

REPORT & REQUEST FOR REPLY

United Rentals, dba Reliable Onsite Services

County Sewage Hauler Operating Permit No. LSHOP-000063 · 6144 Federal Boulevard, San Diego

Submitted to the Honorable Summer Stephan, District Attorney, County of San Diego

by Darryl Cotton · Owner, 6176 Federal Boulevard, San Diego, California 92114

August 31, 2026

What you have before you began as a letter designed to give notice of the horrific odor, noise and environmental conditions our community has had to endure as a result of the unregulated handling of millions of gallons of human sewage generated by United Rentals' Porta-Potty business. We have literally been under assault. But that is just one side of the story. The other side has been trying to find out what agencies are responsible for regulating these activities and for that I had to be led down numerous rabbit holes where each agency pointed at the other, denying their own responsibilities and in some cases just ignoring me. What had been various agency questions, through responses to my California Public Records Act requests, turned what had been a letter into this report. A report that turned those questions into findings.

This report relies on communications between myself and these agencies and compiles the responses to the CPRA requests I have made in this matter. It rests on the records those requests produced from the following cities and agencies, each of which played a part:

- County of San Diego, Department of Environmental Health & Quality — Nos. 25-4030, 26-3709, and 26-4763
- City of San Diego (Public Utilities, Fire-Rescue, City Attorney, and Stormwater) — Nos. 26-6342, 26-6343, 26-6357, 26-6533, and 26-6563
- City of El Cajon — Nos. 26-583 and 26-679
- Orange County Sanitation District — Request No. P004671-080826
- San Diego Air Pollution Control District — request dated June 27, 2026
- City of San Diego District 4 Councilmember Henry Foster

I would also like to thank all of the government staff who assisted me in compiling this information. It is a thankless task they are faced with; and when a citizen is forced to confront an issue as large as the one my neighbors and I are facing, it is through these records-act requests — whether by the information they provide, or, at times, by the absence of the information they reveal — that we can hope to make sense of the nonsensical. It is with that staff response that our attempts to find justice will ultimately prevail.

Sincerely,

Darryl Cotton

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Abbreviations used in this report:

UR — United Rentals (North America), Inc., dba Reliable Onsite Services

DEHQ — County of San Diego Department of Environmental Health & Quality

HMD — DEHQ Hazardous Materials Division

LWQD — Land and Water Quality Division (as named on the County permit and roster forms)

SD — City of San Diego

PS-1 — Pump Station No. 1 for City of San Diego

EC — City of El Cajon

OC San — Orange County Sanitation District (Fountain Valley station)

BOS — County of San Diego Board of Supervisors

POTW—Publicly Owned Treatment Works (Discharge Station)

BT—UR’s Only 4,000 Gallon Bulk Transfer Truck

2CV—UR’s Fleet of Smaller 2 Compartment, Septage and Cleansing Fluid Tanks for Service

Table of Authorities

The authorities referenced in this report, and the page(s) on which each appears:

Permit No. LSHOP-000063 — the County Sewage Hauler Operating Permit under which UR conducts the operation, and the written undertaking it carries to conform to all applicable laws and County ordinances. (pp. 1, 4, 6, 7)

California Health and Safety Code, Division 104, Part 13, Chapter 4, Article 1 — the state Environmental Health statute on onsite sewage and waste disposal (septic tanks) that the County permit's undertaking expressly incorporates and agrees to conform to. (p. 2)

San Diego County Code § 68.320 — the County's holding-tank permitting ordinance: a permit is required, and — for a temporary tank in lieu of a septic system — only where public sewer is unavailable, with an annual operating permit to ensure proper maintenance. (p. 5)

San Diego County Code § 68.609 — requires a registered sewage hauler to keep and, on request, report where its collected material is finally disposed of; a false statement or material omission in a required report is itself a violation. (pp. 2, 6)

San Diego County Code § 68.610 — vests the Director with authority over where collected sewage may lawfully be deposited. (pp. 2, 7)

40 C.F.R. § 403.5(b)(2) — federal pretreatment standard barring discharge to a publicly owned treatment works of waste with pH below 5.0. (pp. 5, 8)

Water Code §§ 13260, 13387 — state waste-discharge requirements and water-quality enforcement. (p. 8)

EPA, Guide to Septage Treatment and Disposal (EPA/625/R-94/002) — EPA guidance recognizing that septage held in storage turns anaerobic and corrosive over time. (p. 5)

NFPA 820 — the national fire-safety standard for wastewater treatment and collection facilities, addressing the classification and control of hydrogen sulfide and methane hazards. (pp. 3, 5, 7)

Penal Code §§ 118, 115 — perjury; offering a false or forged instrument for filing. (p. 8)

Penal Code § 372; Civil Code §§ 3479–3480 — public nuisance. (p. 8)

DARRYL COTTON

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August 31, 2026

The Honorable Summer Stephan, District Attorney, County of San Diego

Attn: Economic Crimes and Consumer Protection Division — Environmental Protection Unit

Via email: Summer.Stephan@sdcda.org

cc: Marvin Mayorga, Group Program Manager, Land Use & Environment Group, County of San Diego <marvin.mayorga@sdcounty.ca.gov>

Re: Request for review, and a proposed resolution — United Rentals, dba Reliable Onsite Services; County Sewage Hauler Permit No. LSHOP-000063; 6144 Federal Boulevard. Follows my August 13, 2026, complaint to the Board of Supervisors, cc'd to your office.

Dear District Attorney Stephan:

This letter follows my August 13, 2026, complaint to the Board of Supervisors, on which you were cc'd, and addresses conditions I learned of only after that complaint was filed. I own 6176 Federal Boulevard, immediately adjacent to a commercial septage operation United Rentals conducts next door under County Sewage Hauler Operating Permit No. LSHOP-000063. Based on what I will reveal here I would ask that the Director and Deputy Director of the Department of Environmental Health & Quality review this matter.

What follows rests entirely on the parties' own records — obtained through Public Records Act requests to each agency involved and assembled here, for the first time, in one place. Seven entities touch this operation: United Rentals, dba Reliable Onsite Services, the permittee ("UR"); the County's Department of Environmental Health & Quality ("DEHQ") and its Land and Water Quality Division ("LWQD"), which issued and administers the permit, and its Hazardous Materials Division ("HMD"), which examined the FRAC tank; the City of San Diego ("SD") whose Pump Station No. 1 ("PS-1") the permit names; the City of El Cajon ("EC"), whose Vernon Way station received the waste; and the Orange County Sanitation District, whose Fountain Valley ("OC San") station the permit also names. Taken one file at a time, each shows only a fragment; read together — as the records now permit — they show what happened here. It is that pattern, not any single document, that I ask your office to examine.

The record is as notable for who is absent from it as for what it shows. Nothing that I've seen produced, places these conditions before the officials with authority to act on them. Not DEHQ's Director, Amy Harbert, nor the Deputy Director who oversees the divisions that handled this, John-Ross Glueck (**Exhibit 1**); and nothing produced shows the leadership of SD, EC, or OC San apprised of the whole that their combined records reveal. Each agency acted on the fragment in front of it. No one on this record has yet acted on the pattern — which is why I bring it to your office to decide where responsibilities lie.

1. What the records show

For six consecutive years — 2020 through 2025 — UR’s annual applications to the County, each signed under penalty of perjury (**Exhibit 2**), named OC San’s Fountain Valley station as its disposal facility. Yet OC San has determined, in writing, that it holds no record of any kind for UR from December 1, 2022, to the present (**Exhibit 2, pp. 052–053**) — the station it swore it would use has no record of it for that period.

The contradiction sits in the County’s own file, and DEHQ’s own enforcement records frame it. Each year — and again within a year as UR’s fleet changed — DEHQ inspected the company’s trucks under this permit, checked their required lettering, assigned each a DEHQ decal, and recorded its field observations on a truck-inventory form (**Exhibit 2**). That vehicle enforcement was managed closely and continuously. The disposal destination written on those same forms was not: the applicant fills it in, and nothing in the permit process verifies or approves it. On the inventories DEHQ inspected, UR named PS-1 and, from 2023, EC — never the Fountain Valley station its applications swore to. The same company thus gave the same Department two accounts of where its waste goes — one on the applications it signed under penalty of perjury, one on the inventories it was inspected against — and DEHQ, which checked every truck, never checked the destination.

EC’s own records show where the material actually went: approximately **5.4 million gallons** of septage, over 43 consecutive months beginning December 2022, disposed of at EC’s Vernon Way facility, for which no testing records have been produced, a destination not identified in Permit No. LSHOP-000063 (**Exhibit 2, p. 017**), never named on a County application until December 11, 2025 (**Exhibit 2, p. 043**) — roughly three years after disposal there began. EC is a participating agency in the regional Metropolitan sewerage system, so that volume was ultimately conveyed to SD’s Point Loma Wastewater Treatment Plant and discharged, through the Point Loma Ocean Outfall, to the Pacific Ocean.

The OC San determination and UR’s 2020–2025 applications (**Exhibit 2**) were each produced under OC San Request No. P004671-080826 and County Public Records Request No. 26-4763. The neighborhood petition of the affected commercial corridor is before the County as Exhibit E to my August 13, 2026, complaint to the Board of Supervisors (“BOS”). I delivered this same record to DEHQ (Ryan Johnson) on August 18, 2026, so the County already holds it.

I first raised this matter in public comment before the [BOS on August 18, 2026](#). When I gave those comments I had not yet received the OC San “No Records Exist” response — it arrived only after I returned from the BOS meeting — so the position I propose here is one the records later confirmed, not one built around them.

2. DEHQ’s undertaking — and its disclaimer

While DEHQ has previously asserted that the FRAC tank we complain of is outside its purview, I disagree, because the County’s own permit application language states that the applicant “agree[s] 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” — an undertaking that appears on each of the applications UR signed (**Exhibit 2**). UR thus agreed, in writing and under penalty of perjury, to obey DEHQ’s orders and all applicable

ordinances. DEHQ need not resolve whether it “regulates” the tank; it need only hold its permittee to that undertaking. Separately, San Diego County Code section 68.610 vests the Director with authority over where collected sewage may lawfully be deposited.

DEHQ’s own records go further. On June 22, 2026, the Program Coordinator for DEHQ’s HMD, Sharon Preece wrote, internally, that the FRAC-tank sewage processing and storage was “not within industry standards” but “out of our jurisdiction” (**Exhibit 3, p. 055**).

Both halves of that sentence matter. DEHQ’s own coordinator acknowledged the practice is “not within industry standards,” and in the same breath disclaimed it as “out of our jurisdiction.” That disclaimer is hard to square with DEHQ’s own practice: the same HMD routinely inspects, photographs, and writes up 55-gallon drums, yet treats a 40,000-gallon open-top tank of stored septage — an open-top, unventilated vessel of the kind NFPA 820, the fire- and explosion-safety standard for gas-producing wastewater environments, is written to guard against (**Exhibit 4**) — as beyond its reach.

3. The DEHQ Divide

A coordinator’s written finding that a practice is “not within industry standards” is not nothing: it is a documented professional judgment, in DEHQ’s own file, that this operation was substandard. Yet DEHQ’s answer to it was a jurisdictional disclaimer, not a safety evaluation — Ms. Preece did not conclude the operation was safe; she concluded it was not hers to address. And DEHQ was not without divisions equipped to address it. The same HMD that wrote the disclaimer regulates aboveground storage tanks and administers California’s Accidental Release Prevention program; the Community Health Division’s functions include industrial hygiene and hazard evaluation (**Exhibit 1**). Whether either had jurisdiction over a 40,000-gallon open-top tank generating hydrogen sulfide and methane was a question for DEHQ to resolve — and DEHQ is the one body that could have resolved it.

The record does not show it ever tried at a level that mattered — and the shape of the failure is plain once the divisions are named. The HMD, under Chief Zoraida Moreno, disclaimed the operation three times over: Mr. LeClair on June 17, Ms. Preece on June 22, and Mr. Wirschem on June 30, each routing it elsewhere. The same operation was then found “in compliance with [its] pumper truck permit” — a finding Ryan Johnson, Chief of the Food, Water and Housing Division that administers that permit, affirmed in writing. One division said the hazard was not its concern; the other said there was no problem; and the disposal destination both touched was verified by neither. Above the two chiefs sit the Deputy Director, John-Ross Glueck, who supervises both divisions, and the Director, Amy Harbert — the two officials who could have reconciled “not ours” with “no problem.” Given the seriousness of what had been reported — a permittee moving millions of gallons off the destinations it swore to, into a tank DEHQ measured but would not authorize — the matter needed to reach them. On the record produced, it never did (**Exhibit 1**).

That the finding went nowhere is easier to understand once one sees that DEHQ’s own records do not agree on which of its divisions administers this permit. The permit and truck-inventory forms carry the letterhead of DEHQ’s “Land and Water Quality Division,” which identifies itself as a division of DEHQ. Yet DEHQ’s own organizational chart (**Exhibit 1**) — the only org chart it publishes — does not show a LWQD anywhere in its hierarchy, and the County classifies it nowhere else; the chart instead places the “Septic Tank Pumpers” function, which is this permit,

within the Food, Water and Housing Division headed by Ryan Johnson — the official who would later find the operation “in compliance.” And LWQD’s own published program list does not include sewage-hauler or pumper-truck permits at all. When a department’s own letterhead names an administering division that its own organizational chart does not recognize, the oversight that permit requires is the first thing to fall between the cracks — and on this record, it did.

4. A Jurisdictional Doubt Is Not a Stopping Point; It Is a Routing Question

Where a division is unsure a matter is its own, the ordinary course is to settle whose it is — to check the point against the sibling divisions equipped to weigh it and, where they hesitate or disagree, to put it to the Deputy Director or the Director, who can say which unit holds the authority and direct it to act. What was never in doubt is that the authority existed somewhere in DEHQ: Permit No. LSHOP-000063, UR’s own undertaking, and San Diego County Code section 68.610 place the power to require this operation to conform — and, where warranted, to stop — within the County’s own hands. The only open question was which unit would exercise it. That question was never answered: each division that touched the matter set it down as another’s, and none of it rose to the officials who could have resolved it. And so, no unit exercised the authority at all, and the operation continued — not because the County lacked the power to end it, but for want of an answer to a question DEHQ alone could give. Based on the records, I see no evidence that this formula was followed.

5. The EC POTW Discharge v. The County’s DEHQ Records

EC’s own billing measures the whole of it. From the City’s first invoice in December 2022 through June 2026, EC billed UR for 5,445,200 gallons of septage disposed at the Vernon Way station — a facility the County permit does not name. Rolled up by year from EC’s own invoices:

Table No. 1 — UR septage disposed at EC, by year

Year	Gallons disposed at EC
Dec. 2022	60,100
2023	1,050,400
2024	1,561,100
2025	1,881,400
Jan.–June 2026	892,200
Total	5,445,200

Total gallons disposed at the EC Septic Station, Account No. 5000032, rolled up by year from the City’s 43 monthly invoices (Public Records Request No. 26-583). December 2022 is the first billed month; 2026 runs through June. Records provided upon request.

