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August 17, 2026

Ernie Liwag, REHS

Program Coordinator

County of San Diego

Department of Environmental Health and Quality

Food, Water, and Housing Division

Via email: Ernie.Liwag2@sdcounty.ca.gov

Re: United Rentals (North America), Inc. — Sewage Hauler Operating Permit LSHOP-000063

6144 Federal Boulevard, San Diego · Public Records Request No. 26-4763 · **Request for a written determination**

Ernie,

I want you to understand what brought me here, because the file does not convey it. My business, my neighbors, and their employees and customers can no longer abide the raw-egg stench of hydrogen sulfide coming off the United Rentals yard next door — sewer gas from the porta-potty septage United Rentals accumulates in a fixed, open-top FRAC tank a few feet from my property line. When my real-estate broker, Jeff Davies, went to raise the issue with the branch manager, David Perez, on June 9, 2026, Mr. Perez threw him out and filed a no-trespass order against him with the San Diego Police Department. Since then I have tried to find out which agency authorized this operation and how it is regulated, and I have been referred from office to office. I am asking DEHQ not to refer me onward, but to make a written determination on one narrow question: has the Department authorized this operation, and if so, under what written authority?

I detailed the conditions for the Board of Supervisors in my August 13, 2026 complaint and will not restate it here. This letter does something different: it lays out the documented operational pattern, and the specific questions that follow from it, so DEHQ can make a determination that the operator, the neighboring businesses, and the public can rely on. I am not asking the Department to assume anyone's intent. I am asking it to compare the documented operation against the permit file and the rules that govern sewage hauling, and to identify the authority that makes this lawful or to state that none exists.

Documented operational pattern

Read in sequence, DEHQ's own permit records and my contemporaneous photographic record establish the following:

1. The Department's 2025 permit application for United Rentals (Exhibit 1) identifies a single 4,000-gallon single-compartment bulk-transfer truck (the "BT truck") and, otherwise, only two-compartment vacuum trucks ("2CV trucks") that service the portable-toilet rentals and are supposed to discharge at the licensed stations named on the application.
2. The fixed, open-top FRAC tank on the yard is not identified anywhere in those permit materials as an item of equipment or as an approved disposal or transfer location.
3. Historical aerial imagery places the FRAC tank at the property by February 11, 2024 — nineteen days before the County's March 1, 2024 inspection (Exhibit 4).

4. Exhibit 3 documents repeated sewage-hauling tanker and personnel activity at the fixed tank and manifold area, including numerous nighttime and pre-dawn appearances across multiple dates. Representative extended sequences appear at Images 65–69 (August 10), 73–77 (August 11), and 93–100 (August 14).
5. Exhibit 3 Images 111 and 124 show the BT truck displaying California plate 95407F4 in the operation area, beside the hose and fittings.
6. DEHQ’s records associate three different plate numbers with that one BT truck: 3533049 on the 2025 inventory, 95407F4 in the photographs, and 95409F4 on the 2026 inventory.

The regulatory question that follows is not speculative: is the fixed tank, and the transfer process that moves septage from the 2CV trucks through that tank and into the BT truck, an authorized part of the permitted operation — and if so, where is that authorization documented?

The FRAC tank and the BT truck are integral to each other. The tank is where the 2CV trucks’ loads accumulate; the single 4,000-gallon BT truck is the only vehicle in the permitted fleet built to draw that accumulation back out and haul it away — the fourth vehicle listed on the 2025 Sewage Hauler Truck Inventory (Exhibit 1, at DEHQ-UNITED RENTALS - 008), and the only 4,000-gallon single-compartment entry on the roster (decal 025042). Take either away and the operation as documented cannot function — yet neither the tank nor its role appears anywhere in the permit. The photograph below, taken August 16, 2026, shows that junction: the BT truck connected to the fixed manifold that serves the tank.



Exhibit 3, Image 124 — August 16, 2026: the BT truck (California plate 95407F4) at the fixed hose and manifold serving the FRAC tank.

The nighttime and pre-dawn pattern is worth stating with specificity, because it is repeated rather than isolated. Exhibit 3 documents tanker or vehicle activity at the tank and operations area at approximately 3:50 and 3:55 a.m. on August 3 (Images 14–15); 4:49 a.m. on August 8 (Image 53); 4:40 a.m. on August 9 (Image 61); repeatedly between roughly 1:19 and 6:17 a.m. on August 10 (Images 65–69); between roughly 2:43 and 6:12 a.m. on August 11 (Images 73–77); 3:00 a.m. on August 12 (Image 84); 2:28 a.m. on August 13 (Image 89); across an extended sequence from roughly 2:39 through 6:43 a.m. on August 14 (Images 93–100); and at roughly 3:09 and 5:14 a.m. on August 15 (Images 108–

109). I do not ask the Department to infer from these photographs alone that liquid was flowing at any given moment. I ask it to recognize repeated tanker presence and activity at the fixed tank during hours that warrant explanation against the permit and the approved-disposal-location records — and I have retained the full-resolution images so DEHQ can see for itself.

The following six questions are concrete and answerable from DEHQ's own permit, inspection, and public-records files. I request a written answer to each.

1. Authorization of the FRAC tank.

If DEHQ contends the fixed FRAC tank is authorized, please identify the specific written authorization for the tank and its use, including, to the extent applicable: (a) the permit, registration, or approval under which it is authorized; (b) the date of approval; (c) the approved location; (d) the authorized capacity; (e) whether it may receive or store sewage collected from portable toilets; (f) whether truck-to-tank and tank-to-truck transfers are authorized; (g) the approved destination for material removed from the tank; and (h) the inspection and reporting requirements that apply to it. If no such authorization exists, please state that expressly.

2. Permit scope and the transfer chain.

Please state whether LSHOP-000063 authorizes the use of a fixed, on-site FRAC tank for the intermediate storage and transfer of septage — including truck-to-tank transfer from the 2CV trucks and tank-to-truck transfer into the BT truck. If DEHQ concludes this is outside the scope of the permit, please state whether the operation may continue or resume without an amended permit or other required authorization.

3. The records of the operation.

Please identify the records in your production that establish the path from collection to final disposal: what the 2CV trucks collected and where they discharged it, what entered the FRAC tank, what the BT truck removed from it, and where that material was finally disposed. Public records I have obtained indicate disposal at El Cajon's Vernon Way facility beginning in 2022 — a location that does not appear on the DEHQ applications until December 2025, though the applications named Pump Station No. 1 and the Fountain Valley plant. Please state whether DEHQ has records reconciling the permitted disposal facilities with the operation's actual disposal locations. If DEHQ contends no such records are required, please identify the legal basis.

4. Application of County Code §§ 68.604, 68.609, and 68.610.

San Diego County Code § 68.610 provides that sewage may not be deposited at a location other than one approved in writing by the Director; § 68.609 requires the registrant to keep records and, on request, provide complete and accurate reports identifying the disposal site and final disposition; and § 68.604 governs the registration and verification of identified disposal locations. Please state how DEHQ applies these provisions to the documented operation — and, if the FRAC tank is not an approved location, whether depositing sewage into it is inconsistent with § 68.610 and how the § 68.609 recordkeeping and reporting requirements apply.

