

UNITED RENTALS FRAC TANK OPERATIONS REPORT

July 14, 2026

The following images are time/date stamped to provide evidence of how the United Rentals ("UR") FRAC tank, located at 6144 Federal Blvd., San Diego, CA 92114 has been in use during the time photographs were taken in effort to document operational processes. What will be seen are the noteworthy changes in operational characteristics from before multi-agency reports that were generated by Darryl Cotton at the neighboring 6176 Federal Blvd. property of the FRAC tank being used by UR as a main holding tank for their vacuum trucks discharge of septage and how that operation currently attempts to align with their DEPARTMENT OF ENVIRONMENTAL HEALTH & QUALITY LAND AND WATER QUALITY DIVISION ("DEHQ") 2025 APPLICATION FOR ANNUAL SEWAGE HAULER PERMIT which at the top of that application defines their operations "TO ENGAGE IN THE CLEANING OF SEPTIC TANKS, CHEMICAL TOILETS, CESSPOOLS, OR SEEPAGE PITS AND THE TRANSPORTATION AND DISPOSAL OF CLEANING" (See the "2025 Hauler Application," Attachment 1).

Beginning on May 27, 2026, Cotton began taking pictures of the UR vacuum trucks from the roof of his property which showed these vacuum trucks pulling up to the FRAC tank and discharging septage from their tanks. Based on their 2025 Hauler Permit, these were the trucks that would have been engaged, under permit, to haul that septage.

What needs to be understood is that the 2025 Hauler Application lists 15 UR trucks that engage in the collection, hauling and discharge of septage. It was signed by UR agent Jeffrey Walker on September 18, 2024, directly above a printed certification declaring "under penalty of perjury that to the best of my knowledge and belief, the information I have provided is true and accurate" — and it identifies the trucks that will be discharging septage into Pump Station #1 with an alternate destination in Fountain Valley. With today's report we can now report that UR has made reference to DEHQ that they have 3 different discharge locations for their trucks and 1 of those locations does not take septage.

- **Facility authorization.** Naming Pump Station #1 and the Orange County Sanitation District as disposal sites presumes United Rentals actually holds the City of San Diego IWCP trucked-waste hauler permit and/or the OCSD wastehauler permit. Whether it holds either is a matter of record — and the City's IWCP has already stated that this site does not discharge to the sewer. If United Rentals lacks those facility permits, it declared disposal points it was not authorized to use.
- **Independent third-party records.** Neither facility accepts waste on the honor system: Pump Station #1 generates an operator-cosigned voucher for every load, and OCSD logs every discharge. Both are public agencies subject to the California Public Records Act, so the receiving records can be requested directly from the City and OCSD for any United Rentals / Reliable Onsite Services discharges — including plates 3533049 and 95407F4 — from 2023 to present. If the septage went where the permit says, it will appear in those records; if it does not, that is an affirmative absence at the two places it was declared to go.

- **The declared destinations do not reconcile.** The permit names Pump Station #1 and OCSD in Fountain Valley, while the County's own account (McCullough) described the tank contents as going "mainly to the El Cajon dump station" — a location that does not accept private-party septage and appears on neither the permit nor the City/OCSD list of receiving stations. Three different destinations, none reconciling, is itself a flag. (See the DEHQ–RWQCB communication, Attachment 2.)

One point on the truck count before the roster itself. United Rentals' 2025 DEHQ permit lists 15 trucks at the Federal Blvd. yard (CHART ONE, below). The County has elsewhere described the operation differently — as "16 septic pumping trucks that operate out of this location," and, to the Regional Water Board, as part of a "total of 23 trucks with yards in both Vista and San Diego" (Attachment 2). The larger number reflects the company's whole fleet across two yards and can be reconciled with the 15 permitted here; it is set out only so the reader is not surprised to find 15, 16, and 23 all appearing in the record for the same operator, and so that each figure is checked rather than assumed.¹

CHART ONE: United Rentals / Reliable Onsite Services — Permitted Hauler Fleet & Declared Septage Capacity

Source: County of San Diego DEHQ, 2025 Sewage Hauler Truck Inventory (application dated 2024-09-18, LSHOP-000063; signed under penalty of perjury). For split-tank trucks, Waste/Septage = larger compartment, Cleaner/Fresh = smaller compartment (per operator's own truck lettering, e.g., "1100 WASTE / 500 FRESH").

#	DEHQ Decal #	Make	License Plate	Total Tank (gal)	Waste / Septage (gal)	Cleaner / Fresh (gal)	DEHQ Notes
1	025031	Peterbilt	3224519	1,600	1,100	500	
2	025032	Peterbilt	3224527	1,600	1,100	500	
3	025033	Peterbilt	3213370	1,600	1,100	500	
4	025034	Hino	3145317	995	695	300	Slider tank; DEHQ hand-noted "please confirm capacity"
5	025035	Ford	76662Y2	1,150	800	350	"In the shop"
6	025036	Hino	01851Y2	1,600	1,100	500	
7	025037	Isuzu	3778078	995	695	300	
8	025038	Mack	3710607	1,600	1,100	500	
9	025039	Mack	3710606	1,600	1,100	500	
10	025040	Mack	3482874	995	695	300	Slider tank
11	025041	Isuzu	3791919	995	695	300	
12	025042	Peterbilt	3533049	4,000	4,000	0	NOT split — the only dedicated waste hauler; DEHQ noted "blue" mechanical fluid dripping on main valve
13	025043	Mack	3482510	1,600	1,100	500	
14	025044	Mack	3482288	1,600	1,100	500	Brand new
15	025045	Mack	3284107	995	695	300	Brand new
TOTAL — 15 permitted trucks				22,925	17,075	5,850	

Fleet septage (waste) capacity EXCLUDING line 12 (the collection trucks that feed the tank): 17,075 – 4,000 = 13,075 gal — more than 3× the single 4,000-gal hauler's capacity.

Permit-declared disposal sites: (1) Pump Station #1, E. Harbor Dr, San Diego; (2) Orange County Sanitation District, Fountain Valley. No on-site holding tank appears anywhere on the permit.

Prepared 2026-07-14 from the DEHQ 2025 inventory. Neutral record; figures are the operator's own declared capacities. Not legal advice.

¹ The 15-truck figure on Application LSHOP-000063 is the Federal Blvd. yard inventory; the form directs that a separate application be completed for each location where vehicles are stored, and United Rentals operates a second yard in Vista, so DEHQ's 23-truck total (15 here plus the Vista yard) reflects that per-yard structure. Cotton has not sought United Rentals' Vista-yard sewage hauler records. That the 23-truck total is DEHQ-verified is itself reason for a closer inspection of the Vista operation in light of what the Federal Blvd. site has revealed — particularly because the Federal Blvd. permit names the Fountain Valley (OCSD) facility, approximately 84 miles away (per Cotton's Disposal-Facility Distance Reference, July 10, 2026), as its alternate disposal site, while United Rentals' Vista yard lies roughly 42 miles from San Diego (city-to-city distance; the exact Vista yard address has not been obtained) — half the distance. Declaring an 84-mile alternate when a company yard sits half as far makes little sense on its face; it is one more anomaly worth resolving.

When looking at the 2025 Hauler Application, it can be seen that DEHQ inspectors did a very thorough job of making hand written notes next to the vehicles they were inspecting. It is unknown if that inspection took place at the UR 6144 Federal yard but if it did, it seems implausible that the FRAC tank — which is a trailer and could have been used to transport larger volumes of septage to an approved discharge station — was NOT LISTED anywhere on that report. That was an operational omission that neither UR nor DEHQ can be excused on.

The size of the FRAC tank does not hold still on the agency record, and the disagreement is the County's own. The County's Hazardous Materials Division, inspecting the site on July 8, 2026, described an "11,000-gallon frac aboveground storage tank" (Attachment 4). Nine days earlier, on June 30, 2026, the County's Land and Water Quality Division told the Regional Water Board the tank holds "40,000 gallons" (Attachment 2) — nearly four times larger. (An earlier estimate drawn from photographs had put it near 21,000 gallons.) A four-fold spread on the volume of a single, stationary tank — from the same County, nine days apart — is reason to treat every figure in this matter with caution. Whichever controls, this is an industrial-scale septage vessel, huge, taking up a corner of their yard. It could not, nor should it, have been missed in any on-site inspection where septage handling was the purpose of said inspection. On UR's part, the failure to list the FRAC tank with DEHQ was deliberate. In defense of DEHQ, the FRAC tank operation was not even mentioned.

The FRAC tank has not moved for years, and the fact that it has been an integral part of UR's mass storage of septage is in and of itself the number one reason that UR must produce manifests of all the vacuum trucks listed in the 2025 Hauler Application to confirm where up to 17,075 gallons per day (see Attachment 3, CHART ONE) of septage ended up being discharged. Based on the total gallons of septage these trucks could hold and the total number of gallons per week / month / year these trucks could conceivably have to haul and discharge, on just a single-pass-per-day calculation that amount comes to:

Per Day: 17,075 gallons

Per Week: 119,525 gallons

Per Month: 478,100 gallons

Per 29 months: 13,864,900 gallons

What we can determine, by the CHART ONE totals, is that by UR's own submission there are 17,075 gallons of septage that must be accounted for. The question becomes how much septage came from the FRAC tank. In the DEHQ communication with RWQCB (Attachment 2), the County describes the tank's contents being transferred into a 4,000-gallon trailer and hauled "mainly to the El Cajon dump station" — a location that does not accept private-party waste discharge.

That 4,000-gallon unit is where this record and the permit diverge, and the divergence is worth stating plainly. CHART ONE lists exactly one 4,000-gallon non-split hauler among United Rentals' 15 permitted trucks — line 12 (decal 025042, California plate 3533049). The 4,000-gallon unit photographed drawing down the tank in FIGURES 8 and 9, however, carries California plate 95407F4, which does not match line 12. Its "Capacity Waste - 4000" placard and single, non-split tank make it a dedicated bulk septage hauler: a unit with no fresh-water or cleaner compartment, and therefore no

field-service function, whose only purpose is to move collected septage in bulk — which at this yard means emptying the FRAC tank. Whether the photographed 95407F4 unit is line 12 under a separate registration, a separately registered trailer, or a 4,000-gallon unit that does not appear on the permit at all cannot be determined from the plate. This report is limited to the 2025 permit record (LSHOP-000063, Attachment 1); should United Rentals' current sewage hauler record not list a 4,000-gallon bulk unit bearing plate 95407F4, that absence would itself be significant.

The point is not academic, because bulk septage does not move without a paper trail. Trucked-waste disposal turns on chain of custody: each load delivered to a receiving facility is to be manifested with its origin, volume, hauler and date, creating an unbroken record from the point of generation to the treatment plant. The facility that accepts this unit's loads therefore holds records stating where each load originated. If those records give the origin as 6144 Federal Blvd., they document the yard being operated as a septage source and transfer point — the use no permit in this record authorizes. If instead the loads are manifested from individual job sites while the septage in fact passed through the on-site FRAC tank first, the manifests do not reflect the actual chain of custody. Those receiving records are held by the disposal facility, are obtainable independently of United Rentals, and are the subject of a pending Public Records Act request to the City of El Cajon.

PHOTOGRAPHIC RECORD — CHANGE IN OPERATIONS

The photographs below document the FRAC tank and the United Rentals servicing yard. Read against their capture dates, they show a change in how the tank was used. In the earlier images the tank is in its working configuration — manway open, suction hose deployed, collection trucks drawn up to it. In the later images the same tank sits idle: its fittings webbed over and corroding, and the vacuum trucks repositioned away from it. That change tracks the period in which the multi-agency review of this site began.



FIGURE 1. Two of United Rentals’ permitted vacuum trucks — a “Reliable” unit and an “Onsite Services” unit — tied into the FRAC tank at the same time on a clear day, the top manway hatch standing open and suction hose deployed. More than one permitted hauler feeding a single on-site tank at once is consistent with a routine mass-storage operation, not an occasional one-off transfer, and it forecloses any suggestion that the tank saw only a single 4,000-gallon load. These are the same vacuum trucks the 2025 permit obligates to discharge at Pump Station #1 (alternate OCSD); here they are instead offloading into an unpermitted tank at the yard, feet from the shared property line. *Photographed May 27, 2026 at 3:31 p.m.*



FIGURE 2. Street-level view into the 6144 Federal Blvd. yard: a Reliable / Onsite Services (United Rentals) vacuum truck, stored portable toilets, and intermediate bulk containers staged in the open yard, with the green FRAC-tank enclosure along the United Rentals perimeter wall at right. The photograph fixes the tank's location within the active servicing yard, feet from the shared property line. *Photographed May 27, 2026 at 5:45 p.m.*



FIGURE 3. Top of the FRAC tank on an overcast day. The manway hatch and its collar are heavily rusted and a PVC vent line rises from the deck; a Reliable vacuum truck stands alongside. Corrosion at the tank's roof and vent — its pressure-relief points — is the subject of the separate FRAC-tank roof-vent corrosion analysis and bears on the safety of storing septage in this vessel. *Photographed June 18, 2026 at 11:01 a.m.*



FIGURE 4. Cab-door identification on one of the vacuum trucks — a Peterbilt carrying a stainless Imperial Industries vacuum tank: “Reliable Onsite Services — Operated by United Rentals,” “CDL Required to Operate / Tanker Endorsement Required,” USDOT 899748. That number is United Rentals’ motor-carrier (FMCSA) number — it identifies the company, not the individual vehicle. The 2025 DEHQ permit identifies its 15 trucks by DEHQ decal and California license plate (CHART ONE, Attachment 3), neither of which is legible here, so this unit cannot be matched to a specific permit line from the door markings alone. Whether it is one of the 15 trucks on the permit — or a truck not listed on the permit at all — cannot be determined from this photograph. Either way, it is a United Rentals / Reliable Onsite Services vacuum truck at the 6144 Federal FRAC-tank yard rather than at the Pump Station #1 the permit requires. *Photographed June 26, 2026 at 2:42 p.m.*



FIGURE 5. The same FRAC tank photographed later, its top valve, discharge piping and manway spanned by cobwebs and accumulated pine-needle and paper litter. Undisturbed webbing and settled debris across the working fittings are consistent with a vessel that has not been actively operated for an extended period — a change from the tank's earlier use as the yard's primary septage receiver. *Photographed June 26, 2026 at 3:42 p.m.*



FIGURE 6. The wider 6144 Federal Blvd. yard at first light: several hundred portable toilets staged in rows for servicing. The scale of the chemical-toilet inventory handled from this yard is the collection side of the volume question CHART ONE raises — the daily septage these units generate must be reconciled against the permitted 17,075-gallon fleet capacity and the disposal records of the facilities named on the permit. *Photographed July 9, 2026 at 7:17 p.m.*



FIGURE 7. A fixed discharge manifold at the base of the FRAC tank — a row of cam-lock couplings for as many as five hoses, with two discharge lines connected and sandbags packed around the fittings. The sandbags are telling. Required secondary containment for septage is impermeable by rule: a sealed or lined base and berm sized to hold 110% of the vessel's volume, so that no leak reaches soil or storm drains (federal SPCC / 40 CFR 264.175 and the SDAPCD/DEHQ containment standard both require containment "sufficiently impervious" to hold the liquid). Sandbags are a permeable, temporary spill-diversion material — liquid weeps through and around them rather than being contained — so their presence at these fittings indicates seepage that is not being properly contained. This is permanent transfer infrastructure, not an occasional connection, and it raises a direct question for the record: the County DEHQ inspected this site on July 8, 2026 — the day before this photograph — and reported no violations and "no evidence of improper wastewater disposal" along the yard; how was an uncontained, sandbagged septage-transfer point not among the conditions that inspection documented? *Photographed July 9, 2026 at 7:18 p.m.*

None of this is concealed — it is visible at the transfer point in plain daylight. That a July 8 site inspection recorded no violations here fairly invites the question of how closely, and from how near, the yard was actually examined.



FIGURE 8. A stainless Onsite Services vacuum unit staged beside the FRAC tank, its placard reading “Capacity Waste – 4000” (Imperial Industries; California plate 95407F4). This is a dedicated 4,000-gallon septage hauler — a single, non-split tank with no cleaner compartment. CHART ONE lists only one 4,000-gallon non-split hauler on United Rentals’ 15-truck permit (line 12, plate 3533049), and its plate does not match this unit’s; whether this is that permitted truck or a separately registered unit cannot be confirmed from the photograph (see the discussion above). A coiled suction hose lies at the base of the tank. *Photographed July 12, 2026 at 7:20 p.m.*



FIGURE 9. The 4,000-gallon “Capacity Waste – 4000” unit (Imperial Industries; California plate 95407F4) parked immediately alongside the FRAC tank on the morning of July 14, 2026. Within the last 7–10 days it can be seen that the 4,000-gallon hauler has been regularly staged adjacent to the FRAC tank. No longer have the smaller vacuum trucks been seen pumping their septage into the FRAC tank. That is significant, because this 4,000-gallon unit is the tank’s outlet — the truck the County says carries the tank’s contents to El Cajon. With no smaller-truck input to the tank, there is nothing for this unit to draw and carry to any receiving facility. The scene — the outlet truck staged at a tank the collection trucks are no longer seen to feed — is consistent with an operation adjusting to the review it is now under. *Photographed July 14, 2026 at 9:01 a.m.*



FIGURE 10. A United Rentals worker on the FRAC tank’s elevated platform, working at the tank’s top over an extended period on the morning of July 14, 2026, while the 4,000-gallon hauler stands alongside (a short video taken minutes later records the same activity). The activity is consistent with United Rentals now working to draw down and remediate the FRAC tank whose use came under multi-agency review. Notably, the worker wears ordinary high-visibility clothing but no visible respiratory protection or gas monitoring — none of the protective equipment appropriate to a septage vessel that generates hydrogen sulfide and methane (see the roof-vent corrosion and worker-safety analyses in the record). What the photograph cannot convey is the persistent noise and the strong sewage odor carried to the adjoining property during this work. *Photographed July 14, 2026 at 9:43 a.m.*

THE COUNTY’S JULY 8, 2026 INSPECTIONS — ALIGNING THE OPERATION TO THE PERMITS

On July 8, 2026, following a complaint referral, the County DEHQ sent both its Hazardous Materials Division and its septic (Land and Water Quality) staff to the 6144 Federal yard. The results are set out here because they show the agencies characterizing the FRAC-tank operation as something that falls outside anyone’s authority rather than confronting it as an unpermitted use.

The Hazardous Materials inspection (Attachment 4) issued a Notice of Violation — but for hazardous-materials paperwork: a Unified Program facility permit not obtained, materials not kept in their tanks, and an incomplete inventory, tied to oil, transmission fluid, and porta-potty deodorizers. The inspector expressly recorded that “none of the violations observed are causing odors or are related to the holding tank or pumper trucks themselves,” and described the FRAC tank only in passing as an

“11,000-gallon frac aboveground storage tank” used for temporary storage. The tank itself drew no violation, and the report does not treat its use as a problem at all.

The County’s written summary of the visit, sent July 10, 2026 (Attachment 5), goes further. The septic team “verified the monthly receipts for dumping the waste at the City of El Cajon Dump Station,” reported “no violations ... under DEHQ’s septic pumper authority,” and stated that “DEHQ does not have authority over the onsite intermediary sewage transfer tank or odor complaints.” The Regional Water Board, it added, “confirmed their oversight is not required for the intermediary sewage transfer tank.” The County even acknowledged the odor mechanism — that neighbors “are smelling odors when the trucks come in and fill the above ground tank, as well as when the tank and trucks are opened to transfer the wastewater” — while concluding there are “not DEHQ violations related to these smells.”

Read together, these documents describe an operation being fitted to the two permits the operator holds — a hazardous-materials permit and a septic hauler permit — neither of which speaks to an aboveground tank of 11,000 or 40,000 gallons storing collected septage feet from a neighboring building. The tank is recast as an “intermediary transfer tank” that no agency claims to regulate. That characterization is precisely what this report asks the Regional Board to look behind: an unpermitted use narrated into a regulatory gap, at the very moment the photographs show its day-to-day use changing.

SUMMARY

The purpose of this record is narrow and factual: to document a change in how United Rentals used the FRAC tank at 6144 Federal Blvd. once its operations came under multi-agency review. Read in date order, the photographs show that change. On May 27, 2026 the tank was in active service — its manway open and more than one permitted vacuum truck tied into it at once (FIGURE 1). By late June the same tank appears idle: its roof fittings corroded (FIGURE 3) and its top valve and manway spanned by undisturbed cobwebs and settled debris (FIGURE 5), with the collection trucks repositioned away from it. By mid-July the dedicated 4,000-gallon hauler — the tank’s outlet to El Cajon — sits parked against a tank the collection trucks are no longer seen to feed (FIGURE 9). That shift in operational posture tracks the period in which the County DEHQ, the SDAPCD, and the RWQCB began reviewing this site — a tactical change in the tank’s use that is the central observation of this report.

Two points follow from the record and are offered for the agencies’ attention. First, the tank was not an occasional convenience: FIGURE 1 shows multiple permitted haulers feeding it at the same time, and the fixed multi-hose manifold at its base (FIGURE 7) is built to run several lines — a configuration consistent with routine mass storage, not a single 4,000-gallon transfer. Second, and raised here only as a question meriting closer, separate review: United Rentals’ 2025 permit obligates these vacuum trucks to discharge at Pump Station #1, with OCSD as the alternate. Yet loaded trucks servicing metro-area rentals were offloading into an on-site tank whose contents — by the County’s own account — then went “mainly to the El Cajon dump station,” a facility that does not accept private-party septage. Why permitted trucks would drive past their required receiving station to fill a yard tank that then required hauling to a non-accepting site is a question the load manifests and the independent discharge records of the City and OCSD can answer. This report takes no position on those manifests; it documents what is visible, dates it, and leaves the reconciliation to the records the agencies can obtain directly.