The same records show the vehicles that carried it — and when the operation changed. Before UR put the FRAC tank on site, its vacuum trucks hauled to EC directly; once the tank was in service, a single bulk-transfer truck emptied it in EC and the vacuum trucks stopped discharging there at all. The same gallons, sorted by truck:

Table No. 2 — the same gallons, by truck

Company Name	United Rentals (Reliable Onsite Services)	
Month-Year	2CV Trucks (gal.)	BT Truck (gal.)
Dec 2022	60,100	0
2023	1,050,400	0
2024	172,400*	1,388,700
2025	0	1,881,400
Jan-Jun 2026	0	892,200
Total Gallons	1,282,900	4,162,300

“2CV” denotes the smaller two-compartment vacuum trucks UR owns, which collect septage directly; “BT” is the single 4,000-gallon bulk-transfer truck that empties the on-site FRAC tank. The split follows the FRAC-tank timeline — vacuum trucks hauling directly before the tank (through January 2024), the bulk-transfer truck once it was in service (from February 2024) — and is corroborated by EC’s sign-in sheets, which name the bulk-transfer truck by plate (3533049; 95407F4 in 2026) across 2025–2026 and show only vacuum trucks in 2022. Figures from EC’s records, Public Records Requests Nos. 26-583 and 26-679.¹

* The 172,400 gallons is January 2024 alone — the last month UR hauled to EC by their fleet of 2CV trucks. The FRAC tank appears in the aerial record by February 11, 2024 (**Exhibit 5**), and from February on every gallon is the bulk-transfer or BT truck emptying it. Because the permit’s two named facilities cannot account for the 2CV fleet’s septage — PS-1 barred UR’s out-of-state trucks, and the OCSD Fountain Valley plant produced no records — the FRAC tank stands, on this record, as the single collection point into which that fleet emptied everything it gathered: an open-top, unventilated tank of commercial septage of the kind **Exhibit 4** shows creates toxic, explosive, and environmental conditions.

The reading is not subtle. Through 2023, before the tank existed, every gallon came off the vacuum trucks, hauled straight to EC. By 2025 not one did — every gallon was the single bulk-transfer truck emptying the FRAC tank, and the vacuum trucks had vanished from EC entirely; 2024 is the year the operation flipped. All of it went to a station the County permit does not name, and none to the two it does. DEHQ has had this record, has been shown it in writing more than once, and has enforced nothing. When a permittee’s disposal is harming its neighbors and the environment, and DEHQ has been told so on the record, enforcing the permit it issued is DEHQ’s duty, not its discretion. Where DEHQ has concluded that no further action is required, I ask your office to determine whether the matter warrants investigation or referral to the agency with the appropriate authority.

6. The UR FRAC Tank: A Chronology

Each entry below is drawn from the records collected in the Chronology Set — the SD PS-1 trucked-waste file, the County permit applications and truck inventories, the site aerials, DEHQ’s correspondence and site-visit report, the Perez ↔ EC exchange, the OC San determination, and the EC billing and discharge-permit records — presented here in date order.

March 2, 2020 — UR files its first County sewage-hauler permit application (Permit No. LSHOP-000063), signed by Environmental Manager Jeffrey Walker (“Walker”) under penalty of perjury. The disposal destinations named are PS-1 (San Diego), primary, and OC San / Fountain Valley, alternate (**Exhibit 2, p. 017**).

¹ El Cajon has not completed its production under PRR26-679. Three of the six ShareFile links the City provided on August 27, 2026 do not resolve, and the records behind them — which appear to be the 2023 and 2024 sign-in sheets and the responses to items 1, 2, and 6, among the most probative records in this matter — have not been delivered. I notified the City that same day; it has not cured. This is a critical, still-outstanding omission from a production the City represented as complete, and I have demanded in writing that it be cured by September 8, 2026. Should the further production add material information, I will supplement this report.

September 7, 2022 — Walker signs SD’s Trucked Waste Requirements Certification for PS-1 (Exhibit 2, p. 026).

November 1–17, 2022 — SD bars UR’s out-of-state-plated trucks from PS-1. A truck is “just turned away from pump station 1”; the City writes that such trucks “will not be allowed to discharge at our Pump Station 1,” and that its program “has not allowed out of state plates since its inception.” (Exhibit 2, pp. 022–025).

December 2022 — Disposal at the EC Septic Station (1050 Vernon Way) begins — the month after the turn-away (Exhibit 2, p. 030).

June 17, 2023 — An aerial of 6144 Federal Boulevard shows no holding tank on the site (Exhibit 2, p. 035).

February 11, 2024 — An aerial shows the fixed holding tank in place. From this point the tank is UR’s sole on-site collection point: the service (“2CV”) trucks empty into it, and a single bulk-transfer truck draws it down in early-morning runs to EC; EC billing shifts this year from the service trucks to that one truck (Exhibit 2, p. 035).

September 10, 2024 — UR’s own County truck inventory lists EC as a location where its waste is disposed (Exhibit 2, pp. 037–038).

September 18, 2024 — Walker signs the County permit application under penalty of perjury; the disposal destinations named remain PS-1 and Fountain Valley only — no EC — twenty-two months after the PS-1 lockdown began (Exhibit 2, p. 036).

April 23, 2025 — Walker signs a EC Septic Sewage Discharge Permit application for the 6144 Federal yard, naming EC; the County permit continued to name only PS-1 and Fountain Valley (Exhibit 2, p. 040).

September 5, 2025 — SD reiterates that it “will not permit trucks with out of state licenses to dump at Pump Station 1”; UR’s City permit “only has one vehicle listed.” Walker states the fleet is “registered through the State of IN at a corporate level.” (Exhibit 2, p. 041).

September 15, 2025 — Walker signs another County permit application; the destinations named are again PS-1 and Fountain Valley (Exhibit 2, p. 042).

December 11, 2025 — David Perez, Reliable Onsite Services Branch Manager (“Perez”) signs the first County permit application to name EC as the primary disposal destination — roughly three years after EC disposal began (Exhibit 2, p. 043).

June 17, 2026 — SD refers the 6144 Federal matter to the County, recording UR’s own statement that the tank “was emptied and hauled off-site for disposal as needed.” (Exhibit 2, p. 044).

June 30, 2026 — Leon Wirschem², a Supervising Environmental Health Specialist on the County’s Hazardous Incident Response Team (HMD), contacts me about my pending Public Records Act request — by his own account “in the absence of” DEHQ’s records coordinator — and asks that I confirm it does not pertain to CUPA compliance, hazardous materials, or wastes, which would narrow it to exclude those records. I decline; the request stands as submitted. Mr. Wirschem states that HMD does not regulate the on-site storage or hauling of the septage and refers the

² Leon Wirschem is a Supervising Environmental Health Specialist in DEHQ’s Hazardous Materials Division. That same Division issued a Notice of Violation for this site (Permit No. 214482) on March 1, 2024, through a specialist, Linda Wirschem. I do not know whether they are related; I note only the shared surname and that both dealt with this operation, and leave any inquiry to your office.

disposal-verification question to the LWQD. Asked whether the Hazardous Incident Response Team has any role where the sewage tank creates a hazardous gas condition, he refers the matter elsewhere (**Exhibit 2, pp. 045–048**).

July 8, 2026 — Perez emails the EC — Lee Mutter, a Management Assistant — asking whether its station tests what it receives. Mutter refers the question to Aaron Jones, the City’s Deputy Director of Public Works, who answers, in writing, that it does not, and that any questionable or industrial-strength load should go elsewhere (**Exhibit 2, pp. 049–050**).

August 4, 2026 — County DEHQ reports three site visits (June 22, June 29, July 8) and finds UR “in compliance.” On the first visit, June 22, County staff could not gain access to the yard and reported only that no odor was detected “from the surrounding area.” (**Exhibit 2, p. 051**).

August 18, 2026 — OC San issues a “No Responsive Records” determination: no discharge, manifest, or billing record for UR from December 2022 to the present (**Exhibit 2, pp. 052–053**).

Across this period, EC billing reflects approximately **5,445,200 gallons** discharged.

7. The DEHQ Site Inspections

My complaints brought DEHQ to the yard three times, and DEHQ’s own emails record each visit. The field observations from the June 29 visit appear in its June 30, 2026, correspondence with the Regional Water Board (**Exhibit 3**); the full three-visit sequence, and the compliance finding that followed, appear in the written response of its Supervising Environmental Health Specialist, Craig Caes, dated August 4, 2026 (**Exhibit 3, p. 062**). By DEHQ’s own account, a single inspector made all three visits — but it has not named that inspector in any record produced to me. Mr. Caes reported the visits; he does not state that he made them.

On June 22, 2026, the inspector came to the site but was unable to gain access to the yard and, by Mr. Caes’s account, detected no odor from the surrounding area (**Exhibit 3**).

On June 29, 2026, the inspector reached the yard. He found no sewage pooling on the ground — but “did detect a sewage odor when he was within 2 feet of the holding tank” (**Exhibit 3**). DEHQ measured that tank at 40,000 gallons: an open-top, unventilated vessel taking on commercial waste by the truckload, nearly double the roughly 21,000-gallon capacity standard for a frac tank of its kind (**Exhibit 7**), and discharging to no sewer or field at all — it simply accumulates until a truck draws it off. The next day its own supervisor wrote the Regional Water Board that “the DEHQ permit they hold does not include the design and operation of an above-ground sewage holding tank,” and that “I do not believe this operation meets the outlined criteria” (**Exhibit 3**).

On July 8, 2026, the inspector returned, again reached the yard, and once more found no spilled sewage and no spill-indicating odor — and on the strength of these three visits DEHQ found UR “in compliance with their current pumper truck permit” (**Exhibit 3, p. 062**). That same day, UR’s branch manager emailed the EC station to ask whether it tests what it receives (**Exhibit 2**).

That determination rested on the site visits alone, and its timing bears noting. When Mr. Caes conveyed it on August 4, 2026, I replied the same day: the finding had been reached during the June and July visits — before the City of El Cajon produced, on August 3, 2026, the account records showing 43 months of off-permit disposal — and so could not have weighed the very facts at the heart of my complaint (**Exhibit 3, p. 063**). I asked that the finding be held open and reconciled against the El Cajon production. No reconciliation has been provided.

That County staff detected no odor is not the reassurance it appears to be. On the first visit they could not gain access to the yard and reported only the absence of odor “from the surrounding area” — not from the tank. And odor is no measure of this hazard. The anaerobic decomposition of septage generates methane, which is odorless and flammable when mixed with air, alongside hydrogen sulfide, which deadens the sense of smell at the very concentrations that make it dangerous. A finding that nothing could be smelled, from outside a yard no one could enter, cannot establish that a fixed tank of decomposing septage is safe — and the record does not show that anyone measured what the tank actually held.

And after three separate visits DEHQ did nothing — no cease-and-desist, no order to stop, no direction of any kind. Having stood two feet from the hazard, measured it, and admitted in writing that its own permit did not authorize it, DEHQ left the operation running. By its own responses, DEHQ gave UR a green light for a use it had just conceded its permit does not allow.

8. DEHQ’s Records Review

Before that response, the Department had already declared the matter closed. On August 14, 2026, the Department’s program coordinator, Ernie Liwag, wrote that “there is no further action needed to be taken by DEHQ for this operation and our investigation is closed,” adding that the Department had “reviewed all of the operational information with the Regional Water Quality Control Board and our internal County Counsel, both who confirmed that there is no further action” (**Exhibit 3, p. 064**). I do not doubt the review occurred; I ask what it reached. The City of El Cajon’s account records had been produced only eleven days earlier, on August 3, 2026, and the Orange County Sanitation District’s determination that it holds no record of this operation would not issue for another four days. Whether a review that took in those two records could still find “no further action” is a question your office is better placed to put to the reviewers.

There is more, and it is DEHQ’s own. In his August 18, 2026, written response to my questions (**Exhibit 3, pp. 065–067**), DEHQ’s Ryan Johnson — Chief of its Food, Water and Housing Division, the division its own organizational chart assigns this permit — stated that DEHQ had “verified through disposal records” that UR uses the EC station — the very records that show EC, while UR’s sworn 2020–2025 applications named only PS-1(SD) and Fountain Valley (OC San). DEHQ looked at the records which prove the mismatch and called them satisfactory. That concession cuts against DEHQ, not for it: its permit process has no step for verifying a disposal destination — it inspects trucks, not where their loads go — so the “disposal records” Mr. Johnson invokes did not verify the destination in advance; they belatedly confirmed, from EC’s own billing, a destination the permit file never approved and UR never disclosed on a signed application until December 2025.

Under San Diego County Code § 68.609, a registered sewage hauler must record and, on request, report to the Director where its collected material is finally disposed of, and a misstatement or material omission in that report is a violation in its own right:

“Said reports shall contain ... the location of the disposal site, where sewage effluent or other material has been finally disposed of. ... Making a false statement or a material omission in a required report is a violation of this Chapter, whether the report was or was not required to be sworn.” (San Diego County Code § 68.609.)

The disposal location is thus DEHQ's own concern under its own Code — and it is the very fact the 2020–2025 applications did not accurately state.

9. Revisiting the July 8, 2026, Perez-to-Mutter Email on Testing

As previously stated, on July 8, 2026, nine days after that DEHQ inspection, UR's branch manager, David Perez, emailed the EC station to ask one question: "By chance does your team do PH testing?" EC's Deputy Director of Public Works, Aaron Jones, answered that it does not, and that "if you have a questionable load, it should be taken to the SD dump site where they take industrial waste" (**Exhibit 2**).

The timing and subject of that question are what stand out. The EC station is a self-service discharge station — drivers sign themselves in by plate, with after-hours and weekend access — and, by the City's own answer, it tests nothing that arrives. UR had been discharged there, under those conditions, across the entire period since December 2022. So, the question the record leaves for your office is what changed: why, nine days after a County inspector stood at its tank, and after years of dumping without the question ever arising, its branch manager suddenly needed to know whether the one place it discharges its bulk septage would test what it brought.

The tables show what moved, and how. For why it matters, the parties speak for themselves. UR's own branch manager asked the EC station whether it tests what it receives; EC's Deputy Director of Public Works answered, in writing, that it does not — and that any questionable or industrial-strength load should go elsewhere (**Exhibit 2**). The County's own HMD, describing this operation to the Regional Water Board, put the tank at 40,000 gallons and the septage as "transferred as needed" to a 4,000-gallon trailer, "multiple trips a day" (**Exhibit 3**).

Set those exhibits beside these tables and little is left to infer: a tank the County measured but never authorized, filled out of sight of any discharge record, drawn off by one truck to the single station that — by its own admission — tests nothing, moving a volume no one traced. And running beneath all of it is a plain divergence, sustained across six years of applications signed under penalty of perjury, between the disposal UR swore to — PS-1 and Fountain Valley — and the disposal its own records show, at EC, by the millions of gallons. That is a misrepresentation of precisely the kind the permit exists to prevent — and it is the County that issued the permit, and the County that holds the records proving the gap. Whether it rises to a knowing violation is your office's to determine. That it demands the County's attention is not, respectfully, a close question.