5. The 2024 inspection and the plate discrepancy.

Exhibit 4 shows DEHQ's Hazardous Materials Division conducted a CUPA inspection at 6144 Federal Boulevard on March 1, 2024 (CUPA No. 214482), documenting a 350-gallon used-oil tank in secondary containment and drums of cleaner; the aerial imagery in Exhibit 4 places the FRAC tank on

site by February 11, 2024; and your Land and Water Quality unit conducted the annual truck inspection at the same yard on November 19, 2024, noting in its own hand that the BT truck was “dripping ‘blue’ mechanical fluid on the main valve” (Exhibit 1). Please state whether DEHQ has reviewed why the FRAC tank appears in neither inspection record, and please identify the source document and verification method by which DEHQ associated plate numbers 3533049, 95407F4, and 95409F4 with the same 4,000-gallon vehicle, correcting the permit record if any entry is erroneous.

6. Water-quality jurisdiction, and corrective action if the tank is unauthorized.

Exhibit 5 is July 2026 correspondence in which the San Diego Regional Water Quality Control Board states that its July 8, 2026 inspection identified a potential illicit connection, that its investigation is ongoing, and that it had concerns regarding potential discharge of septage toward Chollas Creek. If septage stored or transferred through the FRAC tank is being discharged to land or to waters of the State, or if the operation is a new or materially changed discharge, Water Code § 13260 and related waste-discharge requirements may be implicated. Please state whether DEHQ has coordinated with the Water Board on this operation and whether any separate water-quality or discharge authorization is implicated; if DEHQ concludes none is, the factual and legal basis for that conclusion. And if the FRAC tank is not authorized, please state what DEHQ requires as to its removal and decontamination and the lawful disposition of any remaining content or residue, and identify the applicable classification and the responsible agency. This last point is not abstract: the Chollas Creek Channel runs along the northern end of this property, and there is no acceptable path by which residual septage from this tank should be permitted to reach it. Finally, if DEHQ concludes it lacks authority to make these determinations, please identify in writing the agency it believes is responsible and the specific issue it believes falls outside its jurisdiction — a substantive jurisdictional determination, not another referral.

These are not merely general requirements. On each application United Rentals affirmed, under penalty of perjury, that it would conform to California Health & Safety Code Division 104, Part 13, Chapter 4, Article 1, and to San Diego County Code §§ 68.601–68.613 — including §§ 68.604, 68.609, and 68.610 above. The fixed FRAC tank and the bulk-transfer truck are precisely where that certification meets the record.

Based on the permit file, the inspection records, and the photographic record identified above, I request that DEHQ issue a written determination addressing whether the fixed FRAC tank at 6144 Federal Boulevard is an authorized component of the sewage-hauling operation conducted under LSHOP-000063, and identifying the specific permit, registration, written approval, or other authority on which any such conclusion rests. If the tank is not an approved location, I ask the Department to identify what approvals would be required before its use could lawfully occur or resume, and to address the corrective action set out in question 6. If DEHQ reaches a different conclusion, please identify the factual and legal basis for it.

Preservation and record request.

Because this correspondence is intended to create a clear administrative record, please preserve all records reasonably related to the FRAC tank, the sewage transfers, the BT truck, LSHOP-000063, and DEHQ’s inspection or enforcement activity at 6144 Federal Boulevard — including permit applications, amendments, inventories, inspection reports, photographs, field notes, correspondence, internal referrals, complaints, enforcement records, and records identifying approved disposal or

transfer locations. Please also place this correspondence, the attached exhibits, and DEHQ's written response in the permit and enforcement file associated with LSHOP-000063 and in PRA No. 26-4763.

I understand United Rentals has a business to run but this is an ongoing assault on the neighborhood that even today, continues unabated. My request is narrower than that: a clear administrative determination as to whether the operation documented at 6144 Federal Boulevard is authorized, under what written authority, and which agency is responsible for each regulatory component. There is no reason the neighboring commercial properties should bear the cost of a septage operation that has, until now, escaped the oversight it plainly requires. I would rather see this resolved with a determination than with litigation. Please provide a substantive written response addressing each numbered question above; and if any question cannot be answered from the present record, please identify the additional record or inspection DEHQ believes is necessary and whether it will undertake that review.

Respectfully,

Darryl Cotton

Owner, 6176 Federal Boulevard, San Diego, California 92114

Enclosures / Exhibits

Ex. 1 — 2025 DEHQ Sewage Hauler Permit / Truck Inventory (LSHOP-000063). The fleet roster: fourteen two-compartment 2CV trucks and the single 4,000-gallon single-compartment BT truck (Peterbilt; roster plate 3533049; decal 025042).

Ex. 2 — High-resolution photograph, BT-truck license plate. The truck photographed at 6144 Federal Boulevard bears California plate 95407F4 (the front/rear issued pair under Veh. Code § 5200).

Ex. 3 — August 2026 Operation Image Set and Index (124 frames). 124 date- and time-stamped photographs of the yard, August 1–16, 2026, with a chronological index (keyed by date, time, and image number) and a Key Frames sheet identifying the most probative frames and, conservatively, what each shows. One derivative screenshot from the original 125-file capture was removed; the underlying original photograph is retained, and the original archive is preserved as the source. The full-resolution images are provided in the accompanying ZIP file and retained for inspection.

Ex. 4 — DEHQ CUPA Notice of Violation, March 1, 2024 (CUPA No. 214482), with historical aerial imagery. The County's own inspection record for 6144 Federal Boulevard, documenting other regulated tanks and materials in the yard, followed by aerial imagery placing the FRAC tank on site by February 11, 2024 — nineteen days before that inspection — yet the tank appears nowhere in the inspection record.

Ex. 5 — Regional Water Quality Control Board, Region 9 correspondence. July 2026 correspondence stating that the July 8, 2026 inspection identified a potential illicit connection, that the investigation is ongoing, and that the Board had concerns regarding potential discharge of septage toward Chollas Creek.

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EXHIBIT 1

2025 DEHQ Sewage Hauler Permit / Truck Inventory (LSHOP-000063)

United Rentals' annual sewage-hauler permit application and truck inventory. The BT truck is the fourth vehicle listed — the only 4,000-gallon single-compartment tank on the roster (decal 025042); its plate is entered as 3533049.



**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

DEHQ-UNITED RENTALS - 007

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

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 ready (brand new) ✓ Decal issued
Truck	Mack	3482288	1600	1100/500	Not available Yes	025044	Not ready (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	^{699 240} 695/300	Yes	025041	
Truck	Mack	3482874	995	^{pending capacity} 695/300	Yes	025040	- slider tank
Truck	Mack	3710606	^{sk} 1600	1100/500	Yes	025039	
Truck	Mack	3710607	1600	1100/500	Yes	025038	Good
Truck	Isuzu	3778078	995	^{699 240} 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.
 - 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 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

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EXHIBIT 2

BT-Truck License Plate — California 95407F4

High-resolution photograph of the bulk-transfer truck showing California plate 95407F4 — the plate the 2025 inventory records as 3533049 and the 2026 inventory as 95409F4.



BT truck at 6144 Federal Blvd. — front plate visible.



Close-up: California plate 95407F4 (dmv.ca.gov). Compare Exhibit 1 — the 2025 Sewage Hauler Truck Inventory (at DEHQ-UNITED RENTALS - 008) — which records this vehicle's plate as 3533049; the 2026 inventory lists 95409F4.

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EXHIBIT 3

August 2026 Operation Image Set and Index

124 date- and time-stamped frames of the yard, August 1-16, 2026. Includes a provenance/revision note, a Key Frames sheet identifying the most probative frames, and a chronological index. Full-resolution images are in a shared Google Drive folder (link below); files are prefixed with the Image number so each matches its index row.

■ **OPEN THE FULL IMAGE SET (click here)**

Hosted in a shared Google Drive folder — the link travels with this document, no attachment required.

