

SECTION 11.39: LINKS SUMMARY

[2026.05.08 — Neighborhood Petition](#)

The community's own demand — roughly ninety neighbors asking that United Rentals relocate or cease the waste-processing operation. It predates every government filing here: the record began with the people who live and work downwind.

Off-ramps — jump straight to the record:

- ▶ [“What is that FOUL SMELL?”](#) — the complaint in the neighbors' own words, citing SDAPCD Rule 51 and Health & Safety Code § 41700. p. 1
- ▶ [The signatures](#) — roughly ninety neighbors. p. 2

[2026.05.30 — Porta-Potty Waste Treatment Process](#)

A plain-English walk-through of what actually happens to porta-potty (chemical-toilet) waste — collection, hauling, enclosed offloading, and disposal — set against the environmental-regulatory requirements at each step. It is the primer that makes the rest of this section legible: once you know the process, the gaps in the record stand out.

Off-ramps — jump straight to the record:

- ▶ [The step-by-step process](#) — how chemical-toilet / septage waste must be collected, hauled, and disposed. p. 001
- ▶ [Where the hazardous-waste and permit rules attach](#) — the regulatory requirements at the disposal step. p. 002
- ▶ [What United Rentals is required to do vs. what the evidence shows](#) — the conclusion. p. 007

[2026.06.14 — United Rentals FRAC-Tank Fire-Suppression Requirements](#)

A focused analysis of the fire and explosion risk of a FRAC tank in human-waste service, and the sealed-system and fire-suppression measures the hazard calls for. It is the technical companion to the roof-vent analysis: the vent shows the corrosive gas is there; this explains why that matters for ignition.

Off-ramps — jump straight to the record:

- ▶ [The explosion / lower-explosive-limit \(LEL\) risk](#) — why a septage tank's headspace is an ignition concern. p. 001
- ▶ [Ignition sources and the sealed-system requirement](#) — why containment matters. p. 002
- ▶ [The recommendations](#) — the suppression and containment measures the hazard calls for. p. 004

[2026.06.18 — FRAC Tank Roof-Vent Corrosion, Explosion & Pine-Tree Analysis](#)

A close visual assessment of the tank's roof vent and hatch — where the corrosion is concentrated and what that says about the gas collecting there — now paired with the condition of the adjacent pine tree. Together they make the invisible visible: the metal is being eaten at the vent, and the living tree beside the tank is dying back.

Off-ramps — jump straight to the record:

- ▶ [The roof-hatch photographs and findings](#) — heavy rust at the manway; the broader coated surfaces still sound. p. 001

- ▶ [Why the corrosion points to concentrated gas at the vent](#) — the H₂S / hydrogen-sulfide mechanism. p. 003
- ▶ [The adjacent pine tree's dieback](#) — the canopy condition beside the tank. p. 009

2026.06.18 — Complaint to Sanchez at the Air Pollution Control District (with Analysis)

The full seventeen-message email thread with the San Diego Air Pollution Control District over the waste-processing permits and the odor — Cotton's complaint, the District's answers, and the follow-ups — bundled with the legal analysis of SDAPCD Rule 51 and Health & Safety Code § 41700. One file that shows the whole exchange, not just the opening letter.

Off-ramps — jump straight to the record:

- ▶ [The permits question that opened the thread](#) — what Cotton asked the District to confirm. p. 001
- ▶ [The jurisdictional referral loop](#) — the odor and tank-contents questions bounced between agencies, answered by none. p. 009
- ▶ [The Rule 51 / § 41700 nuisance analysis](#) — the odor-nuisance authorities applied to the facts. p. 006

2026.07.02 — Complaint to City of SD District 4 Councilmember Henry Foster

A constituent request emailed to the councilmember whose district contains the operation — with the case summary, the technical tank analysis, and the supporting record attached, thirty-five pages in all. It puts an elected official on notice at the district level and hands him everything needed to act.

