

6144 FEDERAL BLVD., SAN DIEGO — PUBLIC RECORDS FILE

Section 11.70 · United Rentals (North America), Inc. dba Reliable Onsite Services — Sewage Disposal Records

Date	June 30 – July 1, 2026
Agency	County of San Diego DEHQ — Hazardous Materials Division (HMD)
Request No.	Correspondence related to CPRA Request No. 26-3709
Status	OPEN
Description	Email correspondence in which County Hazardous Materials states that sewage / septage falls outside its CUPA jurisdiction and refers the inquiry to other programs. Attached with what the County's produced records show about the facility.

Summary

This is the County DEHQ Hazardous Materials Division (HMD) email correspondence concerning the United Rentals operation at 6144 Federal Blvd. In it, HMD takes the position that sewage and septage are outside its CUPA (hazardous-materials) jurisdiction and refers the inquiry to other programs. The accompanying analysis summarizes only what the County's own produced records show.

Related records (Section 11.70): County DEHQ PRA 26-3709 (request and produced records A.1–A.10); Regional Water Board (Region 9) production; United Rentals sewage hauler permit.

Public record, reproduced for transparency. This slip sheet describes the attached document; it is a factual summary, not legal argument. No violation by any party is alleged. The full document follows.



Darryl Cotton <151darrylcotton@gmail.com>

Sewage hauling and management at United Rentals, 6176 Federal Blvd

6 messages

Wirschem, Leon <Leon.Wirschem@sdcounty.ca.gov>
To: "151darrylcotton@gmail.com" <151darrylcotton@gmail.com>

Tue, Jun 30, 2026 at 10:09 AM

Dear Mr. Cotton

Thanks for speaking with me about the public records request. Please confirm as we discussed that your request is specific to sewage concerns at the United Rentals location and not pertaining to CUPA compliance, hazardous materials and wastes.

If you have evidence of discharge to the Creek, you can report that to various agencies including the stormwater program, regional water board or CalOES spill reporting line 800-852-7550.

For your concerns related to Fire prevention in the city of San Diego could be directed here. Technical Services: SDFDTechServices@sandiego.gov or 619 533-4477.

Best of luck getting this resolved

**Leon Wirschem, SEHS HIRT – [Hazardous Materials Division](#)**

Department of Environmental Health and Quality

County of San Diego

Cell: 858-888-0610

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Darryl Cotton <151darrylcotton@gmail.com>
To: "Wirschem, Leon" <Leon.Wirschem@sdcounty.ca.gov>

Tue, Jun 30, 2026 at 12:47 PM

Hi Leon,

Thank you for the call and for the follow-up.

To confirm regarding the public records request: I'd like it to remain as originally submitted rather than narrowed. My

interest does center on how septage is handled and disposed of at the United Rentals site, but that question overlaps with CUPA compliance and hazardous-materials/waste records — particularly given the on-site holding tank — so I'd ask that the request continue to cover both the sewage/septage handling and disposal records and any applicable CUPA and hazardous-materials records for the location. If a portion needs to be routed to a different division to be fully answered, please let me know and I'll direct it accordingly, but I don't want to drop any category at this stage.

I appreciate the reporting contacts you provided for stormwater, the regional water board, CalOES, and Fire. I'm still gathering and evaluating information and will use the appropriate channel as things become clearer.

[Quoted text hidden]

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Darryl Cotton
619.954.4447

Wirschem, Leon <Leon.Wirschem@sdcounty.ca.gov>
To: Darryl Cotton <151darrylcotton@gmail.com>

Tue, Jun 30, 2026 at 1:21 PM

Sewage does not fall under CUPA authority, it is excluded, as are it's tanks. I'll pass along your information

Leon Wirschem

Supervising EHS/Hazmat Specialist

County of San Diego DEHQ-HMD

Hazardous Incident Response Team

858-888-0610

[Quoted text hidden]

Darryl Cotton <151darrylcotton@gmail.com>
To: "Wirschem, Leon" <Leon.Wirschem@sdcounty.ca.gov>

Tue, Jun 30, 2026 at 1:49 PM

Got it. Thanks

[Quoted text hidden]

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Darryl Cotton
619.954.4447

Darryl Cotton <151darrylcotton@gmail.com>
To: "Wirschem, Leon" <Leon.Wirschem@sdcounty.ca.gov>

Wed, Jul 1, 2026 at 8:17 AM

Leon,

I've been thinking about our conversation yesterday and again would like to thank you for the information and the referral contacts. I want to make sure I've captured your position accurately for the record, and to ask a few follow-ups.

As I understood it: the Hazardous Materials Division considers sewage/septage — and the tanks that store it — excluded from CUPA authority, so HMD will not be exercising jurisdiction over the United Rentals septage operation and holding tank at 6144 Federal Blvd. Please let me know if I've stated that incorrectly.