EXHIBIT 3 — PROVENANCE AND REVISION NOTE

This exhibit is a set of 124 date- and time-stamped photographs of the yard at 6144 Federal Boulevard, August 1–16, 2026. The original capture set contained 125 files; one derivative image — a screenshot of a photograph displayed in an image-editing application (original file "20260815_121145 (1).jpg") — has been removed because it is a derivative of an underlying photograph rather than an independent capture. The underlying original photograph ("20260815_121145.jpg") is retained in this set. For ease of reference, each file in the linked Google Drive folder is prefixed with its Image number from the index; the original capture filename, which carries the capture timestamp, is preserved after the prefix. The unaltered original set is retained as the source. The descriptions here and in the index are intentionally conservative: they identify what is visibly present and do not assert that pumping or liquid transfer occurred at the moment of capture unless the image itself establishes it.

■ **OPEN THE FULL AUGUST 2026 IMAGE SET ([click here](#))**

Full-resolution images are hosted in a shared Google Drive folder; the link travels with this document.

EXHIBIT 3 — KEY FRAMES

The most probative frames, with conservative descriptions. Full chronology follows in the index; full-resolution images are in the linked C

Img #	Date	Time	What it shows
14	Aug 3	3:50 a.m.	Pre-dawn; yard lit, vehicles present at the tank/operations area.
53	Aug 8	4:49 a.m.	Pre-dawn; two tanker trucks in the operations area near the tanks.
61	Aug 9	4:40 a.m.	Pre-dawn; tanker truck at the center of the operations area.
68	Aug 10	5:56 a.m.	Dawn; tanker truck and a worker beside the FRAC tank.
73	Aug 11	2:43 a.m.	Pre-dawn; vehicle activity at the operations area, yard lit.
84	Aug 12	3:00 a.m.	Pre-dawn; FRAC tank and a worker present (green box is the camera's motion detection).
93	Aug 14	2:39 a.m.	Pre-dawn; tanker at the operations area beside the FRAC tank.
96	Aug 14	4:39 a.m.	Pre-dawn; vehicle activity at the operations area.
98	Aug 14	6:04 a.m.	Dawn; tanker truck beside the FRAC tank.
108	Aug 15	3:09 a.m.	Pre-dawn; tanker beside the FRAC tank.
111	Aug 15	12:11 p.m.	Close-up: BT truck displaying California plate 95407F4 beside hose/fittings; orange hose in foreground.
124	Aug 16	11:34 a.m.	Close-up: BT truck (plate 95407F4) at the fixed hose and manifold serving the FRAC tank.

Files in the linked Google Drive folder are prefixed with the Image # below — open the file whose name matches each row

6144 FEDERAL BLVD — AUGUST 2026 OPERATION IMAGE INDEX

Time-stamped camera captures of the yard at 6144 Federal Boulevard, August 1–16, 2026 (124 frames). Files in the linked Google Drive folder are prefixed with the Image # below; the original capture filename is preserved after the prefix. Open the file whose name matches each row.

Img #	Date	Day	Time	File Name (in folder)
1	2026.08.01	Saturday	3:54:33 a.m.	001 2026.08.01_035433.jpg
2	2026.08.01	Saturday	8:44:48 a.m.	002 2026.08.01_084448.jpg
3	2026.08.01	Saturday	9:39:32 a.m.	003 2026.08.01_093932.jpg
4	2026.08.01	Saturday	9:44:37 a.m.	004 2026.08.01_094437.jpg
5	2026.08.01	Saturday	11:35:11 a.m.	005 2026.08.01_113511.jpg
6	2026.08.02	Sunday	4:51:44 a.m.	006 2026.08.02_045144.jpg
7	2026.08.02	Sunday	4:54:43 a.m.	007 2026.08.02_045443.jpg
8	2026.08.02	Sunday	7:33:20 a.m.	008 2026.08.02_073320.jpg
9	2026.08.02	Sunday	11:46:22 a.m.	009 2026.08.02_114622.jpg
10	2026.08.02	Sunday	12:04:09 p.m.	010 2026.08.02_120409.jpg
11	2026.08.02	Sunday	12:25:48 p.m.	011 2026.08.02_122548.jpg
12	2026.08.02	Sunday	1:13:48 p.m.	012 2026.08.02_131348.jpg
13	2026.08.03	Monday	1:24:53 p.m.	013 2026.08.03_012453.jpg
14	2026.08.03	Monday	3:50:24 a.m.	014 2026.08.03_035024.jpg
15	2026.08.03	Monday	3:55:15 a.m.	015 2026.08.03_035515.jpg
16	2026.08.03	Monday	6:06:08 a.m.	016 2026.08.03_060608.jpg
17	2026.08.03	Monday	6:59:12 a.m.	017 2026.08.03_065912.jpg
18	2026.08.03	Monday	7:09:53 a.m.	018 2026.08.03_070953.jpg
19	2026.08.03	Monday	8:25:49 a.m.	019 2026.08.03_082549.jpg
20	2026.08.03	Monday	11:21:11 a.m.	020 2026.08.03_112111.jpg
21	2026.08.03	Monday	12:18:19 p.m.	021 2026.08.03_121819.jpg
22	2026.08.03	Monday	2:46:06 p.m.	022 2026.08.03_144606jpg.jpg
23	2026.08.03	Monday	3:28:16 p.m.	023 2026.08.03_152816.jpg
24	2026.08.03	Monday	3:39:53 p.m.	024 2026.08.03_153953.jpg
25	2026.08.03	Monday	4:07:09 p.m.	025 2026.08.03_160709.jpg
26	2026.08.04	Tuesday	2:57:27 a.m.	026 2026.08.04_025727.jpg
27	2026.08.04	Tuesday	4:49:16 a.m.	027 2026.08.04_044916.jpg
28	2026.08.04	Tuesday	6:17:23 a.m.	028 2026.08.04_061723.jpg
29	2026.08.04	Tuesday	7:29:14 a.m.	029 2026.08.04_072914.jpg
30	2026.08.04	Tuesday	1:36:49 p.m.	030 2026.08.04_133649.jpg
31	2026.08.04	Tuesday	2:20:41 p.m.	031 2026.08.04_142041.jpg
32	2026.08.05	Wednesday	6:35:07 a.m.	032 2026.08.05_063507.jpg
33	2026.08.05	Wednesday	7:45:50 a.m.	033 2026.08.05_074550.jpg
34	2026.08.05	Wednesday	12:28:38 p.m.	034 2026.08.05_122838.jpg
35	2026.08.05	Wednesday	12:34:06 p.m.	035 2026.08.05_123406.jpg

Files in the linked Google Drive folder are prefixed with the Image # below — open the file whose name matches each row