Taken together, the photographs and records assembled here describe an operation carried on with little regard for the interests the permit scheme exists to protect. The environment: an aboveground septage tank the County has variously put at 11,000 and 40,000 gallons, operated with no disclosed permit and a disposal destination the County's own accounts cannot reconcile. The permitting process: a tank disclosed to no agency and now recast as an "intermediary transfer tank" outside everyone's authority. The neighbors: the odors the County itself attributes to the trucks filling and opening the tank, crossing the shared property line day after day. And United Rentals' own employees: the worker in FIGURE 10 drawing down a vessel that generates hydrogen sulfide and methane with no visible respiratory protection. The change in operations these photographs date is what brings that disregard into view.

ATTACHMENT LOG

Reconciliation of each attachment to where it is cited in this report and what it establishes.

#	Attachment (document)	Cited in report at	What it establishes
1	2025 DEHQ Sewage Hauler Permit — Application for Annual Sewage Hauler Permit (LSHOP-000063), signed under penalty of perjury by J. Walker, 9/18/2024.	Introduction; foundation of CHART ONE.	The 15-truck permitted fleet at 6144 Federal Blvd. and the declared disposal at Pump Station #1 (alternate OCSD, Fountain Valley), certified true under penalty of perjury.
2	County DEHQ – RWQCB Region 9 email chain (produced in RWQCB PRA response, 7/9/2026).	Truck-count ¶¶; "Destinations do not reconcile" bullet; tank-size ¶¶; manifests ¶¶; FIGURE 8.	40,000-gallon tank volume; contents "mainly to the El Cajon Dump Station"; a 4,000-gallon trailer as the tank's outlet; 23-truck total fleet (Vista + San Diego).
3	CHART ONE — Permitted Hauler Fleet & Declared Septage Capacity (DEHQ 2025 inventory).	CHART ONE caption; manifests ¶¶; FIGURE 4.	17,075-gallon declared septage capacity across the 15 permitted trucks.
4	County DEHQ Hazardous Materials Division inspection / Notice of Violation, 7/8/2026 (DEH2011-HUPFP-214482; CERS ID 10386103).	Tank-size ¶¶; "July 8, 2026 Inspections" section.	11,000-gallon frac tank figure; hazmat violations expressly "not ... related to the holding tank or pumper trucks"; no violation as to the tank's use.
5	County of San Diego communication (G. Conaughton) summarizing the 7/8/2026 site visit, dated 7/10/2026.	"July 8, 2026 Inspections" section.	No septic-authority violations; El Cajon Dump Station receipts verified; County and RWQCB both disclaim authority over the "intermediary sewage transfer tank."

ATTACHMENTS

Attachment 1 — 2025 DEHQ Application for Annual Sewage Hauler Permit (LSHOP-000063), digitally signed under penalty of perjury by UR agent Jeffrey Walker on September 18, 2024; lists the 15-truck fleet (confirmed by the DEHQ office entry "# of Vehicles: 15") and declares Pump Station #1 (with an alternate at OCSD, Fountain Valley) as the disposal destination.

Attachment 2 — County DEHQ – RWQCB Region 9 email chain, produced in the RWQCB Public Records Act response of July 9, 2026 (“County DEHQ Holding Tank Admissions”). In it the County states the holding tank’s volume as 40,000 gallons; describes the sewage as transferred from that tank to a 4,000-gallon trailer and hauled “mainly to the El Cajon Dump Station”; states that United Rentals’ fleet “includes a total of 23 trucks with yards in both Vista and San Diego”; and acknowledges the tank is not covered by United Rentals’ hauler permit. This is the source for the tank size, the disposal-destination admissions, and the 23-truck fleet figure cited above.

Attachment 3 — CHART ONE — United Rentals / Reliable Onsite Services Permitted Hauler Fleet & Declared Septage Capacity (DEHQ 2025 inventory); establishes the 17,075-gallon declared septage capacity across the fleet.

Attachment 4 — County DEHQ Hazardous Materials Division inspection / Notice of Violation, United Rentals Branch 70M, 6144 Federal Blvd. (Record DEH2011-HUPFP-214482; CERS ID 10386103), inspected July 8, 2026 by EHS Mayra A. Cabral. Describes the on-site vessel as an “11,000-gallon frac aboveground storage tank,” records hazardous-materials violations expressly “not ... related to the holding tank or pumper trucks,” and issues no violation as to the tank’s use.

Attachment 5 — County of San Diego communication (G. Conaughton) dated July 10, 2026 summarizing the July 8 HazMat and septic site visit: septic team verified El Cajon Dump Station receipts and found “no violations ... under DEHQ’s septic pumper authority”; states “DEHQ does not have authority over the onsite intermediary sewage transfer tank or odor complaints” and that the Regional Water Board “confirmed their oversight is not required for the intermediary sewage transfer tank.”

ATTACHMENT 1

2025 DEHQ Application for Annual Sewage Hauler Permit

Permit No. LSHOP-000063 — digitally signed under penalty of perjury by United Rentals agent Jeffrey Walker on September 18, 2024. Lists the 15-truck fleet and declares Pump Station #1 (alternate: OCSD, Fountain Valley) as the disposal destination.

Attachment to: United Rentals FRAC Tank Operations Report — July 14, 2026



**DEPARTMENT OF ENVIRONMENTAL HEALTH & QUALITY
LAND AND WATER QUALITY DIVISION**

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2025

APPLICATION FOR ANNUAL SEWAGE HAULER PERMIT

**TO ENGAGE IN THE CLEANING OF SEPTIC TANKS, CHEMICAL TOILETS, CESSPOOLS, OR SEEPAGE PITS
AND THE TRANSPORTATION AND DISPOSAL OF CLEANINGS**

Name of Business:	United Rentals (North America), Inc.; DBA: Reliable Onsite Services		
Mailing Address:	791 East 64th Ave		
City:	Denver	State:	CO Zip Code: 80229
Business Address:	6144 Federal Ave		
City:	San Diego	State:	CA Zip Code: 92114
Business Phone Number:	619-210-2850	Email:	environmental@ur.com
Legal Owner(s):	United Rentals (North America), Inc		
Address:	100 First Stamford Place, Suite 700		
City:	Stamford	State:	CT Zip Code: 06902
Phone Number:	303-286-4394	Email:	environmental@ur.com
Emergency Contact:	Luis Campuzana	Cell Phone Number:	619-565-0059

Services Provided:	☐ Septic Tanks ☐ Seepage Pits ☒ Portable Restrooms ☐ Cesspools ☐ Other _____		
Primary Liquid Waste Disposal Facility Name:	Pump Station #1		
Facility Address:	3550 East Harbor Drive		
City:	San Diego	State:	CA Zip Code: 92101
Alternate Liquid Waste Disposal Facility Name:	Ocean County Sanitation District		
Facility Address:	10844 Ellis Dr		
City:	Fountain Valley	State:	CA Zip Code: 92708

The undersigned hereby applies for a sewage hauling permit registration. I declare under penalty of perjury that to the best of my knowledge and belief, the information I have provided is true and accurate. I understand that to become and remain registered and eligible to provide hauling services in San Diego County, I must pay the annual registration fee established by the County under applicable law. I also agree to conform to all conditions, orders, and directions issued pursuant to the California Health and Safety Code and all applicable County and City Ordinances including California Health and Safety Code Division 104, Part 13, Chapter 4, Article 1. and San Diego County Code Sections 68.601 – 68.613.

Date: 9/18/2024

Jeffrey Walker

Print Name

Jeffrey Walker

Signature

Digitally signed by Jeffrey Walker
Date: 2024.09.18 08:43:31 -04'00'

FOR OFFICE USE ONLY

Permit Number	# of Vehicles	Date
LSHOP-000063	15	9/27/24

2025 SEWAGE HAULER TRUCK INVENTORY

(Complete separate form for each location where vehicles are stored)

5:55

Inspection 11/19/24
Dakane + Hyatt
at yard facility

Completed By Applicant for Each Permitted Vehicle					Completed by Department of Environmental Health & Quality		
Truck or Trailer?	Vehicle Make	License Plate	Tank Size (total gal)	Split Tank? (gal/ side)	3" Lettering on Vehicle? (yes or no) ¹	Decal #	DEHQ Observations and Comments on Hoses, Valve, Cap, Waste Transfer, etc.
Truck	Mack	3284107	995	695/300	Not available Yes	025045	Not really (brand new) ✓ Decal issued
Truck	Mack	3482288	1600	1100/500	Not available Yes	025044	Not really (brand new) off
Truck	Mack	3482510	1600	1100/500	Yes	025043	
Truck	Peterbilt	3533049	4000	4000	Yes	025042	Observed dripping "blue" mechanical fluid on main valve
Truck	Isuzu	3791919	995	695/300 699 240	Yes	025041	
Truck	Mack	3482874	995	695/300 pending capacity	Yes	025040	- slider tank
Truck	Mack	3710606	1600 ^{sk}	1100/500	Yes	025039	
Truck	Mack	3710607	1600	1100/500	Yes	025038	no!
Truck	Isuzu	3778078	995	695/300 699 240	Yes	025037	

¹lettering includes name of business and phone number

Additional Comments (To Be Completed By DEHQ):



DEPARTMENT OF ENVIRONMENTAL HEALTH & QUALITY
LAND AND WATER QUALITY DIVISION
 5500 Overland Ave. Suite # 210, San Diego, CA 92123
 (858) 565-5173 | LWQDuty.DEH@sdcounty.ca.gov

*11/19/24
 Annual Inspection
 conducted at the
 yard facility.
 - Hype & Parane*

2025 SEWAGE HAULER TRUCK INVENTORY
 (Complete separate form for each location where vehicles are stored)

Company Name: Reliable Onsite Services		Owner: United Rentals (North America), Inc		Contact: Luis Campuzano		Phone: 619-565-0059	
Company Address: 791 East 64th Ave, Denver, CO 80229		Vehicle Storage Address: 6144 Federal Blvd, San Diego 92114				Email: lcampuzano@ur.com	
Location(s) Where Waste Is Disposed: 1) Pump Station #1 - 3350 East Harbor Dr, San Diego, CA 2) Ocean County Sanitation District 10844 Ellis Dr, Fountain Valley, CA 92708							
Completed By Applicant for Each Permitted Vehicle					Completed by Department of Environmental Health & Quality		
Truck or Trailer?	Vehicle Make	License Plate	Tank Size (total gal)	Split Tank? (gal/ side)	3" Lettering on Vehicle? (yes or no) ¹	Decal #	DEHQ Observations and Comments on Hoses, Valve, Cap, Waste Transfer, etc.
Truck	Hino	01851Y2	1600	1100/500 ✓	Yes	025036	
Truck	Ford	76662Y2	1150	800/350	Not available	025035	in the shop
Truck	Hino	3145317	995	695/300 <i>Please confirm capacity</i>	Yes	025034	Slider tank
Truck	Peterbilt	3213370	1600	1100/500 ✓	Yes	025033	
Truck	Peterbilt	3224527	1600	1100/500 ✓	Yes	025032	
Truck	Peterbilt	3224519	1600	1100/500 ✓	Yes	025031	

¹lettering includes name of business and phone number

ATTACHMENT 2

County DEHQ – RWQCB Region 9 Email Chain

Produced in the RWQCB Public Records Act response of July 9, 2026 (“County DEHQ Holding Tank Admissions”). States the holding tank’s volume as 40,000 gallons, the transfer to a 4,000-gallon trailer hauled “mainly to the El Cajon Dump Station,” United Rentals’ 23-truck total fleet, and that the tank is not covered by the hauler permit.

Attachment to: United Rentals FRAC Tank Operations Report — July 14, 2026

From: [Osibodu, Fisayo@Waterboards](mailto:Osibodu.Fisayo@Waterboards)
To: ["McCullough, Jamelle"](mailto:McCullough.Jamelle); [Izadmehr, Mahsa@Waterboards](mailto:Izadmehr.Mahsa@Waterboards)
Cc: [Liwag, Ernie](mailto:Liwag.Ernie); [Johnson, Ryan](mailto:Johnson.Ryan); [Lee, Joann](mailto:Lee.Joann)
Subject: RE: [External] RE: UNITED RENTALS/DBA RELIABLE ONSITE SERVICES - DEHQ permitted sewage hauler
Date: Tuesday, July 7, 2026 10:52:00 AM
Attachments: [image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)

Thanks for the information, Jemelle. I will be available for a phone call any time between 330pm and 5 pm today or between 10am and 12pm tomorrow.



Fisayo Osibodu, P.E

Senior WRC Engineer

Region 9 SAN DIEGO
Site Restoration & Groundwater Protection Branch
Water Sustainability and Protection Unit

Email: Fisayo.Osibodu@Waterboards.ca.gov
Phone: +1 (619) 521-8036

San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100, San Diego CA 92108
Website: www.waterboards.ca.gov

Follow: [X](#) | [Instagram](#) | [Facebook](#) | [LinkedIn](#)

From: McCullough, Jamelle <Jamelle.McCullough@sdcounty.ca.gov>
Sent: Tuesday, July 7, 2026 9:20 AM
To: Osibodu, Fisayo@Waterboards <Olufisayo.Osibodu@waterboards.ca.gov>; Izadmehr, Mahsa@Waterboards <Mahsa.Izadmehr@Waterboards.ca.gov>
Cc: Liwag, Ernie <Ernie.Liwag2@sdcounty.ca.gov>; Johnson, Ryan <Ryan.Johnson@sdcounty.ca.gov>; Lee, Joann <Joann.Lee@sdcounty.ca.gov>
Subject: RE: [External] RE: UNITED RENTALS/DBA RELIABLE ONSITE SERVICES - DEHQ permitted sewage hauler

Hi Fisayo,

[See responses below.](#)

Jamelle McCullough, MPH, REHS

Supervising Environmental Health Specialist
Department of Environmental Health and Quality
O: 858-505-6843

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We are pleased to announce the Department of Environmental Health & Quality, Land and Water Quality Division frequently requested records can now be downloaded directly through the [Environmental Health Document Library](#).

For your convenience, you may also pay your fees online via six easy steps with this link [here](#).

Please note that on 12/1/2025, the Land and Water Quality counter in building 5510 will be relocated to building 5500 Overland Ave. Suite 110.

From: Osibodu, Fisayo@Waterboards <Olufisayo.Osibodu@waterboards.ca.gov>

Sent: Tuesday, July 7, 2026 8:55 AM

To: McCullough, Jamelle <Jamelle.McCullough@sdcounty.ca.gov>; Izadmehr, Mahsa@Waterboards <Mahsa.Izadmehr@Waterboards.ca.gov>

Cc: Lee, Joann <Joann.Lee@sdcounty.ca.gov>; Liwag, Ernie <Ernie.Liwag2@sdcounty.ca.gov>

Subject: RE: [External] RE: UNITED RENTALS/DBA RELIABLE ONSITE SERVICES - DEHQ permitted sewage hauler

Hi Jamelle,

The RV parks we regulate under WDRs also have septic tanks connected to leach fields or seepage pits. In those cases, there is a discharge to land and potential impact to groundwater. I have a few questions:

- What's the volume of the holding tank? [40,000 gallons](#)
- Is the holding tank meant to be temporary or is it part of permanent operations? [The holding tank serves as temporary storage of sewage collected from port-a-potties. Sewage is transferred as needed from the 40,000 gallon tank to their 4,000 gallon trailer and transported to the El Cajon Dump Station. Depending on the need they might make multiple trips a day from the yard to dump in El Cajon. It serves as temporary storage for a permanent operation.](#)
- Does the facility have any plans to connect to the sewer system? [I am not certain, but I believe the office, may be connected to City of San Diego sewer. We do not have any septic records and would need to confirm with City of San Diego Public Utilities if this parcel is served by their public sewer.](#)
- Are the contents of the holding tank pumped out and hauled offsite to the City of San

Diego's pump station or another facility? [Yes, the contents are transferred to a 4,000 gallon trailer and transported mainly to the El Cajon Dump station.](#)

It may be helpful to have a quick call to discuss this facility. [I think a call would be helpful, do you have availability today? We will be responding to a public record request tomorrow.](#)
[@Lee, Joann](#) and [@Ryan Johnson](#) are you available for a call today?

Thanks,



Fisayo Osibodu, P.E

Senior WRC Engineer

Region 9 SAN DIEGO
Site Restoration & Groundwater Protection Branch
Water Sustainability and Protection Unit

Email: Fisayo.Osibodu@Waterboards.ca.gov

Phone: +1 (619) 521-8036

San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100, San Diego CA 92108
Website: www.waterboards.ca.gov

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From: McCullough, Janelle <Janelle.McCullough@sdcounty.ca.gov>

Sent: Monday, July 6, 2026 8:38 AM

To: Osibodu, Fisayo@Waterboards <Olufisayo.Osibodu@waterboards.ca.gov>; Izadmehr, Mahsa@Waterboards <Mahsa.Izadmehr@Waterboards.ca.gov>

Cc: Lee, Joann <Joann.Lee@sdcounty.ca.gov>; Liwag, Ernie <Ernie.Liwag2@sdcounty.ca.gov>

Subject: RE: [External] RE: UNITED RENTALS/DBA RELIABLE ONSITE SERVICES - DEHQ permitted sewage hauler

Good morning Fisayo,

Thanks for your email. DEHQ is able to permit holding tanks under very specific situations, see ordinance and snip from LAMP below. I do not believe this operation meets the outlined criteria. I understand that your department permits holding tanks that do not discharge to land or surface water, such as for RV dump stations. I was wondering if the sewage holding tank we have been discussing would fall under that category of use?

SEC. 68.320. TEMPORARY USE OF HOLDING TANKS.

The Director may issue a permit authorizing a property owner to temporarily install a holding tank in lieu of an on-site wastewater treatment system if: (a) public sewer is not available, (b) an OWTS is not practicable and (c) the Director determines that the property will be

able to connect to a public sewer within 24 months of the permit application. The Director may issue a permit for a holding tank for up to 24 months and may grant one extension for up to an additional 12 months if the Director determines the property owner has been unable to connect with the sewer through no fault of the property owner. An annual operating permit is required to ensure proper maintenance of the system.

1. Temporary Holding Tank Requirements

1.1 A holding tank may be permitted in lieu of an OWTS if public sewer is not available, an OWTS is not practicable; and the Director determines that the property will be able to connect to public sewer within 24 months of the permit application.

1.2 A permit is required to install temporary holding tanks and is valid for 24 months. The Director may grant one extension for up to an additional 12 months if it is determined the holding tank is being properly maintained and the property owner has been unable to connect with the sewer through no fault of the property owner.



Jamelle McCullough, MPH, REHS

Supervising Environmental Health Specialist
Department of Environmental Health and Quality
O: 858-505-6843

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For your convenience, you may also pay your fees online via six easy steps with this link [here](#).

Please note that on 12/1/2025, the Land and Water Quality counter in building 5510 will be relocated to building 5500 Overland Ave. Suite 110.

From: Osibodu, Fisayo@Waterboards <Olufisayo.Osibodu@waterboards.ca.gov>

Sent: Tuesday, June 30, 2026 2:53 PM

To: McCullough, Jamelle <Jamelle.McCullough@sdcounty.ca.gov>; Izadmehr, Mahsa@Waterboards <Mahsa.Izadmehr@Waterboards.ca.gov>

Cc: Lee, Joann <Joann.Lee@sdcounty.ca.gov>; Liwag, Ernie <Ernie.Liwag2@sdcounty.ca.gov>

Subject: [External] RE: UNITED RENTALS/DBA RELIABLE ONSITE SERVICES - DEHQ permitted sewage hauler

Hi Jamelle,

My initial thought is the above ground holding tank would not need to be permitted by the Regional Board since there isn't a discharge to land or surface waters. You may be able to refer the odor complaints to the San Diego County Air Pollution Control District or the California Air Resources Board. If the operation is connected to the City of San Diego's sewer system, the City of San Diego's pretreatment program staff may be able to investigate the issue. However, I assume the operation may not be connected to the sewer system since they have an above ground holding tank.

Thanks,



Fisayo Osibodu, P.E

Senior WRC Engineer

Region 9 SAN DIEGO
Site Restoration & Groundwater Protection Branch
Water Sustainability and Protection Unit

Email: Fisayo.Osibodu@Waterboards.ca.gov
Phone: +1 (619) 521-8036

San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100, San Diego CA 92108
Website: www.waterboards.ca.gov

Follow: [X](#) | [Instagram](#) | [Facebook](#) | [LinkedIn](#)

From: McCullough, Janelle <Janelle.McCullough@sdcounty.ca.gov>

Sent: Tuesday, June 30, 2026 11:59 AM

To: Izzadmehr, Mahsa@Waterboards <Mahsa.Izzadmehr@Waterboards.ca.gov>; Osibodu, Fisayo@Waterboards <Olufisayo.Osibodu@waterboards.ca.gov>

Cc: Lee, Joann <Joann.Lee@sdcounty.ca.gov>; Liwag, Ernie <Ernie.Liwag2@sdcounty.ca.gov>

Subject: UNITED RENTALS/DBA RELIABLE ONSITE SERVICES - DEHQ permitted sewage hauler

Caution: External Email. Use caution when clicking links or opening attachments. When in doubt, contact DIT or use the Phish Alert Button.

Good morning Masha and Fisayo,

Last week DEHQ received concerns regarding odors coming from a sewage hauler operation that utilized an above ground sewage holding tank as part of their operation. UNITED RENTALS/DBA RELIABLE ONSITE SERVICES is located at 6144 Federal Blvd in San Diego (APN: 543-020-31,36, & 37) and holds a DEHQ annual operating permit (DEH2020-LSHOP-000063) to collect and transport sewage in San Diego County. Their fleet includes a total of 23 trucks with yards in both Vista and San Diego.

Our staff performed a site investigation yesterday and did not observe any issues with the pumper trucks stored in the yard but did detect a sewage odor when he was within 2 feet of the holding tank. At the time of his visit, he did not observe any pooling of sewage on the ground. The DEHQ permit they hold does not include the design and operation of an above ground sewage holding tank. Can you confirm whether operation of a sewage holding tank would require referral to the Regional Board for permitting? If so, can you provide contact details for the person or working group so that we can make the referral? We would also like to provide this information to the complainant and site operator.

