those objections and subject thereto, as stated in paragraph 16 of Jammie's Answer to BDI's Complaint, since 1999, Jammie's has performed cleaning services for industrial and commercial clients throughout the western United States. Incidental to those services, Jammie's transports for disposal solid and liquid process waste, hazardous waste, dangerous waste and/or special waste for its customers. Jammie's does not otherwise dispose of solid waste and does not hold itself out as a solid waste collection company, as those terms are defined in WAC 480-07-041. In total, processing and disposing of solid wastes represents a small fraction of the services Jammie's provides and is done only incidentally. The allegations in BDI's Complaint are the first time any party in any jurisdiction has accused Jammie's of conducting services requiring a solid waste collection certificate.

First Supplemental Response:

Following a meet and confer between the parties on August 11, 2022, and subsequent communications between the parties, without waiving its objections and subject thereto, Jammie's agrees to provide information for work done in BDI's service territory as described in BDI's G-118 Certificate and at any facility that Jammie's serves and will rely upon to support its Application regardless of its location during the time period April 1, 2021 to April 1, 2022.

In response to BDI Data Request No. 027, Jammie's will produce responsive documents detailing work that Jammie's performed for BNSF Railway from March 19 - April 21, 2022. Jammie's vacuumed and hauled polyethylene pellets from a spill that occurred on the railroad tracks/railyard area near 5566 N. Railroad Avenue #4544 in Pasco. As reflected in the attached Special Waste Application, the spilled polyethylene pellets that Jammie's collected and hauled are a special waste. Jammie's transported the pellets in drop boxes using a belt trailer.

Jammie's will further supplement this response to the extent it identifies any additional responsive information.