Img #	Date	Day	Time	File Name (in folder)
36	2026.08.05	Wednesday	2:34:26 p.m.	036 2026.08.05_143426.jpg
37	2026.08.05	Wednesday	2:37:03 p.m.	037 2026.08.05_143703.jpg
38	2026.08.06	Thursday	6:19:24 a.m.	038 2026.08.06_061924.jpg
39	2026.08.06	Thursday	6:21:28 a.m.	039 2026.08.06_062128.jpg
40	2026.08.06	Thursday	7:29:40 a.m.	040 2026.08.06_072940.jpg
41	2026.08.06	Thursday	1:56:08 p.m.	041 2026.08.06_135608.jpg
42	2026.08.06	Thursday	3:12:45 p.m.	042 2026.08.06_151245.jpg
43	2026.08.06	Thursday	3:15:18 p.m.	043 2026.08.06_151518.jpg
44	2026.08.07	Friday	2:53:52 a.m.	044 2026.08.07_025352.jpg
45	2026.08.07	Friday	4:41:55 a.m.	045 2026.08.07_044155.jpg
46	2026.08.07	Friday	6:12:49 a.m.	046 2026.08.07_061249.jpg
47	2026.08.07	Friday	7:05:49 a.m.	047 2026.08.07_070549.jpg
48	2026.08.07	Friday	1:07:22 p.m.	048 2026.08.07_130722.jpg
49	2026.08.07	Friday	1:12:32 p.m.	049 2026.08.07_131232.jpg
50	2026.08.07	Friday	1:16:51 p.m.	050 2026.08.07_131651.jpg
51	2026.08.07	Friday	2:35:19 p.m.	051 2026.08.07_143519jpg.jpg
52	2026.08.07	Friday	2:56:33 p.m.	052 2026.08.07_145633.jpg
53	2026.08.08	Saturday	4:49:18 a.m.	053 2026.08.08_044918.jpg
54	2026.08.08	Saturday	7:10:19 a.m.	054 2026.08.08_071019.jpg
55	2026.08.08	Saturday	6:26:14 p.m.	055 2026.08.08_182614.jpg
56	2026.08.08	Saturday	6:29:04 p.m.	056 2026.08.08_182904.jpg
57	2026.08.08	Saturday	6:33:18 p.m.	057 2026.08.08_183318.jpg
58	2026.08.08	Saturday	9:04:59 p.m.	058 2026.08.08_210459.jpg
59	2026.08.08	Saturday	9:07:00 p.m.	059 2026.08.08_210700.jpg
60	2026.08.08	Saturday	9:17:42 p.m.	060 2026.08.08_211742.jpg
61	2026.08.09	Sunday	4:40:01 a.m.	061 2026.08.09_044001.jpg
62	2026.08.09	Sunday	1:29:56 p.m.	062 2026.08.09_132956.jpg
63	2026.08.09	Sunday	2:35:23 p.m.	063 2026.08.09_143523.jpg
64	2026.08.09	Sunday	9:22:35 p.m.	064 2026.08.09_212235.jpg
65	2026.08.10	Monday	1:19:13 a.m.	065 2026.08.10_011913.jpg
66	2026.08.10	Monday	2:50:54 a.m.	066 2026.08.10_025054.jpg
67	2026.08.10	Monday	4:57:37 a.m.	067 2026.08.10_045737.jpg
68	2026.08.10	Monday	5:56:31 a.m.	068 2026.08.10_055631.jpg
69	2026.08.10	Monday	6:17:47 a.m.	069 2026.08.10_061747jpg.jpg
70	2026.08.10	Monday	7:31:40 a.m.	070 2026.08.10_073140.jpg
71	2026.08.10	Monday	7:34:22 a.m.	071 2026.08.10_073422.jpg
72	2026.08.10	Monday	7:35:43 a.m.	072 2026.08.10_073543.jpg
73	2026.08.11	Tuesday	2:43:04 a.m.	073 2026.08.11_024304.jpg

Files in the linked Google Drive folder are prefixed with the Image # below — open the file whose name matches each row

Img #	Date	Day	Time	File Name (in folder)
74	2026.08.11	Tuesday	2:50:01 a.m.	074 2026.08.11_025001.jpg
75	2026.08.11	Tuesday	4:27:06 a.m.	075 2026.08.11_042706.jpg
76	2026.08.11	Tuesday	4:38:17 a.m.	076 2026.08.11_043817.jpg
77	2026.08.11	Tuesday	6:12:09 a.m.	077 2026.08.11_061209.jpg
78	2026.08.11	Tuesday	7:11:46 a.m.	078 2026.08.11_071146.jpg
79	2026.08.11	Tuesday	7:22:51 a.m.	079 2026.08.11_072251.jpg
80	2026.08.11	Tuesday	7:26:18 a.m.	080 2026.08.11_072618.jpg
81	2026.08.11	Tuesday	1:22:47 p.m.	081 2026.08.11_132247.jpg
82	2026.08.11	Tuesday	7:35:38 p.m.	082 2026.08.11_193538.jpg
83	2026.08.11	Tuesday	10:48:20 p.m.	083 2026.08.11_224820.jpg
84	2026.08.12	Wednesday	3:00:49 a.m.	084 2026.08.12_030049.jpg
85	2026.08.12	Wednesday	6:26:10 a.m.	085 2026.08.12_062610.jpg
86	2026.08.12	Wednesday	12:10:51 p.m.	086 2026.08.12_121051.jpg
87	2026.08.12	Wednesday	5:13:11 p.m.	087 2026.08.12_171311.jpg
88	2026.08.12	Wednesday	9:20:57 p.m.	088 2026.08.12_212057.jpg
89	2026.08.13	Thursday	2:28:55 a.m.	089 2026.08.13_022855.jpg
90	2026.08.13	Thursday	8:10:19 a.m.	090 2026.08.13_081019.jpg
91	2026.08.13	Thursday	5:41:39 p.m.	091 2026.08.13_174139.jpg
92	2026.08.13	Thursday	10:48:07 p.m.	092 2026.08.13_224807.jpg
93	2026.08.14	Friday	2:39:42 a.m.	093 2026.08.14_023942.jpg
94	2026.08.14	Friday	2:44:25 a.m.	094 2026.08.14_024425.jpg
95	2026.08.14	Friday	2:55:25 a.m.	095 2026.08.14_025525.jpg
96	2026.08.14	Friday	4:39:02 a.m.	096 2026.08.14_043902.jpg
97	2026.08.14	Friday	4:42:16 a.m.	097 2026.08.14_044216.jpg
98	2026.08.14	Friday	6:04:41 a.m.	098 2026.08.14_060441.jpg
99	2026.08.14	Friday	6:20:31 a.m.	099 2026.08.14_062031.jpg
100	2026.08.14	Friday	6:43:51 a.m.	100 2026.08.14_064351.jpg
101	2026.08.14	Friday	7:22:55 a.m.	101 2026.08.14_072255.jpg
102	2026.08.14	Friday	7:41:51 a.m.	102 2026.08.14_074151.jpg
103	2026.08.14	Friday	12:37:14 p.m.	103 2026.08.14_123714.jpg
104	2026.08.14	Friday	12:50:31 p.m.	104 2026.08.14_125031.jpg
105	2026.08.14	Friday	1:24:25 p.m.	105 2026.08.14_132425.jpg
106	2026.08.14	Friday	4:49:33 p.m.	106 2026.08.14_164933.jpg
107	2026.08.14	Friday	10:30:39 p.m.	107 2026.08.14_223039.jpg
108	2026.08.15	Saturday	3:09:02 a.m.	108 2026.08.15_030902.jpg
109	2026.08.15	Saturday	5:14:22 a.m.	109 2026.08.15_051422.jpg
110	2026.08.15	Saturday	11:13:51 a.m.	110 2026.08.15_111351.jpg
111	2026.08.15	Saturday	12:11:45 p.m.	111 20260815_121145.jpg

Files in the linked Google Drive folder are prefixed with the Image # below — open the file whose name matches each row