The reporting party has reached out to many agencies and is continuing to escalate their concerns. They have now involved the media as well.

Thank you,



Jamelle McCullough, MPH, REHS

Supervising Environmental Health Specialist

Department of Environmental Health and Quality

O: 858-505-6843

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SUPPLEMENTAL EXHIBIT

County DEHQ Internal Email

Sharon Preece (Hazardous Materials Division)
to Joann Lee (Land & Water Quality Division)

June 22, 2026

Produced by County DEHQ in Public Records Act Request No. 26-3709 (doc B.16).

“...sewage storage in Frac tanks (which I have learned is not within industry standards) but is out of our jurisdiction.”

Benitez, Maria

From: McCullough, Jamelle
Sent: Monday, June 22, 2026 11:00 AM
To: Preece, Sharon; Caes, Craig
Cc: Moreno, Zoraida; Lee, Joann; Liwag, Ernie; Johnson, Ryan
Subject: RE: [External] Re: [EXTERNAL] 6144 Federal Blvd., SD CA 92114 Waste Processing Permits

Thank you for the email. The ACOM investigation will be covered today by Scott Rosecrans.



Jamelle McCullough, MPH, REHS
Supervising Environmental Health Specialist
Department of Environmental Health and Quality
O: 858-505-6843
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For your convenience, you may also pay your fees online via six easy steps with this link [here](#).

Please note that on 12/1/2025, the Land and Water Quality counter in building 5510 will be relocated to building 5500 Overland Ave. Suite 110.

From: Preece, Sharon <Sharon.Preece@sdcounty.ca.gov>
Sent: Monday, June 22, 2026 10:02 AM
To: Caes, Craig <Craig.Caes@sdcounty.ca.gov>; McCullough, Jamelle <Jamelle.McCullough@sdcounty.ca.gov>
Cc: Moreno, Zoraida <Zoraida.Moreno@sdcounty.ca.gov>; Lee, Joann <Joann.Lee@sdcounty.ca.gov>; Liwag, Ernie <Ernie.Liwag2@sdcounty.ca.gov>; Johnson, Ryan <Ryan.Johnson@sdcounty.ca.gov>
Subject: RE: [External] Re: [EXTERNAL] 6144 Federal Blvd., SD CA 92114 Waste Processing Permits

Adding Craig & Jamelle, Ernie, & Ryan (hit send too fast)

S-)



Sharon Preece BA MS REHS, Program Coordinator
[Hazardous Materials Division](#) | Department of Environmental Health and Quality
Cell: 619-249-9024
[SanDiegoCounty.gov](https://www.sandiegocounty.gov) | [News Updates](#) | [Engage](#)



From: Preece, Sharon
Sent: Monday, June 22, 2026 10:00 AM

To: Lee, Joann <Joann.Lee@sdcounty.ca.gov>

Cc: Moreno, Zoraida <Zoraida.Moreno@sdcounty.ca.gov>

Subject: FW: [External] Re: [EXTERNAL] 6144 Federal Blvd., SD CA 92114 Waste Processing Permits

Hi Joann,

Sending a complaint over to you that we received regarding sewage processing and sewage storage in Frac tanks (which I have learned is not within industry standards) but is out of our jurisdiction.

I think you already have this and are responding but am sending over what we received just in case not.

Thank you,

S-)



Sharon Preece BA MS REHS, Program Coordinator

[Hazardous Materials Division](#) | Department of Environmental Health and Quality

Cell: 619-249-9024

SanDiegoCounty.gov | [News Updates](#) | [Engage](#)



From: LeClair, Richard <Richard.LeClair@sdcounty.ca.gov>

Sent: Monday, June 22, 2026 8:33 AM

To: Preece, Sharon <Sharon.Preece@sdcounty.ca.gov>

Subject: FW: [External] Re: [EXTERNAL] 6144 Federal Blvd., SD CA 92114 Waste Processing Permits

Hello Sharon,

I will talk to you about this later during our 1-on-1 but wanted to brief you up in the meantime.

We had a complaint come in last week regarding odors from a FRAC tank containing sewage at an equipment rental company that rents out port-a-potties. The attached documentation was sent over, including a petition with 36 signatures. I confirmed with the duty desk that referrals were made to APCD and LWQ.

Sewage is excluded from being both a solid and a hazardous waste, so it doesn't have a CUPA nexus (See [22 CCR 66261.4\(b\)\(2\)](#) and [40 CFR 261.4](#)). I responded to the complainant on 6/17, informed him that sewage was not under our purview, and notified him that referrals were made to both APCD and LWQ.

The complainant reached out to APCD on Friday and copied a bunch of different agencies including me and Mayra and asked for an inspection to be conducted at the property. APCD responded this morning and directed the complainant back to us.

ATTACHMENT 3

CHART ONE — Permitted Hauler Fleet & Declared Septage Capacity

United Rentals / Reliable Onsite Services, compiled from the County of San Diego DEHQ 2025 Sewage Hauler Truck Inventory. Establishes the 17,075-gallon declared septage capacity across the 15 permitted trucks.

Attachment to: United Rentals FRAC Tank Operations Report — July 14, 2026

CHART ONE

CHART ONE: United Rentals / Reliable Onsite Services — Permitted Hauler Fleet & Declared Septage Capacity

Source: County of San Diego DEHQ, 2025 Sewage Hauler Truck Inventory (application dated 2024-09-18, LSHOP-000063; signed under penalty of perjury). For split-tank trucks, Waste/Septage = larger compartment, Cleaner/Fresh = smaller compartment (per operator's own truck lettering, e.g., "1100 WASTE / 500 FRESH").

#	DEHQ Decal #	Make	License Plate	Total Tank (gal)	Waste / Septage (gal)	Cleaner / Fresh (gal)	DEHQ Notes
1	025031	Peterbilt	3224519	1,600	1,100	500	
2	025032	Peterbilt	3224527	1,600	1,100	500	
3	025033	Peterbilt	3213370	1,600	1,100	500	
4	025034	Hino	3145317	995	695	300	Slider tank; DEHQ hand-noted "please confirm capacity"
5	025035	Ford	76662Y2	1,150	800	350	"In the shop"
6	025036	Hino	01851Y2	1,600	1,100	500	
7	025037	Isuzu	3778078	995	695	300	
8	025038	Mack	3710607	1,600	1,100	500	
9	025039	Mack	3710606	1,600	1,100	500	
10	025040	Mack	3482874	995	695	300	Slider tank
11	025041	Isuzu	3791919	995	695	300	
12	025042	Peterbilt	3533049	4,000	4,000	0	NOT split — the only dedicated waste hauler; DEHQ noted "blue" mechanical fluid dripping on main valve
13	025043	Mack	3482510	1,600	1,100	500	
14	025044	Mack	3482288	1,600	1,100	500	Brand new
15	025045	Mack	3284107	995	695	300	Brand new
TOTAL — 15 permitted trucks				22,925	17,075	5,850	

Fleet septage (waste) capacity EXCLUDING line 12 (the collection trucks that feed the tank): 17,075 - 4,000 = 13,075 gal — more than 3× the single 4,000-gal hauler's capacity.

Permit-declared disposal sites: (1) Pump Station #1, E. Harbor Dr, San Diego; (2) Orange County Sanitation District, Fountain Valley. No on-site holding tank appears anywhere on the permit.

Prepared 2026-07-14 from the DEHQ 2025 inventory. Neutral record; figures are the operator's own declared capacities. Not legal advice.

ATTACHMENT 4

County DEHQ Hazardous Materials Division Inspection / Notice of Violation

United Rentals Branch 70M, 6144 Federal Blvd. (Record DEH2011-HUPFP-214482; CERS ID 10386103), inspected July 8, 2026 by EHS Mayra A. Cabral. Describes an “11,000-gallon frac aboveground storage tank” and records hazardous-materials violations expressly “not ... related to the holding tank or pumper trucks.”

Attachment to: United Rentals FRAC Tank Operations Report — July 14, 2026



COUNTY OF SAN DIEGO

NOTICE OF VIOLATION

FACILITY NAME: **United Rentals Branch 70M**
ADDRESS: **6144 FEDERAL BLVD**
CITY/ZIP: **SAN DIEGO /92114**

OWNER'S NAME **United Rentals (North America), Inc.**
ADDRESS **100 First Stamford Place, Suite 700**

INSPECTION DATE: **07/08/2026** PAGE **1** OF **12**
RECORD ID #: **DEH2011-HUPFP-214482**
CERS ID: **10386103**
TIME START: **9:08 AM** END: **3:00 PM**
SPECIALIST: **Mayra A Cabral**
INSPECTION CONTACT: **David Perez**
TITLE: **Branch Manager**
PHONE: **619-929-4594**
E-MAIL: **dperez3@ur.com**

CITY/ZIP **Stamford /06902**
PHONE **303-286-4394**

The County Hazardous Materials Division (HMD) inspected your facility on the above date, under the authority of the California Health and Safety Code (HSC), to determine compliance with applicable provisions of the HSC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). This report contains Class I violations. Class I Violations are violations that pose a significant threat of harm to the environment or human life. These violations are willful, intentional, negligent, knowing or should have known. Class I Violations also may show a pattern of neglect or disregard. Minor or Class II violations that are chronic or recalcitrant may become Class I depending on the totality of circumstances. Class I violations may result in an enforcement action and penalties. This notice requires a formal written response to HMD and corrective action within the times specified. Failing to correct the violations and submit a return to compliance certification may result in further enforcement action including monetary fines for each day of non-compliance.

NOTE: Reinspection fees will be charged if additional inspections are required to determine compliance.

CONSENT TO CONDUCT INSPECTION GRANTED BY: David Perez,

TITLE: Branch Manager

INTRODUCTION:

The County of San Diego, Department of Environmental Health & Quality (DEHQ), Hazardous Materials Division (HMD) is the local Certified Unified Program Agency (CUPA) for San Diego County. The HMD regulates businesses subject to Hazardous Materials Business Plan (HMBP) reporting requirements, Hazardous Waste (HW) generator requirements, Medical Waste (MW) generator requirements, Underground Storage Tank (UST) requirements, Aboveground Petroleum Storage Act (APSA) requirements and the California Accidental Release Prevention Program (CalARP). More information at http://www.sandiegocounty.gov/deh/hazmat/hmd_cupa.html

Site Investigation (7/8/2026)

On 7/8/2026, I, Mayra Cabral, Environmental Health Specialist, conducted a Certified Unified Program Agency (CUPA) site investigation of United Rentals Branch 70M located at [6144 FEDERAL BLVD San Diego 92114], in response to a complaint referral submitted on 7/2/2026 to CalEPA and HMD. The complaint referred regarded possible use of chemical toilet additives to the porta-potty/sewage waste stored on site, and disposal concerns of the waste.

This facility is an equipment rental and portable solutions provider. A most recent CUPA routine inspection was conducted on 3/1/2024.

David Perez, Branch Manager, granted consent to conduct today's inspection, to review documents, and was present during the facility walk through and the document review. Adam Langford, Operations Supervisor, was also present during the facility walk through and the document review

Adam Langford, Operations Supervisor, granted consent to take pictures during this inspections. Pictures will be sent to the facility is a separate file and email.

During today's inspection, I observed reported:

- 1 x 350 gallon aboveground storage tank of Used Lubricating Oil
- 1 x 55 gallon steel drum of Automatic Transmission Fluid
- 2 x 55 gallon plastic drum of Walex Concrete Cleaner
- 1 x 55 gallon plastic drum of Walex Alkaline Urinal Cleaner

Observed not reported:

- 2x 55-gal plastic drums of Walex Fragrance Spray & Washdown Cleaner (2 at least more than 3/4 full). Per David Perez, Branch Manager, this product was double ordered and has been on site for 2 days (<30 days).
- 1 carton pallet with Walex Porta Pak Max Pods bags & each bag weighs 1,600 grams (~3.5 lbs) . Per the pallet carton, 1 carton holds up to 250 bags



I also observed below reportable quantities: acetylene, compressed air, argon cylinders, DEF, EXODOR Green Hornet Degreaser EXODOR Soap (<55-gal).

This facility's Hazardous Materials Inventory was verified during today's inspection in comparison to the most recent California Environmental Reporting System (CERS) submittal made on 1/5/2026 CERS ID: 10386103

According to inventory submitted in CERS and this inspection, this facility is subject to:

- Hazardous Materials Business Plan (HMBP) requirements for storing reportable amounts (≥55 gallons, 500 pounds, or 200 cubic feet) of hazardous materials on-site. HSC Chapter 6.95.
- Hazardous waste (HW) regulations for generating any amount of hazardous waste. 40 CFR §260.10

At this time, based on my observations, review of hazardous waste manifests, this facility appears to be a Small Quantity Generator (SQG) of Hazardous Waste. An SQG generates between 27 < 270 gals; 220 < 2200 pounds; 100kg < 1,000kg of non-acute HW OR < 2.2 lbs/1 kg of acutely HW total per month. An SQG must properly dispose of HW either within 180 days (6 months) of the first day the hazardous waste was accumulated.

Chemical Additive Process & Disposal:

Per David Perez, Branch Manager, United Rentals, rents port a potties to customers. As part of the process, the facility adds both toilet chemical deodorizers and cleaners and water (before use) to the port a potties, to control odors during use/storage by the customer. The chemical additives includes fragrance deodorizers, toilets urinal cleaner, and toilet wash spray cleaners. Per David Perez, Branch Manager, the facility follows a standard operating procedure (SOP) of how much chemical to water is added/used. Per David Perez, Branch Manager, chemical toilet additives are not added to the tanker after the port a potties/sewage waste is collected, and or stored on site in the frac AST.

After use, United Rentals then pumps the waste from the port a potties/sewage waste in a 4,000-gal tanker that is transported almost daily to the City of El Cajon Wastewater & Sewer Services station. Service receipts orders were available. Leftover port a potties/sewage waste may also be temporarily stored onsite in a 11,000-gal frac aboveground storage tank (AST) before transporting to the wastewater & sewer station.

The facility maintains electronic copies of the Safety Data Sheets (SDSs) for the chemical additives used as part of the SOP.

Note, the Department of Toxic Substances Control (DTSC) recommends the use of biodegradable products. Review the list of not authorized additives to control odors in sewage disposal systems—refer to 22 CCR 25210 – 25210.2.

Be advised, Chemical toilet products may contain chemicals that are known to cause septic tank failures by killing the bacteria essential to the treatment process in the septic tank. The use of non-biodegradable toxic chemicals and/or use of halocarbons in products used to clean or unclog a sewage disposal system in chemical toilets or waste facilities (toilets) is banned in California. 22 CCR 25210 – 25210.2; 22 CCR 67410.1 – 67425.

For more information, refer to the DTSC Chemical Toilet Products Advisory for Consumers Fact Sheet | Department of Toxic Substances Control:

<https://dtsc.ca.gov/chemical-toilet-products-advisory-for-consumers-fact-sheet/>

This report contains a Class I violation issued on a NOV. A representative from the Hazardous Materials Division (HMD) will be in contact with facility personnel regarding the class I violations and enforcement actions.

*****UPDATE FOR HAZARDOUS WASTE GENERATORS*****

California's adoption of the mandatory and non-substantive amendments of the federal Generator Improvement Rule (GIR) took effect across the state on July 1, 2024. There are seven new amendments that hazardous waste generators are required to comply with. Additionally, there are new definitions that have been added to the Title 22 of the California Code of



Regulations. All hazardous waste generators are responsible for training their staff to ensure they are aware of these regulatory changes. The County of San Diego will notify hazardous waste generators about these new requirements and provide guidance and resources for attaining compliance prior to citing violations. For additional information regarding the GIR, follow the links below.

[GIR information webpage](#)

[GIR rulemaking webpage](#)

[Frequently asked questions \(FAQ\)](#)

[Quick Reference Guide \(QRG\)](#) - Links to the Instructions, Template, and Extra Pages are located near the top of the GIR information webpage. Facilities can download the forms to their computer and upload their completed QRG to CERS > ER Plans > Miscellaneous State-Required Documents. Be sure to upload as PDF with file name "QRG"

[HMD Announcements - GIR](#)

VIOLATION # 1

HMD1001 Unified Program Facility permit not obtained for hazardous materials. SDCC 68.904; 68.905; 68.906, 68.907; 68.907.1

Classification: Class I

Observations:

The facility's Unified Program Facility Permit (UPFP) for handling hazardous materials has expired on 3/31/2025, and is still expired as of today's date.

According to the information submitted in the California Environmental Reporting System (CERS) and my observations, the facility appears to be subject to the Hazardous Materials Business Plan (HMBP) requirements for handling hazardous materials/waste in reportable amounts (listed in the introduction), and as such, the facility is required to obtain and maintain a valid UPFP for handling hazardous materials at or above reportable thresholds. Per my observations (please see picture attached)

I observed:

1 x 350 gallon aboveground storage tank of Used Lubricating Oil

1 x 55 gallon steel drum of Automatic Transmission Fluid

2 x 55 gallon plastic drum of Walex Concrete Cleaner

1 x 55 gallon plastic drum of Walex Alkaline Urinal Cleaner

2x 55-gal plastic drums of Walex Fragrance Spray & Washdown Cleaner (2 at least more than 3/4 full).

1 carton pallet with Walex Porta Pak Max Pods bags & each bag weighs 1,600 grams (~3.5 lbs) . Per the carton, 1 carton holds up to 250 bags.

The overdue balance due \$300.

I referred the business to <https://www.dehpay.com> for a copy of the overdue permit invoice.

No business, person, owner or operator in the County of San Diego shall operate a Unified Program facility, as defined in the California Health and Safety Code (H&SC) without first obtaining a permit from the Department of Environmental Health and Quality (DEHQ) - Hazardous Materials Division (HMD).

Corrective Action Due By:07/22/2026

For expired permits, pay all applicable Unified Permit fees to the County of San Diego, Hazardous Materials Division **within 10 calendar days of receipt of this Notice of Violation**. Contact an Office Assistant at (858) 505-6661 to confirm the amount of permit fees and delinquent fees to be paid.

1. For online payments go to <https://www.dehpay.com>.

2. Go to the DEHQ tab, then in the General Search section, enter the Record Number (printed on invoice) in the Record Number field and click Search.

3. Click on Payments, select Fees from dropdown list, click "Pay Fees" link, then click on "Continue with Application", and select



COUNTY OF SAN DIEGO

SUPPLEMENTAL NOTICE OF VIOLATION

INSPECTION DATE: **07/08/2026**
RECORD ID #: **DEH2011-HUPFP-214482**

PAGE **4** OF **12**

one of the Payment options.

Within 30 days, notify me at mayraa.cabral@sdcounty.ca.gov that your permit fees are paid. You may use the Corrective Action Form located on the last page of this inspection report.

VIOLATION # 2

HMD0131 Unified Program Facility Permit not obtained &/or maintained for the generation of hazardous waste. SDCC 68.904; 68.905; 68.906; 68.907, 68.907.1

Classification: Class I

Observations:

The facility's Unified Program Facility Permit (UPFP) for the generation of hazardous waste has expired on 3/31/2025, and is still expired as of today's date.

According to the information submitted in the California Environmental Reporting System (CERS), the facility appears to be subject to the Hazardous Waste generator requirements, by generating waste used oil, and as such, the facility is required to obtain and maintain an active UPFP for generating hazardous waste in any amount. (see picture attached).

I observed:

1 x 350 gallon aboveground storage tank of Used Lubricating Oil with an accumulation start date of 5/1.2026

The overdue balance due \$300.

I referred the business to <https://www.dehpay.com> for a copy of the overdue permit invoice.

Corrective Action Due By:07/22/2026

For expired permits, pay all applicable Unified Permit fees to the County of San Diego, Hazardous Materials Division **within 10 calendar days of receipt of this Notice of Violation**. Contact an Office Assistant at (858) 505-6661 to confirm the amount of permit fees and delinquent fees to be paid.

1. For online payments go to <https://www.dehpay.com>.
2. Go to the DEHQ tab, then in the General Search section, enter the Record Number (printed on invoice) in the Record Number field and click Search.
3. Click on Payments, select Fees from dropdown list, click "Pay Fees" link, then click on "Continue with Application", and select one of the Payment options.

Within 30 days, notify me at mayraa.cabral@sdcounty.ca.gov that your permit fees are paid. You may use the Corrective Action Form located on the last page of this inspection report.

Specialist should verify the identification of facility representative using a standard form of ID (e.g., CDL#, CA ID# or DOB).

PRINTED NAME OF ENV. HEALTH SPECIALIST Mayra A Cabral	SIGNATURE		DATE SIGNED 07/08/2026
PRINTED NAME OF FACILITY REPRESENTATIVE David Perez	SIGNATURE		DATE SIGNED 07/08/2026
TITLE OF FACILITY REPRESENTATIVE Branch Manager			

You must submit a written response within 30 days (or as specified) addressing all violations noted. The written response must demonstrate all violations have been corrected or include a written notice of disagreement that clearly states the reason for any disputed violations. The County may initiate formal enforcement action including the imposition of substantial penalties for any significant violations addressed in this notice. Any violations that are not promptly corrected will result in liability for additional days in violation and additional penalties. Any failure to provide the information requested will also be a factor in determining penalties. For these purposes, "significant violations" include violations that represent a significant threat to human health or safety or the environment, chronic violations, violations committed by a recalcitrant violator and Class I hazardous waste violations (CCR 66260.10 and H&SC 25110.8.5).