A few questions so I can direct this to the right place:

1. Since HMD/CUPA doesn't regulate the on-site storage and hauling of this septage, which agency or division does?

2. Separate from how the sewage is classified, my concern with the tank is the gas it's generating — hydrogen sulfide and methane, a toxic and flammable atmosphere — along with corrosion at the vent and hatch. Does HMD or the Hazardous Incident Response Team have any role where a sewage tank creates a hazardous gas condition, or should that go to the Fire Department's Technical Services line you provided?

3. I want to flag a likely records gap up front. The records that would actually establish compliant final hauling, treatment, and disposal of this septage — disposal tickets, hauled-waste manifests, and receiving-facility logs — are ordinarily held by the hauler (United Rentals / Reliable Onsite Services) and by the licensed receiving or treatment facility that accepts the waste, whose identity is currently unknown to me (the "Final Processor"). I recognize the County may not itself hold copies, and I wouldn't expect a records request to produce what the County never received. So: are United Rentals and the Final Processor required to maintain records demonstrating that this septage reaches an approved, licensed facility, and to make them available to the County on request or inspection? Does any County program require or verify proof of compliant disposal? If the County neither holds nor requires such records, please confirm that in writing, so I can identify the agency that does.

Finally, you mentioned you'd pass my information along — could you tell me which division or contact you're forwarding it to?

For clarity, I'm not narrowing my pending records request (DEHQ No. 26-3709); the basis for the exclusion determination and any disposal-verification records are among the records it seeks.

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Darryl Cotton
619.954.4447

Wirschem, Leon <Leon.Wirschem@sdcounty.ca.gov>
To: Darryl Cotton <151darrylcotton@gmail.com>

Wed, Jul 1, 2026 at 3:35 PM

Hi Darryl

I passed your information along to the HMD staff that were asked to provide information to the PRR coordinator for your PR Request.

Wastewater agencies regulate the discharge of sewage wastes, in your case the City of San Diego Public Utilities/Metropolitan Wastewater [Water and Wastewater Facilities | City of San Diego Official Website](#). Fire and Building Codes for your city have authority over the structures in the building, including any tanks. SDFD Technical services is where you should direct the concern for the tank and any vapors created within the tank.

Our Land & Water Quality Division can answer your 3rd question. They also received your PRR. Their contact information is on this page: [Septic Systems](#)

The CUPA programs include oversight and inspections for hazardous materials in certain quantities and generation of hazardous wastes, and even Underground storage tanks of hazardous substances, none of which include sewage. [CUPA](#)

If you have any other questions related to the CUPA, please feel free to reach out to our HMD Duty desk: deh.hmdutyeh@sdcounty.ca.gov or (858) 505-6880.

Any changes from your original request should be posted via the PRR system, not through me as I am not coordinating. I simply reached out to get clarification in the absence of our coordinator to try and minimize unnecessary government time expenditures and ensure you are responded to.

Best of luck getting this resolved.



Leon Wirschem, SEHS HIRT

[Hazardous Materials Division](#)

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Analysis — What this record shows

County DEHQ Hazardous Materials Division (HMD) · correspondence of June 30 – July 1, 2026

This section explains what the attached record shows and why it matters. It describes a public agency's written position and what the County's own produced records establish. It does not allege that any private party has violated the law.

What the correspondence is

An email exchange, June 30 – July 1, 2026, between the requester and the County DEHQ Hazardous Materials Division (HMD) concerning the operation at 6144 Federal Blvd.

HMD's position

In the emails, HMD takes the position that sewage and septage — and the tanks that store them — fall outside CUPA (Certified Unified Program Agency) authority, so the Division would not exercise hazardous-materials jurisdiction over the septage operation. It routes the inquiry to other programs: wastewater-discharge questions to the City of San Diego Public Utilities / Metropolitan Wastewater; the tank structure and its vapors to San Diego Fire-Rescue Technical Services; and the disposal-verification question to the County's Land & Water Quality Division. It asks that any change to the records request be made through the public-records system.

What the County's produced records show

Separately, the County's own inspection records for this facility (produced in PRA 26-3709) document a hazardous-materials history on the petroleum side of the operation. A 2021 inspection (record DEH2011-HUPFP-214482) documented a spill-prevention (SPCC/APSA) violation and aboveground petroleum tanks totaling roughly 3,050 gallons per the County's CERS record, a formal tank closure, and a hazardous-waste manifest for a fuel-and-water mixture. A 2024 inspection documented an expired Unified Program Facility Permit (the hazardous-materials permit, lapsed March 31, 2023), unreported hazardous-materials inventory, a 350-gallon used-oil tank, and an active EPA hazardous-waste identification number.

On disposal records

Every manifest, ticket, and log in the produced set pertains to the petroleum-tank cleanout — not to the porta-potty / FRAC-tank septage. The production contains no manifest, trip ticket, or receiving record for the collected human waste.

Bottom line

HMD's position is that the septage side of the operation is outside its hazardous-materials jurisdiction and belongs to other programs. The County's produced records document a hazardous-materials history on the petroleum side of the facility, but contain no disposal record for the collected septage. Where that waste goes remains unanswered in this production.

position; no violation by any private party is alleged.