Img #	Date	Day	Time	File Name (in folder)
112	2026.08.15	Saturday	7:32:50 p.m.	112 2026.08.15_193250.jpg
113	2026.08.16	Sunday	3:49:30 a.m.	113 20260816_034930.jpg
114	2026.08.16	Sunday	3:49:53 a.m.	114 20260816_034953.jpg
115	2026.08.16	Sunday	3:51:42 a.m.	115 20260816_035142.jpg
116	2026.08.16	Sunday	3:51:49 a.m.	116 20260816_035149.jpg
117	2026.08.16	Sunday	3:52:19 a.m.	117 20260816_035219.jpg
118	2026.08.16	Sunday	3:52:28 a.m.	118 20260816_035228.jpg
119	2026.08.16	Sunday	3:53:34 a.m.	119 20260816_035334.jpg
120	2026.08.16	Sunday	4:01:41 a.m.	120 20260816_040141.jpg
121	2026.08.16	Sunday	4:09:13 a.m.	121 20260816_040913.jpg
122	2026.08.16	Sunday	6:09:23 a.m.	122 20260816_060923.jpg
123	2026.08.16	Sunday	6:54:11 a.m.	123 20260816_065411.jpg
124	2026.08.16	Sunday	11:34:00 a.m.	124 20260816_113400.jpg

4

EXHIBIT 4

DEHQ CUPA Notice of Violation (No. 214482), and FRAC-Tank Aerial

The County's March 1, 2024 hazardous-materials Notice of Violation for 6144 Federal Blvd., followed by aerial imagery showing the yard before the FRAC tank (June 2023) and with it on site (February 2024).



COUNTY OF SAN DIEGO

NOTICE OF VIOLATION

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

INSPECTION DATE: **03/01/2024** PAGE **1** OF **12**
RECORD ID #: **DEH2011-HUPFP-214482**
TIME START: **9:00 AM** END: **12:45 PM**
SPECIALIST: **Linda Wirschem**
INSPECTION CONTACT: **Mike Campusano**
TITLE: **Branch Manager**
PHONE: **(619) 565-0059**
E-MAIL: **lcampuzano@ur.com**

OWNER'S NAME **United Rentals (North America), Inc.** CITY/ZIP **Stamford /06902**
ADDRESS **100 First Stamford Place, Suite 700** PHONE **(303) 286-4394**

On the above date, the County inspected your facility under the authority of the California Health and Safety Code (H&SC), to determine compliance with applicable provisions of the H&SC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). The following statements describe significant violations. This notice requires a formal written response and corrective action within the times specified.

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

CONSENT TO CONDUCT INSPECTION GRANTED BY: **Mike Campusano**

TITLE: **Branch Manager**

INTRODUCTION:

The Department of Environmental Health and Quality (DEHQ) serves as the Certified Unified Program Agency (CUPA) for the County of San Diego, and the Hazardous Materials Division (HMD) of DEHQ implements the Unified Program, which includes programs pertaining to Hazardous Materials Business Plan, Hazardous Waste, Aboveground Petroleum Storage, Underground Storage Tank, and California Accidental Release Prevention (CalARP) requirements. In the County of San Diego, HMD also enforces the Medical Waste Management Act.

Routine Inspection

On 3/1/24, I conducted a Certified Unified Program Agency (CUPA) inspection of United Rentals Branch 70M to verify compliance with Hazardous Materials Business Plan (HMBP) and Hazardous Waste requirements. Consent to conduct inspection, take photos and review document was granted to me by facility representative, Mike Campusano, Branch Manager. Yves Raquidan, Environmental Health Specialist was also present during the inspection.

This facility is an equipment rental and portable solutions provider.

At the time of inspection based on observation, this facility is required to maintain a Unified Program Facility Permit for the following:

- Hazardous Materials Business Plan (HMBP) requirements for storing/handling hazardous materials on-site in reportable quantities (≥ 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for gases). HSC §25507
- Hazardous waste generator requirements as a Small Quantity Generator (SQG) of hazardous waste (100-1000 kg/mo; 220-2200 lbs/mo; 27-270 gallons/mo; or ≤ 1 kg [2.2 lbs]/mo of acutely hazardous waste). 40 CFR §260.10 & 22 CCR §66260.10

The following hazardous materials and wastes in reportable amounts were observed during the inspection walk-through of the facility:

- 2 x 55 gallon plastic drum of Walex Concrete Cleaner (see photo #1)
- 1 x 55 gallon plastic drum of EXODOR Green Hornet Degreaser (see photo #2)
- 1 x 55 gallon plastic drum of Walex Alkaline Urinal Cleaner (see photo #3)
- 1 x 350 gallon aboveground storage tank of Used Lubricating Oil (see photo #4)

The following hazardous materials were observed but below reportable threshold and/or exempt:

- 1 x 55 gallon steel drum of NAPA Automatic Transmission Fluid
- 1 x 275 gallon plastic tote of Blue Def Diesel Exhaust Fluid (reportable threshold for irritants: 500 gallons)

VIOLATION # 1

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

DEHQ-UNITED RENTALS - 020



COUNTY OF SAN DIEGO

SUPPLEMENTAL NOTICE OF VIOLATION

INSPECTION DATE: **03/01/2024**
RECORD ID #: **DEH2011-HUPFP-214482**

PAGE **2** OF **12**

Classification: Class I

Observations:

United Rentals Branch 70M, is currently subject to hazardous materials (HM) requirements in reportable amounts.

These are the hazardous materials that I observed on-site:

- 2 x 55 gallon plastic drum of Walex Concrete Cleaner (see photo #1)
- 1 x 55 gallon plastic drum of EXODOR Green Hornet Degreaser (see photo #2)
- 1 x 55 gallon plastic drum of Walex Alkaline Urinal Cleaner (see photo #3)

This facility failed to renew their Unified Programs Facility Permit (UPFP) and as a result has an expired permit. The UPFP has been expired since 3/31/23. Be advised, it is the facility's responsibility to renew the UPFP before the expiration date.

The balance due is \$714.

Corrective Action Completed During Inspection:

Mike Campusano was assisted by Yves Raquidan to immediately renew the facility UPFP by paying the past due balance of **\$714**. Payment was made electronically by going to www.dehpay.com.

VIOLATION # 2

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

Classification: Class I

Observations:

United Rentals Branch 70M, is currently subject to hazardous waste (HW) generator requirements for generating any amount of HW.

This is the hazardous waste (HW) that I observed on-site and was reported in the 1/26/24 California Environmental Reporting System (CERS) HM Inventory:

- 1 x 350 gallon aboveground storage tank of Used Lubricating Oil (see photo #4)

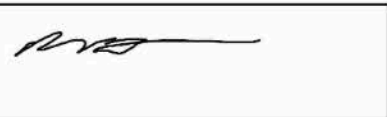
This facility failed to renew their Unified Programs Facility Permit (UPFP) and as a result has an expired permit. The UPFP has been expired since 3/31/23. Be advised, it is the facility's responsibility to renew the UPFP before the expiration date.

The balance due is \$714.

Corrective Action Completed During Inspection:

Mike Campusano was assisted by Yves Raquidan to immediately renew the facility UPFP by paying the past due balance of **\$714**. Payment was made electronically by going to www.dehpay.com.