COUNTY OF SAN DIEGO

NOTICE TO COMPLY

FACILITY NAME: **United Rentals Branch 70M**
ADDRESS: **6144 FEDERAL BLVD**
CITY/ZIP: **SAN DIEGO /92114**

INSPECTION DATE: **07/08/2026** PAGE **5** OF **12**
RECORD ID #: **DEH2011-HUPFP-214482**
CERS ID: **10386103**
TIME START: **9:08 AM** END: **3:00 PM**
SPECIALIST: **Mayra A Cabral**
INSPECTION CONTACT: **David Perez**
TITLE: **Branch Manager**
PHONE: **619-929-4594**
E-MAIL: **dperez3@ur.com**

The County Hazardous Materials Division (HMD) inspected your facility on the above date, under the authority of the California Health and Safety Code (HSC), to determine compliance with applicable provisions of the HSC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). This report may contain both minor and more significant (Class II) violations. Minor violations do not include repeat violations or violations remaining uncorrected for more than 30 days (or as specified below). Minor violations do not include knowing, willful, intentional, or chronic violations; nor do they include violations showing a pattern of neglect or disregard. The remarks below are intended to provide guidance to correct any violations indicated on the attached violation report. You must submit a written response to HMD within 30 days (or as specified below) demonstrating that all violations have been corrected. Prompt correction can protect you from penalties for a "minor violation". Penalties can be imposed for each day in violation for all other violations even if they are corrected promptly. However, correction within 30 days (or as specified below) may make a penalty less likely.

NOTE: Reinspection fees will be charged if additional inspections are required to determine compliance.

VIOLATION # 3

HMD0226 Did not accumulate waste in a container or tank. 22 CCR 66262.16(b)(2)

Classification: Class II

Observations:

I observed oil (dark & red) liquid accumulating on top of the ATF drums and inside (2) secondary containers below the (350-gal used oil AST), and ATF drums. I also observed saturated oily rags inside the secondary container below the (350-gal used oil AST). I observed oily stains on the floor of the hazardous waste storage area. See Image 2-3 attached in a separate file.

Be advised, the secondary containment should always be free of liquid. All spills/ releases must be cleaned up immediately to prevent any health/ safety hazards and releases to the environment. Hazardous waste must be properly containerized, securely closed, and labeled.

Secondary containment is not an appropriate container for accumulation of used oil hazardous waste.

Corrective Action Due By: 08/07/2026

Immediately transfer/clean up hazardous wastes that have accumulated within secondary containment, or other non-appropriate storage units, into appropriate storage containers. Place the hazardous waste in a properly labeled hazardous waste container or tank with a closable lid. Ensure going forward that all spills/ releases of hazardous waste are cleaned up immediately and ensure employees are trained to minimize spills and releases from occurring. **Within 30 days**, provide proof of corrective action for this violation to mayraa.cabral@sdcounty.ca.gov

VIOLATION # 4

1010004 Chemical inventory incomplete or not submitted in CERS. HSC 25505(a)(1); 25507(a); 25508(a)(3); 25508.1(a-b); 19 CCR 1 5030.5 (a) or (d)

Classification: Class II

Observations:

Facilities who are subject to Hazardous Materials Business Plan (HMBP) requirements are required to submit a complete the Hazardous Materials chemical inventory in the California Environmental Reporting System (CERS).

I observed the following reportable quantities not reported as part of this facility's CERS inventory:

- 1 carton pallet with Walex Porta Pak Max Pods bags & per the manufacturer label, each bag weighs 1,600 grams (~3.5 lbs) . Per the pallet carton label, 1 pallet holds up to 250 bags (up to 875-lbs). Per SDS and the manufacturer label, this product is corrosive.

The chemical inventory was last submitted in CERS on 1/5/2026 does not include and Walex Porta Pak Max Pods bags . Per David Perez, Branch Manager, the facility typically uses and stores a high volume of the pods as the main of chemical additive for the port of pottie. Based on my observations, this facility handles >500lbs of Walex Porta Pak Max Pods bags .



SUPPLEMENTAL NOTICE TO COMPLY

Be advised, it is the facility's responsibility to monitor/verify inventory (including reportable amounts of hazardous materials) received/ handled on site, and accurately reporting within 30 days in CERS . Any hazardous materials routinely received on-site that meets or exceeds the reporting threshold (55gal for liquid, 500lbs for solid, 200cuft for gas) should be included as part of the Hazardous Materials Inventory.

Corrective Action Due By: **08/07/2026**

Immediately re-submit your chemical inventory in CERS. **Within 30 days**, provide proof of corrective action to my attention and the completed Corrective Action form at the end of this report to mayraa.cabral@sdcounty.ca.gov

INSPECTION REMARKS:

Hazardous Materials Business Plan (HMBP) Remarks:

- Contacts listed in CERS were up to date.
- HMBP was readily available.
- Contingency Plan/Emergency Information was accessible and posted in a central location.
- Employee training in handling hazardous materials is conducted annually and training records for the previous 3 years were available for review.

Hazardous Waste (HW) Remarks:

- Note, EPA identifies sewage as a material that is not a solid waste (40 CFR 261.4). California identifies materials listed in 40 CFR 261.4 as wastes that are not hazardous wastes, provided that they are not listed in Article 4.1 (M-wastes for mercury content) and do not exhibit a characteristic of HW as described in Article 3 (ICRT).

BE ADVISED: If additives are being introduced into stored sewage to control odors, and those additives cause the sewage to exhibit a HW characteristic, then the sewage becomes a chemical toilet waste. Any changes in the SOP changes, and/or use of chemical additives, may require the business to make a waste determination and comply to HW requirements.

A generator may determine that the waste from his/her particular facility or operation is not a hazardous waste by either:

- a.) Testing the waste according to the methods set forth in the regulations; and/or
- b.) Applying knowledge of the hazardous characteristic(s) or properties of the waste in light of the materials or the processes used and the criteria set forth in the hazardous waste regulations. The testing criteria are specified in Title 22, Division 4.5, of the California Code of Regulations (CCR). [https://www.sandiegocounty.gov/content/dam/sdc/deh/hmd/pdf/hm-984%20\(02-11\).pdf](https://www.sandiegocounty.gov/content/dam/sdc/deh/hmd/pdf/hm-984%20(02-11).pdf)

- Per David Perez, HW Central Accumulation Area (CAA) is inspected daily
- HW containers were properly closed and labeled
- Emergency Response Contingency Plan was available on site. Be advised: Records indicating emergency response arrangements with local authorities (e.g. Police Department, Fire Department, Other Emergency Response Teams, Equipment Suppliers, Hospitals) need to be available or attempts documented .
- NOTE: Submission of the Hazardous Materials Business Plan (HMBP) in the California Environmental Reporting System (CERS) does not satisfy this requirement.

Emergency response arrangements Template available at the HMD website: https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_forms.html

- Per the Department of Toxic Substances Control's Hazardous Waste Tracking System (DTSC HWTS), the EPA ID # (CAL000432214) was active. NOTE: Electronic copies of the Treatment, Storage, and Disposal Facility (TSDF) manifests can be found at www.hwts.dtsc.ca.gov.
- HW disposal receipts were available for review.
- The HW hauler is Safety Kleen (As a SQG, your hazardous waste must be picked up within 180 days of the accumulation start date. Hazardous Waste Manifests must be maintained on-site for 3 years.)
- Most recent pickup occurred on 5/1/2026
- The contents of this report were reviewed with David Perez, Branch Manager prior to obtaining a signature and issuing the report.



COUNTY OF SAN DIEGO

SUPPLEMENTAL NOTICE TO COMPLY

INSPECTION DATE: **07/08/2026**

PAGE **7** OF **12**

RECORD ID #: **DEH2011-HUPFP-214482**

- For **guidance** documents on hazardous materials-related topics,
go to: https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_publications.html
- For information on the California Environmental Reporting System (**CERS**),
go to: https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_cers.html
- If you have **questions** on: permit fees, business plan requirements, or hazardous waste regulations,
go to: <https://www.sandiegocounty.gov/content/sdc/deh/hazmat.html>
- To find out the latest San Diego County **News** and receive updates, subscribe to our govdelivery emails:
<https://public.govdelivery.com/accounts/CASAND/subscriber/new>
- We want to hear from you! Please take 60 seconds to provide us with your **feedback**:
<https://www.surveymonkey.com/r/lueg-deh-feedback?type=SignatureBlock>

You must submit a written response within 30 days (or as specified) addressing all violations noted. The written response must demonstrate all violations have been corrected or include a written notice of disagreement that clearly states the reason for any disputed violations. Any failure to provide the information requested will also be a factor in determining potential enforcement action. Violations that are observed to be chronic/recalcitrant will be escalated and may result in further/substantial penalties.



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

FACILITY NAME: **United Rentals Branch 70M**
ADDRESS: **6144 FEDERAL BLVD**
CITY/ZIP: **SAN DIEGO /92114**

INSPECTION DATE: **07/08/2026** PAGE **8** OF **12**
RECORD ID #: **DEH2011-HUPFP-214482**
CERS ID: **10386103**
TIME START: **9:08 AM** END: **3:00 PM**
SPECIALIST: **Mayra A Cabral**
INSPECTION CONTACT: **David Perez**
TITLE: **Branch Manager**
PHONE: **619-929-4594**
E-MAIL: **dperez3@ur.com**

The County Hazardous Materials Division (HMD) inspected your facility on the above date, under the authority of the California Health and Safety Code (HSC), to determine compliance with applicable provisions of the HSC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). This report will contain observations made during the inspections and may include minor violations corrected in the presence of the inspector. Minor violations do not include repeat violations or violations remaining uncorrected for more than 30 days (or as specified below). Minor violations do not include knowing, willful, intentional, or chronic violations; nor do they include violations showing a pattern of neglect or disregard. If any action items are noted, provide a written response to HMD within the time specified.

NOTE: Reinspection fees will be charged if additional inspections are required to determine compliance.

☐ Unified Program Facility Permit Current	☒ Contingency Plan Available	☐ LQG	☒ SQG
☒ Hazardous Materials Business Plan Available	☒ Employee Training Records Available		
☒ Employee Training is Adequate	☒ Universal Waste Managed Properly		
☒ Waste Disposal Records Available for Review	☐ Waste Containers	☐ Closed	☐ Labeled
☒ Emergency Contacts Current	☐ Updated today	☐ Waste Containers in Good Condition	
☐ Chemical Inventory/Map Current	☐ Updated today	Unified Program Facility Permit Expires On	03/31/2025
☒ EPA ID Active	CAL000432214	UST Permit Expires On	

CONSENT TO CONDUCT INSPECTION GRANTED BY: **David Perez,** TITLE: **Branch Manager**

The Department of Environmental Health and Quality (DEHQ) is the Certified Unified Program Agency (CUPA) for the County of San Diego. The Hazardous Materials Division (HMD), within DEHQ, implements the Unified Program, which includes programs pertaining to Hazardous Materials Business Plan (HMBP), Hazardous Waste (HW), Aboveground Petroleum Storage Act (APSA), Underground Storage Tanks (USTs), and California Accidental Release Prevention (CalARP). In San Diego County, the HMD also regulates the Medical Waste Management Act.

If you have any questions regarding this inspection, please contact Mayra A Cabral, 619-454-9676,

MayraA.Cabral@sdcounty.ca.gov

***** Please Refer to Notice of Violation *****

INSPECTION PHOTOS

None

INSPECTION ATTACHMENTS

None

All regulated businesses are required by law to submit their Unified Program-related information and business updates online through the California Environmental Reporting System (CERS). For additional information about CERS, go to: https://www.sandiegocounty.gov/deh/hazmat/hmd_cers.html

PRINTED NAME OF FACILITY REPRESENTATIVE David Perez	SIGNATURE 	DATE SIGNED 07/08/2026
TITLE OF FACILITY REPRESENTATIVE Branch Manager		

Department of Environmental Health and Quality, Hazardous Materials Division, P.O. Box 129261, San Diego, CA 92112-9261
Phone: (858) 505-6880 <http://www.sdcdehq.org>



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

Handlers of Hazardous Materials and Small and Large Quantity Generators of Hazardous Waste

INSPECTION DATE: **07/08/2026** PAGE **9** OF **12**
RECORD ID #: **DEH2011-HUPFP-214482**

FACILITY NAME: * **United Rentals Branch 70M**

ADDRESS: * **6144 FEDERAL BLVD**

CITY/ZIP: * **SAN DIEGO**

92114

Each violation checked below is for the section(s) of the California Health and Safety Code (HSC), California Code of Regulations (CCR), or the San Diego County Code (SDCC) indicated in italics. Incorporated provisions of Title 40 of the Code of Federal Regulations (CFR) are noted for reference. All violations must be corrected. Submit documentation of return to compliance to your Specialist. You may use the Corrective Action Form (HM-926) to document your return to compliance. Please call (858) 505-6880 or your Specialist if you have any questions. HMBP = Hazardous Materials Business Plan; CUPA = Certified Unified Program Agency; CERS = California Environmental Reporting System; SQG = Small Quantity Hazardous Waste Generator; LQG = Large Quantity Hazardous Waste Generator

HAZARDOUS MATERIALS REQUIREMENTS

#	<u>VIOLATION DESCRIPTION</u>
☐ 1010001	Failed to establish and implement a HMBP. HSC 25505(a) and 25507(a)
☐ 1010002	HMBP not submitted in CERS within the required timeframe. HSC 25508(a)(1); 27 CCR 15188(a),(b),(d)
☐ 1010003	Business activities &/or Business Owner/Operator page not complete or accurate in CERS. 19 CCR 1 5030.3 (a)(1); SDCC 68.904(b); HSC 25508(a)(1), 25508(a)(3)
4 ☒ 1010004	Chemical inventory incomplete or not submitted in CERS. HSC 25505(a)(1); 25507(a); 25508(a)(3); 25508.1(a-b); 19 CCR 1 5030.5 (a) or (d)
☐ 1010005	Site map not submitted in CERS or not sufficient. HSC 25505(a)(2); 25508(a)(3); 25508.1(f); 19 CCR 1 5030.3(a)(3)
☐ 1010006	Failure to electronically update business plan within 30 days of any one of the following events: 1) A 100 percent or more increase in the quantity of a previously disclosed material. 2) Any handling of a previously undisclosed hazardous materials at or above reportable quantities. 3) A change of facility address, business address, business ownership, or business name. 4) A substantial change in the handler's operations that requires modification to any portion of the business plan. HSC 25508.1(a-f); 19 CCR 1 5030.5(d); SDCC 68.904(c)(6)
☐ 1010008	HMBP not certified as complete and accurate in CERS by the required due date. HSC 25508.2, 19 CCR 1 5030.5(b)
☐ 1010010	Emergency response plan and procedures to mitigate a release or threatened release not adequate, not established or not submitted in CERS. HSC 25505(a)(3), 25508(a)(1), 25508(a)(3); 19 CCR 1 5030.9
☐ 1010011	Failure to notify property owner in writing that the business is subject to the HMBP program. HSC 25505.1
☐ 1010012	Failure to provide a copy of HMBP to the property owner within five working days upon request from property owner. HSC 25505.1
☐ 1010014	Failure to submit emergency response plan in CERS, when not meeting agricultural handler exemption. HSC 25507.1(a) and 25508(a)(1); 19 CCR 1 5040.1, 5040.2
☐ 1010015	Failure to submit employee training plan in CERS, when not meeting agricultural handler exemption. HSC 25507.1(a), 25508(a)(1), 19 CCR 1 5040.1, 5040.2
☐ 1010016	HMBP not established or submitted in CERS, when not meeting the remote site exemption. HSC 25507.2 and 25508(a)(1)
☐ 1020001	Employee training and/or plan for safety procedures in the event of a release or threatened release of a hazardous material not adequate, not established or not submitted in CERS. HSC 25505(a)(4), 25508(a)(1), 25508(a)(3); 19 CCR 1 5030.10(a)
☐ 1030001	(AWM) Failure of agricultural handler to post warning signs on buildings where pesticides, petroleum, or fertilizers are stored, that are visible from any direction of probable approach, contain all required information, and are in appropriate language. HSC 6.95 25507.1(a)(2); 19 CCR 1 5040.1, 5040.2
☐ 1020002	Initial &/or annual employee training not conducted in safety procedures for a hazardous material release or threatened release &/or employee training records not available or not maintained for 3 years. HSC 25505(a)(4); 19 CCR 1 5030.10(b)
☐ 1040001	Hazardous materials release or threatened release not immediately reported to the CUPA and OES upon discovery. HSC 25510(a); 19 CCR 2631(a)
1 ☒ HMD1001	Unified Program Facility permit not obtained for hazardous materials. SDCC 68.904; 68.905; 68.906; 68.907; 68.907.1
☐ HMD1005	Emergency contact not provided or current in CERS. HSC 25508.1(f); SDCC 68.904(b)
☐ HMD1007	Highly toxic gas (TLV<10 ppm) not disclosed in CERS. SDCC 68.1113(a)
☐ 1010017	HMBP not readily available to facility personnel or the CUPA. HSC 25505(c)
☐ 1010018	Failure to complete and electronically submit a business plan, or required hazardous materials reporting, when handling a consumer product that is a hazardous material in a quantity equal to or greater than the reportable threshold, and stored at a facility that manufactures the product, or is a warehouse or distribution center with no direct sales to consumers, or where the product is dispensed on the retail premises. HSC 6.95 25507(b)(5)(B)(i), 25508(a)(1)
☐ 1010019	Failure to complete and electronically submit a business plan, or required hazardous materials reporting, when handling a consumer product that is a hazardous material at a retail establishment in a quantity equal to or greater than the reportable threshold if the product is not intended for personal, family, or household purposes, or is not present in the same form, concentration, or quantity as a product prepackaged for distribution to a consumer for personal, family, or household purposes; or 1. the product has a NFPA or HMIS rating of 3 or 4 and is stored, at any time, in quantities equal to, or greater than, 165 gallons for a liquid, 600 cubic feet for a compressed gas, or 1,500 pounds for a solid; or 2. The product poses a significant potential hazard, and the UPA requires the product to be reported. HSC 6.95 25507(b)(5)(B)(ii), 25508(a)(1)
☐ 1010020	Failure to provide sale or provision records, within 5 days of a request from an UPA. HSC 6.95 25507.5
☐ 1010021	Failure of a handler to notify and disclose a hazardous material transfer, when directed by an UPA. HSC 6.95 25508.3

HAZARDOUS WASTE REQUIREMENTS FOR SQGS ONLY

#	<u>VIOLATION DESCRIPTION</u>
3 ☒ HMD0226	Did not accumulate waste in a container or tank. 22 CCR 66262.16(b)(2)
☐ 3030007	Failure to properly label hazardous waste accumulation containers and portable tanks with the following requirements: "Hazardous Waste", name and address of the generator, physical and chemical characteristics of the Hazardous Waste, and starting accumulation date. 22 CCR 12 66262.16(b)(4) (A), 66262.17(a)(5)(A)
☐ 3030009	(VSQG) Failure to send non-acute hazardous waste offsite for treatment, storage, or disposal within 180 days (or 270 days if waste is transported over 200 miles) of when the accumulation period begins, for a generator who generates less than 100 kilogram per month if the quantity of hazardous waste accumulated onsite never exceeds 6,000 kilograms; or failure to send acute hazardous waste offsite within 90 days. 22 CCR 12 66262.16(b)(1), 66262.16(b)(8), 66262.16(c), 66262.16(g)(1); HSC 6.5 25123.3(c), 25123.3(h)(1)
☐ 3030010	Failure to send hazardous waste offsite for treatment, storage, or disposal within 180 days (or 270 days if waste is transported over 200 miles) for a generator who generates less than 1000 kilograms per month and the quantity of hazardous waste accumulated onsite never exceeds 6,000 kilograms; or failure to send acute hazardous waste offsite within 90 days once one kilogram of such waste is generated. 22 CCR 12 66262.16(b)(1), 66262.16(b)(8), 66262.16(c), 66262.16(g)(2); HSC 6.5 25123.3(h)(1)
☐ 3030013	Failure to: (1) Accumulate hazardous waste in a container that is in good condition; (2) Immediately transfer the hazardous waste from a leaking container to a container that is in good condition; or (3) Immediately manage the waste in some other way that complies with waste management requirements. 22 CCR 12 66262.16(b)(2)(A), 66262.15(a)(1)
☐ 3030015	Failed to accumulate or store hazardous waste in a lined &/or compatible container. 22 CCR 12 66262.16(b)(2)(B), 66262.15(a)(2) 043



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

Hazardous Materials and Hazardous Waste (continued)

INSPECTION DATE: **07/08/2026**
RECORD ID #: **DEH2011-HUPFP-214482**

PAGE **10** OF **12**

- ☐ 3030017 Failure to meet the following container management requirements: (a) A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. (b) A container holding hazardous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak. (c) A container holding hazardous waste in a satellite accumulation area must always be closed during storage, except when it is necessary to add or remove waste, or when temporary venting of a container is necessary for the proper operation of equipment or to prevent dangerous conditions such as build-up of extreme pressure. 22 CCR 12 66262.15(a)(4), 66262.16(b)(2)(C)
- ☐ 3030019 Failed to inspect hazardous waste storage area at least weekly. 22 CCR 66262.16(b)(2)(D)
- ☐ 3030022 Failed to properly separate incompatible waste. 22 CCR 12 66262.15(a)(3), 66262.16(b)(2)(E)
- ☐ 3030030 Failure to maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. 22 CCR 12 66262.16(b)(6)(A)
- ☐ 3030036 Failed to maintain adequate aisle space. 22 CCR 12 66262.16(b)(6)(E)
- ☐ 3010022 Failure to post the valid information next to the telephone: (A) The name and telephone number of the emergency coordinator; (B) Location of fire extinguishers and spill control material, and, if present, fire alarm; and (C) The telephone number of the fire department, unless the facility has a direct alarm. 22 CCR 12 66262.16(b)(7)(B)
- ☐ 3020001 Failure to ensure employees are thoroughly familiar with proper waste handling and emergency procedures during normal facility operations and emergencies. 22 CCR 66262.16(b)(7)(C)
- ☐ 3030032 Failed to maintain the following emergency response equipment or equivalent unless none of the hazards posed by waste handled at the facility could require the particular kind of required equipment: 1) An internal communication or alarm system; 2) A communication device, such as a telephone; 3) Portable fire extinguishers, fire/spill control equipment and decontamination equipment; and 4) Water at adequate volume and pressure. 22 CCR 12 66262.16(b)(6)(B), 66262.16(b)(6)(D)
- ☐ 3030034 Failure of the facility to test and maintain as necessary all communications or alarm systems, fire protection equipment, and decontamination equipment to assure its proper operation in time of emergency. 22 CCR 12 66262.16(b)(6)(c)
- ☐ 3030039 Failed to have an emergency coordinator on the premises or on call, and available during an emergency. 22 CCR 12 66262.16(b)(7)(A)
- ☐ HMD0412 Failed to implement and/or coordinate emergency response measures during an emergency, spill/release. 22 CCR 66262.16(b)(7)
- ☐ 3010030 Failed to submit an Exception Report to DTSC for hazardous waste manifest. HSC 25123.3(h)(2); 22 CCR 66262.42(a), (c-d)