10. Questions for your office

I am not asking your office to adopt any conclusion as to UR's intent. The questions below reduce to three: whether the applications were accurate, and if not, knowingly so; whether the disposal at EC was authorized; and whether the tank-and-transfer operation warrants investigation or referral. I would respectfully ask that your office please examine the factual questions the records raise and respond in writing, no later than September 11, 2026, as to:

1. whether UR knowingly represented on its 2020–2025 permit applications that the OC San Fountain Valley station was a disposal destination when the records show otherwise;
2. whether UR disposed of collected septage at EC during a period when that facility was not identified or authorized under Permit No. LSHOP-000063;

3. whether the fixed holding tank and its associated transfer operation were conducted without the authorization required by applicable County or other law; and
4. whether the disposal-site reports that San Diego County Code section 68.609 requires of a registered sewage hauler — which must state where the material was finally disposed of — accurately reflected the EC disposal, and whether any false statement or material omission occurred, which section 68.609 makes a violation of the County Code;
5. whether UR’s applications naming only PS-1 and Fountain Valley can be reconciled with UR’s own 2024 County truck inventory, in DEHQ’s file, on which the company itself listed EC (1050 Vernon Way) as where its waste is disposed;
6. whether the November 2022 barring of UR’s trucks from PS-1 — the destination the company continued to name under penalty of perjury through 2025 — and the commencement of EC disposal the following month bear on why the disposal moved off the permitted destinations; and
7. whether DEHQ’s compliance review of this operation, including its August 2026 “in compliance” finding, accounted for the fixed tank and its contents, given that the hazards the records describe — including odorless, flammable methane from the anaerobic decomposition of septage — are not detectable by smell.
8. whether DEHQ can explain how both records co-exist in its own permit file for Record LSHOP-000063 — UR’s application naming PS-1 and Fountain Valley (**Exhibit 2, p. 036**) and UR’s own County truck inventory naming EC (**Exhibit 2, p. 037**) — and how, with both records before it, DEHQ’s August 2026 review found this operation “in compliance.”
9. how DEHQ’s active, annual enforcement of this permit’s vehicle requirements — under which it inspected and decaled UR’s trucks each year — can be reconciled with its never having verified the disposal destination those trucks served, and with UR’s having named PS-1 and EC on the inventories it was inspected against while swearing to PS-1 and Fountain Valley on its applications (**Exhibit 2, pp. 036–043**).
10. whether DEHQ can explain how a matter of this gravity — a permittee’s disposal of millions of gallons of unclassified septage off its permitted destinations, into an on-site tank DEHQ measured but would not authorize — came to be reviewed, disclaimed among DEHQ’s divisions, and found “in compliance,” without the produced record showing that DEHQ’s Director or Deputy Director, or the other agencies concurrently involved, were ever apprised of it.
11. whether the review on which the Department’s closure rests — Ernie Liwag’s August 14, 2026 statement that the Department, before closing its investigation, “reviewed all of the operational information with the Regional Water Quality Control Board and our internal County Counsel, both who confirmed that there is no further action” (**Exhibit 3, p. 064**) — was a review by or with your office; and, if it was, whether — armed with the full record assembled in this Report — that remains your office’s position.

11. The resolution I propose

Accordingly, should your office conclude that the records warrant intervention, I ask that it coordinate with DEHQ and with Marvin Mayorga, the County’s Group Program Manager for Land

Use and Environment, to obtain an enforceable directive to UR — under Permit No. LSHOP-000063 and UR’s own undertaking above — providing:

1. that UR **immediately and permanently cease** all use of the FRAC tank at 6144 Federal Boulevard for the storage, handling, processing, or bulk transfer of septage — a use Permit No. LSHOP-000063 does not authorize — within 72 hours; and
2. that the **decontamination** of the tank be performed by a licensed third-party environmental-services tank-cleaning company and completed within 30 to 60 days, subject to that company’s scheduling — pumping it out and steam-cleaning or sandblasting it to remove all residual septage — the company certifying in writing upon completion that no detectable residual septage or septage constituents remain anywhere inside the tank, whether solid, liquid, or the gases associated with the anaerobic decomposition of that material (hydrogen sulfide, methane, and ammonia), with that certification provided to DEHQ as part of the record.

I want to be clear about how narrow this is. I am not asking that the tank be removed or relocated. Once its use for septage has permanently ceased and it has been decontaminated and certified clean by a third party service, it may remain exactly where it sits. This is strictly an environmental remedy directed at past conduct DEHQ itself has already acknowledged — an order to stop an acknowledged unpermitted use and to clean up what that use left behind — and nothing more.

12. Authority, duty, and the path forward

DEHQ has both the authority and the duty to require this. Its own records already acknowledge what the tank is used for — its HMD so described it, and DEHQ itself described that same transfer to the Regional Water Quality Control Board (**Exhibit 3**). Its authority runs from Permit No. LSHOP-000063, UR’s own written undertaking, and San Diego County Code section 68.610; its duty runs from its own mission. Decontamination is not an optional step but a condition of any acceptable resolution,³ and I am advised that licensed environmental tank-cleaning services equipped for this work are available locally. And the question raised by those six sworn attestations — each naming a facility that has no record of UR’s waste — remains for your office; decontaminating the tank neither resolves it nor relieves UR of any enforcement it may invite.⁴

I have since discussed the resolution proposed above with Mr. Mayorga, who concurs that, in light of the OC San records, a directive requiring UR to cease this use immediately and to decontaminate the tank is an appropriate resolution. In light of the conversations we have had over this matter — directed at a prospective solution to where things now stand — I am copying Mr. Mayorga on this letter; he can speak both to the Board proceeding and to the basis for that view.

³ This decontamination requirement reflects the opinion of Mike Dale, an environmental remediation professional at Environmental Works, Inc. (environmentalworks.com), whom I consulted. As used, the FRAC tank functions as an anaerobic digester — seeded by the septage pumped into it — generating the hydrogen sulfide and methane at issue and driving its contents toward lower pH, a decline brought on by the wide internal temperature swings an aboveground steel tank would experience. Lower pH can make a hauler’s onward discharge a pretreatment problem at the receiving works, and relocating the tank without first pumping and steam-cleaning or sandblasting away its residual septage would export the hazard, not end it. That the tank held septage is beyond dispute on the record — DEHQ’s transfer “from the 40,000-gallon tank to their 4,000-gallon trailer” (Exhibit 2), Table No. 2’s attribution of the EC discharges to that truck, and the pump line from the vacuum trucks to the tank, visible on site.

⁴ That decontamination matters regardless of the tank’s fate. Because UR rents and sells tanks of this kind, this one may not be retired — it may return to service, to a renter or buyer with no way of knowing what it last held. Should UR represent that it will decommission the tank, nothing guarantees the step is taken; cutting up a vessel that still holds residual septage and its gas-producing residue relocates the hazard as contaminated scrap rather than ending it. The tank should therefore be sterilized whatever its fate — reused, sold, or scrapped, it should not leave the site until certified free of the material and conditions that make it dangerous, within the agency’s duty to protect the public.

Because two SD agencies did not respond to these concerns, I was compelled to file two petitions for writ of mandate — *Cotton v. SD* (Code Enforcement, “CODE BLUE”), Case No. 26CU043242C; and *Cotton v. SD* (Fire-Rescue / NFPA 820 hazardous location), Case No. 26CU045721C. Should this Proposal be deemed acceptable, and the required conditions confirmed complete, the hazard those petitions were brought to abate would be resolved, and I would move to dismiss them.

To that end all I would ask is that, should this Resolution Proposal be agreeable, the County provide me written confirmation that UR has satisfactorily met the conditions of the directive — at which point the abatement I seek would be accomplished and those petitions would have served their purpose, as the ordinary province of any regulating agency’s responsibilities. To be clear, this Proposal concerns the abatement of the operation and the disposition of those pending petitions, and nothing in it is intended, or should be construed, as a release or waiver of any other claim or right. Your civil authority to seek injunctive relief remains the surest backstop, reaching UR directly and without dependence on the County’s cooperation; the underlying conduct also implicates the frameworks your unit enforces — Penal Code sections 118 and 115; the pretreatment and water-quality laws (40 C.F.R. § 403.5; Wat. Code, §§ 13260, 13387); and public nuisance (Pen. Code, § 372; Civ. Code, §§ 3479–3480) — which your office remains free to pursue.

I would prefer this to be resolved through the directive I propose rather than asking a court to decide what the records — including DEHQ’s own — already answer. I am glad to discuss it if you wish.

13. Conclusion

Whether UR knew this was the wrong tank — a question its own published guidance presses (**Exhibit 6**) — is only the most visible of the questions this record raises. It is not a single lapse but a sequence. UR swore, under penalty of perjury for six consecutive years, to disposal destinations one of which barred its trucks and the other of which has no record of them; it disposed of roughly 5.4 million gallons at a facility the County permit never named; and it built and ran a fixed storage-and-transfer tank the permit does not authorize.

DEHQ’s own permit file held an LWQD truck inventory naming the true destination beside the sworn applications naming a different one, and its August 2026 review found the operation “in compliance” without ever gaining access to the tank. And at the receiving end, EC-POTW accepted the entire UR volume across forty-three months. Each of these is documented in the Chronology at Section 6 and the exhibits it cites — and each is a point at which a process meant to catch this operation did not. There is a further gap of the same kind. DEHQ reported that it had “verified through disposal records” that UR disposes at EC, yet the County’s own permit-file production for this operation contains no such disposal records at all — the records on which DEHQ rested its finding are the records its own file, on production, does not hold.

I do not ask your office to apportion blame among the agencies; that is for your office to weigh. I ask it to see what the record shows plainly: that this operation ran for years past every checkpoint meant to catch it — the permit intake, the compliance inspection, and the receiving facility alike — and not one of them stopped it. That is precisely why enforcement cannot be left to the same processes that have so far let it continue, and why I bring it to you.

This is precisely the harm DEHQ exists to prevent. Its own mission is “protecting the environment and enhancing public health by preventing disease, promoting environmental responsibility and, when necessary, enforcing environmental and public health laws.” What I ask your office to direct is nothing more than the final clause of that mission — enforcement, where it is plainly necessary, of a permit and of laws already on the books.

This is not a closed chapter: to date, [the operation continues](#), and absent that enforcement it will simply go on. Nearly every fact set out here comes from the agencies’ own files and UR’s own words; none of it rests on my say-so — the assembling is done. What remains is for your office to determine whether these records warrant investigation, enforcement, or referral to the agency with the appropriate authority. I ask only that you read it as I have.

Please provide a response to this letter on or before close of business on September 11, 2026.

In anticipation of your reply, I remain,

Respectfully,



Darryl Cotton

Owner, 6176 Federal Boulevard, San Diego, California 92114

Enclosures:

Exhibit 1 — County of San Diego Department of Environmental Health & Quality Functional Organizational Chart, placing the “Septic Tank Pumpers” function (this permit) within the Food, Water and Housing Division and showing no LWQD (p. 015).

Exhibit 2 — The Chronology Set: a single date-ordered, Bates-numbered record backing the chronology at Section 6 — the County permit applications and 2023–2024 truck inventories; the SD PS-1 trucked-waste file; the 6144 Federal Boulevard aerials; the EC first invoice and Septic Sewage Discharge Permit; the July 8, 2026, Perez ↔ EC exchange on testing; and the OC San “No Responsive Records” determination (pp. 017–053).

Exhibit 3 — DEHQ correspondence (June 22–August 18, 2026): HMD’s June 22, 2026 internal email (p. 055); the exchange with the Regional Water Quality Control Board, Region 9 (pp. 056–061); Craig Caes’s August 4, 2026 “in compliance” finding and my same-day reply (pp. 062–063); and the County complaint thread — my August 13 complaint, the Department’s August 14 closure, and Ryan Johnson’s August 18, 2026 response to the six questions (pp. 064–067).

Exhibit 4 — Hazardous (Classified) Location: why the UR FRAC tank must be treated as creating an explosive environment (NFPA 820 / NEC Class I, Division 1) (pp. 069–071).

Exhibit 5 — 6144 Federal Blvd. aerial imagery: the FRAC tank absent (June 17, 2023) and present (February 11, 2024) (p. 073).

Exhibit 6 — UR’s “Frac Tank Guide: Choosing the Best Frac Tank for the Job” (unitedrentals.com, September 4, 2024) (pp. 075–077).

Exhibit 7 — Comparison: the closed-top gas-containment frac tank UR rents and the open-top tank in service at 6144 Federal Boulevard (p. 079).

1

EXHIBIT 1

County of San Diego DEHQ Functional Organizational Chart

The Department's own functional organizational chart, placing the “Septic Tank Pumpers” function — the function under which this permit is issued — within the Food, Water and Housing Division headed by Ryan Johnson, and showing no Land and Water Quality Division among the Department's operating divisions.



COUNTY OF SAN DIEGO

DEPARTMENT OF ENVIRONMENTAL HEALTH AND QUALITY



Director of Environmental Health and Quality
Amy Harbert

Administrative Secretary IV
Ana Becker



Director of Environmental Health, REHS
Heather Buonomo

Administrative Secretary III
Dolores Scruggs

Deputy Director
VACANT



Deputy Director
Deb Mosley



Deputy Director
John-Ross Glueck

Finance Chief
Vivian He

Group Program Manager
Jessica Geiszler

Chief
Saran Grewal

Chief
Zoraida Moreno

Chief
Ryan Johnson

Chief
Joann Lee

Group IT Program Manager
Joe Chan

SUPPORT SERVICES DIVISION
Programs/Functions

Policy Coordination and Recommendations
Community Events
Data Analysis

Sr. Dept. HR Officer
Valerie Espinoza

COMMUNITY HEALTH DIVISION
Programs/Functions

Industrial Hygiene/Occupational Health:
Asbestos Management (County facilities)
Childhood Lead Environmental Investigations
Hazard Communication
Hazard Evaluation
Respiratory Protection
Radiological Health
Nuclear Emergency Planning
Radiation Shielding Plan Reviews
Radioactive Materials
X-Ray Machine Inspection
Vector Control:
Disease Surveillance
Vector Borne Disease Investigation
Mosquito Control
Domestic Rat Control
Commercial Poultry Ranch Fly Control
Vector Borne Disease Laboratory Testing
After-Hours Emergency Response (Performed by HIRT staff)

HAZARDOUS MATERIALS DIVISION
Programs/Functions

Certified Unified Program Agency (CUPA):
Hazardous Waste/Tiered Permitting
Hazardous Materials Business Plans
Underground Storage Tanks
CA Accidental Release Prevention
Aboveground Petroleum Storage Tanks
Hazardous Incident Response Team (HIRT)
Response Service
Non-Business-Related Complaints
After-Hours Emergency Response
U.S./Mexico Border Involvement:
Border Inspections/Enforcement
Site Assessment and Mitigation
Meth Lab Clean-Up*
Corrective Action Program
Medical Waste Program*
Training, Outreach, Special Projects

FOOD WATER AND HOUSING DIVISION
Programs/Functions

Epidemiological Investigations
Retail Food:
Restaurants/Markets
Mobile Food/Vending
Wholesale Food Warehouses
Temporary Food Events
Food Recalls
Food Handler Training
Bathhouses
Body Art
Public Swimming Pools
Plan Check (Food, Pools, Massage, Body Art)
Septic Systems
Land Use Planning
Septic Tank Pumps
After-Hours Emergency Response (Performed by HIRT staff)

FOOD WATER AND HOUSING DIVISION
Programs/Functions

Beach and Bay Water Quality Monitoring
Spill Notifications/Sewage Spill Response
Mobile Home Parks
Monitoring Wells & Water Wells
Hotels/Motels/Apartments
Substandard Housing
Organized Camps
Rural Generalist Program
Jails/Detention Facilities
State Small Water Systems
Solid Waste Local Enforcement Agency (LEA):
Landfills
Transfer Stations
Burn Sites
Organic Facilities
Construction, Demolition and Inert
After-Hours Emergency Response (Performed by HIRT staff)

2

EXHIBIT 2

The Chronology Set

A single, date-ordered, Bates-numbered record backing the chronology at Section 6: United Rentals' County Sewage Hauler permit applications (2020–2025 and December 2025) and its 2023–2024 truck inventories; the City of San Diego Pump Station No. 1 trucked-waste file; the 6144 Federal Boulevard aerials; the City of El Cajon first invoice and Septic Sewage Discharge Permit; the July 8, 2026 Perez–El Cajon exchange on testing; and the Orange County Sanitation District “No Responsive Records” determination.