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 Linda Wirschem	SIGNATURE		DATE SIGNED 03/01/2024
PRINTED NAME OF FACILITY REPRESENTATIVE Mike Campusano			DATE SIGNED 03/01/2024
TITLE OF FACILITY REPRESENTATIVE Branch Manager	SIGNATURE		

DEHQ-UNITED RENTALS - 021



COUNTY OF SAN DIEGO

SUPPLEMENTAL NOTICE OF VIOLATION

INSPECTION DATE: **03/01/2024**

PAGE **3** OF **12**

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

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

COMPLIANCE INSPECTION REPORT

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

INSPECTION DATE: **03/01/2024** PAGE **4** OF **12**
RECORD ID #: **DEH2011-HUPFP-214482**
TIME START: **9:00 AM** END: **12:45 PM**
SPECIALIST: **Linda Wirschem**
INSPECTION CONTACT: **Mike Campusano**
TITLE: **Branch Manager**
PHONE: **(619) 565-0059**
E-MAIL: **lcampuzano@ur.com**

On the above date, the County inspected your facility under the authority of the California Health and Safety Code (H&SC), to determine compliance with applicable provisions of the H&SC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). **This report serves as a Notice to Comply (H&SC 25187.8 & 25404.1.2) for any minor violations as defined in H&SC 25404 and 25117.6.** 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 this report within 30 days (or as specified below) demonstrating that all violations have been corrected or include a written notice of disagreement that clearly states the reason for any disputed violations. 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) will make a penalty less likely.

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	Permit Expires On	03/31/2023

CONSENT TO CONDUCT INSPECTION GRANTED BY: **Mike Campusano**

TITLE: **Branch Manager**

VIOLATION # 3

1010004 Chemical inventory incomplete or not submitted in CERS. HSC 25505(a)(1); 25507(a); 25508.1(a-b); 19 CCR 2654 (a) or (d)

Classification: Class II

Observations:

This facility is subject to the HMBP for storing hazardous materials and hazardous waste. During the inspection walk-through, the following inventory was observed:

- 2 x 55 gallon plastic drum of Walex Concrete Cleaner (see photo #1)
- 1 x 55 gallon plastic drum of EXODOR Green Hornet Degreaser (see photo #2)
- 1 x 55 gallon plastic drum of Walex Alkaline Urinal Cleaner (see photo #3)

At the time of the inspection, these item were not reported in the facility's CERS submittal on 1/26/24.

Therefore the facility failed to report these HM items within 30 days.

Be advised, hazardous materials in reportable quantities (≥ 55 gallons of a liquid, ≥ 500 pounds of a solid, or 200 cubic feet of gas) must be reported in the HM Inventory in CERS within 30 days.

Corrective Action Due By: **03/31/2024**

Immediately, but within 30 days, log in to CERS, add the items unreported and submit in CERS.

Additional Information for assistance with CERS:

CERS Help Desk: 858-505-6990

Monday through Friday from 8:00am to 3:00pm

CERS: <https://cersbusiness.calepa.ca.gov/Account/SignIn?ReturnUrl=%2f>

Notify HMD by sending an e-mail to Linda.Wirschem@sdcounty.ca.gov when this corrective action has been completed. You may use the corrective action form on the last page of this report.

DEHQ-UNITED RENTALS - 023



COUNTY OF SAN DIEGO

SUPPLEMENTAL COMPLIANCE INSPECTION REPORT

INSPECTION DATE: **03/01/2024**
RECORD ID #: **DEH2011-HUPFP-214482**

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NOTE: 1 x 55 gallon steel drum of Brake Fluid is reported in the Hazardous Materials Inventory in CERS but was not observed on site. If this item is no longer at the facility, it can be removed from the inventory list in CERS.

VIOLATION # 4

1010005 Site map not submitted in CERS or not sufficient. HSC 25505(a)(2); 25508.1(f); 19 CCR 2652(a)(3)

Classification: Class II

Observations:

This facility is subject to the HMBP for storing hazardous materials and hazardous waste and providing a sufficient Site Map. During the inspection walk-through, the following inventory was observed:

- 2 x 55 gallon plastic drum of Walex Concrete Cleaner (see photo #1)
- 1 x 55 gallon plastic drum of EXODOR Green Hornet Degreaser (see photo #2)
- 1 x 55 gallon plastic drum of Walex Alkaline Urinal Cleaner (see photo #3)

At the time of the inspection, these item were not included in the facility's Site Map (a part of the Hazardous Materials Inventory element) in the CERS submittal on 1/26/24.

Therefore the facility failed to submit a Site map with sufficient information that includes all reportable hazardous materials and hazardous waste.

Corrective Action Due By:03/31/2024

Immediately, but within 30 days, update the Site Map to ensure that it includes ALL reportable hazardous materials and hazardous waste.

Log in to CERS, and upload the corrected Site map and resubmit. NOTE: when uploading the Site map, ensure that the format of the file is a .pdf (portable document format).

Additional Information for assistance with CERS:

CERS Help Desk: 858-505-6990

Monday through Friday from 8:00am to 3:00pm

CERS: <https://cersbusiness.calepa.ca.gov/Account/SignIn?ReturnUrl=%2f>

Notify HMD by sending an e-mail to Linda.Wirschem@sdcounty.ca.gov when this corrective action has been completed. You may use the corrective action form on the last page of this report.

NOTE: 1 x 55 gallon steel drum of Brake Fluid is reported in the Hazardous Materials Inventory in CERS but was not observed on site. If this item is no longer at the facility, it can be removed from the Site Map in CERS.

INSPECTION REMARKS:

Hazardous Materials Business Plan (HMBP):

The facility's HMBP, including the 1) Facility Information, 2) Hazardous Materials Inventory, and 3) Emergency Response/Training Plans, was last submitted in California Environmental Reporting System (CERS) on 1/26/24 and was available on-site. CERS ID number 10386103. As a reminder, please re-certify annually, re-submit every 3 years, and/or within 30 days of a substantial change to any portion of the HMBP.

Emergency contacts and billing address was verified as current.

Employee training for the last 3 years in regard to hazardous materials and hazardous waste management was available and reviewed at the time of inspection. Ensure training is conducted initially and annually and records are readily available and documents maintained for a minimum of 3 years.

DEHQ-UNITED RENTALS - 024



COUNTY OF SAN DIEGO

SUPPLEMENTAL COMPLIANCE INSPECTION REPORT

INSPECTION DATE: **03/01/2024**
RECORD ID #: **DEH2011-HUPFP-214482**

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Hazardous Waste:

Per DTSC's Hazardous Waste Tracking System, the facility's EPA ID, CAL000432214, is active.

The facility's hazardous waste hauler is Safety Kleen. Hazardous waste manifests were available for review during the inspection. Per Mike Campusano, hazardous waste generated on site has decreased over the last couple of years because the facility out sources the maintenance of their vehicles servicing.

Mike Campusano stated that a Safety Meeting is scheduled daily and records of attendance are maintained and readily available for review. He also stated that employees are assigned on-line training throughout the year and records are available on-line.

Per Mike Campusano, the hazardous waste accumulation areas and hazardous material storage area are inspected 2-3 times a week.

Contents of this report was reviewed by Mike Campusano and signature was obtained by Mike Campusano at the end of the inspection.