HAZARDOUS WASTE TANK SYSTEMS FOR SQGS ONLY

- | # | VIOLATION DESCRIPTION |
|----------------------------------|---|
| ☐ 3030026 | Failure to maintain the following general tank operating requirements: a) Hazardous wastes or treatment reagents shall not be placed in a tank system if they could cause the tank, its ancillary equipment, or the secondary containment system to rupture, leak, corrode, or otherwise fail. b) The owner or operator shall use appropriate controls and practices to prevent spills and overflows from tank or secondary containment systems. These include at a minimum: 1) Spill prevention controls (e.g., check valves, dry discount couplings); 2) Overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank); and 3) Maintenance of sufficient freeboard in uncovered tanks to prevent overtopping by wave or wind action or by precipitation. Uncovered tanks shall be operated to ensure at least 60 centimeters (2 feet) of freeboard, unless the tank is equipped with a containment structure (e.g., dike or trench), a drainage control system or a diversion structure (e.g., standby tank) with a capacity that equals or exceeds the volume of the top 60 centimeters (2 feet) of the tank. CCR 12 66262.17(a)(2); CCR 15 66265.194. |
| ☐ 3030024 | Failed to operate uncovered tank to ensure at least 2 ft. of freeboard to prevent overtopping, unless the tank is equipped with a containment structure, a drainage control system, or a diversion structure with a capacity that equals or exceeds the volume of the top 2 ft. of the tank. 22 CCR 66262.16(b)(3)(A)(3) |
| ☐ 3030025 | Failed to provide an overfill protection device on continuously fed hazardous waste tank(s). 22 CCR 66262.16(b)(3)(A)(4) |
| ☐ 3030027 | Failed to conduct daily tank inspection of discharge control system, monitoring equipment and waste level. 22 CCR 12 66262.16(b)(3)(B)1.-3. |
| ☐ 3030028 | Failed to conduct weekly hazardous waste tank inspection(s) to detect signs of leakage and ensure that the construction materials, fixtures and surrounding areas of the tank are in good condition. 22 CCR 12 66262.16(b)(3)(B)4.-5., 66262.16(b)(3)(C) |
| ☐ 3050007 | Failure to remove all hazardous waste from tanks, discharge control equipment, and discharge confinement structures upon closure of the facility. 22 CCR 12 66262.16(b)(3)(D) |
| ☐ 3040001 | Failure to immediately remove from service a tank system or secondary containment system from which there has been a leak, spill, is unfit for use and comply with applicable requirements. 22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.196 |
| ☐ HMD1612 | Hazardous waste improperly stored in a tank system causing leaks, corrosion, or failure. 22 CCR 66262.16 (b)(3) |
| ☐ HMD1614 | Failed to pre-notify the CUPA in writing prior to closing a hazardous waste tank system. 22 CCR 67383.3(a)(1) |
| ☐ HMD1615 | Failed to properly accumulate ignitable or reactive waste in a tank system. 22 CCR 66262.16 (b)(3)(e) |

HAZARDOUS WASTE REQUIREMENTS FOR SQGS AND LQGS

RECORD KEEPING/OPERATIONAL REQUIREMENTS

- | # | VIOLATION DESCRIPTION |
|---|--|
| 2 ☒ HMD0131 | Unified Program Facility Permit not obtained &/or maintained for the generation of hazardous waste. SDCC 68.904; 68.905; 68.906; 68.907, 68.907.1 |
| ☐ 3030053 | Failed to maintain waste analysis records, analytical records &/or waste determination results for at least 3 years. 22 CCR 66262.40(c) |
| ☐ 3010002 | Failed to obtain &/or maintain an Identification Number prior to treating, storing, disposing of, transporting or offering for transportation any hazardous waste. Maintenance of ID numbers must be annually verified by using the Electronic Verification Questionnaire (eVQ). 22 CCR 66262.18(a); HSC 6.5 25205.16(b) |
| ☐ 3010038 | Failure of a RCRA SQG to maintain ID number by notifying DTSC by September 1 of each year in which re-notifications are required. Re-notification must be done by using EPA form 8700-12. 22 CCR 12 66262.18(d); HSC 6.5 25205.16(a) |
| ☐ 3010039 | Failure to maintain documentation of the arrangements with the local fire department and other emergency response agencies; or if none exist, that the attempt to make the arrangements was made. 22 CCR 12 66262.16(b)(6)(F)2, 66262.17(a)(6), 66262.256(b) |
| ☐ 3010008 | Failed to properly complete a uniform hazardous waste manifest. 22 CCR 66262.23(a) |
| ☐ 3010009 | Failed to submit an Exception Report to DTSC for hazardous waste manifest. HSC 25123.3(h)(2); 22 CCR 66262.42(b), (c), &/or (d) |
| ☐ 3010010 | Failed to maintain copies of Uniform Hazardous Waste Manifest, consolidated manifest, or Bills of Lading for 3 years. HSC 25160.2(b)(3), 25185(a)(4); 22 CCR 66262.40(a), 66262.23(a)(3) |
| ☐ 3010011 | Failed to send a copy of the uniform hazardous waste manifest that originated in paper form to DTSC within 30 days of shipment. 22 CCR 66262.23(a)(4); HSC 25160(b)(1)(c) |
| ☐ 3010013 | Failed to meet the consolidated manifesting requirements for waste shipment. HSC 25160.2(b)(3) &/or (c) |
| ☐ 3010014 | Failed to retain at the generator's place of business disposal records of spent lead-acid batteries for at least 3 years. 22 CCR 66266.81(a)(4)(A) &/or (B) |
| ☐ 3030006 | Failed to determine if a hazardous waste is restricted or prohibited from land disposal and has to be treated. 22 CCR 12 66262.16(b)(5), 66262.17(a)(9); 22 CCR 18 66268.7(a) |



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

INSPECTION DATE: **07/08/2026** PAGE **11** OF **12**
RECORD ID #: **DEH2011-HUPFP-214482**

Hazardous Materials and Hazardous Waste (continued)

- ☐ 3010016 Failure of recycler who recycles more than 100 kilograms per month of a recyclable material to submit the biennial Recyclable Materials Report (RMR) in CERS when claiming exclusion or exemption. HSC 25143.10(a), (c) &/or (d)
- ☐ HMD0149 Failed to keep disposal receipts for drained used oil filters and/or drained fuel filters for 3 years. HSC 25250.22; 22 CCR 66266.130(c)(5)
- ☐ HMD0140 Failed to have Land Disposal Restriction documentation onsite for 3 years. 22 CCR 66268.7(a)(8)
- ☐ HMD0142 Failed to notify the CUPA in CERS for onsite hazardous waste treatment/tiered permitting. HSC 25201(a)
- ☐ 3010035 Failure to annually submit notification of generator's intent to remotely consolidate hazardous waste. HSC 25110.10(d)
- ☐ 3010036 Failure to report, and report accurately, program data (such as hazardous waste generation activities) electronically. HSC 25404(e)(4), CCR 15188(b) and (c)
- ☐ 3010037 Failure to notify the CUPA of aerosol can processing procedures no later than the date on which the handler first initiates this activity. HSC 6.5 25201.16(j)
- ☐ 3050009 Failure to obtain a hazardous waste facilities permit, or other grant of authorization, prior to accepting, treating, storing, or disposing of a hazardous waste at the facility, area, or site. HSC 6.5 25201(a)

DISPOSAL AND TRANSPORTATION

#

VIOLATION DESCRIPTION

- ☐ 3010007 Failed to prepare a hazardous waste manifest for the transport of a waste for off-site transfer, treatment, storage, or disposal. HSC 25160(b)(1) or (2), 25160.2(b)(9); 22 CCR 66262.20(a)
- ☐ 3030005 Failed to make a proper waste determination. 22 CCR 66262.11, 66262.40(c)
- ☐ 3050001 Failed to use a DTSC registered hazardous waste transporter to transport hazardous waste. HSC 25163(a)
- ☐ 3050002 Failure to dispose of hazardous waste at a facility which has a permit from DTSC or disposing of hazardous waste at any point which is not authorized or which does not have a valid ID number. 22 CCR 12 66262.18(c); HSC 6.5 25189.5(a)
- ☐ HMD0308 Impermissible dilution of hazardous waste. 22 CCR 66268.3(a)
- ☐ HMD0305 Disposed of used oil illegally. HSC 25250.5(a), 25189.5(a)
- ☐ HMD0306 Failed to properly dispose of oil-based paint &/or hazardous waste latex paint liquid. HSC 25217.1, 25189.5(a)
- ☐ 3010027 Failure to obtain CUPA approval prior to the replacement of identical or functionally equivalent tank system parts or components. 22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.192(m)

STORAGE AND HANDLING

#

VIOLATION DESCRIPTION

- ☐ 3030001 Failed to meet the management requirements when handling or storing spent lead-acid batteries. 22 CCR 66266.81(a)
- ☐ 3030003 Failed to properly manage 'damaged' spent lead acid batteries so as to minimize the release of acid and lead and to protect the handlers and the environment 22 CCR 66266.81(b)
- ☐ 3030004 Failure to properly manage used oil filters and/or fuel filters in accordance with the requirements. HSC 25250.22; 22 CCR 66266.130
- ☐ 3050004 Failure to prevent intentional contamination of used oil with other hazardous waste other than minimal amounts of vehicle fuel. HSC 25250.7(a)
- ☐ HMD0222 Failed to properly label Excluded Recyclable Materials (ERM) accumulated in a container or tank. HSC 25143.9(a)
- ☐ HMD0216 Failed to label hazardous material container within 10 days after the container was discovered to be mislabeled or inadequately labeled. HSC 25124(b)(3)(A)
- ☐ HMD0217 Failed to repackage and properly label damaged/deteriorated hazardous material container within 96 hours. HSC 25124(b)(3)(B)
- ☐ HMD0219 Failed to properly segregate used oil &/or fuel drained from filters. HSC 25250.22(b)(4); 22 CCR 66266.130(c)(6)
- ☐ 3030057 Failed to comply with hazardous waste satellite container regulation. 22 CCR 12 66262.15(a)
- ☐ 3030058 Failed to mark date on empty container larger than 5 gallons &/or properly manage it within one year. 22 CCR 66261.7
- ☐ 3030060 Failure of the owner or operator managing laboratory hazardous waste in a laboratory accumulation area to comply with the accumulation, storage, management, training, and/or record-keeping requirements. HSC 25200.3.1(b) and/or (c)

UNIVERSAL WASTE HANDLER REQUIREMENTS

#

VIOLATION DESCRIPTION

- ☐ 3010004 Failure of a universal waste handler to obtain an ID Number from DTSC when storing 5,000 kilograms or more of universal waste when a federal ID number is not required. 22 CCR 23 66273.32(b)
- ☐ HMD0151 Failed to maintain universal waste handler training records for 3 years. 22 CCR 66273.36(c),(d)
- ☐ 3020003 Failed to properly train handlers of universal waste in universal waste management and response procedures. 22 CCR 66273.36(a),(b)
- ☐ 3030008 Failed to properly label or mark Universal Waste container, package, or pallet (excluding CESQUWG) 22 CCR 66273.34
- ☐ 3030011 Failed to properly dispose of Universal Waste within one year. 22 CCR 66273.35(a) &/or (b)
- ☐ HMD0147 Failed to keep records of offsite Universal Waste shipment(s) available for inspection for 3 years. 22 CCR 66273.39(c),(d)(2)
- ☐ 3030046 Failure of the universal waste handler to transfer universal waste to another universal waste handler, or appropriate destination facility. Failure to package, label, mark and placard shipments and prepare shipping papers for any universal waste that meets the hazardous materials definition in accordance with DOT 49 CFR parts 171-180. 22 CCR 23 66273.38(a), 66273.38(c); 49 CFR 1 172-180
- ☐ 3030051 Failed to meet accumulation, labeling, marking, &/or containment standards for Universal Waste aerosol containers. HSC 25201.16(f)
- ☐ 3040004 Failed to manage universal waste in a manner to prevent release(s) to the environment. 22 CCR 23 66273.33, 66273.33.5, 66273.33.6, 66273.37
- ☐ HMD0307 Disposal of universal waste (UW) to an unauthorized point. HSC 25189.5(a); 22 CCR 66273.31(a), 66273.8(b)
- ☐ 3010005 Failure of a universal waste handler of PV modules, electronic devices, CRTs, and/or CRT glass who might accept and accumulate, but not treat, any PV module, electronic device, CRT, and/or CRT glass from an offsite source to submit notification with all required information to DTSC no later than 30 calendar days prior to accepting any above noted waste. 22 CCR 23 66273.32(c), 66273.32(e)
- ☐ 3010020 Failure of a universal waste handler to submit an annual report that includes all required information to DTSC by February 1 of every year. 22 CCR 66273.32(d), (f)
- ☐ 3010006 Failure of the universal waste handler who sends electronic devices, CRTs, and/or CRT glass to any foreign destination to comply with the following: (1) Notify DTSC 60 days prior to the intended export before any electronic devices, CRTs, and/or CRT glass are scheduled to leave the United States and cover all export activities extending over the next twelve (12) month or lesser period; (2) Concurrently send a copy of the notification required pursuant to subsection 66273.40(a)(2)(B) of 22 CCR to the CUPA having jurisdiction over the universal waste handler's facility; (3) sign the export notification; and (4) include all required information in the export notification. 22 CCR 23 66273.40(a)(2), 66273.40(a)(3), 66273.40(a)(4)
- ☐ 3110030 Failure to notify the CUPA of aerosol can processing procedures no later than the date on which the handler first initiates this activity. HSC 6.5 25201.16(j)



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

Hazardous Materials and Hazardous Waste (continued)

INSPECTION DATE: **07/08/2026** PAGE **12** OF **12**
RECORD ID #: **DEH2011-HUPFP-214482**

CERTIFIED APPLIANCE RECYCLER REQUIREMENTS

#	<u>VIOLATION DESCRIPTION</u>
☐ 3010033	Failure to obtain Certified Appliance Recycler certification (CAR) from DTSC. HSC 25211.4
☐ 3010034	Failure of certified appliance recycler (CAR) to provide documentation that all materials that require special handling (MRSH) have been properly removed and managed. HSC 25211.2, 25211.3
☐ 3030055	Failure of certified appliance recycler (CAR) to properly remove and dispose of all materials that require special handling (MRSH). HSC 25212

HM-923 (08-21)



COUNTY OF SAN DIEGO

CORRECTIVE ACTION FORM TO DOCUMENT RETURN TO COMPLIANCE

FACILITY NAME: **United Rentals Branch 70M**
ADDRESS: **6144 FEDERAL BLVD**
CITY/ZIP: **SAN DIEGO /92114**

INSPECTION DATE: **07/08/2026**
RECORD ID #: **DEH2011-HUPFP-214482**
CERS ID: **10386103**
SPECIALIST: **Mayra A Cabral**
INSPECTION CONTACT: **David Perez**
TITLE: **Branch Manager**
PHONE: **619-929-4594**
E-MAIL: **dperez3@ur.com**

VIOL#	VIOL CLASS	DUE DATE	DATE CORRECTED	INDICATE HOW VIOLATIONS WERE CORRECTED (Attach Any Supporting Documentation)
#1 HMD1001	Class I	07/22/2026		
#2 HMD0131	Class I	07/22/2026		
#3 HMD0226	Class II	08/07/2026		
#4 1010004	Class II	08/07/2026		

I certify under penalty of law that this facility has corrected all violations marked on the Compliance Inspection Report/Notice of Violation. I have personally examined and am familiar with the information submitted and believe the information is true, accurate and complete. I am authorized to file this certification for the facility, and am aware that there are significant penalties for submitting false information.

PRINTED NAME OF FACILITY REPRESENTATIVE	SIGNATURE		DATE SIGNED
TITLE OF FACILITY REPRESENTATIVE			

SEND COMPLETED FORM AND SUPPORTING DOCUMENTATION TO THE ADDRESS LISTED BELOW

COUNTY OF SAN DIEGO USE ONLY

REVIEWED BY: _____ DATE: _____

SPECIALIST'S COMMENTS:

☐ All violations noted on date listed above were corrected

☐ Based On Information Provided By The Facility

☐ Based On Field Verification By Specialist

☐ RTC entered by Specialist on: _____

☐ RTC entered by Office Assistant on: _____

Department of Environmental Health and Quality, Hazardous Materials Division, P.O. Box 129261, San Diego, CA 92112-9261
(858) 505-6880 <http://www.sdcdehq.org>

ATTACHMENT 5

County of San Diego Communication — July 8, 2026 Site Visit Summary

Communication of July 10, 2026 (G. Conaughton) summarizing the July 8 HazMat and septic inspection: El Cajon Dump Station receipts verified, “no violations ... under DEHQ’s septic pumper authority,” and County/RWQCB both disclaiming authority over the “intermediary sewage transfer tank.”

Attachment to: United Rentals FRAC Tank Operations Report — July 14, 2026



Darryl Cotton <151darrylcotton@gmail.com>

Fwd: Hey JW, here's the latest information; our hazmat and septic staff conducted a site inspection Wednesday after you gave us more info...

1 message

JW August <jwaugustsd@gmail.com>

Fri, Jul 10, 2026 at 11:36 AM

To: Darryl Cotton <151darrylcotton@gmail.com>, JW August <jwaugustsd@gmail.com>

The county's response to my inquiries---

There are a number of remaining issues....plus as I recall you said APCD blew you off.....and they are one of the agencies responsible for investigating the smells according to this email.....did they ever come to the property?

NBC7 has this response as well. They remain interested. its not over until the fat dog howls.

jw



JW August
Freelance journalist
jwaugustsd@gmail.com
619-992-2210
X: @JW_August
Facebook: JW August
<https://muckrack.com/j-w-august-2>

----- Forwarded message -----

From: **Conaughton, Gig** <Gig.Conaughton@sdcounty.ca.gov>

Date: Fri, Jul 10, 2026 at 10:54 AM

Subject: Hey JW, here's the latest information; our hazmat and septic staff conducted a site inspection Wednesday after you gave us more info...

To: JW August <jwaugustsd@gmail.com>

Cc: Conaughton, Gig <Gig.Conaughton@sdcounty.ca.gov>

Hey JW,

Sorry it took a bit. When I asked you to directly address what you are looking into, ie: — *"its believed the owner at Federal Blvd location is illegally dumping the poop they collect in their out houses provided for concerts, big events, like fair or NASCAR at Coronado"* —

we were able to establish it as a complaint. We sent hazmat and septic out immediately on Wednesday.

Here's what we have; I've included staff reports:

Following your report of potential illegal disposal of wastewater on the property, and a separate complaint received for potential hazardous waste violations, we had both our HazMat and Septic staff conduct a site visit on 7/8 to investigate.

The HazMat team conducted a full hazardous materials and hazardous waste inspection, including verification of chemical storage, chemical additives used, permit status, and reporting compliance.

We found no evidence of illegal dumping or containers leaking sewage. The Hazmat team found four hazardous materials violations regarding chemicals including oil, transmission fluids, and chemicals to deodorize and clean porta potties and urinals. None of the violations observed are causing odors or are related to the holding tank or pumper trucks themselves. The Haz Mat team will be following up on these violations for compliance.

None of the violations observed are causing odors or are related to the holding tank or pumper trucks themselves. The Haz Mat team will be following up on these violations for compliance.

Our Septic Team was able to verify the monthly receipts for dumping the waste at the City of El Cajon Dump Station since January of this year (the 2025 receipts were reviewed during the site visit in December, with no concerns noted). Note that staff only verify the receipts, we do not collect those as a record. They also investigated the areas identified along the fence line and saw no evidence of improper wastewater disposal in these areas, nor did staff observe any odors while on site. There were no violations observed under DEHQ's septic pumper authority.

It's likely that the neighbors are smelling odors when the trucks come in and fill the above ground tank, as well as when the tank and trucks are opened to transfer the wastewater. However, there are not DEHQ violations related to these smells.

Staff were also able to meet with the Regional Water Quality Control Board who confirmed their oversight is not required for the intermediary sewage transfer tank.

Here is a recap of the information we've discussed over the past two weeks:

- Questions were related to UNITED RENTALS (NORTH AMERICA) DBA RELIABLE ONSITE SERVICES, located at [6144 Federal Blvd, San Diego](#)
- The site operates a porta potty rental business, which includes 16 septic pumping trucks that operate out of this location, storage of the portable toilet and associated chemical/products, a intermediary sewage transfer tank and equipment/supplies related to operating the vehicles and tanks, including some materials that are classified as hazardous materials, such as automatic transmission fluid. The site has two permits with DEHQ, a Hazardous Materials permit (DEH2011-HUPFP-214482), for regulated Haz Waste held on site to support the operation and a Septic permit for the pumper trucks (DEH2020-LSHOP-000063).
- DEHQ's Septic staff has authority over the permitting and inspecting of sewage-hauling vehicles and conducts annual inspections to verify compliance of regulation for these

Gmail - Fwd: Hey JW, here's the latest information; our hazmat and septic staff conducted a site inspection Wednesday after you ... vehicles, which can occur at the business location or DEHQ's office.