County of San Diego

DEPARTMENT OF ENVIRONMENTAL HEALTH
LAND AND WATER QUALITY DIVISION
5500 Overland Ave., Suite # 201, San Diego, CA 92123
P.O. Box 129261, San Diego, CA 92112-9261
(858) 565-5173 | (800) 253-9933 | www.sdcdeh.org



APPLICATION FOR 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:	5640 Cherry Ave		
City:	Long Beach	State:	CA Zip Code: 90805
Business Phone Number:	(626) 755-5852	Email:	jwalker5@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:	Andrew Harding	Cell Phone Number:	(626) 755-5852

Services Provided:	☐ Septic Tanks ☐ Seepage Pits ☒ Portable Restrooms ☐ Cesspools ☐ Other: _____		
Primary Liquid Waste Disposal Facility Name:	Pump Station #1		
Facility Address:	3550 East Harbor Dr		
City:	San Diego	State:	CA Zip Code: 92101
Alternate Liquid Waste Disposal Facility Name:	Orange County Sanitation District		
Facility Address:	10844 Ellis Ave		
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: 3/2/2020

Jeffrey Walker

Print Name

Jeffrey Walker
Signature

FOR OFFICE USE ONLY

Permit Number	# of Vehicles	Date
L-Shop - 000063	3	3/25/2020



County of San Diego

DEPARTMENT OF ENVIRONMENTAL HEALTH & QUALITY LAND AND WATER QUALITY DIVISION

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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:	jwalker5@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:	(619) 210-2850	Email:	environmental@ur.com
Emergency Contact:	Luis Campuzano	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:	Orange County Sanitation District		
Facility Address:	10844 Ellis Ave		
City:	Fountain Valley	State:	CA Zip Code: 92708

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Date: 9/17/2021

Jeff Walker

Print Name

Signature

FOR OFFICE USE ONLY

Permit Number	# of Vehicles	Date
DEH2020-LSHOP-000063	6	9-17-21

Decals
2464-2469



County of San Diego

DEPARTMENT OF ENVIRONMENTAL HEALTH & QUALITY LAND AND WATER QUALITY DIVISION

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Phone Number:	(619) 210-2850	Email:	environmental@ur.com
Emergency Contact:	Luis Campuzano	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		
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City:	San Diego	State:	CA Zip Code: 92101
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Facility Address:	10844 Ellis Ave		
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: 3/23/2022

Jeff Walker

Print Name

Signature

FOR OFFICE USE ONLY

Permit Number	# of Vehicles	Date
DEH2020-LSHDP-000063	7	3/23/22

From: [Jeffrey Walker](#)
To: [Nguyen, Anh-Vu](#)
Cc: [Jarvis, Steven](#); [Husak, Kimber](#)
Subject: Re: [EXTERNAL]RE: IU# 25-0604 United Rentals (North America) Inc; DBA Reliable Onsite Services., out-of-state license plate
Date: Tuesday, November 1, 2022 11:41:15 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Thanks Anh.

Appreciate the follow up.

I'll follow back with the new plate info.

Jeff

Sent from my iPhone

On Nov 1, 2022, at 2:35 PM, Nguyen, Anh-Vu <APNguyen@sandiego.gov> wrote:

Hi Jeffrey,

The requirement is a long-standing policy and it was officially codified into the latest TWRP; therefore, we cannot provide a grace period. If you have indicated that it was out-of-state license plate on the application, then we would have brought it up before the permit was renewed. When you have the CA license plate, we can add it back to the system.

Thank you,

Anh Nguyen

Pretreatment Inspector III
Industrial Wastewater Control Program
City of San Diego, Public Utilities Department

APNguyen@sandiego.gov

Phone: (858) 654-4118



~ A world-class city for all ~

From: Jeffrey Walker <jwalker5@ur.com>
Sent: Tuesday, November 01, 2022 11:06 AM
To: Nguyen, Anh-Vu <APNguyen@sandiego.gov>
Cc: Jarvis, Steven <SJarvis@sandiego.gov>; Husak, Kimber <KHusak@sandiego.gov>
Subject: [EXTERNAL] RE: IU# 25-0604 United Rentals (North America) Inc; DBA Reliable Onsite Services., out-of-state license plate

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Thanks for reaching out Anh.

We will work to get it switched over.

Can I ask when the CA plate requirement when into effect?

Also – is there any way you could provide us with a grace period to change to the CA plate?

Thanks

Jeff

Jeffrey Walker
Environmental Manager



C (856)305-6625

E jwalker5@ur.com

[UnitedRentals.com](https://www.UnitedRentals.com)



From: Nguyen, Anh-Vu <APNguyen@sandiego.gov>
Sent: Tuesday, November 1, 2022 1:50 PM
To: Jeffrey Walker <jwalker5@ur.com>
Cc: Jarvis, Steven <SJarvis@sandiego.gov>; Husak, Kimber <KHusak@sandiego.gov>
Subject: [EXTERNAL]IU# 25-0604 United Rentals (North America) Inc; DBA Reliable

Onsite Services., out-of-state license plate

Good morning Jeffrey,

This is Anh Nguyen with the Industrial Wastewater Control Program. One of our attendants notified us that your company is using a truck with an out-of-state license plate (see photo below). Section A and C of The Trucked Waste Requirements and Procedures (attached) stated that each truck is required to have a California license plate. I will inactivate the truck with License # 3224527 in our system today. Please note this truck (with License # 3224527) and any trucks with out-of-state license plates will not be allowed to discharge at our Pump Station 1 until they have a CA license plate. Once you have the CA license plate, please let us know and we will add the truck to our system so you will be able to use it.



Thank you,

Anh Nguyen

Pretreatment Inspector III

Industrial Wastewater Control Program

City of San Diego, Public Utilities Department

APNguyen@sandiego.gov

Phone: (858) 654-4118



~ A world-class city for all ~

From: [Luis Campuzano](#)
To: [Husak, Kimber](#)
Cc: [Nguyen, Anh-Vu](#)
Subject: [EXTERNAL] RE: CA License Registration for Trucks - United Rentals (NA) Inc; DBA Reliable Onsite Svcs (IU# 25-0604)
Date: Thursday, November 10, 2022 3:51:21 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hi Kimberly,

One of the trucks on the list 3145317 was just turned away from pump station 1.
Please advise.

Thanks.

Mike Campuzano
Branch Manager
Reliable Onsite Services
San Diego
Cell 619-565-0059
lcampuzano@ur.com

From: Husak, Kimber <KHusak@sandiego.gov>
Sent: Thursday, November 10, 2022 3:29 PM
To: Luis Campuzano <lcampuzano@ur.com>
Cc: Nguyen, Anh-Vu <APNguyen@sandiego.gov>
Subject: [EXTERNAL]CA License Registration for Trucks - United Rentals (NA) Inc; DBA Reliable Onsite Svcs (IU# 25-0604)

Hello Mike,

I received your request regarding the out of state trucks you are receiving. Unfortunately we do not allow any trucks to discharge to Pump Station 1 without a CA license and being registered in our database for the Domestic Trucked Waste Permit. Temporary permits are also no longer issued in the interim.

The Domestic Trucked Waste Permit (IU# 25-0604-03A) was renewed for United Rentals (NA) Inc; DBA Reliable Onsite Svcs and allows discharge of raw sewage to Pump Station 1 when hauled by the following trucks:

License	Make Model	Year	Capacity
01851Y2	HINO 268	2020	1100
3145317	HINO 268	2020	695

3213370	PETERBILT	2021	1100
3224519	PETERBILT 337	2021	1100
3284107	MACK F/B	2022	695
76662Y2	FORD F-550	2020	800

Please use the trucks listed above for discharging to PS1 until the new trucks are registered in California. Once registered, please supply the License, Make/Model, Year, Capacity and new County Health Permit with stickers I can add the new trucks to your existing permit.

I apologize for any inconvenience.

Thank you,

Kimber Husak

Industrial Wastewater Control Program

Wastewater Pretreatment Inspector

City of San Diego

Public Utilities Department

(E) KHusak@sandiego.gov

(T) 619-533-6603

Upcoming PS1 Shut Downs

none

Trucked Waste Permit Resources

<https://www.sandiego.gov/public-utilities/permits-construction/industrial-user-permits/trucked>

From: [Beto, Michael](#)
To: [Nguyen, Anh-Vu](#)
Cc: [Husak, Kimber](#)
Subject: Truck Waste Duty Call (11/10/22)
Date: Thursday, November 10, 2022 1:41:19 PM

Hi Anh,

There was a duty call today regarding truck waste.

Contact: Mike

Company: United Rentals/Reliable Onsite Services

IU: 25-0604 (old), 10-0568 (pending)

Email: lcampuzano@ur.com

Issue: Apparently the company is receiving company trucks from out of state and they are having issues dumping into the Harbor Drive disposal. The problem stemmed from having license plates not in California for the trucks they use. The corporate office is in the process of transferring the truck registrations to California. He is looking for alternatives or an allowance in the interim? Can you reach out to him and provide him the options or what is allowed? He mentioned disposing in El Cajon, but the issue was availability of hours is limited compared to the Harbor Drive location.

Regards,

Michael Beto

Wastewater Pretreatment Inspector

Industrial Wastewater Control Program

City of San Diego

Public Utilities Department

T: (858) 654-4113



CONFIDENTIAL COMMUNICATION

This electronic mail message and any attachments are intended only for the use of the addressee(s) named above and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If you are not an intended recipient, or the employee or agent responsible for delivering this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you received this e-mail message in error, please immediately notify the sender by replying to this message or by telephone. Thank you.

From: [Jarvis, Steven](#)
To: [Sara Obi](#); [Nguyen, Anh-Vu](#); [Husak, Kimber](#)
Cc: [Ryan Anthony](#); [Jeffrey Walker](#)
Subject: Re: CA License Requirement FW: IU# 25-0604 United Rentals (North America) Inc; DBA Reliable Onsite Services., out-of-state license plate
Date: Thursday, November 17, 2022 1:44:03 PM
Attachments: [Outlook-dzix3u4g.png](#)

Hi Sara,

Anh forwarded this issue to my attention. We have been training new staff and we did not catch this error until one of our pump station attendants noticed the out of state license. I am sorry for the inconvenience this has caused, but our program has not allowed out of state plates since its inception, and the policy is outlined in our Trucked Waste Requirements and Procedures. As apart of the permit renewal, Environmental Manager Jeffrey Walker signed the Trucked Waste Requirements Certification on 9/7/2022, which certified they were familiar with the current Trucked Waste Requirements and Procedures, including the California License requirement in Section A2d. I appreciate the information on the apportioned licensing, but we only accept California licensed vehicles because of the strict rules and regulations that California has on the handling of waste. For example, the prohibition of waste mixing (non-RCRA hazardous, hazardous waste, domestic, or industrial wastes).

Please let me know if you have any additional questions and again I am sorry for the inconvenience this has caused you.

Thank you,

Steven Jarvis

Supervising Wastewater Pretreatment Inspector
Industrial Wastewater Control Program
City of San Diego, Public Utilities Department
T (858) 654-4170



From: Sara Obi <sobi@ur.com>
Sent: Tuesday, November 15, 2022 3:56 PM
To: Nguyen, Anh-Vu <APNguyen@sandiego.gov>; Jarvis, Steven <SJarvis@sandiego.gov>; Husak, Kimber <KHusak@sandiego.gov>
Cc: Ryan Anthony <ranthony1@ur.com>; Jeffrey Walker <jwalker5@ur.com>
Subject: [EXTERNAL] RE: CA License Requirement FW: IU# 25-0604 United Rentals (North America)

Inc; DBA Reliable Onsite Services., out-of-state license plate

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Will you send me your supervisors phone number? I would like to call and discuss the reasoning for this policy to properly relay to our legal team as we address in the future

Sara Obi 
Manager Fleet Legalization
United Rentals
6929 East Greenway Parkway # 200
Scottsdale, AZ 85254
480-609-2043- office
928-398-1086- cell
[*sobi@ur.com*](mailto:sobi@ur.com)
[*Workplace Vehicle Fleet*](#)



From: Nguyen, Anh-Vu <APNguyen@sandiego.gov>
Sent: Tuesday, November 15, 2022 12:47 PM
To: Sara Obi <sobi@ur.com>; Jarvis, Steven <SJarvis@sandiego.gov>; Husak, Kimber <KHusak@sandiego.gov>
Cc: Ryan Anthony <ranthony1@ur.com>; Jeffrey Walker <jwalker5@ur.com>
Subject: [EXTERNAL]RE: CA License Requirement FW: IU# 25-0604 United Rentals (North America)
Inc; DBA Reliable Onsite Services., out-of-state license plate

Hi Sara,

Thank you for the information. I talked to my supervisor and the requirements from the Trucked Waste Requirements and Procedures (TWRP) still stand (see Section A and C of the attached TWRP). If you wish to use our discharge location, then you need to abide by the TWRP. Each truck is required to have a California license plate.

Best regards,

Anh Nguyen
Pretreatment Inspector III
Industrial Wastewater Control Program
City of San Diego, Public Utilities Department

APNguyen@sandiego.gov
Phone: (858) 654-4118



~ A world-class city for all ~

From: Sara Obi <sobi@ur.com>
Sent: Monday, November 14, 2022 9:00 AM
To: Nguyen, Anh-Vu <APNguyen@sandiego.gov>; Jarvis, Steven <SJarvis@sandiego.gov>; Husak, Kimber <KHusak@sandiego.gov>
Cc: Ryan Anthony <ranthony1@ur.com>; Jeffrey Walker <jwalker5@ur.com>
Subject: [EXTERNAL] RE: CA License Requirement FW: IU# 25-0604 United Rentals (North America) Inc; DBA Reliable Onsite Services., out-of-state license plate

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Yes, of course.

Sara Obi 
Manager Fleet Legalization
United Rentals
6929 East Greenway Parkway # 200
Scottsdale, AZ 85254
480-609-2043- office
928-398-1086- cell
sobi@ur.com
[Workplace Vehicle Fleet](#)



From: Nguyen, Anh-Vu <APNguyen@sandiego.gov>
Sent: Monday, November 14, 2022 9:58 AM
To: Sara Obi <sobi@ur.com>; Jarvis, Steven <SJarvis@sandiego.gov>; Husak, Kimber <KHusak@sandiego.gov>
Cc: Ryan Anthony <ranthony1@ur.com>; Jeffrey Walker <jwalker5@ur.com>
Subject: [EXTERNAL]RE: CA License Requirement FW: IU# 25-0604 United Rentals (North America) Inc; DBA Reliable Onsite Services., out-of-state license plate

Hi Sara,

Thank you for reaching out to us. Regarding the apportioned license I need to talk to my supervisor, and he is out today. I will follow up with you on this. In the meantime, do you have a current valid

cab card for this license plate as the one you forwarded was already expired.