Off-ramps — jump straight to the record:

- ▶ [The constituent request](#) — the specific asks, including an inspection and convening the responsible departments. p. 001
- ▶ [The one-page SUMMARY put in front of him](#) — the whole matter in brief. p. 005
- ▶ [The tank's corrosion and missing ignition controls](#) — hydrogen-sulfide attack; no flame arrestor or pressure/vacuum relief. p. 006

2026.07.02 — San Diego Regional Water Quality Control Board (Region 9) Complaint

A combined file: Cotton's California Public Records Act request to the Regional Water Quality Control Board (Region 9) over the septage / chemical-toilet operation, together with the follow-up correspondence and the Board's responses. It frames a key rule — chemical-toilet / septage waste may be disposed only at a site holding Waste Discharge Requirements (WDRs) — and carries the illicit-discharge (IDDE) complaint tied to South Chollas Creek.

Off-ramps — jump straight to the record:

- ▶ [The Public Records Act request — and the WDR-only disposal rule](#) — what Board records were sought, and the rule it sets out. p. 001
- ▶ [The Board's determination and response](#) — how Region 9 answered. p. 002
- ▶ [The illicit-discharge \(IDDE\) complaint — South Chollas Creek](#) — the stormwater angle put to the Board. p. 017

2026.07.02 — Master Sound Nuisance & Intrusion Log

A consolidated report built on seven date- and time-stamped recordings and their acoustic analysis. It widens the matter beyond odor into noise — as both a nuisance and a trespass onto the adjacent property — and with it both the potential damages and the legal authorities in play.

Off-ramps — jump straight to the record:

- ▶ [The 2:50 a.m. acoustical analysis — Clip A.5](#) — the deep-night recording, inside the protected 10 p.m.–7 a.m. window. p. 004
- ▶ [Side-by-side against the source-off baseline](#) — what the tank adds over silence. p. 005
- ▶ [Known adverse medical and task-efficiency effects](#) — of that exposure. p. 008

2026.07.02 — CalEPA Report No. COMP-68387

A formal environmental complaint filed with CalEPA over the operation, docketed as COMP-68387. It puts the State’s hazardous-materials apparatus on notice and ties the operation to a named responsible party and a State hazardous-waste ID.

Off-ramps — jump straight to the record:

- ▶ [What was reported to CalEPA](#) — the hazardous-materials complaint as submitted. p. 001
- ▶ [The responsible party recorded](#) — United Rentals (North America), Inc. — State hazardous-waste ID CAL000432214. p. 003

2026.07.14 — FRAC Tank Daily Operations Reports (Field Operations Report)

The documentary heart of the operations record: a time- and date-stamped photographic report of the FRAC tank in continuous use, assembled with its attachments and the County DEHQ (Preece) correspondence into one filing package. This is the evidence that the tank runs as a working transfer station, day in and day out — and it carries the HazMat admission inside it.

Off-ramps — jump straight to the record:

- ▶ [The time-stamped operations record](#) — the tank documented in continuous use. p. 001
- ▶ [The observed storage-and-transfer cycle](#) — the working-transfer-station pattern the photographs establish. p. 014
- ▶ [“Not within industry standards ... out of our jurisdiction”](#) — the County HazMat admission, captured inside the package. p. 031

2026.08.06 — Cotton’s Supplemental Package 4.1 to Caes at DEHQ

The El Cajon disposal analysis, submitted to the County’s Environmental Health & Quality division. Drawing on El Cajon’s own account records, it documents the scale of the disposal and the authorization gap behind it.

Off-ramps — jump straight to the record:

- ▶ [Part 1 — the Video Log](#) — continuous pumping documented across a single ordinary Tuesday. p. 1
- ▶ [~5.5 million gallons, and the authorization gap](#) — 5,445,200 gallons / \$536,896.72, disposed where El Cajon’s own code (§ 13.20.130) requires a Council authorization no record reflects. p. 2

2026.08.10 — Cotton’s Supplemental Package 4.2 to Caes at DEHQ

The follow-on to 4.1, built on the City of San Diego’s own Industrial Wastewater Control file (produced under PRA 26-6533). Where 4.1 shows the volumes, 4.2 adds the mechanism — how the operation came to discharge at El Cajon rather than the destinations its permit authorizes.