- A routine inspection was conducted on 12/11/25 and found no violations. Record is attached.
- An inspection for illegal discharge was conducted yesterday and found no violations, no signs of illegal discharge or dumping of wastewater, as well as no odors. Record is attached.
- Records confirm that all wastewater pumped is being disposed of at the City of El Cajon dump station located at [1050 Vernon Way](#) in El Cajon.
- DEHQ's Haz Mat team has authority over permitting and inspecting businesses that store or generate hazardous waste.
 - In response to a complaint received, an inspection was conducted yesterday. The inspection had violations related to the permit being expired, materials not being continued inside the tanks, and an incomplete inventory, but were not related to the sewage truck haulers and no odors were observed. Record is attached.
- DEHQ does not have authority over the onsite intermediary sewage transfer tank or odor complaints.
- Contact information was provided for the CARB and APCD, who may have authority of qualifying odor violations. If community members are experiencing odors associated with this site, they are encouraged to report those directly to APCD.
- San Diego Zoning/Code Enforcement would have authority over the use of the land, what type of businesses can operate at this property.
- Regional Water Quality Control Board does not have a regulatory role at this site.



Gig Conaughton, Communications Specialist

Communications Office

(858) 692-7214

[SanDiegoCounty.gov](https://www.sandiegocounty.gov) | [News Updates](#) | [Engage](#)



3 attachments

 **2026-07-08.PDF**
131K



Macros_Inspection Photos PP _DEH2011-HUPFP-214482_7.8.2026.pdf

2372K



DEH2026-ACom-103865 inspection 07.08.26.pdf

408K

SUPPLEMENT TO THE JULY 14, 2026 FRAC TANK OPERATIONS REPORT

Overnight Pump-Out and Identification of the Hauling Vehicle — July 15, 2026 (Recording A.6 and Photographs)

6144 Federal Blvd., San Diego — United Rentals (North America), Inc. / Reliable Onsite Services

Prepared by Darryl Cotton, 6176 Federal Blvd. · July 15, 2026 · Reference: FRAC Tank Operations Report transmitted to RWQCB Region 9 on July 14, 2026

1. Purpose

I submit this supplement to add to the FRAC Tank Operations Report I transmitted to the Board on July 14, 2026 two things I documented in the early hours of July 15, 2026: an overnight pump-out of the FRAC tank, recorded as Exhibit A.6; and the identification, by time-stamped photograph later that same morning, of the specific vehicle that emptied the tank and hauled the material away. Together they fix the times, name the truck, and — because that truck's only logistically feasible permitted disposal site keeps mandatory records — point directly to the documents that would confirm or refute lawful disposal. The recording and the photographs described below accompany this supplement.

2. The overnight pump-out (Exhibit A.6)

Exhibit A.6 is a 29-second, 1080p video with audio that I recorded at approximately 2:47 a.m. on July 15, 2026 from my property at 6176 Federal Blvd., looking toward the adjacent United Rentals yard at 6144 Federal Blvd. The recording captures the yard's light towers illuminated and a steady mechanical pump audible throughout. Consistent with what I observed at the time, a vacuum tank truck was at the FRAC tank and the tank was being pumped out at that hour. I observed the loaded truck depart the yard at approximately 6:15 a.m. What I documented over the following hour is set out, in order, in Section 4.

► [See the A.6 video — 2026.07.15 FRAC TANK PUMP-OUT at 02:47 a.m. \(file: "A.6\) 20260715_024730.mp4"\)](#)

3. Acoustic characterization

Analyzing the recording by the same method I used for the A-series recordings in the Master Noise Nuisance Report, I find that the audio contains a steady, tonal, low-frequency source with a fundamental near 100 Hz and clean harmonics at approximately 200 Hz and 300 Hz, present as unbroken bands for the full 29 seconds — the characteristic signature of a motor-driven vacuum pump under load, categorically unlike traffic, wind, or HVAC. The ~100 Hz tone closely matches the ~99.6 Hz source I characterized in the July 2, 2026 recording (Exhibit A.5), indicating the same class of source and a continuation of the same activity. Emptying the tank into the hauling truck is a powered operation, not a passive gravity drain: a motor-driven pump — the truck's own vacuum pump, or the on-site transfer pump — is required to draw the material up into the elevated, sealed hauling tank. That is what is audible on the recording.

4. The morning sequence — the vehicle and its round trip

I observed the loaded truck leave the yard at approximately 6:15 a.m. What follows is the sequence I documented that morning, in chronological order.



Figure S-1. At approximately 7:07 a.m., July 15, 2026, the vacuum tanker's staging position beside the FRAC-tank enclosure (green, left) is empty — consistent with the ~6:15 a.m. departure I observed and the roughly one-hour absence that followed.



Figure S-2. Approximately 7:33 a.m., July 15, 2026: the operator (the "Black Hat Driver") crossing the yard, with the returned Reliable / Onsite Services tanker (unit 95407F4) at right and the green FRAC-tank enclosure in the foreground.

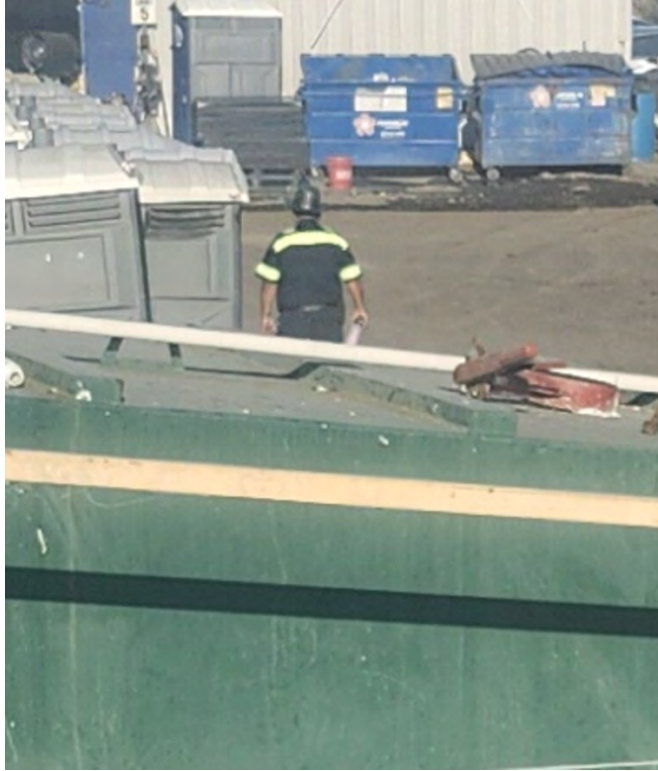


Figure S-2 (detail). The “Black Hat Driver,” enlarged.



Figure S-3. The returned tanker, rear view, approximately 7:34 a.m. California plate 95407F4 and the “Capacity Waste – 4000” placard (Imperial Industries tank) identify it as line 12 of United Rentals’ 2025 permit fleet — the same vehicle identified in my July 14, 2026 report (Figure 8), and the single dedicated, waste-only hauler the County (DEHQ) named as taking material from this FRAC tank.



Figure S-3 (detail). License plate 95407F4, enlarged.



Figure S-4. The same unit, approximately 7:36 a.m.: the tractor marked "Onsite Services — Operated by United Rentals," USDOT 899748, coupled to the 4,000-gallon Imperial vacuum tank.

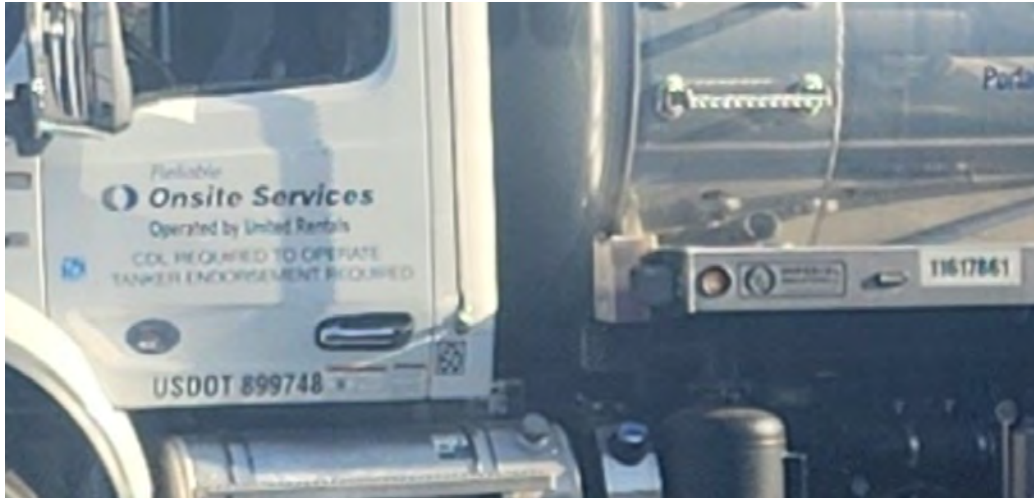


Figure S-4 (detail). Cab and tank markings, enlarged: "Reliable Onsite Services — Operated by United Rentals," "CDL Required to Operate / Tanker Endorsement Required," USDOT 899748, and the tank-mounted unit number 11617861.

In sum, the same permitted unit — plate 95407F4 — pumped out the FRAC tank at approximately 2:47 a.m., departed the yard loaded at approximately 6:15 a.m., was gone from the yard at approximately 7:07 a.m., and returned emptied at approximately 7:33 a.m.: a round trip of roughly 75 to 80 minutes, yard to yard.

5. What the recording and photographs document, stated neutrally

- **Identity.** The hauler is United Rentals' permitted unit, California plate 95407F4 — line 12 of the 2025 permit and the single truck the County named as servicing this tank.
- **Timing.** The FRAC tank was pumped out at approximately 2:47 a.m.; the loaded truck departed at approximately 6:15 a.m.; the emptied truck returned at approximately 7:33 a.m.
- **Manner.** The transfer is a powered pumping operation requiring personnel, a vacuum tank truck, and the yard's light towers in operation at that hour — not a passive gravity drain.
- **A new operational pattern.** In my observation, this overnight pump-out of the FRAC tank into the 4,000-gallon unit, followed by a first-light haul, is a new pattern — distinct from the earlier operation, in which smaller vacuum trucks fed septage into the tank (activity I have not observed for approximately the preceding five days). A 6:15 a.m. departure, timed to shortly after the permitted disposal site opens, is consistent with a scheduled disposal run; how regularly it occurs is answerable from the disposal records.

6. Timing, distance, and the permitted disposal window

The transfer of a single 4,000-gallon load is a short operation — well under an hour. The material's destination, however, is constrained by the clock and the map. United Rentals' 2025 hauler permit (Attachment 1) names two disposal destinations: the City of San Diego's Pump Station No. 1 — the City's published address for the facility is 3350 East Harbor Drive, San Diego; the permit application records it as 3550 East Harbor Drive for the same station — and, as the alternate, the Orange County Sanitation District in Fountain Valley. A round trip of roughly 75 to 80 minutes cannot reach OCSD, which lies about 90 miles north — a drive that is roughly three hours round trip before any discharge. Pump Station No. 1, on the order of ten miles away, is well within the observed window. Of the permit's two named destinations, only Pump Station No. 1 is logistically feasible for a truck that left the yard at 6:15 a.m. and was back by 7:33 a.m.

Pump Station No. 1 receives trucked liquid waste Monday through Saturday, 5:00 a.m. to 5:00 p.m., and requires a signed manifest from the station operator before any discharge (City of San Diego, Trucked Waste Requirements and Procedures). Two conclusions follow, and they are the actionable point of this supplement. First, a 6:15 a.m. departure is timed to shortly after that station opens — consistent with a run to Pump Station No. 1. Second, if the July 15 load was lawfully discharged at the only feasible permitted site, a dated, signed manifest exists for truck 95407F4 recording its volume, time, and destination; and if no such manifest exists, the load was not disposed of at the permitted destination. Separately, the County's own account had this same truck hauling "mainly to the El Cajon Dump Station," a site the County states does not accept private-party septage — a load taken there would not be a permitted disposal either. Every one of these possibilities is resolved by documents the Board can obtain.

There is, moreover, a second and independent record worth seeking alongside the manifest: the receiving facility's financial records. As would be standard industry practice, Pump Station No. 1 charges a fee for every discharge, so the City's billing and payment records for United Rentals would show how much the company was charged for each load received — by date, volume, and vehicle. Those records are generated by the receiving side, not the hauler, and a facility does not accept a discharge without booking the charge. They therefore independently establish that a discharge occurred, quantify it, and may surface loads, dates, and volumes that appear nowhere else in the record. And because charging for receipt is the norm at any permitted disposal facility, the same records should exist wherever United Rentals claims to have taken this material — Pump Station No. 1, the Orange County Sanitation District, or any other site it names. I respectfully suggest that any records request in this matter seek not only the manifests but these financial records as well, at every facility United Rentals identifies: whether, and how much, it was charged for disposal, matched against the tank's throughput, either reconciles the operation or reveals precisely where it does not.

Nor does the question stop at a single load. On this record, the FRAC tank has operated for approximately 29 months. The disposal, billing, and manifest records for this truck and this operation over that period either exist and reconcile against the volume the tank has taken in and discharged, or they do not. Either way, the answer is documentary — and it is now anchored to a specific, plate-identified vehicle and a specific, dated haul.

7. Conclusion — the bulk hauler, its source, and the records that must exist

Among the fifteen trucks on United Rentals' 2025 permit, unit 95407F4 (line 12) is the only one that is not a split fresh-water/waste service truck: it is a single, dedicated 4,000-gallon waste tank. The other fourteen are the split-tank service trucks that circulate to portable toilets in the field, carrying fresh water out and a limited volume of waste back. A dedicated 4,000-gallon waste-only tanker is not a field-service configuration. By its size and single purpose it is a bulk-transfer vehicle — built to move large volumes of accumulated septage from a fixed point to a discharge station. At 6144 Federal Blvd., the only fixed point from which such volumes can be drawn is the FRAC tank; and the recording and photographs in this supplement show unit 95407F4 doing exactly that. Line 12's function at this yard is to empty the on-site storage tank.

That distinction matters. A sewage-hauler permit authorizes the collection and transport of liquid waste for prompt disposal at an authorized facility; on its face it does not authorize accumulating tens of thousands of gallons of septage in a fixed on-site tank and bulk-transferring it out. The presence of a dedicated bulk hauler on the permit is thus both evidence of, and the instrument of, an on-site storage operation the hauler permit does not on its face reach. Whether that storage requires separate authorization is for the County and the Board to determine; the narrower, documentary point is that the bulk hauler exists to service the FRAC tank.

The 2025 permit application (Attachment 1) bears the DEHQ inspector's handwritten, vehicle-by-vehicle notes — a fleet inspection was performed. An agency that inspected United Rentals' trucks and permitted a single dedicated 4,000-gallon bulk waste hauler at this work location faced the question every such vehicle raises: what does it fill from? For unit 95407F4 at 6144 Federal, the answer is the FRAC tank. DEHQ's permitting and inspection records for line 12 should therefore identify the tank as the source it services — and the tank's absence from that record, for a vessel the County itself has described as holding on the order of 21,000 to 40,000 gallons and sitting in the open yard, is itself a documented gap the Board can note.

It follows that if unit 95407F4 has been drawing from the FRAC tank and hauling to Pump Station No. 1 — the destination the permit names and, as Section 6 shows, the only one its round-trip times can reach — a signed manifest exists for each such load. Those manifests should span the operation: at a minimum from the issuance of the 2025 permit forward, and, if the practice predates it, across the tank's approximately 29 months of use. Their existence would confirm compliant disposal and reconcile against the tank's throughput; their absence would establish that the accumulated septage did not reach the permitted destination. Either way, the answer is documentary, and it is now anchored to a single, identified vehicle.

8. Headspace gas and safety

Pump-out is the phase at which the tank's headspace gases — hydrogen sulfide, methane, and related anaerobic-digestion gases described in the June 18, 2026 corrosion and explosion-risk analysis — are agitated and released. Conducting that phase overnight, with personnel present, adjacent to an occupied building, and, on the record before the Board, without the gas-detection, scrubbing, or secondary-containment controls the prior reports found absent, presents a public-safety and environmental concern warranting examination and, as appropriate, referral.

9. Closing

I assert no legal conclusion in this supplement. I document that the operation described in the July 14, 2026 report is continuing; that on July 15, 2026 it was conducted overnight and the material was hauled away at first light by an identified, permitted vehicle (California plate 95407F4); and that the disposal of that material — for this load and across the operation's approximately 29 months — is confirmable or refutable from receiving-facility records the Board can obtain — the manifests, and the billing records that price each discharge. I respectfully ask that Exhibit A.6, the photographs described here, and this supplement be added to the file and considered together with the pending matter.

Attachments: Attachment 1 — United Rentals 2025 Sewage Hauler Permit Application (County DEHQ, Application No. LSHOP-000063), signed September 18, 2024, including the DEHQ handwritten fleet inventory (Chart One) — appended to this PDF, beginning on the following page. Exhibit A.6 — video with audio, 29 seconds, recorded July 15, 2026, approximately 2:47 a.m. (file: "A.6) 20260715_024730.mp4"). Figures S-1 through S-4 — still photographs taken July 15, 2026 at the times stamped (approximately 7:07 a.m. and 7:33–7:36 a.m.).

ATTACHMENT 1

United Rentals (North America), Inc. / Reliable Onsite Services

2025 Sewage Hauler Permit Application

County of San Diego, Department of Environmental Health & Quality

Application No. LSHOP-000063 · signed September 18, 2024 · includes the handwritten fleet inventory (Chart One)

The 3-page permit application follows this page.



**DEPARTMENT OF ENVIRONMENTAL HEALTH & QUALITY
LAND AND WATER QUALITY DIVISION**

5500 Overland Ave. Suite # 210, San Diego, CA 92123
(858) 565-5173 | LWQDuty.DEH@sdcounty.ca.gov

2025

APPLICATION FOR ANNUAL SEWAGE HAULER PERMIT

**TO ENGAGE IN THE CLEANING OF SEPTIC TANKS, CHEMICAL TOILETS, CESSPOOLS, OR SEEPAGE PITS
AND THE TRANSPORTATION AND DISPOSAL OF CLEANINGS**

Name of Business:	United Rentals (North America), Inc.; DBA: Reliable Onsite Services		
Mailing Address:	791 East 64th Ave		
City:	Denver	State:	CO Zip Code: 80229
Business Address:	6144 Federal Ave		
City:	San Diego	State:	CA Zip Code: 92114
Business Phone Number:	619-210-2850	Email:	environmental@ur.com
Legal Owner(s):	United Rentals (North America), Inc		
Address:	100 First Stamford Place, Suite 700		
City:	Stamford	State:	CT Zip Code: 06902
Phone Number:	303-286-4394	Email:	environmental@ur.com
Emergency Contact:	Luis Campuzana	Cell Phone Number:	619-565-0059

Services Provided:	☐ Septic Tanks ☐ Seepage Pits ☒ Portable Restrooms ☐ Cesspools ☐ Other _____		
Primary Liquid Waste Disposal Facility Name:	Pump Station #1		
Facility Address:	3550 East Harbor Drive		
City:	San Diego	State:	CA Zip Code: 92101
Alternate Liquid Waste Disposal Facility Name:	Ocean County Sanitation District		
Facility Address:	10844 Ellis Dr		
City:	Fountain Valley	State:	CA Zip Code: 92708

The undersigned hereby applies for a sewage hauling permit registration. I declare under penalty of perjury that to the best of my knowledge and belief, the information I have provided is true and accurate. I understand that to become and remain registered and eligible to provide hauling services in San Diego County, I must pay the annual registration fee established by the County under applicable law. I also agree to conform to all conditions, orders, and directions issued pursuant to the California Health and Safety Code and all applicable County and City Ordinances including California Health and Safety Code Division 104, Part 13, Chapter 4, Article 1. and San Diego County Code Sections 68.601 – 68.613.

Date: 9/18/2024

Jeffrey Walker

Print Name

Jeffrey Walker

Signature

Digitally signed by Jeffrey Walker
Date: 2024.09.18 08:43:31 -04'00'

FOR OFFICE USE ONLY

Permit Number	# of Vehicles	Date
LSHOP-000063	15	9/27/24

5:05

2025 SEWAGE HAULER TRUCK INVENTORY

(Complete separate form for each location where vehicles are stored)

Inspector 11/19/25
Dakane + Hyatt
@ York County

Completed By Applicant for Each Permitted Vehicle					Completed by Department of Environmental Health & Quality		
Truck or Trailer?	Vehicle Make	License Plate	Tank Size (total gal)	Split Tank? (gal/ side)	3" Lettering on Vehicle? (yes or no) ¹	Decal #	DEHQ Observations and Comments on Hoses, Valve, Cap, Waste Transfer, etc.
Truck	Mack	3284107	995	695/300	~~Not available~~ Yes	025045	Not ready (brand new) ✓ Decal issued
Truck	Mack	3482288	1600	1100/500	~~Not available~~ Yes	025044	Not ready (brand new) April
Truck	Mack	3482510	1600	1100/500	Yes	025043	
Truck	Peterbilt	3533049	4000	4000	Yes	025042	Observed dripping "blue" mechanical fluid on main valve
Truck	Isuzu	3791919	995	⁶⁹⁵ 695/300	Yes	025041	
Truck	Mack	3482874	995	⁶⁹⁵ 695/300	Yes	025040	- slider tank
Truck	Mack	3710606	¹⁶⁰⁰ 1600	1100/500	Yes	025039	
Truck	Mack	3710607	1600	1100/500	Yes	025038	Boil
Truck	Isuzu	3778078	995	⁶⁹⁵ 695/300	Yes	025037	

¹lettering includes name of business and phone number

Additional Comments (To Be Completed By DEHQ):



DEPARTMENT OF ENVIRONMENTAL HEALTH & QUALITY
LAND AND WATER QUALITY DIVISION
 5500 Overland Ave. Suite # 210, San Diego, CA 92123
 (858) 565-5173 | LWQDuty.DEH@sdcounty.ca.gov

11/19/24
 Annual Inspection
 conducted at the
 yard facility.
 - HVE & Dianne

2025 SEWAGE HAULER TRUCK INVENTORY

(Complete separate form for each location where vehicles are stored)

Company Name: Reliable Onsite Services		Owner: United Rentals (North America), Inc	Contact: Luis Campuzano	Phone: 619-565-0059			
Company Address: 791 East 64th Ave, Denver, CO 80229		Vehicle Storage Address: 6144 Federal Blvd, San Diego 92114					
Location(s) Where Waste Is Disposed: 1) Pump Station #1 - 3350 East Harbor Dr, San Diego, CA 2) Ocean County Sanitation District 10844 Ellis Dr, Fountain Valley, CA 92708							
Completed By Applicant for Each Permitted Vehicle				Completed by Department of Environmental Health & Quality			
Truck or Trailer?	Vehicle Make	License Plate	Tank Size (total gal)	Split Tank? (gal/ side)	3" Lettering on Vehicle? (yes or no) ¹	Decal #	DEHQ Observations and Comments on Hoses, Valve, Cap, Waste Transfer, etc.
Truck	Hino	01851Y2	1600	1100/500	yes	025036	
Truck	Ford	76662Y2	1150	800/350	NOT KNOWLEDGE	025035	'IN the shop
Truck	Hino	3145317	995	695/300 capacity	yes	025034	slider tank
Truck	Peterbilt	3213370	1600	1100/500	yes	025033	
Truck	Peterbilt	3224527	1600	1100/500	yes	025032	
Truck	Peterbilt	3224519	1600	1100/500	yes	025031	

¹lettering includes name of business and phone number

DAILY SUPPLEMENT No. 1 — July 16, 2026
United Rentals / Reliable Onsite Services — FRAC Tank Operations, 6144 Federal Blvd., San Diego
Supplement to the July 14, 2026 Report and July 15, 2026 Supplement

Date of observations: July 16, 2026.