Thank you,

Anh Nguyen

Pretreatment Inspector III
Industrial Wastewater Control Program
City of San Diego, Public Utilities Department

APNguyen@sandiego.gov

Phone: (858) 654-4118



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From: Sara Obi <sobi@ur.com>

Sent: Saturday, November 12, 2022 1:12 PM

To: Nguyen, Anh-Vu <APNguyen@sandiego.gov>; Jarvis, Steven <SJarvis@sandiego.gov>; Husak, Kimber <KHusak@sandiego.gov>

Cc: Ryan Anthony <ranthony1@ur.com>; Jeffrey Walker <jwalker5@ur.com>

Subject: [EXTERNAL] RE: CA License Requirement FW: IU# 25-0604 United Rentals (North America) Inc; DBA Reliable Onsite Services., out-of-state license plate

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Anh,

Jeffrey reach out to me regarding the Apportioned plates we run for our all of our company vehicles. Apportioned licensing is used throughout the united States and Canada, allowing us to legally operate in any area of the United States. Because we are an international company, this eases our fluid fleet. You can see in the attached registration, our vehicle is considered to be registered in California. Is there another valid reason a CA plate would be required?

Sara Obi 

Manager Fleet Legalization

United Rentals

6929 East Greenway Parkway # 200

Scottsdale, AZ 85254

480-609-2043- office

928-398-1086- cell



City of El Cajon
200 Civic Center Way, El Cajon, CA 92020
Phone: (619) 441-1668
Email: finance@elcajon.gov

General Invoice

Customer Copy

CUSTOMER		INVOICE DATE		INVOICE NUMBER		AMOUNT PAID		DUE DATE		INVOICE TOTAL DUE					
UNITED RENTALS		02/22/2023		605		\$5,925.86		03/24/2023		\$0.00					
DESCRIPTION		QUANTITY		PRICE		UOM		ORIGINAL BILL		ADJUSTED		PAID		AMOUNT DUE	
WASTE WATER - SEPTIC DUMPING		601.00		\$9.860000		EACH		\$5,925.86		\$0.00		\$5,925.86		\$0.00	
									Invoice Total:		\$0.00				
SEPTIC DISPOSAL CHARGES FOR THE MONTH OF DECEMBER 2022															
CHARGES \$9.86/UNIT															
ONE UNIT EQUALS 100 GALLONS															
650710-5060															

✂ DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT ✂



City of El Cajon
200 Civic Center Way, El Cajon, CA 92020
Phone: (619) 441-1668
Email: finance@elcajon.gov

General Invoice

Remit Portion

Invoice Date	02/22/2023
Invoice Number	605
Customer Number	5000032
Amount Paid	
Due Date	03/24/2023
Invoice Total Due	\$0.00

UNITED RENTALS
6144 FEDERAL BLVD.
SAN DIEGO, CA 92114

Please reference this invoice number
on your check remittance.

DA-UNITED RENTALS - 030



County of San Diego

DEPARTMENT OF ENVIRONMENTAL HEALTH & QUALITY LAND AND WATER QUALITY DIVISION

5500 Overland Ave. Suite # 201, San Diego, CA 92123
(858) 565-5173 | LWQDuty.DEH@sdcounty.ca.gov



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:	(619) 210-2850	Email:	environmental@ur.com
Emergency Contact:	Luis Campuzano	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:	Orange 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: 10/26/2022

Jeffrey Walker

Print Name

Jeffrey Walker
Signature

FOR OFFICE USE ONLY

Permit Number	# of Vehicles	Date
DEH2020-000063	7	10/26/22



County of San Diego
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

9/10/24



4th
2023 SEWAGE HAULER TRUCK INVENTORY

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

DEH2020-LSHOP-000063

Company Name: United Rentals	Owner: United Rentals	Contact: Mike Campuzano	Phone: 619-565-0059				
Company Address: 6144 Federal Blvd SD 92114	Vehicle Storage Address: 6144 Federal Blvd SD 92114	Email: lcampuzano@ur.com					
Location(s) Where Waste Is Disposed: 1060 Vernon Wy, El Cajon Ca 92020 - 3550 E Harbor Dr San Diego Ca							
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	ISUZU	3791919	995	Y 695 W/500 C	Yes	004326	11/06/24 - COC Trucks are in great condition DC
TRUCK	MACK	3710607	1600	Y 1100W/500C		4310	
TRUCK	MACK	3482874	1600	Y 695/500	yes	4036	paid and inspected. Decal issued no lettering observed
TRUCK	MACK	3710606	1600	Y 1100/500	Yes	004309	11/6/24 - COC no lettering observed
						004309	no lettering observed. Decal issued

¹lettering includes name of business and phone number

2024 SEWAGE HAULER TRUCK INVENTORY

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

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	Yes	4028	ll
Truck	Mack	3482288	1600	1100/500	Yes	4035	ll
Truck	Mack	3482510	1600	1100/500	Yes	4031	ll
Truck	Mack	3533049	4000		Yes	4034	ll
Truck	Mack	3482879	995	695/300	Yes	4036	Add additional inspection fee and email to company. Truck inspected, no issues and decal issued.

¹lettering includes name of business and phone number

Additional Comments (To Be Completed By DEHQ):



County of San Diego
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



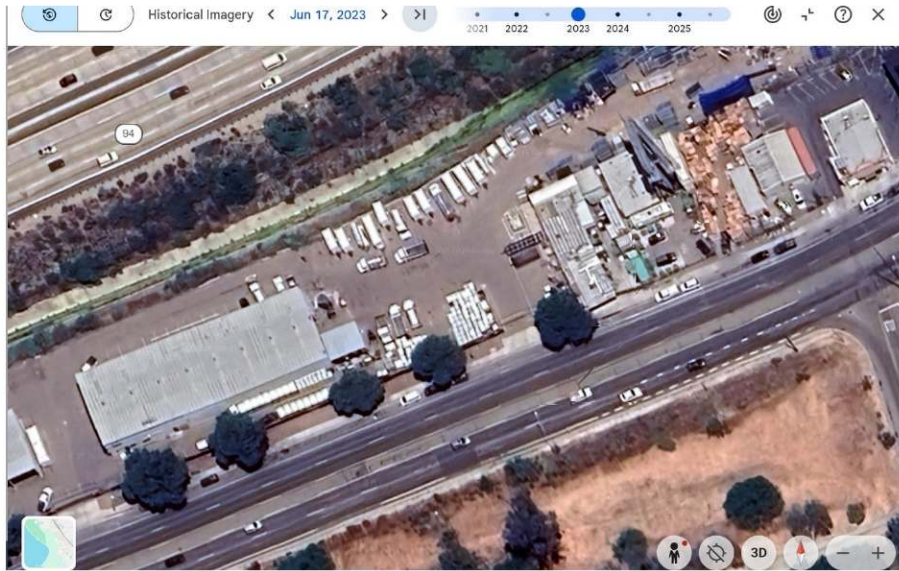
2024 SEWAGE HAULER TRUCK INVENTORY

(Complete separate form for each location where vehicles are stored) **LSHOP-000063**

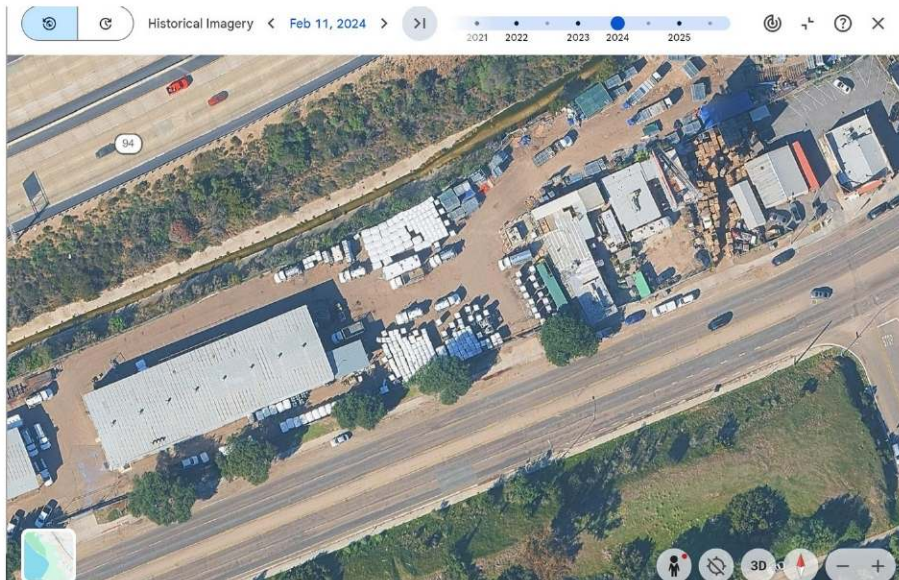
Company Name: Reliable Onsite Services		Owner: United Rentals North America Inc	Contact: Luis Campuzano	Phone: 619-565-0059
Company Address: 791 East 64th Ave, Denver, CO 80229		Vehicle Storage Address: 6144 Federal Blvd, San Diego, CA 92114		
Location(s) Where Waste Is Disposed: Pump Station #1 - 3350 East Harbor Dr, San Diego, CA				
Completed By Applicant for Each Permitted Vehicle				
Truck or Trailer?	Vehicle Make	License Plate	Tank Size (total gal)	Split Tank? (gal/ side)
Truck	Hino	01851Y2	1600	1100/500
Truck	Ford	76662Y2	1150	800/350
Truck	Hino	3145317	995	695/300
Truck	Peterbilt	3213370	1600	1100/500
Truck	Peterbilt	3224527	1600	1100/500
Truck	Peterbilt	3224519	1600	1100/500
Completed by Department of Environmental Health & Quality				
	3" Lettering on Vehicle? (yes or no) ¹	Decal #	DEHQ Observations and Comments on Hoses, Valve, Cap, Waste Transfer, etc.	
	Yes	4029	Inspection at business. Truck checks ok. No issues. Decal issued.	
		4038	Currently in shop for blown engine. Decal not issued yet date.	
	Yes	4030	"	
	Yes	4037	"	
	Yes	4032	"	
	Yes	4033	"	

¹lettering includes name of business and phone number

6144 Federal Blvd. — the FRAC tank absent (June 17, 2023), then present (February 11, 2024)



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.



County of San Diego

DEPARTMENT OF ENVIRONMENTAL HEALTH & QUALITY

LAND AND WATER QUALITY DIVISION

5500 Overland Ave. Suite # 201, San Diego, CA 92123

(858) 565-5173 | LWQDuty.DEH@sdcounty.ca.gov



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:	Orange 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:	9/13/2023	Jeffrey Walker	
		Print Name	Signature

FOR OFFICE USE ONLY

Permit Number	# of Vehicles	Date
LSHOP-000063	10	9/18/2023



County of San Diego
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



2024 SEWAGE HAULER TRUCK INVENTORY
(Complete separate form for each location where vehicles are stored)

Company Name: United Rentals		Owner: United Rentals		Contact: Mike campuzano		Phone: 619-565-0059	
Company Address: 6144 Federal Blvd SD 92114		Vehicle Storage Address: 6144 Federal Blvd SD 92114				Email: lcampuzano@ur.com	
Location(s) Where Waste Is Disposed: 1050 Vernon Wy El cajon Ca 92020							
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	3710606	1600	Y 500/1100			
Truck	Mack	3710607	1600	Y 500/1100			

¹lettering includes name of business and phone number

2024 SEWAGE HAULER TRUCK INVENTORY

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

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.

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

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

CITY OF EL CAJON
Septic Sewage Discharge Permit

4/23/2025

Date

Permit Number

BUSINESS NAME: United Rentals (North America), Inc.; DBA: Reliable Onsite Services

BUSINESS ADDRESS: 6144 Federal Blvd, San Diego, CA 92114

CONTACT PERSON: David Perez TELEPHONE: 619-210-2850

Truck/Trailer
Make/Model

Model
Year

Capacity
(Gal.)

License
Number

SEE ATTACHED

This permit authorizes the discharge of septic sewage at the City of El Cajon sewage disposal site, 1050 Vernon Way. I hereby certify that the information shown on this application is true and correct, that failure to abide by the conditions of sewage disposal as set forth by the Municipal Code for the City of El Cajon and the Metropolitan Sewage System will result in forfeiture of this permit. Permit shall be subject to inspection at any time by authorized employees of the City of El Cajon. The City reserves the right to modify operating procedures and/or fee schedules at any time.

NAME: Jeffrey Walker

TITLE: Environmental Manager

SIGNATURE: Jeffrey Walker

DATE: 4/23/2025

Sorry about that.

See attached.

Jeff

Jeffrey Walker
Environmental Manager



C (856)305-6625

E jwalker5@ur.com

UnitedRentals.com



From: McClelland, Michael <MMcClelland@sandiego.gov>

Sent: Friday, September 5, 2025 2:30 PM

To: Jeffrey Walker <jwalker5@ur.com>

Cc: Nguyen, Anh-Vu <APNguyen@sandiego.gov>

Subject: [EXTERNAL] Re: United Rentals_Trucked Waste Renewal Notice -United Rentals (NA) Inc DBA Reliable Onsite Services (FAC-8102, PMT-37888)

Hello Jeffrey,

I have attached your current permit which only has one vehicle listed.

The City of San Diego requires that trucks be licensed in California and will not permit trucks with out of state licenses to dump at Pump Station 1. Please review Section A, part 2d of the attached TWRP for more information.

Thank You,
Michael McClelland

From: Jeffrey Walker <jwalker5@ur.com>

Sent: Friday, September 5, 2025 11:00 AM

To: McClelland, Michael <MMcClelland@sandiego.gov>

Cc: Nguyen, Anh-Vu <APNguyen@sandiego.gov>

Subject: [EXTERNAL] RE: United Rentals_Trucked Waste Renewal Notice -United Rentals (NA) Inc DBA Reliable Onsite Services (FAC-8102, PMT-37888)

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hi Michael,

Thanks for reaching out.

I've included the County Sticker #'s for each vehicle.

In regards to the license plate numbers, all of our trucks are registered through the State of IN at a corporate level. We included the same truck list/license plates in our past submittals. Please let me know if there is additional information that I could supply in order to process our application.