Additional Information:

CERS Help Desk: 858-505-6990

Monday through Friday from 8:00am to 3:00pm

CERS: <https://cersbusiness.calepa.ca.gov/Account/SignIn?ReturnUrl=%2f>

Helpful Websites:

- 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>

If you have any questions regarding this inspection, please contact Linda Wirschem, (619) 214-2683,
Linda.Wirschem@sdcounty.ca.gov



COUNTY OF SAN DIEGO

SUPPLEMENTAL COMPLIANCE INSPECTION REPORT

INSPECTION DATE: **03/01/2024**
RECORD ID #: **DEH2011-HUPFP-214482**

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

INSPECTION PHOTOS



Photo #1:
**55 gallon Walex Concrete
Cleaner**

Location: Warehouse



Photo #2:
**55 gallon Green Hornet
Cleaner/Degreaser**

Location: Warehouse



COUNTY OF SAN DIEGO

SUPPLEMENTAL COMPLIANCE INSPECTION REPORT

INSPECTION DATE: 03/01/2024
RECORD ID #: DEH2011-HUPFP-214482

PAGE 8 OF 12

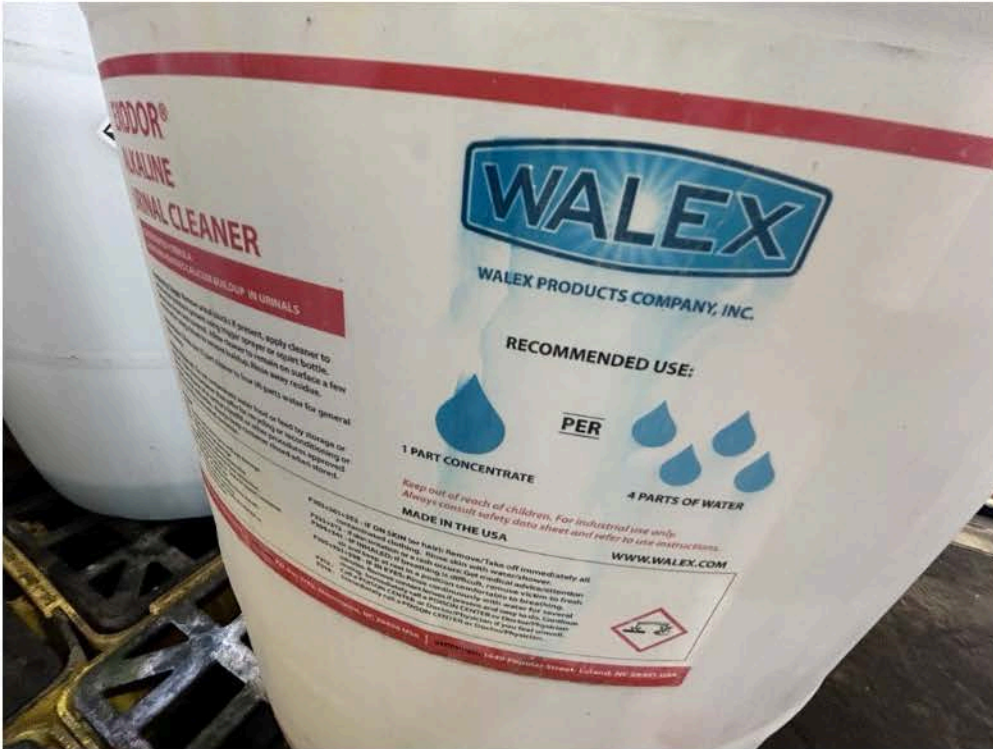


Photo #3:
55 gallon Walex Alkaline Urinal
Cleaner

Location: Warehouse



Photo #4:
350 gallon aboveground tank
of Used Oil

Location: Warehouse

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

DEHQ-UNITED RENTALS - 027



COUNTY OF SAN DIEGO

SUPPLEMENTAL COMPLIANCE INSPECTION REPORT

INSPECTION DATE: **03/01/2024**PAGE **9** OF **12**RECORD ID #: **DEH2011-HUPFP-214482**

PRINTED NAME OF FACILITY REPRESENTATIVE Mike Campusano	SIGNATURE		DATE SIGNED 03/01/2024
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: **03/01/2024** PAGE **10** 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 2652(a)(1); SDCC 68.904(b); HSC 25508(a)(1), 25508(a)(3)
3 ☒ 1010004	Chemical inventory incomplete or not submitted in CERS. HSC 25505(a)(1); 25507(a); 25508.1(a-b); 19 CCR 2654 (a) or (d)
4 ☒ 1010005	Site map not submitted in CERS or not sufficient. HSC 25505(a)(2); 25508.1(f); 19 CCR 2652(a)(3)
☐ 1010006	Failed to update HMBP in CERS within 30 days of a substantial change to any portion of the HMBP, including inventory changes or facility information. HSC 25508.1(a-f); 19 CCR 2654(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 2654(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 2658
☐ 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 2670, 2671
☐ 1010015	Failure to submit employee training plan in CERS, when not meeting agricultural handler exemption. HSC 25507.1(a), 25508(a)(1), 19 CCR 2670, 2671
☐ 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 2659(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 2670, 2671
☐ 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 2659(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)(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)(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>
☐ HMD0226	Did not accumulate waste in a container or tank. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2)
☐ 3030007	Failed to properly label/date hazardous waste container &/or tank. 22 CCR 66262.34(f)
☐ 3030010	Failed to properly dispose of hazardous waste within 180 days (or 270 days if waste is transported over 200 miles). 22 CCR 66262.34(d); HSC 6.5 25123.3(h)(1)
☐ 3030013	Failed to accumulate hazardous waste in a container that is in good condition. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2), 265.171
☐ 3030015	Failed to accumulate or store hazardous waste in a lined &/or compatible container. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2), 265.172
☐ 3030017	Failed to properly close hazardous waste container(s). 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2), 265.173
☐ 3030019	Failed to inspect hazardous waste storage area at least weekly. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2), 265.174
☐ 3030022	Failed to properly separate incompatible waste. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2), 265.177
☐ 3030030	Failed to maintain &/or operate facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(4), 265.31
☐ 3030036	Failed to maintain adequate aisle space. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(4), 265.35
☐ 3010022	Failed to post, next to the telephone, emergency information containing the location of emergency equipment, contact names and phone numbers. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(5)(ii)



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

INSPECTION DATE: **03/01/2024** PAGE **11** OF **12**
RECORD ID #: **DEH2011-HUPFP-214482**

Hazardous Materials and Hazardous Waste (continued)

- ☐ 3020001 Failure to ensure employees are thoroughly familiar with proper waste handling and emergency procedures during normal facility operations and emergencies. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(5)(iii)
- ☐ 3030032 Failed to maintain the following emergency response equipment or equivalent: 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 66262.34(d)(2); 40 CFR 262.34(d)(4), 265.32
- ☐ 3030039 Failed to have an emergency coordinator on the premises or on call, and available during an emergency. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(5)(i)
- ☐ HMD0412 Failed to implement and/or coordinate emergency response measures during an emergency, spill/release. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(5)(iv)
- ☐ 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 |
|----------------------------------|--|
| ☐ 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 66262.34(d)(2); 40 CFR 262.34(d)(3), 265.201(b)(c) |
| ☐ 3030025 | Failed to provide an overfill protection device on continuously fed hazardous waste tank(s). 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(3), 265.201(b)(4) |
| ☐ 3030027 | Failed to conduct daily tank inspection of discharge control system, monitoring equipment and waste level. 22 CCR 66262.34(d)(2); 40 CFR 265.201(c)(1-3), 262.34(d)(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 66262.34(d)(2); 40 CFR 265.201(c)(4 & 5), 262.34(d)(3) |
| ☐ 3050007 | Failed to properly remove all waste upon closure, decontaminate, and document the closure of a hazardous waste tank system. 22 CCR 67383.3; 40 CFR 262.34(d)(3), 265.201(f) |
| ☐ HMD1612 | Hazardous waste improperly stored in a tank system causing leaks, corrosion, or failure. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(3), 265.201(b) |
| ☐ 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 66262.34(d)(2); 40 CFR 262.34(d)(3), 265.201(g) |