Prepared by: Darryl Cotton, 6176 Federal Boulevard, San Diego, CA 92114.

Re: Same-day record of observed intake, storage, venting, and bulk-transfer activity at the 6144 Federal Blvd. FRAC tank, and a note on the scope of Sewage Hauler Permit No. LSHOP-000063.

1. Purpose.

This is a same-day supplement to the FRAC Tank Operations Report and its earlier Supplement previously submitted to the San Diego Regional Water Quality Control Board (Region 9) and the County Department of Environmental Health & Quality (DEHQ). It preserves the dated media captured on July 16, 2026, with a description of the activity shown and a note on how that activity compares to the operator's sewage-hauler permit. It is intended as a running daily record that can be assembled quickly if and when needed.

2. Media of record — July 16, 2026.

Video (intake), ~2:42 p.m.: “A.8) 20260716_144224.mp4.” The still below, drawn from that video, shows two of the operator’s “Reliable Onsite Services” tankers standing side by side in the yard, among the fleet at the FRAC-tank operation.

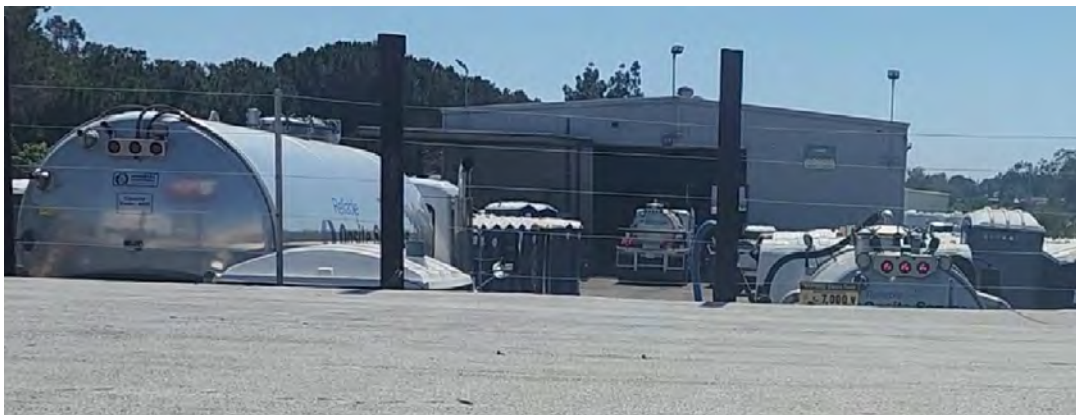


Fig. 1 — Still from video A.8) 20260716_144224.mp4 (~2:42 p.m., July 16, 2026). Two “Reliable Onsite Services” tankers standing side by side in the yard.

See the Video link [Here](#). Original preserved at NOISE ISSUES\Recordings\A.8) 20260716_144224.mp4.

Related media the same day: still image “20260716_194745.jpg” (~7:47 p.m.) shows a large roll-off debris container placed in the yard. The still images below (storage / open vessel) were recorded at approximately 6:11 p.m.



Fig. 2 — 20260716_181112.jpg (~6:11 p.m.). The green FRAC tank (United Rentals asset SV3-3889L) with the top hatch/manway standing open; access catwalk at right; staining down the vessel side. No attendant in view. Of note: with the warmer summer temperatures, the odor emanating from the open tank is overwhelming.



Fig. 3 — 20260716_181152.jpg (~6:11 p.m.). The operator's "Reliable Onsite Services" bulk tanker parked immediately alongside the open FRAC tank, transfer hose deployed; the two operating as one unit, with sandbags staged at the base as apparent secondary containment for spillage.



Fig. 4 — 20260716_181136.jpg (~6:11 p.m.). Yard view: rusted steel frame staged on pallets and a loaded roll-off (construction) debris container newly brought onto the site, adjacent to the tank and the property boundary.

Preservation note. This is the first occasion on which Cotton has observed a construction-type roll-off dumpster brought onto the site. Its arrival may signal impending changes to the site — for example, removal of the concrete berm (currently concealed beneath the temporary fencing that straddles it), alteration of the unpermitted outflow to the South Chollas Creek Channel, or removal of the FRAC tank and its associated equipment. Cotton respectfully suggests that any agency with an interest in the present physical condition of this equipment document it promptly, before site conditions are altered.

3. What the media shows.

Taken together, the July 16 media document a full intake-to-transfer cycle at a fixed on-site vessel: (a) intake — a smaller vacuum truck pumping material into the FRAC tank (A.8, ~2:42 p.m.); (b) storage and venting — the tank standing open at the top, unattended, a few feet from Cotton’s building (Figs. 2–3, ~6:11 p.m.); and (c) bulk transfer out — a 4,000-gallon tanker parked alongside the tank with its transfer hose deployed, and, earlier the same day, drawing material out (Fig. 3; A.7, ~12:03 p.m.). The intake vehicle, the fixed storage tank, and the bulk hauler are co-located and operating together.

The emissions from an open, decomposing human-waste vessel of this kind engage two separate and established safety standards. **The gas itself is defined by OSHA:** hydrogen sulfide, which OSHA identifies as occurring where organic waste decomposes, is by that agency’s description “a highly flammable, explosive gas” that at sufficient concentration is rapidly lethal to humans, and methane, likewise released as waste decomposes, is itself flammable and explosive. **The space around that vented source is defined by the National Electrical Code:** a location in which such flammable gases “may be present in quantities sufficient to produce explosive or ignitable mixtures” is a Class I hazardous (classified) location (NFPA 70 § 500.5(B)) — a classification that governs what electrical equipment may lawfully operate there. In short, OSHA defines the hazard of the emissions (*OSHA, Hydrogen Sulfide — Hazards*, [osha.gov/hydrogen-sulfide](https://www.osha.gov/hydrogen-sulfide)), and the NEC defines the hazard of the surrounding space (NFPA 70, Article 500; incorporated for workplaces at [29 C.F.R. § 1910.307](https://www.ecfr.gov/current/title-29/chapter-I/subchapter-B/part-1910/subpart-307/section-1910.307)); both are present here, within a few feet of Cotton’s building, where ordinary unrated electrical equipment operates in the yard.

Cotton first brought this hazard to the City’s attention on **June 22, 2026**, when he filed a Building and Land Use Enforcement Request for Investigation and the City opened Record No. **CE-0541944**, reporting the operation as an **explosive and toxic-gas hazard** within a few feet of his building. Under the City’s own published “Priority of Cases,” **that allegation is a Priority I matter** carrying a commitment to inspect within one business day. As of this writing — 24 days after filing — the City has taken no apparent enforcement action, and the complaint remains listed as “New” in the City’s online reporting portal; that status persisted unchanged when Cotton captured the portal record the following morning, July 17, 2026 (Fig. 5). Cotton offers these observations as a factual record; the characterization of the City’s response to Cotton’s reporting of these conditions is for the reviewing agencies to decide.

The City of **SAN DIEGO** Online Services

Announcements Register for an Account Login

Submit a Building and Land Use Enforcement (BLUE) Request for Investigation.

Home DSD Permits **Building & Land Use Enforcement** Cannabis Short Term Rental

+ Private Property Investigation Request Search for an Existing Investigation

Record CE-0541944:
Complaint
Record Status: New

Record Info

Location

6144 Federal Bl.
San Diego CA 92114 *

Investigation Details

Case Description:
CD- 4 There is a FRAC tank which is the main holding tank for United Rentals human waste processing from all their porta-potties. The stench and toxic odors that emanate from this are an environmental and explosive hazard. This tank is located within 4 feet of my building and hidden by numerous light towers, IBC totes and porta-potties in front and along it. This entire operation is supposed to be in a Class 1 Div 2 hazard location environment. It is clearly not and as such is a danger to my, my property and surrounding properties.

More Details

Fig. 5 — City of San Diego “BLUE” Online Services portal, Record CE-0541944 (6144 Federal Bl.), captured by Cotton on July 17, 2026: “Record Status: New.” The portal displays no date field; the capture date is Cotton’s. The case description shown is Cotton’s own complaint text, reporting the operation as “an environmental and explosive hazard” that “is supposed to be in a Class 1 Div 2 hazard location environment. It is clearly not.”

4. The operator’s sewage-hauler permit does not appear to authorize on-site storage or transfer at this address.

The operator holds the County’s 2025 Annual Sewage Hauler Permit (Application), **LSHOP-000063**, issued by County DEHQ (Land and Water Quality Division) (application dated 9/18/2024; annual inspection conducted 11/19/2024 at the yard facility). By its own terms, that permit authorizes the holder “to engage in the cleaning of septic tanks, chemical toilets, cesspools, or seepage pits *and the transportation and disposal of cleanings.*”

Several features of that permit bear directly on what the media show:

- Services authorized are “Portable Restrooms” servicing — i.e., cleaning and hauling.
- 6144 Federal Blvd. is listed only as the “Vehicle Storage Address” — the place where the fleet is parked — not as a waste storage, treatment, or disposal site.

- Waste is to be disposed at named facilities: “Pump Station #1” (3550 East Harbor Dr., San Diego) as primary, and the “Ocean County Sanitation District” (Fountain Valley) as alternate — not on site, and not to any storm channel.
- The permit inventories 15 mobile vehicles, all listed as trucks (no trailers). Fourteen carry split, dual-compartment tanks; the sole exception is a single-compartment 4,000-gallon Peterbilt (Decal 025042). A split tank is the configuration of a portable-restroom service truck — one side for collected waste, one side for fresh water — while a single 4,000-gallon tank is a dedicated bulk hauler. On the July 16 media, that bulk hauler draws septage out of the FRAC tank while a split-tank service truck pumps collected waste into it. No fixed or stationary bulk storage tank is listed or permitted.

The FRAC tank observed at 6144 is a fixed vessel far larger than any permitted mobile unit (County figures for its capacity range from roughly 20,000 to 40,000 gallons). Pumping collected waste *into* that fixed tank, accumulating it on site, and transloading it to a bulk tanker parked alongside are storage and transfer activities that the permit’s “cleaning ... transportation and disposal” scope does not, on its face, authorize — and they are occurring at the very address the permit designates only for parking vehicles. Whether that constitutes a permit violation is a determination for DEHQ, as the permitting authority, and for the Regional Water Board; Cotton asserts the facts and the permit language, and leaves the finding to the agencies. (Governing law referenced in the permit: Cal. Health & Safety Code, Div. 104, Pt. 13, Ch. 4, Art. 1; San Diego County Code §§ 68.601–68.613.)

5. Cross-references and preservation.

This supplement should be read with: the July 14, 2026 FRAC Tank Operations Report and the July 15, 2026 Supplement; the July 16, 2026 correspondence from RWQCB engineer Nicholas White, P.E., identifying two Phase I MS4 concerns (illicit connection and illegal discharge) at the South Chollas Creek Channel; and the permit’s named disposal facilities (Pump Station #1 / OCSD), which bear on where the tank’s contents are actually routed. All media referenced above are preserved in their original form in the IMAGES and NOISE ISSUES\Recordings folders, dated by file name.

The concerns Mr. White identified run to the South Chollas Creek Channel, which the San Diego Regional Water Quality Control Board has listed as [impaired under Clean Water Act section 303\(d\)](#) (for metals and toxicity) and for which it has adopted TMDLs. Cotton notes that listing as regulatory context only, and makes no assertion here as to the source of any particular discharge.

Attachments.

1. County of San Diego 2025 Annual Sewage Hauler Permit (Application), LSHOP-000063 (application dated September 18, 2024) — the permit discussed in Section 4.
2. Email of July 16, 2026 from Nicholas White, P.E., California Regional Water Quality Control Board (Region 9), to the City of San Diego, copied to Cotton, regarding the South Chollas Creek Channel — the correspondence referenced in Section 5.



**DEPARTMENT OF ENVIRONMENTAL HEALTH & QUALITY
LAND AND WATER QUALITY DIVISION**

5500 Overland Ave. Suite # 210, San Diego, CA 92123
(858) 565-5173 | LWQDuty.DEH@sdcounty.ca.gov

2025

APPLICATION FOR ANNUAL SEWAGE HAULER PERMIT

**TO ENGAGE IN THE CLEANING OF SEPTIC TANKS, CHEMICAL TOILETS, CESSPOOLS, OR SEEPAGE PITS
AND THE TRANSPORTATION AND DISPOSAL OF CLEANINGS**

Name of Business:	United Rentals (North America), Inc.; DBA: Reliable Onsite Services		
Mailing Address:	791 East 64th Ave		
City:	Denver	State:	CO Zip Code: 80229
Business Address:	6144 Federal Ave		
City:	San Diego	State:	CA Zip Code: 92114
Business Phone Number:	619-210-2850	Email:	environmental@ur.com
Legal Owner(s):	United Rentals (North America), Inc		
Address:	100 First Stamford Place, Suite 700		
City:	Stamford	State:	CT Zip Code: 06902
Phone Number:	303-286-4394	Email:	environmental@ur.com
Emergency Contact:	Luis Campuzana	Cell Phone Number:	619-565-0059

Services Provided:	☐ Septic Tanks ☐ Seepage Pits ☒ Portable Restrooms ☐ Cesspools ☐ Other _____		
Primary Liquid Waste Disposal Facility Name:	Pump Station #1		
Facility Address:	3550 East Harbor Drive		
City:	San Diego	State:	CA Zip Code: 92101
Alternate Liquid Waste Disposal Facility Name:	Ocean County Sanitation District		
Facility Address:	10844 Ellis Dr		
City:	Fountain Valley	State:	CA Zip Code: 92708

The undersigned hereby applies for a sewage hauling permit registration. I declare under penalty of perjury that to the best of my knowledge and belief, the information I have provided is true and accurate. I understand that to become and remain registered and eligible to provide hauling services in San Diego County, I must pay the annual registration fee established by the County under applicable law. I also agree to conform to all conditions, orders, and directions issued pursuant to the California Health and Safety Code and all applicable County and City Ordinances including California Health and Safety Code Division 104, Part 13, Chapter 4, Article 1. and San Diego County Code Sections 68.601 – 68.613.

Date: 9/18/2024

Jeffrey Walker

Print Name

Jeffrey Walker

Signature

Digitally signed by Jeffrey Walker
Date: 2024.09.18 08:43:31 -04'00'

FOR OFFICE USE ONLY

Permit Number	# of Vehicles	Date
LSHOP-000063	15	9/27/24

2025 SEWAGE HAULER TRUCK INVENTORY

(Complete separate form for each location where vehicles are stored)

5:55

Inspection 11/19/24
Dakane + Hyatt
at yard facility

Completed By Applicant for Each Permitted Vehicle					Completed by Department of Environmental Health & Quality		
Truck or Trailer?	Vehicle Make	License Plate	Tank Size (total gal)	Split Tank? (gal/ side)	3" Lettering on Vehicle? (yes or no) ¹	Decal #	DEHQ Observations and Comments on Hoses, Valve, Cap, Waste Transfer, etc.
Truck	Mack	3284107	995	695/300	Not available Yes	025045	Not really (brand new) ✓ Decal issued
Truck	Mack	3482288	1600	1100/500	Not available Yes	025044	Not really (brand new) off
Truck	Mack	3482510	1600	1100/500	Yes	025043	
Truck	Peterbilt	3533049	4000	4000	Yes	025042	Observed dripping "blue" mechanical fluid on main valve
Truck	Isuzu	3791919	995	695/300 699 240	Yes	025041	
Truck	Mack	3482874	995	695/300 pending capacity	Yes	025040	- slider tank
Truck	Mack	3710606	1600 ^{sk}	1100/500	Yes	025039	
Truck	Mack	3710607	1600	1100/500	Yes	025038	no!
Truck	Isuzu	3778078	995	695/300 699 240	Yes	025037	

¹lettering includes name of business and phone number

Additional Comments (To Be Completed By DEHQ):



DEPARTMENT OF ENVIRONMENTAL HEALTH & QUALITY
LAND AND WATER QUALITY DIVISION

5500 Overland Ave. Suite # 210, San Diego, CA 92123
 (858) 565-5173 | LWQDuty.DEH@sdcounty.ca.gov

*11/19/24
 Annual Inspection
 conducted at the
 yard facility.
 - Hype & Parane*

2025 SEWAGE HAULER TRUCK INVENTORY
 (Complete separate form for each location where vehicles are stored)

Company Name: Reliable Onsite Services		Owner: United Rentals (North America), Inc		Contact: Luis Campuzano		Phone: 619-565-0059	
Company Address: 791 East 64th Ave, Denver, CO 80229		Vehicle Storage Address: 6144 Federal Blvd, San Diego 92114		Email: lcampuzano@ur.com			
Location(s) Where Waste Is Disposed: 1) Pump Station #1 - 3350 East Harbor Dr, San Diego, CA 2) Ocean County Sanitation District 10844 Ellis Dr, Fountain Valley, CA 92708							
Completed By Applicant for Each Permitted Vehicle					Completed by Department of Environmental Health & Quality		
Truck or Trailer?	Vehicle Make	License Plate	Tank Size (total gal)	Split Tank? (gal/ side)	3" Lettering on Vehicle? (yes or no) ¹	Decal #	DEHQ Observations and Comments on Hoses, Valve, Cap, Waste Transfer, etc.
Truck	Hino	01851Y2	1600	1100/500 ✓	Yes	025036	
Truck	Ford	76662Y2	1150	800/350	Not available	025035	in the shop
Truck	Hino	3145317	995	695/300 <i>Please confirm capacity</i>	Yes	025034	Slider tank
Truck	Peterbilt	3213370	1600	1100/500 ✓	Yes	025033	
Truck	Peterbilt	3224527	1600	1100/500 ✓	Yes	025032	
Truck	Peterbilt	3224519	1600	1100/500 ✓	Yes	025031	

¹lettering includes name of business and phone number



Darryl Cotton <151darrylcotton@gmail.com>

FW: Complaint Received: IDDE at South Chollas Creek Channel — 6144 Federal Blvd.

1 message

White, Nicholas@Waterboards <Nicholas.White@waterboards.ca.gov>
To: "151darrylcotton@gmail.com" <151darrylcotton@gmail.com>

Thu, Jul 16, 2026 at 4:15 PM

From: White, Nicholas@Waterboards
Sent: Thursday, July 16, 2026 4:11 PM
To: 'Menke, Brianna'
Subject: RE: Complaint Received: IDDE at South Chollas Creek Channel — 6144 Federal Blvd.

Thank you, Brianna!

I appreciate your collaboration on this complaint and the timeliness of the inspector response. I had a short call with Mr. Cotton to better understand the complaint. Following my conversation, I believe there are 2 Phase I MS4 concerns; Illicit connection and illegal discharge.

The 7/8/2026 inspection identified potential illicit connection. Mr. Cotton informed me that he performed cctv inspection of a pipe within his parcel and verified it is a legacy connection to the channel. According to Mr. Cotton, the United Rental pipe shares this connection/outfall.

The previously submitted Exhibit/complaint noted a 20,000+ gallon septage holding tank on the United Rentals property. While no direct allegations were made, Mr. Cotton suspects that the contents of the holding tanks are periodically discharged through the illicit connection to the channel based on tank capacity and observed frequency of filling and subsequent off-site hauling at permitted disposal facilities.

While the investigation is ongoing, I wanted to clarify my specific concerns following discussion with Mr. Cotton and the potential discharge of septage to Chollas Creek.

Please keep me informed when the inspection/investigations are completed.

Best,

Nicholas White, P.E.

Water Resource Control Engineer
Storm Water Management Unit

San Diego Water Board

2375 Northside Drive, Suite 100

San Diego, CA 92108

Phone: (619) 521-8040

From: Darryl Cotton <151darrylcotton@gmail.com>

Sent: Friday, July 10, 2026 12:16 PM

To: RB9_Records, WB@Waterboards <rb9_records@waterboards.ca.gov>

Subject: Cotton — Notice to the MS4 Permitting Authority — Open City Stormwater PRA 26-6563, Dry-Weather Outfall at South Chollas Creek Channel — 6144 Federal Blvd.