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

5500 Overland Ave. Suite # 110, San Diego, CA 92123
(858) 565-5173 | LWQDuty.DEH@sdcounty.ca.gov

12/20/25
2 yards location
Vista: 7 trucks
Federal Blvd. SD: 16 trucks
Total 23

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:	2231 La Mirada Dr		
City:	Vista	State:	CA Zip Code: 92114
Business Phone Number:	760-297-2240	Email:	environmental@ur.com
Legal Owner(s):	United Rentals (North America), Inc		
Address:	100 First Stamford Place		
City:	Stamford	State:	CT Zip Code: 06902
Phone Number:	303-286-4394	Email:	environmental@ur.com
Emergency Contact:	Luis Campuzano	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 Dr		
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: 9/15/2025

Jeffrey Walker

Print Name

Jeffrey Walker

Digitally signed by Jeffrey Walker
Date: 2025.09.15 15:28:17 -04'00'

Signature

FOR OFFICE USE ONLY

Permit Number	# of Vehicles	Date
	7	12/11/25

DEH2020-LSHOP-600063

New yard in Vista location

Received 12/11/25



DEPARTMENT OF ENVIRONMENTAL HEALTH & QUALITY
LAND AND WATER QUALITY DIVISION

5500 Overland Ave. Suite # 110, San Diego, CA 92123
(858) 565-5173 | LWQDuty.DEH@sdcounty.ca.gov

Inspection 12/05/25

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- Reliable Onsite Services		
Mailing Address:	6144 Federal Blvd		
City:	San Diego	State:	CA Zip Code: 92114
Business Address:	6144 Federal Blvd		
City:	San Diego	State:	CA Zip Code: 92114
Business Phone Number:	619-210-2850	Email:	Branch70M@ur.com
Legal Owner(s):	United Rentals		
Address:	6144 Federal Blvd		
City:	San Diego	State:	CA Zip Code: 92114
Phone Number:	619-210-2850	Email:	Dperez3@ur.com
Emergency Contact:	David Perez	Cell Phone Number:	619-929-4594

Services Provided:	☒ Septic Tanks ☐ Seepage Pits ☒ Portable Restrooms ☐ Cesspools ☐ Other		
Primary Liquid Waste Disposal Facility Name:	City of El Cajon		
Facility Address:	1050 Vernon Way		
City:	El Cajon	State:	CA Zip Code: 92020
Alternate Liquid Waste Disposal Facility Name:	Pump Station #1- San Diego		
Facility Address:	3350 East Harbor Dr		
City:	San Diego	State:	CA Zip Code: 91950

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: 12/11/2025

David Perez

Print Name

David Perez

Signature

FOR OFFICE USE ONLY

Permit Number	# of Vehicles	Date
	16	12/11/25

DEH2020-LSHOP-000063

From: [Jarvis, Steven](#)
To: HMDUTYEH@sdcounty.ca.gov
Subject: Referral for 6144 Federal Blvd., San Diego CA 92114
Date: Wednesday, June 17, 2026 8:33:06 AM
Attachments: [3.1\) 2026.05.12 Cotton to CoSD Environmental Services Email.pdf](#)
[6.5\) 2026.06.15 6144 Federal Historical Timeline Images.pdf](#)
[1\) Petition w Signatures.pdf](#)
[Outlook-i25y2b05.png](#)

Good Morning,

We received a complaint from Darryl Cotton regarding odors coming from an above ground storage tank on the property of United Rentals - Reliable Onsite Services located at 6144 Federal Boulevard, San Diego. Below is the email we received from the contact, and I have attached the additional information he provided. Our program conducted an inspection of this site a couple of years ago and found the wastewater from the power washing of portable toilets (using detergents) was routed to a storage tank. The storage tank was not connected to sewer, and the business stated the tank was emptied and hauled off-site for disposal as needed. As they did not discharge industrial wastewater to the sewer system, our program did not issue a permit to this site. I am referring this complaint over to your department because this seems like an environmental health issue.

Thank you,

Steven Jarvis

Wastewater Pretreatment Coordinator
Industrial Wastewater Control Program
City of San Diego, Public Utilities Department
T (858) 654-4170



From: Darryl Cotton
Sent: Tuesday, June 16, 2026 1:13 PM
To: Garcia, Jacob
Subject: Re: [EXTERNAL] 6144 Federal Blvd., SD CA 92114 Waste Processing Permits

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****



Darryl Cotton <151darrylcotton@gmail.com>

Sewage hauling and management at United Rentals, 6176 Federal Blvd

6 messages

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

Tue, Jun 30, 2026 at 10:09 AM

Dear Mr. Cotton

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

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

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

Best of luck getting this resolved

**Leon Wirschem, SEHS HIRT – Hazardous Materials Division**

Department of Environmental Health and Quality

County of San Diego

Cell: 858-888-0610

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

Tue, Jun 30, 2026 at 12:47 PM

Hi Leon,

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

To confirm regarding the public records request: I'd like it to remain as originally submitted rather than narrowed. My
DA-UNITED RENTALS - 045

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

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

[Quoted text hidden]

--

Darryl Cotton
619.954.4447

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

Tue, Jun 30, 2026 at 1:21 PM

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

Leon Wirschem

Supervising EHS/Hazmat Specialist

County of San Diego DEHQ-HMD

Hazardous Incident Response Team

858-888-0610

[Quoted text hidden]

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

Tue, Jun 30, 2026 at 1:49 PM

Got it. Thanks

[Quoted text hidden]

--

Darryl Cotton
619.954.4447

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

Wed, Jul 1, 2026 at 8:17 AM

Leon,

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

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

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

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

DA-UNITED RENTALS - 046

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

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

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

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

[Quoted text hidden]

--

Darryl Cotton
619.954.4447

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

Wed, Jul 1, 2026 at 3:35 PM

Hi Darryl

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

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

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

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

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

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

Best of luck getting this resolved.

DA-UNITED RENTALS - 047



Leon Wirschem, SEHS HIRT

[Hazardous Materials Division](#)

Department of Environmental Health and Quality

County of San Diego

Cell: 858-888-0610

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[Quoted text hidden]

Re: PH testing

From Aaron Jones <ajones@elcajon.gov>

Date Wed 7/8/2026 5:24 PM

To Lee Mutter <lmutter@elcajon.gov>; David Perez <dperez3@ur.com>

 1 attachment (911 KB)

Industrial Waste Acknowledgement Memo.pdf;

Hi David,

We do not offer testing at the dump sight. If you have a questionable load, it should be taken to the City of San Diego dump site where they take industrial waste. Attached is a copy of the Industrial Waste Acknowledgement. Please contact me with questions.

Aaron



Aaron Jones

Deputy Director
Public Works
City of El Cajon

T: [619 441 1732](tel:6194411732)

E: ajones@elcajon.gov
www.elcajon.gov

1050 Vernon Way, El Cajon, CA 92020



From: Lee Mutter <lmutter@elcajon.gov>

Sent: Wednesday, July 8, 2026 5:19 PM

To: David Perez <dperez3@ur.com>; Aaron Jones <ajones@elcajon.gov>

Subject: Re: PH testing

Hey David,

I have tagged Aaron Jones; he will be able to answer this question.

Aaron - do we do PH testing at the dump station?

Thank you,



Lee Mutter

Management Assistant

City of El Cajon

T: 619 441 1658

E: lmutter@elcajon.gov

www.elcajon.gov

200 Civic Center Way, El Cajon, CA 92020



From: David Perez <dperez3@ur.com>

Sent: Wednesday, July 8, 2026 10:30 AM

To: Lee Mutter <lmutter@elcajon.gov>

Subject: PH testing

CAUTION: [EXTERNAL EMAIL] Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Hi Lee. By chance does your team do PH testing?

Best Regards,

David Perez

Branch Manager | Reliable Onsite Services

PH: 619-929-4594

Email: dperez3@ur.com



Portable Restrooms / Restroom Trailers / Temporary Fence /
Shower Trailers / Laundry Trailers / Service Excellence

<https://www.unitedrentals.com/solutions/specialty-solutions/reliable-onsite-services#/>





Darryl Cotton <151darrylcotton@gmail.com>

Re: PRA 26-3709 — LWQD Information Package (United Rentals / Reliable Onsite Services, 6144 Federal Blvd.)

2 messages

Caes, Craig <Craig.Caes@sdcounty.ca.gov>

Tue, Aug 4, 2026 at 12:10 PM

To: "151darrylcotton@gmail.com" <151darrylcotton@gmail.com>

Cc: "Liwag, Ernie" <Ernie.Liwag2@sdcounty.ca.gov>

Hi Darryl,

My team forwarded your email to me regarding the pumper truck operation located at 6144 Federal Blvd. Since your initial complaint that we received as a referral from APCD in June, our team conducted three site visits to this facility. During our initial site investigation on 6/22, although staff was unable to access the property, the inspector did not detect any sewage odors from the surrounding area. During follow-up site investigations on 6/29 and 7/8, where our team was able to access the property, the inspector also did not observe any evidence of spilled sewage, illegal sewage disposal, or sewage odors that would indicate a spill, and found the company in compliance with their current pumper truck permit with our department. Because our investigations did not identify any spilled sewage, illegal sewage discharge, or malfunctioning equipment that could have resulted in a sewage release, DEHQ does not have regulatory authority to enforce odor control.

If you continue to experience odor issues, please report them to the San Diego County Air Pollution Control District, which is the appropriate agency to investigate odor complaints - [Air Quality Complaints - San Diego County Air District](#)

You also mention a PRR in your email, and I wanted to see if you are submitting a new PRR to our department or are referencing a previous PRR that was submitted and responded to. Please let me know if you are submitting a new PRR, and the details of the request, and I will make sure it is routed to my team to provide any responsive records.

Thank you,

**Craig Caes**, Supervising Environmental Health Specialist

Department of Environmental Health and Quality

O: 858-694-2551

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Darryl Cotton <151darrylcotton@gmail.com>

Public Records Request :: P004671-080826

1 message

OC San Public Portal <ocsan@mycusthelp.com>

Tue, Aug 18, 2026 at 10:35 AM

To: "151DarrylCotton@gmail.com" <151DarrylCotton@gmail.com>

--- Please respond above this line ---



Dear Darryl,

The Orange County Sanitation District (OC San) has completed its review of your August 08, 2026 Public Records Request.

Request Description:

"Pursuant to the California Public Records Act (Gov. Code § 7920.000 et seq.), I request records of OC San relating to United Rentals (North America), Inc., doing business as Reliable Onsite Services (and any related account, DBA, or affiliated entity operating sewage-hauling trucks from [6144 Federal Blvd, San Diego, CA 92114](#)), and its sewage-hauling vehicles. Please route to the Source Control Division as records custodian.

1. **PERMIT RECORDS** — any Wastehauler Discharge Permit application(s), issued permit(s), renewals, truck/decal registrations, and current permit status held by the above entity under OCSD-53 (Section 306) and the Source Control Division's wastehauler program, including the list of any trucks/decals registered under any such permit.
2. **DISCHARGE / MANIFEST RECORDS** — any Waste-Tracking Forms, manifests, discharge logs, gate or station sign-in records, volume/gallorage records, and billing or invoice records reflecting discharges by the above entity or its trucks at the OC San Wastehauler Station (or any OC San facility), including the dates, volumes, and number of such discharges (or reflecting that none occurred).
3. **LOAD SAMPLING / ACCEPTANCE RECORDS** — any samples collected, analytical or laboratory results, pH or characteristic measurements, and any acceptance, rejection, or non-compliance records for loads discharged by the above entity or its trucks (per OCSD-53 Section 210.A).
4. **CORRESPONDENCE** — any correspondence between OC San and the above entity regarding permitting, discharge, truck registration, or compliance.

If no responsive records exist within any category — for example, if the entity holds no wastehauler permit, or has no discharge records at OC San facilities — please so state, as the absence of records is itself responsive to this request. If any portion is withheld, please identify the specific exemption and provide all reasonably segregable non-exempt portions. Please contact me before incurring any duplication cost."

Request Determination: No Responsive Records

OC San has reviewed its files and has determined we have no records responsive to your request.

Please feel free to contact me if I can be of further assistance.

Sincerely,

DA-UNITED RENTALS 905052

Orange County Sanitation District
Tania Moore, CMC
Assistant Clerk of the Board
(714) 593-7082 / www.ocsan.gov

To monitor the progress or update this request please log into the [OC San Public Portal](#)



3

EXHIBIT 3

DEHQ Correspondence on the Holding Tank (June 22–August 18, 2026)

The Hazardous Materials Division's June 22, 2026 internal email; the Department's exchange with the Regional Water Quality Control Board, Region 9; Craig Caes's August 4, 2026 site-visit report and “in compliance” finding; and Ryan Johnson's August 18, 2026 written response to the six questions.

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: Osibodu, Fisayo@Waterboards
To: ["McCullough, Jamelle"; Izadmehr, Mahsa@Waterboards](mailto:'McCullough, Jamelle'; Izadmehr, Mahsa@Waterboards)
Cc: Liwag, Ernie; Johnson, Ryan; 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

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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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Help us make sure our customers have a positive experience. Please take 60 seconds to provide us with your [feedback](#).

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, Jamelle <Jamelle.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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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, 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

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

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

To: Izadmehr, Mahsa@Waterboards <Mahsa.Izadmehr@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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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.



Darryl Cotton <151darrylcotton@gmail.com>

Re: PRA 26-3709 — LWQD Information Package (United Rentals / Reliable Onsite Services, 6144 Federal Blvd.)

2 messages

Caes, Craig <Craig.Caes@sdcounty.ca.gov>

Tue, Aug 4, 2026 at 12:10 PM

To: "151darrylcotton@gmail.com" <151darrylcotton@gmail.com>

Cc: "Liwag, Ernie" <Ernie.Liwag2@sdcounty.ca.gov>

Hi Darryl,

My team forwarded your email to me regarding the pumper truck operation located at 6144 Federal Blvd. Since your initial complaint that we received as a referral from APCD in June, our team conducted three site visits to this facility. During our initial site investigation on 6/22, although staff was unable to access the property, the inspector did not detect any sewage odors from the surrounding area. During follow-up site investigations on 6/29 and 7/8, where our team was able to access the property, the inspector also did not observe any evidence of spilled sewage, illegal sewage disposal, or sewage odors that would indicate a spill, and found the company in compliance with their current pumper truck permit with our department. Because our investigations did not identify any spilled sewage, illegal sewage discharge, or malfunctioning equipment that could have resulted in a sewage release, DEHQ does not have regulatory authority to enforce odor control.

If you continue to experience odor issues, please report them to the San Diego County Air Pollution Control District, which is the appropriate agency to investigate odor complaints - [Air Quality Complaints - San Diego County Air District](#)

You also mention a PRR in your email, and I wanted to see if you are submitting a new PRR to our department or are referencing a previous PRR that was submitted and responded to. Please let me know if you are submitting a new PRR, and the details of the request, and I will make sure it is routed to my team to provide any responsive records.

Thank you,

**Craig Caes**, Supervising Environmental Health Specialist

Department of Environmental Health and Quality

O: 858-694-2551

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

Tue, Aug 4, 2026 at 2:06 PM

Craig,

Thank you for your response and for the three site visits your team conducted. I want to make sure the department is evaluating the right question, because I believe the complaint has been read as an odor matter when its core is something different — and squarely within DEHQ's authority. My complaint is not, at bottom, about odor. It is that United Rentals has been disposing of septage off-permit — at a City of El Cajon facility (1050 Vernon Way) that appears on no version of its County Sewage Hauler Permit, LSHOP-000063 — for 43 consecutive months. That is a permit- compliance and lawful-disposal question, and it is DEHQ's to answer as the permitting authority; it is not an APCD odor issue. On that point, I would respectfully note the timing.

Your team's finding that United Rentals is "in compliance with their current pumper truck permit" was reached during the June–July site visits, before the City of El Cajon produced its account records on August 3, 2026. Those records — now assembled in the attached Daily Supplement No. 4 — show 5,445,200 gallons of septage disposed at El Cajon between December 2022 and June 2026, billed at \$536,896.72, at a facility the permit does not name. Permit LSHOP-000063 names only Pump Station #1 and OCSD Fountain Valley. The El Cajon records were not before your inspectors when the compliance determination was made. I therefore ask that DEHQ reconcile the two: given that the permit authorizes disposal only at Pump Station #1 and OCSD Fountain Valley, and the City of El Cajon's own records show 43 months of gallon-metered disposal at El Cajon, on what basis is the operation "in compliance with their current pumper truck permit"? The attached supplement sets out this and related questions, each tied to the underlying record. As to your question about a Public Records Act request: yes. I am submitting a request to DEHQ for the following records, and I would appreciate your routing it to your team:

1. The inspection reports and field notes for the June 22, June 29, and July 8, 2026 site visits to 6144 Federal Blvd.
2. Any record adding, approving, or otherwise authorizing the City of El Cajon facility (1050 Vernon Way) as a disposal site under permit LSHOP-000063.
3. Any amendment or modification to permit LSHOP-000063 changing or expanding the authorized disposal facilities.
4. Any communications between DEHQ and United Rentals (North America), Inc. / Reliable Onsite Services regarding disposal locations, or the fixed FRAC tank at 6144 Federal Blvd.
5. The complete permit file for LSHOP-000063, including all versions of the truck inventory submitted.

