

Q:PET:Allen.1-9: Admit that you are not a Vermont licensed professional engineer.

A:PET:Allen.1-9: I object to the entirety of this request because petitioner has exceeded the allowed maximum of 20 questions including sub-parts. Without waiving such objection, I am not a Vermont licensed professional engineer.

Q:PET:Allen.1-10: Admit that you are not a Vermont licensed civil engineer.

A:PET:Allen.1-10: I object to the entirety of this request because petitioner has exceeded the allowed maximum of 20 questions including sub-parts. Without waiving such objection, I am not a Vermont licensed civil engineer.

Q:PET:Allen.1-11: Admit that you are not a Vermont licensed wastewater engineer.

A:PET:Allen.1-11: I object to the entirety of this request because petitioner has exceeded the allowed maximum of 20 questions including sub-parts. Without waiving such objection, I am not a Vermont licensed wastewater engineer.

Q:PET:Allen.1-12: Admit that you have never prepared an application for, or obtained a construction stormwater discharge permit from the Vermont Department of Environmental Conservation. If denied, provide all applications.

A:PET:Allen.1-12: I object to the entirety of this request because petitioner has exceeded the allowed maximum of 20 questions including sub-parts. Without waiving such objection, I have never prepared an application for, or obtained a construction stormwater discharge permit from the Vermont Department of Environmental Conservation.

Q:PET:Allen.1-13: Admit that you have never prepared an erosion prevention and sediment control ("EPSC") plan for a Vermont construction stormwater discharge permit application.

A:PET:Allen.1-13: I object to the entirety of this request because petitioner has exceeded the allowed maximum of 20 questions including sub-parts. Without waiving such objection, I have never prepared an erosion prevention and sediment control ("EPSC") plan for a Vermont construction stormwater discharge permit application.