Off-ramps — jump straight to the record:

- ▶ [The City’s own records, and the timeline](#) — the Industrial Wastewater Control file behind the discharge. opening pages

2026.08.13 — Cotton’s Complaint Letter to the SD County Board of Supervisors

Puts the County’s elected body formally on notice, gathering the record to date behind a single complaint to the people ultimately answerable for the departments that have handled this.

Off-ramps — jump straight to the record:

- ▶ [The Index of Exhibits](#) — the whole package mapped — including Exhibit D (the all-hours video log), Exhibit B (United Rentals’ own “not within industry standards” contradiction), and Exhibit E (the neighborhood petition). p. 3

2026.08.17 — Cotton’s Letter to E. Liwag at DEHQ

Targets the Sewage Hauler Operating Permit (LSHOP-000063) directly, and asks DEHQ to place the correspondence and its written response into the permit file — building the administrative record where the permit lives.

Off-ramps — jump straight to the record:

- ▶ [The ask](#) — place this letter and DEHQ’s response into the permit file. p. 1
- ▶ [The 124 date- and time-stamped yard photographs](#) — the enclosed photographic exhibit. p. 2

2026.08.31 — Cotton’s Report & Reply Request to SD County DA Summer Stephan

The capstone of the record: a Bates-stamped Report to the District Attorney that gathers the operation, the agency paper trail, and the questions it raises into a single document, and asks the DA’s office for a reply. A thirteen-part narrative (Bates DA-UNITED RENTALS 001–013) followed by seven Bates-stamped exhibits through 078; every factual claim cited to an exhibit page.

Off-ramps — jump straight to the record:

- ▶ [The sworn destination with no record](#) — OC San’s “No Responsive Records” for the Fountain Valley station United Rentals named under penalty of perjury. [Exhibit 2, Bates 052](#)
- ▶ [“Within industry standards” — yet “out of our jurisdiction”](#) — the County HazMat referral, the hazard no agency would own. [Exhibit 3, Bates 055](#)
- ▶ [The questions put to the DA](#) — exactly what the Report asks Stephan’s office to answer. [Bates 013](#)

2026.09.01 — Cotton’s Supplement to the DA Report, on the City of El Cajon’s Own Ordinances & Records

The newest layer — and the City’s own proof. Built entirely from the City of El Cajon’s ordinances and the records it produced after the Report, it establishes, in the City’s documents rather than in any characterization of them, that United Rentals discharged at El Cajon’s public septage site for years under discharge permits and written acknowledgements its own personnel signed — against a required pH range and a bar on gas-producing or malodorous waste the City never once measured. It carries a day-by-day volume ledger drawn from the City’s billing and, in United Rentals’ own signed acknowledgements, the company’s recognition that keeping each load within those limits was ‘their’ responsibility.

Off-ramps — jump straight to the record:

- ▶ [United Rentals signed it was ‘their’ responsibility](#) — the City’s Industrial Waste Acknowledgements, signed twice by United Rentals’ own personnel, accepting the pH 5.5–9.0 limit and the bar on gas-producing or malodorous waste. [Exhibit 2, EX2-0001 \(and EX2-0008\)](#)

- ▶ [Permits issued on a basis the ordinance does not allow](#) — El Cajon issued and renewed United Rentals' discharge permits on terms its own ordinance (§ 13.41.030) does not authorize. Exhibit 2, EX2-0002
- ▶ [Discharging years before the record you'd expect](#) — the City's own sign-in logs place United Rentals at the 1050 Vernon Way site as early as November 25, 2020. Exhibit 2, EX2-0012