I would ask that the compliance determination be held open and revisited in light of the El Cajon production, and that the department's responses be made part of the record under PRA 26-3709.

Thank you.

[Quoted text hidden]

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Darryl Cotton
619.954.4447



2026.08.04 Cotton to LWQD - Daily Supplement No. 4 w Exhibits A-B-C (FULL SET).pdf
7001K

Formal complaint and request for review — United Rentals / Reliable Onsite Services, 6144 Federal Blvd. (County Sewage Hauler Permit LSHOP-000063)
5 messages

Darryl Cotton <151darrylcotton@gmail.com>
To: PublicComment@sdcounty.ca.gov
Cc: lwqduy.deh@sdcounty.ca.gov, hmdutyeh@sdcounty.ca.gov, "Caes, Craig" <Craig.Caes@sdcounty.ca.gov>, Summer.Stephan@sdcdca.org

Thu, Aug 13, 2026 at 12:49 PM

Dear Chair and Members of the Board:

Attached is a formal complaint asking the Board to direct the Department of Environmental Health & Quality to review the off-permit bulk-septage disposal by United Rentals (doing business as Reliable Onsite Services) at 6144 Federal Boulevard, immediately adjacent to my property. The County's own Sewage Hauler Operating Permit (No. LSHOP-000063) authorizes disposal at only two destinations — the City of San Diego's Pump Station #1 and OCSD Fountain Valley — yet the City of El Cajon's own records show more than 5.4 million gallons discharged over 43 months at a facility the permit does not name. I placed this record before the Department's field supervisor twice this month and have not received a response. The matter falls squarely within the Department's Land and Water Quality Division, which issued and oversees the permit.

The submission is a single bookmarked PDF (30 pages, consecutively numbered UNITED RENTALS - 001-030): the complaint letter followed by six exhibits — my correspondence with the Department, United Rentals' own materials, the County permit, a dated video log of the operation, a neighborhood petition of roughly ninety residents, and the transcript of my August 11 public comment to the El Cajon City Council.

I am simply asking for the County's help. I would be grateful for a response letting me know whether this is something the County can and will look into.

Thank you for your time and attention.

Darryl Cotton
619.954.4447

 **2026.08.18 County of San Diego - Complaint to Board of Supervisors (COMPLETE PACKAGE).pdf**
2558K

Liwig, Ernie <Ernie.Liwag2@sdcounty.ca.gov>
To: "151darrylcotton@gmail.com" <151darrylcotton@gmail.com>
Cc: "Caes, Craig" <Craig.Caes@sdcounty.ca.gov>, "McCullough, Jamelle" <Jamelle.McCullough@sdcounty.ca.gov>, "Johnson, Ryan" <Ryan.Johnson@sdcounty.ca.gov>

Fri, Aug 14, 2026 at 4:29 PM

Darryl,

We have received your newest public records request and are currently processing that to provide any responsive documents we have. Once complete you will be notified so you can retrieve your files from our Next Request system. As we have mentioned in all of our previous emails, there is no further action needed to be taken by DEHQ for this operation and our investigation is closed. Prior to closing the investigation, we reviewed all of the operational information with the Regional Water Quality Control Board and our internal County Counsel, both who confirmed that there is no further action that needs to be taken for this operation.

For any future correspondence, please direct your emails to our Chief of Departmental Operations, Ryan Johnson as ryan.johnson@sdcounty.ca.gov. He is also the person you can send any media inquiries that you receive over to, and he will coordinate with our County Communications Office to respond to those inquiries.



Ernie Liwig, REHS
Program Coordinator
Department of Environmental Health & Quality
Food, Water, and Housing Division
(619) 204-7709
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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.

[Quoted text hidden]

Darryl Cotton <151darrylcotton@gmail.com>

Mon, Aug 17, 2026 at 8:58 AM

To: "Liwag, Ernie" <Ernie.Liwag2@sdcounty.ca.gov>

Cc: "Caes, Craig" <Craig.Caes@sdcounty.ca.gov>, "McCullough, Jamelle" <Jamelle.McCullough@sdcounty.ca.gov>, "Johnson, Ryan" <Ryan.Johnson@sdcounty.ca.gov>

Ernie,

Thank you for your August 14 email. I've read it carefully, and I want to respond in the spirit of keeping this on the record rather than reopening an argument.

Your note says the investigation is closed and that no further action is needed, after review with the Regional Water Board and County Counsel. I'm not able to treat that as the end of it, for one plain reason: the question I've been asking still hasn't been answered in writing. I am not asking the Department to agree that a violation occurred. I am asking it to identify the specific written authority — if any — that makes United Rentals' fixed, on-site FRAC tank and its transfer operation an authorized part of Permit LSHOP-000063, or to state that no such authorization exists.

The attached letter and exhibits lay that out as a set of concrete, answerable questions drawn entirely from the Department's own permit, inspection, and public-records files. It follows my August 13 complaint to the Board of Supervisors. **I am also uploading this letter and its exhibits into open Public Records Request No. 26-4763 — and I want to be plain about why: doing so places this correspondence, and in turn the Department's response to it, into the public record. My aim is a clear, durable record of what the Department was shown and how it answered.**

Two notes on the attachment: it is Bates-numbered end to end for easy reference, and Exhibit 3 — the August 1–16 image set — is included as a link within the package, so the full-resolution photographs travel with the document and require no separate download.

I would genuinely rather resolve this with a written determination than in any other way. I ask only for a substantive response to the numbered questions — or, if the Department believes any of them fall outside its jurisdiction, a written statement identifying the agency it considers responsible.

[Quoted text hidden]

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Darryl Cotton
619.954.4447



2026.08.17 UR FRAC Tank - DEHQ-E.Liwag Letter + Exhibits.pdf
4657K

Johnson, Ryan <Ryan.Johnson@sdcounty.ca.gov>

Tue, Aug 18, 2026 at 1:14 PM

To: Darryl Cotton <151darrylcotton@gmail.com>, "Liwag, Ernie" <Ernie.Liwag2@sdcounty.ca.gov>

Cc: "Caes, Craig" <Craig.Caes@sdcounty.ca.gov>, "McCullough, Jamelle" <Jamelle.McCullough@sdcounty.ca.gov>, "Johnson, Ryan" <Ryan.Johnson@sdcounty.ca.gov>

Hi Darryl,

Thank you for highlighting that there were 6 specific questions on your provided attachment that you wanted addressed. I've pulled those out and provided responses to them below. Our department will remain available to conduct future complaint investigations if there is an observance of improperly disposed wastewater, or leaking equipment at this location.

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.

The FRAC tank is not part of the pumper truck permit application and truck inspection process. However, after consultation with the Regional Water Quality Control Board, there is no regulatory authority established to oversee the use of these intermediary tanks, so the use of one is not prohibited by a pumper truck facility.

DEHQ would become the regulatory authority if the tank was leaking sewage and wastewater onto the ground, but our investigations have determined this is not the case, so no enforcement action is needed regarding this tank.

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.

As noted in question 1, the use of this tank is not part of the pumper truck permit but can be utilized by a pumper truck facility as an intermediary storage tank for wastewater. No amendments need to be made to the permit in order for the site to continue to use this tank.

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

DA-UNITED RENTALS - 065

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.

All documents requested have been provided as requested under your submitted PRR. Our department has evaluated their current permit application and has verified through disposal records that United Rentals is currently utilizing the approved pump station location in El Cajon for their San Diego location.

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.

DEHQ reviews dumping records as part of the annual inspection of the facility to verify that the final location used to dispose of waste is at an approved location and matches what is provided on that year's application. Should we need additional records at any point later in the year, the CCRO requires a site to provide those upon request. The use of an intermediary storage tank prior to the final dumping location does not require any additional approval for use, as it is not the final dumping site used for disposal of wastewater.

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 DEHQ-UNITED RENTALS – 003 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.

Since the intermediary tank is not part of the oversight of the pumping truck permit as outlined in CCRO, it would not be part of the annual inspection process. The tank was recently evaluated because of the complaint received related to possible improper discharge of wastewater at this facility. Upon investigation, there was no sign of wastewater being improperly discharged, so no further action was required by DEHQ.

I will need more clarification on your second part of the question related to truck usage and plate number verification. Are you indicating that there is an issue with the trucks identified under the current year's permit and the type of vehicle associated with them? For any reference to a previous year's truck, I can only point to what is included on the application/inspection findings that you requested under you PRR. I am unable to identify why there is a discrepancy from information gathered in previous years and can only verify that they are operating as indicated on their current permit application.

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.

Investigations conducted by DEHQ have not identified any unpermitted wastewater discharge on the property or on the property adjacent to the business. Should any improper wastewater discharge be observed, DEHQ would coordinate with the State and County DPW-Stormwater to determine the best course of action for a resolution.

Thank you,



Ryan Johnson, M.B.A, REHS

Chief, Departmental Operations

Department of Environmental Health and Quality

Food, Water, and Housing Division

C: 619-379-7647

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[Quoted text hidden]

Darryl Cotton <151darrylcotton@gmail.com>

To: "Johnson, Ryan" <Ryan.Johnson@sdcounty.ca.gov>

Cc: "Liwag, Ernie" <Ernie.Liwag2@sdcounty.ca.gov>, "Caes, Craig" <Craig.Caes@sdcounty.ca.gov>, "McCullough, Janelle" <Janelle.McCullough@sdcounty.ca.gov>, "Johnson, Ryan" <Ryan

Ryan,

Thank you for your August 18 responses to the six questions. I appreciate the Department putting its position in writing. One point of agreement, and then one new document.

On the FRAC tank (Questions 1 and 2): I take your answer to mean the Department identifies no written authorization for the tank, and instead treats it as "not prohibited" because no reg

On the disposal location (Questions 3 and 4): your answer is that the Department verifies, at each annual inspection, that disposal records match "what is provided on that year's applicati have when you wrote is now in hand.

Attached is my letter to Ernie of today's date, together with its exhibits. Exhibit 1 places side by side the Orange County Sanitation District's Public Records Act response and United Rentals' records — no waste hauler permit and no discharge, manifest, sampling, or billing record — for United Rentals / Reliable Onsite Services. Yet United Rentals' applications for 2020 through 2025 show disposal at a facility. El Cajon appears on no application until December 11, 2025, though the City of El Cajon's own records show disposal there beginning December 2022.

By the Department's own described method — verifying each year that disposal matches the application — the 2022 through 2025 applications named a facility OC San now certifies new answerable question: does the Department hold any records reconciling the disposal facilities named on those applications with where the material actually went during that period — and if not, please state so in writing. 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; for that period

This FRAC tank was, and remains, an integral part of the bulk transfer, storage, and handling of this waste. Taking it out of operation would not relieve the condition — whatever remains agency to put an end to these shenanigans and to exert the authority I believe you have to cease these activities once and for all.

As before, I am placing this correspondence in open Public Records Request No. 26-4763. I've also provided this package today to Martin Arias and Marvin Mayorga of the County, who

[Quoted text hidden]

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Darryl Cotton
619.954.4447



2026.08.18 OC San No-Records + UR 2020-2025 Applications + Petition (Bates OCSD-UNITED).pdf
3570K

4

EXHIBIT 4

Hazardous (Classified) Location

Why the United Rentals FRAC tank in service at 6144 Federal Boulevard must be treated as creating an explosive environment — the national fire-safety and electrical standards (NFPA 820 / NEC Class I, Division 1) governing hydrogen sulfide and methane hazards at wastewater facilities.

HAZARDOUS (CLASSIFIED) LOCATION — WHY THE UNITED RENTALS FRAC TANK MUST BE TREATED AS CREATING AN EXPLOSIVE ENVIRONMENT CLASS

Reference Exhibit — United Rentals / Reliable Onsite Services FRAC-Tank Septage Operation

NFPA 820: Fire Protection in Wastewater Treatment and Collection Facilities

NFPA 820, the Standard for Fire Protection in Wastewater Treatment and Collection Facilities, sets minimum requirements to prevent fires and explosions across wastewater systems: treatment plants, pump and lift stations, and the sewer collection systems that feed them. Its defining feature is hazard classification — the standard's tables assign hazardous (classified) area designations to specific wastewater processes and tie those designations to the ventilation each space maintains.

A septage treatment and/or collection plant makes its own fuel. Anaerobic digestion produces digester gas that is typically 50–70% methane — the same fuel as natural gas — and methane becomes explosive at just 5% concentration in air. It is lighter than air, so it rises and accumulates at the ceilings and high points of enclosed spaces. Raw wastewater and sludge release gas well beyond the digester complex, which is why the classification questions reach wet wells, headworks, and sludge-handling areas too.

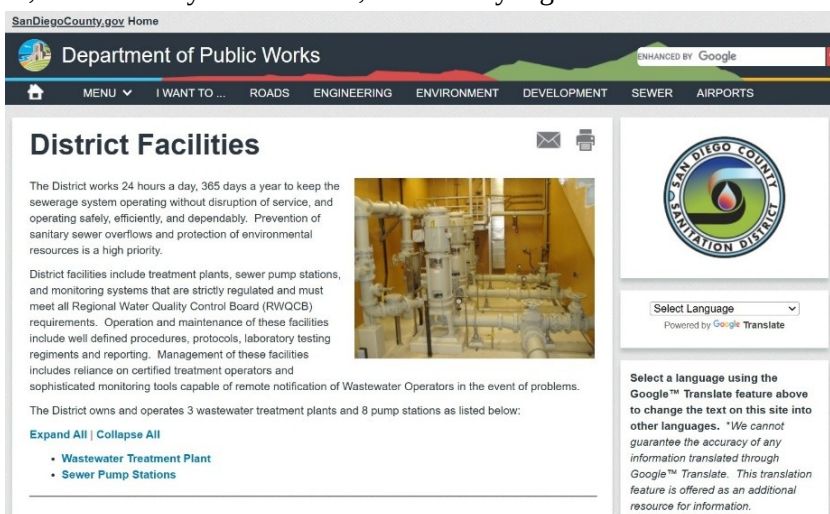
The second gas is hydrogen sulfide. Its rotten-egg odor is obvious at trace concentrations, but the sense of smell fatigues rapidly and cannot be relied on to warn of its continuous presence. OSHA's general-industry limit is a 20 ppm ceiling with a 50 ppm peak allowed for at most 10 minutes; NIOSH recommends a 10 ppm ceiling; 100 ppm is immediately dangerous to life and health. H₂S is also itself flammable, with a lower explosive limit of 4%, and in raw digester gas its concentration can exceed 4,000 ppm.

In response to my June 17, 2026, complaint to DEHQ, Inspector McCullough walked past nine sealed vacuum trucks listed on United Rentals' County Sewage Hauler Permit No. LSHOP-000063 — vessels that, by design, do not allow the release of sewer gases from their tanks. Yet that same containment standard is not being applied to the open-top FRAC tank located on the very same property. The United Rentals vacuum trucks haul septage which will **contain** these gases where the open-top FRAC tank **releases** them. The standards below explain why that inversion is not a lesser hazard but in the case of this FRAC tank, a far greater one.

