

DATE PREPARED: July 21, 2022	WITNESS: Charlie Dietrich
DOCKET: TG-220215 and 220243	RESPONDER: Basin Disposal, Inc. and
REQUESTER: Jammie's Environmental, Inc.	Charlie Dietrich

**DATA REQUEST NO. 002:**

Produce all documents relating to BDI's collection, hauling, or disposal of OCC Rejects for PCA.

**RESPONSE:**

Objection. Over broad, unduly burdensome, fails to articulate with reasonable particularity the categories of records sought, not reasonably calculated to lead to the discovery of admissible evidence. This request also seeks records that are subject to work product and attorney client privilege. Additionally, this request seeks information that is strictly relevant to the fitness of the protestant, which is not an issue in application proceedings. *See In Re: Application E-18894 of Carl Oscar Lundell, d/b/a Lundell Trucking, for Extension of Auth. Under Common Carrier Permit No. 36044.*, Order M.V. No. 129479 (Apr. 6, 1984).

Subject to and without waiving the foregoing objections, Basin Disposal responds as follows:

See the documents produced with bates labels **BDI 00001 through BDI 00082.**