

DARRYL COTTON

6176 Federal Boulevard, San Diego, California 92114
619.954.4447 · 151DarrylCotton@gmail.com

September 14, 2026

The Honorable Joel Anderson
Supervisor, District 2
County of San Diego, Board of Supervisors
1600 Pacific Highway, Room 335, San Diego, California 92101

Via email — joel.anderson@sdcounty.ca.gov

Re: Your California Insider conversation — and a documented San Diego County matter, part of it in your own district, that raises the very accountability questions you spoke to.

Dear Supervisor Anderson,

I watched your [September 12 California Insider interview](#), and I wanted to write to tell you how much of it landed — not in the abstract, but because so much of what you described is what I am living right now.

You spoke about the County falling outside the FPPC because of its size; about public-records compliance that depends on an official searching his own inbox and deciding what to turn over — if he does not report it, how is anyone to know; about retention practices that let records disappear before anyone can act on them; and about the temptations that single-source contracting invites. And, most of all, you named the thing I have run into at every turn: the lane no one will claim — “not our lane,” even as, in your words, “nobody else is stepping up.”

I am a commercial property owner in San Diego. For approximately 29 months the property next to mine has hosted a porta-potty septage operation built around a large, open-top FRAC tank of hauled human waste a few feet from my building. Trying to get any agency to address it, I have met the pattern you described almost point for point:

- The County’s Department of Environmental Health inspected the tank, found the operation “in compliance,” closed the file with “no further action” — and then said, in the same correspondence, that it has “no regulatory authority” over that tank.
- The City of San Diego and the County each point responsibility at the other, so no agency will say the operation cannot lawfully continue.
- When I asked, under the Public Records Act, for the records that would show what each agency knew and did, I met the failures you described — a blanket privilege claim with no index of what was withheld, a “no responsive records” that could not be true, a missed production deadline.
- And the same records-access failures you described are not confined to my property — I have run into them across more than one state and county process.

You will recognize the through-line, because it is the one you named on the program: the lane. Staying in one’s lane is a real discipline — right up until a hazard falls between the lanes and someone has to step

across to deal with it. A strict siloing rule only matters until the moment it needs to be broken; here, no agency would break it, and so a permitted, hazardous operation has simply sat in the gap.

Today I am presenting a formal Government Claims Act (§ 910) claim to the County of San Diego, alongside the claim already on file with the City of San Diego (Claim No. 43952). The matter reaches across three jurisdictions: the County, which issues and administers the hauler's operating permit; the City of San Diego, the fire and code authority over an explosive-gas condition; and the City of El Cajon — where, in your District 2, this operation discharged roughly 5.4 million gallons of septage over several years at a disposal site the County's own permit never authorized, documented in El Cajon's own billing records. I mention your district deliberately: a substantial part of what I am describing happened in East County.

For greater context, I have linked my [08.18.2026 County Board of Supervisors](#) appearance, my [08.11.2026 City of El Cajon City Council](#) appearance, and my [07.02.2026 "Pottygate" video](#) of what it looks like when 5.4 million gallons of human sewage is being processed in your community and nobody seems to give a shit (pun intended) that the operator, United Rentals, is doing so without regard for the environment, the toxic and explosive conditions this represents, or simply the deliberate nuisance it creates for the surrounding properties.

A broader note, offered only because you put the question on the table. To my mind, your rolled-up-car-window analogy is the whole case for the very thing you support: you lock your car, you said, to keep honest people honest, because checks and balances stop someone who would not otherwise cut a corner from cutting it. And that is exactly why you do need a County ethics commission to be that rolled-up window. Its worth is not that it jails people; it is that, like the locked door, it keeps decent public servants from ever drifting to the point where anyone would need to. What I have lived is what that window looks like left down — not a villain caught in the act, but a hazard that persisted because the ordinary safeguards were missing: no clear line of responsibility, records that go unkept or unproduced, retention so short the proof is gone before anyone can act, and access conditioned on appearing in person. Those are the failure modes such a commission ought to be built to catch — and, with respect, they are why the FPPC and the state agencies under it are as much a caution to learn from as a template to copy. I am holding the specifics of my own experience with them for their proper forum, but the pattern bears directly on getting the County's model right — because whatever becomes of this particular measure, what we have now is plainly not working, and my matter is the proof.

Two documents follow this letter: Attachment 1 is the Government Claims Act (§ 910) claim I am presenting to the County today, with its exhibits; and Attachment 2 is a short summary of what the record shows and why it reaches well past my property. None of this is my say-so — it runs on the agencies' own paper. My August 31, 2026 Report to the District Attorney, which sets out the fuller record with the source documents, is public online: [Report to the District Attorney](#). I am glad to provide the balance of the underlying records on request.

I am not asking you to take a position on my claim. I am writing because you, better than almost anyone, understand what it looks like when the safeguards you described are missing — and because the way this operation has been handled raises exactly the oversight questions you have spent your career on. If it is of interest, I would welcome fifteen minutes of your time, or a pointer to where this belongs.