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; 68.907.1 |
| ☐ HMD0150 | Failed to submit complete and accurate Facility Information in CERS. 27 CCR 15188(b-c); SDCC 68.904(b) |
| ☐ 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 active EPA ID Number. 22 CCR 66262.12(a) |
| ☐ 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 66268.7(a)(1) |
| ☐ 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) |
| ☐ HMD0152 | Failed to report &/or update the required inventory information for hazardous waste(s) generated at the facility in CERS. SDCC 68.904(a)(2) |
| ☐ 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) |
| ☐ 3010037 | Failure to notify the CUPA of aerosol can processing procedures prior to commencement of operations. HSC 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 | Failed to properly dispose of hazardous waste at an authorized facility. HSC 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) |

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 environment 22 CCR 66266.81(b) |

DEHQ-UNITED RENTALS - 030



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

INSPECTION DATE: **03/01/2024** PAGE **12** OF **12**
RECORD ID #: **DEH2011-HUPFP-214482**

Hazardous Materials and Hazardous Waste (continued)

- ☐ 3030012 (RCRA LQG) Failed to properly dispose of hazardous waste within 90 days. 22 CCR 66262.34(a), (c); HSC 6.5 25123.3(b)(1)
- ☐ 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); 22 CCR 66262.34(f)
- ☐ HMD0217 Failed to repackage and properly label damaged/deteriorated hazardous material container within 96 hours. HSC 25124(b)(3)(B); 22 CCR 66262.34(f)
- ☐ 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 66262.34(e)
- ☐ 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

- | # | <u>VIOLATION DESCRIPTION</u> |
|----------------------------------|--|
| ☐ 3010004 | Failed to obtain a California ID Number from DTSC or federal ID Number from USEPA prior to accumulating 5,000 kgs or more of Universal Waste. 22 CCR 66273.32(a-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) |
| ☐ 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 66273.33; 66273.33.5, 66273.33.6 |
| ☐ 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 handler of PV modules, electronic devices, and/or CRTs from an offsite source to notify DTSC 30 days prior to acceptance. 22 CCR 66273.32(c), (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 or CRTs to any foreign destination to notify DTSC 60 days prior to export and send a copy to the CUPA. 22 CCR 66273.40(a)(2),(3) |
| ☐ 3110030 | Failed to notify the CUPA of aerosol processing procedures prior to commencement of operations. HSC 25201.16(j) |

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: **03/01/2024**
RECORD ID #: **DEH2011-HUPFP-214482**
SPECIALIST: **Linda Wirschem**
INSPECTION CONTACT: **Mike Campusano**
TITLE: **Branch Manager**
PHONE: **(619) 565-0059**
E-MAIL: **lcampuzano@ur.com**

VIOL#	DATE CORRECTED	INDICATE HOW VIOLATIONS WERE CORRECTED (Attach Any Supporting Documentation)	DUE DATE
#1 HMD1001	03/01/2024	Corrected during inspection	03/31/2024
#2 HMD0131	03/01/2024	Corrected during inspection	03/31/2024
#3 1010004			03/31/2024
#4 1010005			03/31/2024

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

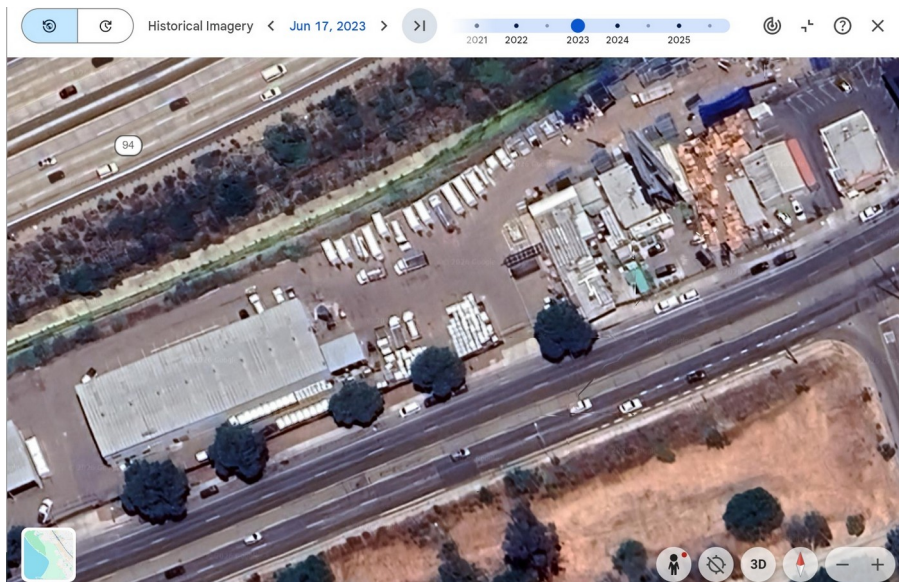
☐ RTC entered by Specialist on: _____

☐ RTC entered by Office Assistant on: _____

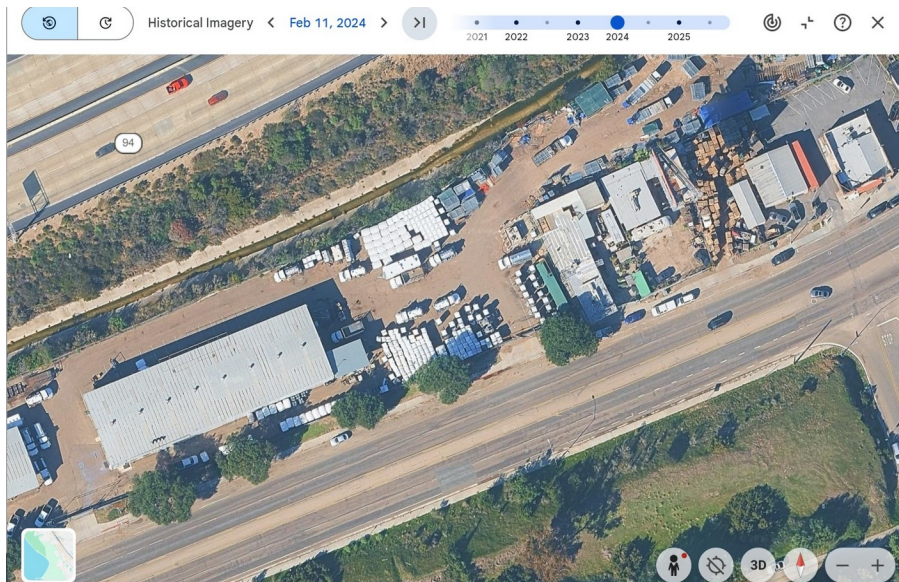
Department of Environmental Health and Quality, Hazardous Materials Division, P.O. Box 129261, San Diego, CA 92112-9261
(858) 505-6880 <http://www.sdcdehq.org>

EXHIBIT 4, CONTINUED — THE CONDITION THE INSPECTIONS MISSED

When the FRAC tank was not on site, and when it was



Google Earth historical imagery, June 17, 2023 — the yard before the FRAC tank. The tank is not on site.



Google Earth historical imagery, February 11, 2024 — the FRAC tank is on site. It was present for both County field inspections that followed: the March 1, 2024 CUPA inspection (above) and the November 19, 2024 annual truck inspection at this same yard.

The FRAC tank stores accumulated septage — the very class of materials the Department regulates for proper handling. Its appearance on this site, and its presence throughout the County's own field visits, places its oversight squarely within DEHQ's responsibility.

5

EXHIBIT 5

Regional Water Quality Control Board, Region 9 — Correspondence

RWQCB Region 9 correspondence stating that the July 8, 2026 inspection identified a potential illicit connection, that the investigation is ongoing, and that the Board had concerns regarding potential discharge of septage toward Chollas Creek.



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

DEHQ-UNITED RENTALS - 035

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