1. This equipment classification is one the County already employs at their own facilities.

San Diego County, through its Sanitation District and Department of Public Works, owns and operates wastewater treatment plants and sewer pump stations that, in the County's own words, are "strictly regulated and must meet all Regional Water Quality Control Board requirements," run by certified operators with "sophisticated monitoring tools" (Figure 1 –[County of San Diego Public Works](#)).

Those gas-producing facilities are classified locations built with explosion-proof electrical systems, forced ventilation, and continuous gas monitoring under NFPA 820 — precisely because they hold the same hydrogen-sulfide- and methane-generating material that now sits in an open-top, improperly rated FRAC tank for this duty.



In either a pump station or in collection, the septage material is explosive, however in an open-top FRAC tank the situation can be worse. Concentrated amounts of septage in the FRAC tank, where there are no controls to monitor the gas, ventilation systems, or scrubbers within the explosive boundary it creates requires that equipment, among other things, be rated as explosion-proof. That is not the case with any of the equipment located within this FRAC tank boundary.

2. The electrical-area classification — Class I, Division 1.

Both gases fall within the Code's flammable range in these conditions — hydrogen sulfide from roughly 4.3% to 46% in air (NEC Group C) and methane from about 5% (NEC Group D). NFPA 820 classifies these spaces using the National Electrical Code (NFPA 70), Article 500, "Hazardous (Classified) Locations."

A **Class I** location is one in which flammable gases or vapors may be present in quantities sufficient to produce explosive or ignitable mixtures (NEC § 500.5(B)). A **Class I, Division 1** location is one in which ignitable concentrations of flammable gas can exist under *normal operating conditions* (NEC § 500.5(B)(1)). Under NFPA 820, an enclosed sewage or sludge space, and the vapor space of a holding tank, is a Class I, Division 1 location *unless* it is provided with adequate continuous mechanical ventilation sufficient to reduce that classification. An open-top tank that is not mechanically ventilated meets neither condition — it is neither explosion-rated nor ventilated to standard — and remains Division 1.

The classification is given legal force in California through the California Electrical Code (Cal. Code Regs., tit. 24, pt. 3, which adopts NFPA 70) and, for workplaces, through 29 C.F.R. § 1910.307. Under NFPA 820 the classification turns on ventilation: continuous mechanical ventilation on the order of twelve air changes per hour is what can reduce an enclosed wastewater space from Division 1 to Division 2, and only still-greater ventilation can render it unclassified. An open-top tank maintains none of that engineered ventilation, so it does not fall below Division 1 — it stands at the top of the scale.

3. What a classified location requires.

In a Class I location, the standards govern how electrical equipment and wiring may be installed within — and at the boundary of — the hazardous area (NEC Article 501). At a minimum, for an operation like this to exist compliantly under NFPA 820, they require:

- **Vapor containment or engineered ventilation** — either a closed, vapor-tight vessel, or continuous mechanical ventilation sufficient to reduce the area classification, exhausted low and driven by corrosion-resistant, spark-resistant fans (NFPA 820);
- **Explosion-proof electrical equipment and wiring** — every fixture, motor, panel, and instrument within the classified boundary identified and rated for the hazardous atmosphere; ordinary, unrated equipment is not permitted (NEC §§ 500.7, 500.8, 501.10);
- **Sealed conduit** — explosion-proof seal-offs at enclosures and at the boundary (within 18 inches of spark-producing devices) to contain any internal ignition (NEC § 501.15);
- **Continuous combustible-gas detection and monitoring** — with alarms; because hydrogen sulfide deadens the sense of smell, monitoring, not odor, is the only reliable warning (NFPA 820); and
- **Fire detection and suppression** — appropriate to the process and space (NFPA 820).

Compliance is also continuing, not a one-time condition. To KEEP an installation like this compliant, the fire marshal — as the authority having jurisdiction — requires, on an ongoing basis, the following conditions be met:

- **A current fire-code operational permit** — issued and renewed by the fire authority to conduct the operation and store the gas-producing material (California Fire Code operational and hazardous-materials permits);
- **Recurring fire-prevention inspection** — periodic inspection of the classified area by the fire marshal, with any deficiency corrected on the authority's order;
- **Maintained and monitored ventilation** — the ventilation that supports the area classification kept in continuous service and routinely tested; the 2024 edition of NFPA 820 adds quarterly testing of ventilation-monitoring systems, and a reduced classification is only as good as that ventilation's upkeep;
- **Calibrated gas detection** — combustible-gas and hydrogen-sulfide monitors kept in calibration and function-tested on schedule, with alarms verified (NFPA 820);
- **Maintained explosion-proof equipment and fire protection** — rated enclosures, seal-offs, bonding and grounding, and fire-detection and suppression equipment inspected and kept intact, with degraded equipment removed from service; and

- **Ignition-source control and records** — continuing control of ignition sources within the boundary, including a hot-work permit for any spark- or flame-producing work, with the area-classification drawing and inspection and test records kept current and available to the fire marshal.

4. What Inspector McCullough's field inspection did not address.

The Department's inspection measured the tank against the County's operating-permit code and looked for leaks; it did not take up any of the aforementioned NFPA 820 / Class I, Division 1 conditions the vessel presents. The most charitable explanation is that Inspector McCullough was not familiar with the environmental fire-safety considerations that NFPA 820 and its subsidiary sections impose on a gas-producing wastewater vessel — a familiarity the County itself plainly holds, since it builds its own facilities to that very standard. Nonetheless, NFPA 820 is the recognized standard of care that overseeing agencies, design engineers, insurers, and fire marshals apply to wastewater facilities — and those authorities, not the operator, have the final say on a facility's area classification, ventilation, and fire protection. Whichever the case, the condition, borne of multiple agencies' inaction, remains unaddressed.

Authorities (cited and characterized, not reproduced): NFPA 820, Fire Protection in Wastewater Treatment and Collection Facilities; NFPA 70 (National Electrical Code), Articles 500 and 501 — §§ 500.5(B), 500.5(B)(1), 500.7, 500.8, 501.10, 501.15; California Electrical Code, Cal. Code Regs., tit. 24, pt. 3 (adopting NFPA 70); California Fire Code, Cal. Code Regs., tit. 24, pt. 9; 29 C.F.R. § 1910.307. Figure 1: San Diego County Sanitation District, District Facilities page. Gas flammability ranges and NEC groups from OSHA/NIOSH references. Copyrighted standards are cited and characterized; their text is not reproduced.

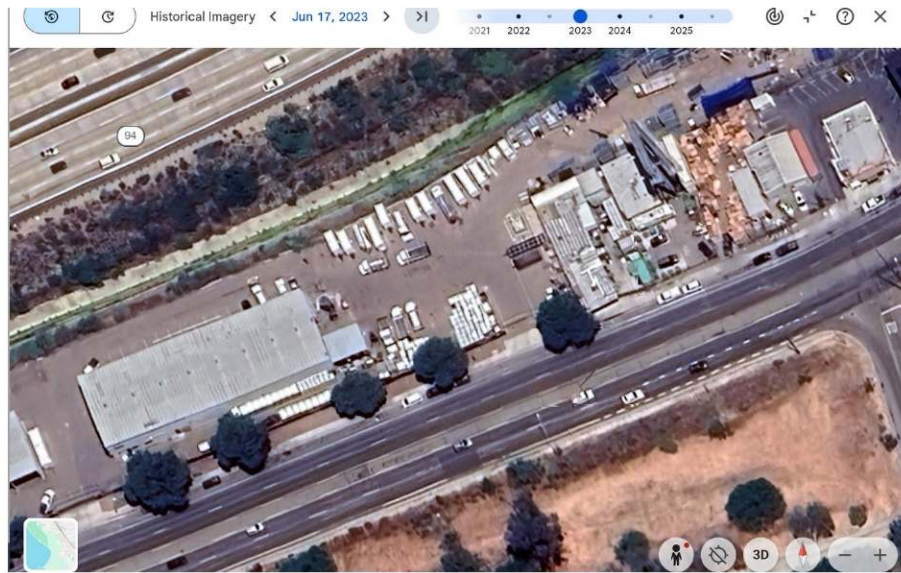
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EXHIBIT 5

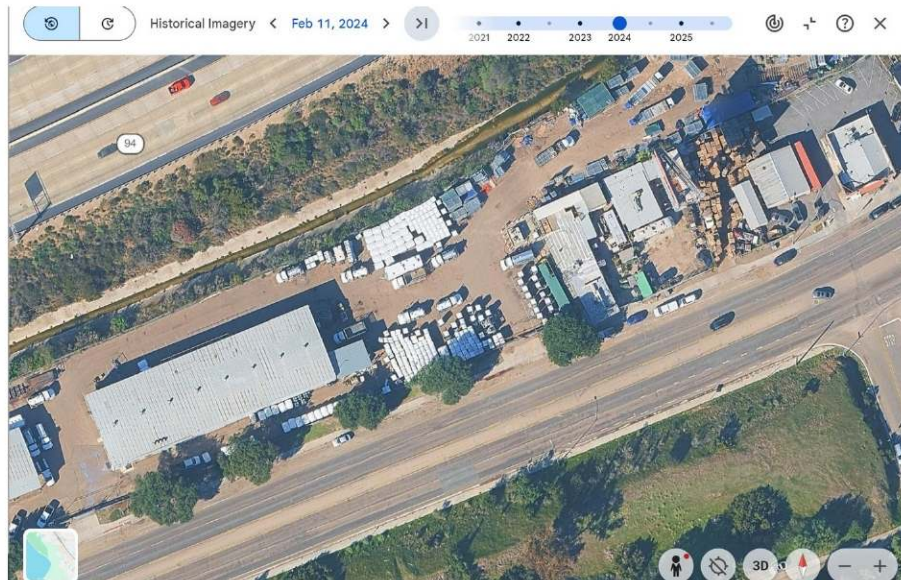
6144 Federal Boulevard — Aerial Imagery

Aerial imagery of 6144 Federal Boulevard showing the FRAC tank absent on June 17, 2023 and present on February 11, 2024 — fixing when the tank appeared on the site.

6144 Federal Blvd. — the FRAC tank absent (June 17, 2023), then present (February 11, 2024)



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.

6

EXHIBIT 6

United Rentals' “Frac Tank Guide”

United Rentals' own “Frac Tank Guide: Choosing the Best Frac Tank for the Job” (unitedrentals.com, September 4, 2024) — the company's published guidance on selecting the correct tank for the material stored.

United Rentals, “Frac Tank Guide: Choosing the Best Frac Tank for the Job,”
unitedrentals.com/project-uptime/equipment/frac-tank-guide-choosing-best-frac-tank-job (published Sept. 4, 2024; accessed Aug. 21, 2026).

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Frac Tank Guide: Choosing the Best Frac Tank for the Job

Matching the tank to the liquid being stored is critical to both safety and efficiency.

September 4, 2024

How to Choose

Trending Articles

- [How to Cut Concrete Using a Concrete Saw](#)
- [Contractors: Are You Violating OSHA's Portable Toilet Guidelines?](#)
- [What is a Mini Excavator Used For? Sizes, Applications and Attachments Explained](#)
- [Wood Chipper Safety: Tips for Avoiding Accidents and Injuries](#)
- [Locating Pipes with Acoustics and Mapping Software](#)

Related Equipment

United Rentals — Frac Tank Guide (page header, title, and publication date).

DA-UNITED RENTALS - 075

critical to both safety and efficiency.

September 4, 2024

How to Choose

Frac tanks are beneficial for a range of projects that involve storing liquid. They come in a variety of types, and choosing the right type of frac tank for the application is critical to project success as well as worker and environmental safety. Storing hazardous liquid in the wrong tank could lead to an industrial accident or an ecological disaster. When in doubt, your temporary equipment vendor can steer you to the tank that will serve you best.

What is a frac tank?

Frac tanks are large, mobile steel containers designed to temporarily store bulk quantities of liquids. These liquid storage tanks are often used in the construction, oil and gas and chemical manufacturing industries.

Frac tank types include open top frac tanks, closed top frac tanks, single wall frac tanks, double wall frac tanks and [mini frac tanks](#). Most frac tanks have a flat bottom or a V-bottom for more complete draining and faster cleaning. Some frac tanks, such as mix tanks, are outfitted with electric motors and mixer paddles for storing materials that must be rolled or mixed.

Frac tank sizes

Applications and Attachments Examples

- [Wood Chipper Safety: Tips for Avoiding Accidents and Injuries](#)
- [Locating Pipes with Acoustics and Mapping Software](#)

Related Equipment

[Pumps, Tanks & Filtration](#)

Pumps, Tanks & Filtration



“Storing hazardous liquid in the wrong tank could lead to an industrial accident or an ecological disaster.”

The temperature

Many chemicals are more corrosive when heated. The frac tank construction materials, as well as the valve and gasket materials, must be able to withstand the liquid at the temperature it is expected to reach during storage.

The specific gravity

Most frac tanks are rated for storing liquids with a specific gravity of 1.7 to 2.0. (Specific gravity is the liquid’s density relative to water, which has a specific gravity of 1.) When storing high-density liquids you must consider the design parameters of the tank.

Open top vs. closed top frac tanks

Open top frac tanks are ideal for storing non-hazardous liquids such as wastewater, ground water remediation or storm water run-off. They are often used when treating these liquids prior to discharge.

Many of the products that are stored in frac tanks may off gas regulated vapors. This application typically requires a closed top [vapor-tight tank](#), a type of chemical storage tank that allows vapors to collect in the headspace at the top of the tank and exit through a pressure relief vent or sent to a vapor treatment system for remediation. A vapor-tight tank should be used when storing groundwater contaminated with a chemical such as benzene that will emit a hazardous gas, for example. These tanks are also ideal for containing liquids that may emit harmful chemical vapors. This type of frac tank is commonly used in chemical

“Open top vs. closed top frac tanks” — open-top for non-hazardous liquids; off-gassing products require a closed, vapor-tight tank.

7

EXHIBIT 7

Comparison — Closed-Top vs. Open-Top Frac Tank

Side-by-side comparison of the closed-top, gas-containment frac tank United Rentals rents to its customers and the open-top tank in service at 6144 Federal Boulevard — the wrong tank, by United Rentals' own guidance, for storing wastewater that off-gasses hydrogen sulfide and methane.

United Rentals Knows What FRAC Tank Is Rated for Gas & Odor Containment!

Gas Buster Frac Tank, 21,000 Gal.

Cat Class: 605-2060



This item is not available for online ordering.

Request more information about this Fluid Solutions product and one of our specialty representatives will contact you shortly.

[Request a Quote](#)

Sign in to view account pricing and jobsites. Federal, state, and local government customers must sign in to avoid taxes and other fees. Sign in or register.

If you have questions, call us at 844.873.4949.



United Rentals offers the Gas Buster **Closed-Top** Frac Tank designed with dedicated gas vent lines to release methane, carbon dioxide, or H₂S safely away from liquids. [Unitedrentals.com](https://www.unitedrentals.com)

They just don't care when it comes to their own operations!



United Rentals' **Open-Top**, bulk-storage FRAC tank located at 6144 Federal Blvd. — storing septage and venting these “sewer” gases directly into the atmosphere. And sitting beside their FRAC tank is the only 4,000-gallon Bulk Transfer truck that takes all of that accumulated, unclassified waste to any Publicly Owned Treatment Works that won't check the actual acidity (pH) of the material, regardless of where United is permitted, for final discharge of that waste.