Thank you for the work you are doing to make this government more accountable. From where I sit, it could not be more timely.

Respectfully,

A handwritten signature in black ink, appearing to read 'Darryl Cotton', with a stylized, sweeping flourish at the end.

Darryl Cotton

Owner, 6176 Federal Boulevard, San Diego, California 92114
619.954.4447 · 151DarrylCotton@gmail.com

Attachments (2), following this letter: Attachment 1 — § 910 Claim to the County of San Diego, with Exhibits A–C;
Attachment 2 — SD County Claim Summary.

ATTACHMENT 1

Government Claims Act (§ 910) Claim to the County of San Diego
— Notice and Exhibits A–C (Bates COTTON CLAIM 001–037) —

DARRYL COTTON

6176 Federal Boulevard, San Diego, California 92114
619.954.4447 · 151DarrylCotton@gmail.com

September 14, 2026

Office of County Counsel
Claims and Investigation Division
County of San Diego
1600 Pacific Highway, Room 355
San Diego, California 92101

Via email — COSD.Claims@sdcountry.ca.gov — and U.S. Certified Mail No. 7022 2410 0001 2590 0368

Re: Claim under the Government Claims Act (Gov. Code §§ 910 et seq.) — Claimant Darryl Cotton — County of San Diego, Department of Environmental Health and Quality; Sewage Hauler Operating Permit No. LSHOP-000063 (United Rentals (North America), Inc. dba Reliable Onsite Services; 6144 Federal Boulevard).

To the Clerk of the Board of Supervisors, the Office of County Counsel, and the Claims and Investigation Division:

This letter is presented as a written claim against the County of San Diego under the Government Claims Act, California Government Code sections 910 through 915, to place the County on notice of, and to preserve, my claim. It concerns the County's issuance and administration of Sewage Hauler Operating Permit No. LSHOP-000063 and the County's failure, through its Department of Environmental Health and Quality ("DEHQ"), to discharge mandatory duties in connection with the septage-hauling and disposal operation conducted by United Rentals (North America), Inc., doing business as Reliable Onsite Services, at 6144 Federal Boulevard — the property immediately adjacent to my commercial property at 6176 Federal Boulevard, San Diego. The general nature of my injury is stated below; its full extent and amount are continuing and reserved for proof.

This claim is the culmination of an extended and documented chain of communications with the County. It follows my August 13, 2026 complaint to the Board of Supervisors, the Department's August 4, 2026 site-visit finding and its August 14, 2026 closure of the matter, my August 17, 2026 letter, and the Department's August 18, 2026 written answers — none of which resolved the hazard next to my property. The exhibits to this claim are that record. It is presented to give the County full and formal notice, and to preserve my rights, before the limitations period runs.

The information required by Government Code section 910 is as follows.

- 1. Name and address of claimant (§ 910(a)).** Darryl Cotton, 6176 Federal Boulevard, San Diego, California 92114.
- 2. Address to which notices are to be sent (§ 910(b)).** Darryl Cotton, 6176 Federal Boulevard, San Diego, California 92114; 151DarrylCotton@gmail.com.
- 3. Date, place, and circumstances of the occurrence (§ 910(c)).** The County, through DEHQ, issues and administers Sewage Hauler Operating Permit No. LSHOP-000063, under which United Rentals is authorized to collect, haul, and dispose of septage and related liquid waste, and under

which the County is charged with approving and verifying the hauler's disposal destinations and operations (Exhibit A, COTTON CLAIM - 006). The County's permit record identifies authorized disposal destinations — the San Diego Metropolitan (Point Loma / "PS-1") system and the Orange County Sanitation District (Fountain Valley) — that United Rentals did not use for this waste stream; the Orange County Sanitation District has certified, in a "no responsive records" determination, that it never permitted or received this waste, while United Rentals' own 2020–2025 applications continued to name it (Exhibit A, COTTON CLAIM - 013, COTTON CLAIM - 015). Instead, as documented in the City of El Cajon's own records (set out in the Report and Supplement incorporated at Exhibit C), United Rentals discharged millions of gallons of septage at the City of El Cajon's disposal site at 1050 Vernon Way over a period of years, and the first County permit application to identify El Cajon at all was not signed until December 11, 2025 — years after that disposal had begun (Exhibit A, COTTON CLAIM - 021). The County possessed, but did not exercise, mandatory duties to approve the hauler's disposal locations in writing, and to require and verify the annual operating permit and the hauler's disposal reporting.