Caution: External Email. Use caution when clicking links or opening attachments. When in doubt, contact DIT or use the Phish Alert Button.

To the Region 9 Records Unit:

Attached is a 15-page notice to the Board in its capacity as the MS4 permitting authority under Order No. R9-2013-0001, with a supporting photographic exhibit (plates B.0–B.10).

It concerns a matter distinct from the sewage holding tank in my July 10 submission: an approximately 10-inch outfall observed discharging in dry weather at the South Chollas Creek Channel, adjacent to 6144 Federal Blvd. The City of San Diego — the Board's Copermittee — has an open Public Records Act request on this location (No. 26-6563, determination due July 13); an earlier request closed with no responsive documents.

I assert no violation and no established illicit discharge. I ask only that the Board note the matter, and that this reach and this Copermittee's IDDE obligations are on its record whatever the City elects to do.

I would ask this be routed to the Board's MS4 / stormwater oversight staff. Please confirm receipt.

Respectfully,

--

Darryl Cotton

619.954.4447

DAILY SUPPLEMENT No. 3 — July 17, 2026

United Rentals / Reliable Onsite Services — FRAC Tank Operations, 6144 Federal Blvd., San Diego
Supplement to the July 14, 2026, Report, the July 15, 2026, Supplement and all prior Daily Supplements

Date of observations: July 17, 2026.

Prepared by: Darryl Cotton, 6176 Federal Boulevard, San Diego, CA 92114.

Re: Same-day record of an apparent tank-cleaning operation observed at the 6144 Federal Blvd. FRAC tank on July 17, 2026, undertaken without apparent government oversight.

1. Purpose.

This is a same-day supplement to the FRAC Tank Operations Report and its earlier Supplements, previously submitted to the San Diego Regional Water Quality Control Board (Region 9) and the County Department of Environmental Health & Quality (DEHQ). It addresses only the activity observed on July 17, 2026 — an apparent effort by the operator to empty and clean the fixed FRAC tank, carried out without apparent government oversight. (The prior day's observations were addressed in the July 16, 2026 Daily Supplement.) It preserves the dated media captured on July 17, 2026, and is intended as a running daily record that can be assembled quickly if and when needed.

2. July 17, 2026 — An apparent tank-cleaning operation, conducted without apparent oversight.

On July 17, 2026, Cotton observed and recorded activity at the 6144 Federal Blvd. FRAC tank that differs in kind from the intake-and-storage cycle documented on prior dates. Beginning in the pre-dawn hours and continuing through the afternoon and into the evening, the operator's personnel appear to have undertaken a deliberate effort to empty and clean the fixed FRAC tank of the accumulated human waste (septage) it has contained — introducing fluid into the tank from the operator's split-tank ("dual-compartment") service trucks and drawing the contents and rinsate out to the single-compartment bulk hauler parked alongside. The media below are presented in chronological order; the first three are stills drawn from video. July 17 media are labeled Fig. 17-1 et seq. Cotton offers these as factual observations; the significance is for the reviewing agencies.



Fig. 17-1 — “20260717 at 0250.jpg” (≈ 2:50 a.m., July 17, 2026), still from video. Pre-dawn activity under work lights at the green FRAC tank (asset SV3-3889-L, at left), consistent with the overnight pump-out pattern recorded on prior dates (e.g., ≈ 2:47–2:50 a.m. recordings of July 2 and July 15).

July 17, 2026, ≈ 2:50 a.m. clip. [See Video Here](#). Original preserved in NOISE ISSUES\Recordings.



Fig. 17-2 — “20260717 at 1300.jpg” (≈ 1:00 p.m.), still from video. In daylight, the single-compartment bulk-septage tanker (the dedicated bulk hauler) is staged at the FRAC tank.

July 17, 2026, ≈ 1:00 p.m. clip. [See Video Here](#). Original preserved in NOISE ISSUES\Recordings.



Fig. 17-3 — “20260717 at 1400.jpg” (≈ 2:00 p.m.), still from video. Approximately one hour later, additional units — including a split-tank service truck — are present at the tank; the service truck appears to be pumping into the FRAC tank.

July 17, 2026, ≈ 2:00 p.m. clip. [See Video Here](#). Original preserved in NOISE ISSUES\Recordings.



Fig. 17-4 — “20260717_143102.jpg” (≈ 2:31 p.m.). The bulk-septage tanker and service units remain at the tank through the afternoon.



Fig. 17-5 — “20260717_184550.jpg” (≈ 6:46 p.m.). The operation continues into the evening. A ground-level pipe-and-valve manifold sits in a black containment tray holding dark liquid, with staining across the pad, at the property boundary; a construction roll-off at rear loaded with debris; no attendant protective measures or agency presence in view.



Fig. 17-6 — “20260717_184602.jpg” (≈ 6:46 p.m.). The single-compartment bulk hauler (bearing California plate 95407F4 — the dedicated bulk unit identified in the July 15 supplement), hoses connected; a white-poly supply tank staged into the transfer, with piping running from the open FRAC-tank hatch toward the white-poly tank. Of note: across the dated images of this operation from May 27 through July 16, 2026, transfers at the FRAC tank were bulk draw-outs by

hose at the tank's base to a stainless bulk tanker; the white-poly trailer tank had not previously been observed positioned at the FRAC tank with piping entering its hatch. That configuration — consistent with fluid being introduced into the tank — appears first on July 17, 2026.



Fig. 17-7 — “20260717_184620.jpg” (≈ 6:46 p.m.). The green FRAC tank (asset SV3-3889-L) with the transfer plumbing and containment tray at its base along the boundary; staining down the vessel; the bulk hauler (plate 95407F4) at right; a white-poly supply tank at center, appearing roughly half full of what may be cleaning solution.

Read together, the July 17 media appear to document a deliberate cleaning of the fixed FRAC tank: cleaning fluid introduced from the split-tank service trucks, and the accumulated contents and rinsate drawn out to the single-compartment bulk hauler for transport off site — to a destination not documented in any disposal record produced to date. Two features warrant the reviewing agencies’ attention.

First, this apparent cleaning is being carried out by the operator’s own personnel, on the operator’s own initiative and timetable, with no agency observed on site and no visible supervisory oversight — no agency supervision, and no protective, monitoring, or hazard-classified controls. That matters here for a specific reason. Beginning May 12, 2026, numerous government agencies were placed on notice that this FRAC tank was being operated in what Cotton reported to be an unpermitted and unregulated capacity. For an apparent cleanup of that same tank — whose decomposing contents generate hydrogen sulfide and methane, an explosion and toxic-gas hazard the City’s own records classify as Priority I (City Record CE-0541944, Cotton’s Building & Land Use complaint) — now to proceed with no agency supervision or oversight is difficult to reconcile with that record of notice. The pre-dawn start — with activity recorded on July 17 as early as approximately 2:50 a.m. — makes it unlikely that any arrangement exists between the operator and any agency to ensure that the work is being performed, at a minimum, to industry and safety standards. Cotton submits that, given the history of this matter, the absence of any supervisory oversight of this operation is intolerable, and respectfully asks the reviewing agencies to take note.

Second, an unsupervised cleaning of the vessel alters the very physical conditions any agency would need to inspect and sample. Cotton respectfully requests that any agency with an interest document present conditions promptly, before they are further altered. Cotton asserts the facts and the timestamps and leaves the characterization to the agencies. (A still photograph cannot establish the direction of flow or the contents of any vehicle tank; the descriptions above are of what the media appear to show — the split,

dual-compartment service trucks that may now be pumping IN cleaning fluid, not septage, and the single-compartment bulk hauler that draws it out.)

3. The controlling permit is attached.

Cotton attaches the operator's 2025 Annual Sewage Hauler Permit Application (County of San Diego, Department of Environmental Health & Quality, Land and Water Quality Division; LSHOP-000063) — the authority Cotton understands to control this type of operation. On its face, that permit authorizes the holder to engage in the cleaning of chemical toilets and the transportation and disposal of cleanings; it lists 6144 Federal Blvd. only as a vehicle-storage address, and names off-site liquid-waste disposal facilities (Pump Station #1, San Diego; Ocean County Sanitation District, Fountain Valley). It does not, on its face, authorize the on-site storage or treatment of collected waste, the fixed FRAC tank observed at the address, or the tank-cleaning activity documented above. Cotton submits that nothing documented in this record appears to conform to the permit's terms, and attaches the permit so the reviewing agencies may weigh the observed operation against what Cotton understands to be the controlling authority. Whether any of this constitutes a violation is a determination for the reviewing agencies.

Attachment.

1. County of San Diego 2025 Annual Sewage Hauler Permit Application, LSHOP-000063 (application dated September 18, 2024; annual inspection recorded November 19, 2024). The vehicle-inventory pages are presented upright for ease of review.

ATTACHMENT 1

County of San Diego

2025 Annual Sewage Hauler Permit Application

United Rentals (North America), Inc. — Permit No. LSHOP-000063

Vehicle-inventory pages presented upright for ease of review.



**DEPARTMENT OF ENVIRONMENTAL HEALTH & QUALITY
LAND AND WATER QUALITY DIVISION**

5500 Overland Ave. Suite # 210, San Diego, CA 92123
(858) 565-5173 | LWQDuty.DEH@sdcounty.ca.gov

2025

APPLICATION FOR ANNUAL SEWAGE HAULER PERMIT

**TO ENGAGE IN THE CLEANING OF SEPTIC TANKS, CHEMICAL TOILETS, CESSPOOLS, OR SEEPAGE PITS
AND THE TRANSPORTATION AND DISPOSAL OF CLEANINGS**

Name of Business:	United Rentals (North America), Inc.; DBA: Reliable Onsite Services		
Mailing Address:	791 East 64th Ave		
City:	Denver	State:	CO Zip Code: 80229
Business Address:	6144 Federal Ave		
City:	San Diego	State:	CA Zip Code: 92114
Business Phone Number:	619-210-2850	Email:	environmental@ur.com
Legal Owner(s):	United Rentals (North America), Inc		
Address:	100 First Stamford Place, Suite 700		
City:	Stamford	State:	CT Zip Code: 06902
Phone Number:	303-286-4394	Email:	environmental@ur.com
Emergency Contact:	Luis Campuzana	Cell Phone Number:	619-565-0059

Services Provided:	☐ Septic Tanks ☐ Seepage Pits ☒ Portable Restrooms ☐ Cesspools ☐ Other _____		
Primary Liquid Waste Disposal Facility Name:	Pump Station #1		
Facility Address:	3550 East Harbor Drive		
City:	San Diego	State:	CA Zip Code: 92101
Alternate Liquid Waste Disposal Facility Name:	Ocean County Sanitation District		
Facility Address:	10844 Ellis Dr		
City:	Fountain Valley	State:	CA Zip Code: 92708

The undersigned hereby applies for a sewage hauling permit registration. I declare under penalty of perjury that to the best of my knowledge and belief, the information I have provided is true and accurate. I understand that to become and remain registered and eligible to provide hauling services in San Diego County, I must pay the annual registration fee established by the County under applicable law. I also agree to conform to all conditions, orders, and directions issued pursuant to the California Health and Safety Code and all applicable County and City Ordinances including California Health and Safety Code Division 104, Part 13, Chapter 4, Article 1. and San Diego County Code Sections 68.601 – 68.613.

Date: 9/18/2024

Jeffrey Walker

Print Name

Jeffrey Walker

Signature

Digitally signed by Jeffrey Walker
Date: 2024.09.18 08:43:31 -04'00'

FOR OFFICE USE ONLY

Permit Number	# of Vehicles	Date
LSHOP-000063	15	9/27/24

2025 SEWAGE HAULER TRUCK INVENTORY

(Complete separate form for each location where vehicles are stored)

5:55

Inspection 11/19/24
Dakane + Hyatt
at yard facility

Completed By Applicant for Each Permitted Vehicle					Completed by Department of Environmental Health & Quality		
Truck or Trailer?	Vehicle Make	License Plate	Tank Size (total gal)	Split Tank? (gal/ side)	3" Lettering on Vehicle? (yes or no) ¹	Decal #	DEHQ Observations and Comments on Hoses, Valve, Cap, Waste Transfer, etc.
Truck	Mack	3284107	995	695/300	Not available Yes	025045	Not really (brand new) ✓ Decal issued
Truck	Mack	3482288	1600	1100/500	Not available Yes	025044	Not really (brand new) off
Truck	Mack	3482510	1600	1100/500	Yes	025043	
Truck	Peterbilt	3533049	4000	4000	Yes	025042	Observed dripping "blue" mechanical fluid on main valve
Truck	Isuzu	3791919	995	695/300 699 240	Yes	025041	
Truck	Mack	3482874	995	695/300 pending capacity	Yes	025040	- slider tank
Truck	Mack	3710606	1600 ^{sk}	1100/500	Yes	025039	
Truck	Mack	3710607	1600	1100/500	Yes	025038	no!
Truck	Isuzu	3778078	995	695/300 699 240	Yes	025037	

¹lettering includes name of business and phone number

Additional Comments (To Be Completed By DEHQ):



DEPARTMENT OF ENVIRONMENTAL HEALTH & QUALITY
LAND AND WATER QUALITY DIVISION
 5500 Overland Ave. Suite # 210, San Diego, CA 92123
 (858) 565-5173 | LWQDuty.DEH@sdcounty.ca.gov

*11/19/24
 Annual Inspection
 conducted at the
 yard facility.
 - Hype & Parane*

2025 SEWAGE HAULER TRUCK INVENTORY
 (Complete separate form for each location where vehicles are stored)

Company Name: Reliable Onsite Services		Owner: United Rentals (North America), Inc		Contact: Luis Campuzano		Phone: 619-565-0059	
Company Address: 791 East 64th Ave, Denver, CO 80229		Vehicle Storage Address: 6144 Federal Blvd, San Diego 92114				Email: lcampuzano@ur.com	
Location(s) Where Waste Is Disposed: 1) Pump Station #1 - 3350 East Harbor Dr, San Diego, CA 2) Ocean County Sanitation District 10844 Ellis Dr, Fountain Valley, CA 92708							
Completed By Applicant for Each Permitted Vehicle					Completed by Department of Environmental Health & Quality		
Truck or Trailer?	Vehicle Make	License Plate	Tank Size (total gal)	Split Tank? (gal/ side)	3" Lettering on Vehicle? (yes or no) ¹	Decal #	DEHQ Observations and Comments on Hoses, Valve, Cap, Waste Transfer, etc.
Truck	Hino	01851Y2	1600	1100/500 ✓	Yes	025036	
Truck	Ford	76662Y2	1150	800/350	Not available	025035	in the shop
Truck	Hino	3145317	995	695/300 <i>Please confirm capacity</i>	Yes	025034	Slider tank
Truck	Peterbilt	3213370	1600	1100/500 ✓	Yes	025033	
Truck	Peterbilt	3224527	1600	1100/500 ✓	Yes	025032	
Truck	Peterbilt	3224519	1600	1100/500 ✓	Yes	025031	

¹lettering includes name of business and phone number

DAILY SUPPLEMENT No. 4 — August 3, 2026

United Rentals / Reliable Onsite Services — FRAC Tank Operations, 6144 Federal Blvd., San Diego

Continuing-operations record — supplement to the July 14, 2026 Report and all prior Supplements (Nos. 1–3, July 15–17, 2026)

Date of observations: July 18 – August 2, 2026 (dated media captured July 20, July 21, July 31, and August 1–2, 2026).

Prepared by: Darryl Cotton, 6176 Federal Boulevard, San Diego, CA 92114.

Re: A continuing-operations record for the ~2.5-week window since the last Daily Supplement (No. 3, July 17, 2026) — documenting that the FRAC-tank operation at 6144 Federal Blvd. has continued without interruption, together with the operator's stormwater admission and the City's July 30, 2026 no-discharge finding and what they imply about the existence of disposal manifests.

1. Purpose.

This is a continuing-operations supplement to the FRAC Tank Operations Report (July 14, 2026) and its Supplements (July 15–17, 2026), previously submitted to the County Department of Environmental Health & Quality, Land and Water Quality Division (DEHQ / LWQD) and enclosed in the Information Package I sent the Division on July 31, 2026 (PRA 26-3709). Its purpose is to close the gap in the daily record since the last Daily Supplement (No. 3, July 17, 2026) and to show that the operation at 6144 Federal Blvd. has continued, without interruption, through August 2, 2026. It preserves dated media captured on July 20, July 21, July 31, and August 1 and 2, 2026 — including a pre-dawn, 4:44 a.m. capture — and records two developments bearing on the permit and disposal questions: the operator's own account of the tank's use, given to the City, and the City's July 30, 2026 finding that it saw no evidence of a discharge from the tank to the adjacent channel. The video clips referenced below are being posted to YouTube; the links will be inserted in the figure lines once uploaded, and the originals are preserved in NOISE ISSUES\Recordings. I offer these as factual observations; the significance is for the reviewing agencies.

2. Continuing operations, July 18 – August 2, 2026.

The FRAC tank has remained in place and in active use throughout the ~2.5-week window since the last Daily Supplement. The stills below — drawn from dated video and, on July 31, from my own property — are presented in chronological order. They show the fixed FRAC tank in the operator's yard with bulk-vacuum (“7,000 V”-placarded) and Reliable Onsite Services hauler units repeatedly staged at and alongside it, in daylight and — as on July 21 — before dawn under work lights. The pattern is the same intake-and-storage-then-haul cycle documented in the July Report and Supplements, continuing without interruption.



Fig. 1 — “20260720_083302” (≈ 8:33 a.m., July 20, 2026), still from video. The fixed FRAC tank in the operator's yard, with the “7,000 V” bulk-vacuum unit staged at right.
 July 20, 2026, ≈ 8:33 a.m. clip. YouTube: _____ (insert after upload). Original preserved in NOISE ISSUES\Recordings.



Fig. 2 — “20260721_044439” (≈ 4:44 a.m., July 21, 2026), still from video. Pre-dawn: the yard lit by work lights, activity underway before daylight — consistent with the odd-hours operation reported earlier.
 July 21, 2026, ≈ 4:44 a.m. clip. YouTube: _____ (insert after upload). Original preserved in NOISE ISSUES\Recordings.



Fig. 3 — July 31, 2026, ≈ 6:50 a.m., photograph from the adjacent property (6176 Federal Blvd.). The FRAC tank with Reliable Onsite Services hauler / vacuum units at and around it. This is the same image enclosed as Exhibit 10 (Bates 116) to the July 31, 2026 Information Package.

Already of record — Exhibit 10 (Bates 116) to the July 31, 2026 LWQD Information Package (PRA 26-3709).



Fig. 4 — “20260801_084320” (≈ 8:43 a.m., August 1, 2026), still from video. The FRAC tank with the “7,000 V” bulk-vacuum unit alongside.

August 1, 2026, ≈ 8:43 a.m. clip. YouTube: _____ (insert after upload). Original preserved in NOISE ISSUES\Recordings.



Fig. 5 — “20260802_105002” (≈ 10:50 a.m., August 2, 2026), still from video. The FRAC tank with hauler and service units clustered at right.

August 2, 2026, ≈ 10:50 a.m. clip. YouTube: _____ (insert after upload). Original preserved in NOISE ISSUES\Recordings.



Fig. 6 — “20260802_122031” (≈ 12:20 p.m., August 2, 2026), still from video. A Reliable Onsite Services (“www.ros.ur.com”) bulk-vacuum unit staged directly at the FRAC tank — the most recent capture, one day before this supplement.

August 2, 2026, ≈ 12:20 p.m. clip. YouTube: _____ (insert after upload). Original preserved in NOISE ISSUES\Recordings.

3. The operator's own account, and the City's July 30, 2026 finding.

Two things said and found by others frame these observations. First, the operator's own account: on July 30, 2026, the City of San Diego Stormwater program (Daniel DeCurtins) relayed United Rentals' statement that the on-site tank is used for “large event” storage of septage that cannot be taken directly to Pump Station #1. That is an admission, in the operator's own words to a government agency, that the fixed FRAC tank is used to store collected septage — a use the operator's portable-restroom hauling permit (LSHOP-000063) does not describe. Second, the City's finding: in that same July 30 site visit, Mr. DeCurtins stated that he found no evidence of the FRAC tank discharging into the adjacent Chollas Creek channel.

4. What the City's no-discharge finding implies — the disposal manifests must exist.

If the City's July 30 finding holds — that the tank is not discharging to the channel — then the septage United Rentals admits it accumulates in the FRAC tank has only one lawful way off the property: it must be pumped back into trucks and hauled to a permitted disposal facility. Lawful off-site disposal of that waste does not happen invisibly. Each such haul generates a record — a trip ticket or discharge manifest at the receiving facility, and a corresponding billing or receipt for the disposal. It follows that, for this operation to be lawful, those trip / discharge manifests and the billings that accompany them must exist. And the volumes are not trivial: the tank has been in continuous use, as this supplement and its predecessors document. Two propositions therefore cannot both be true — that there was no discharge to the channel, and that no disposal manifests or billing records exist. One or the other must give.

I respectfully submit that the way to resolve it is the one the Information Package already asks for: produce the trip / discharge manifests and the receiving-facility billings for the septage collected and stored at 6144 Federal Blvd. Whether their absence, if they cannot be produced, is significant is a determination for the reviewing agencies.

5. The controlling permit.

For continuity with the prior Supplements: the authority I understand to control this operation is the operator's 2025 Annual Sewage Hauler Permit (LSHOP-000063; County DEHQ / LWQD), signed under penalty of perjury on September 18, 2024, which authorizes the cleaning of portable restrooms and the transport and disposal of the cleanings at the two named facilities (Pump Station #1, San Diego; Ocean County Sanitation District, Fountain Valley). It does not, on its face, authorize the fixed on-site FRAC tank or the bulk storage of septage documented above. The permit was attached to the July 15 and July 17 Supplements and is enclosed as Exhibit 4 (Bates 064–074) to the July 31, 2026 Information Package; it is not re-attached here. Whether the continuing operation conforms to the permit is a determination for the reviewing agencies.