Separately, **DEHQ physically inspected this operation and evaluated the FRAC tank** in which the waste is accumulated at 6144 Federal Boulevard. Its inspector made three site visits to the property — June 22, June 29, and July 8, 2026 (Exhibit B, COTTON CLAIM - 028); the tank itself was, in DEHQ's own words, "recently evaluated because of the complaint" (Exhibit B, COTTON CLAIM - 035); and the Department reported the tank's volume in writing to the San Diego Regional Water Quality Control Board at 40,000 gallons — a figure it never measured, and one that United Rentals' own published specifications put at approximately 21,000 gallons. Having gone onto the property, evaluated the tank, and reported its volume, the Department found the operation "in compliance with [its] current pumper truck permit" (Exhibit B, COTTON CLAIM - 028) and closed its investigation with "no further action" needed — a closure it stated it reached only after reviewing "all of the operational information with the Regional Water Quality Control Board and [its] internal County Counsel, both who confirmed" it (Exhibit B, COTTON CLAIM - 029). At the same time, the Department stated that the tank "is not part of the pumper truck permit" and that "there is no regulatory authority established to oversee the use of these intermediary tanks" (Exhibit B, COTTON CLAIM - 033). The Department took no action to address the resulting fire, explosive-gas, and odor hazard — and a larger tank, if the volume is nearer the County's own 40,000-gallon figure, is only a greater hazard and never a lesser one — and instead directed the matter elsewhere, including toward the City. The occurrence is continuing: the discharge and the tank operation span at least December 2022 through the present, and the County's non-response is documented across 2026 (Exhibit B).

The operation and its odor were known to me before May 26, 2026; the economic injury on which this claim is based, however, was first discovered on that date. On **May 26, 2026**, the pending sale of my property — an executed agreement to sell 6176 Federal Boulevard for \$935,000 — failed in escrow. The buyer's broker identified the odor from the adjacent operation among the reasons the transaction could not be completed. That was the first date on which I became aware of the economic injury forming the basis of this claim, and this claim is therefore presented within six months of that discovery. The places of the occurrence are 6144 Federal Boulevard and my adjacent property at

6176 Federal Boulevard, San Diego; the offices of the County of San Diego and DEHQ; and the disposal site at 1050 Vernon Way, El Cajon. The full documentary basis is set out in my August 31, 2026 Report to the District Attorney and my September 1, 2026 supplement to that Report, together with the public-records productions on which they rely (Exhibit C, incorporated by reference). I reserve all positions regarding the date of accrual and the timeliness of this claim, and present it now to preserve my rights.

4. General description of the injury, damage, or loss (§ 910(d)). The injuries and losses incurred, so far as known at this time, include: a continuing private and public nuisance from the odor, hydrogen-sulfide and other gas emissions, and noise emanating from the operation next door; the loss of an executed \$935,000 sale of my property at 6176 Federal Boulevard, the odor from the adjacent condition being among the reasons the buyer cancelled; the resulting inability to insure and to market the property, and its diminution in value; and related economic loss. These injuries are continuing and continue to accrue, and their full nature, extent, and amount will be established by proof and are reserved.

5. Public employees causing the injury, if known (§ 910(e)). To the extent known, Elizabeth A. Pozzebon, Director of DEHQ; Ryan Johnson, Chief, Departmental Operations, DEHQ; Craig Caes, Supervising Environmental Health Specialist, DEHQ; and Ernie Liwag, DEHQ, together with other County and DEHQ personnel in the permit-administration and complaint-handling chain whose identities are presently known to the County or will be ascertained.

6. Amount claimed (§ 910(f)). Because the amount claimed exceeds ten thousand dollars (\$10,000), no dollar amount is stated. This claim would be an unlimited civil case; the amount in controversy exceeds twenty-five thousand dollars (\$25,000). Damages are sought according to proof.

Basis of the claim.

California public entities are liable where they fail to discharge a mandatory duty imposed by an enactment designed to protect against the kind of injury suffered, and where that failure proximately causes the injury (Gov. Code § 815.6). My position is that the County's own ordinances impose such duties here — including the County's sewage-hauler regulatory scheme, San Diego County Code sections 68.601–68.613 — among them section 68.604 (registration and verification of the hauler's identified disposal locations), section 68.609 (disposal recordkeeping and reporting), and section 68.610 (the Director's written approval of disposal locations) — and that the County's failure to discharge those duties allowed an unpermitted, hazardous septage operation to persist next to my property and caused the losses described above. Ryan Johnson of DEHQ has confirmed in writing that DEHQ reviews the hauler's dumping records at the annual inspection “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” (Exhibit B, COTTON CLAIM - 035); the duty is thus one the County acknowledges, not one I supply. This claim is presented to give the County notice and to preserve my rights; I reserve all legal theories, arguments, and positions for any complaint that may follow.

Demand and resolution.

I demand that the County (1) promptly take up the condition and determine whether the operation at 6144 Federal Boulevard may lawfully continue under Permit No. LSHOP-000063 and, if it may not, require that its unpermitted use cease; and (2) compensate me for the injuries and losses described, in an amount according to proof. I remain willing to discuss a prompt and reasonable resolution of this matter, and to make the underlying records available to the County's investigators.

This claim and demand are directed to the County of San Diego only. Nothing in it waives, releases, or limits any claim I may have against United Rentals (North America), Inc., Westport Properties, their insurers, or any other person or entity, and it is presented without prejudice to my pending writ proceedings and to the matter now before the District Attorney. I reserve all rights.

Please direct all correspondence regarding this claim to me at the address above.

Respectfully,



Darryl Cotton

Owner, 6176 Federal Boulevard, San Diego, California 92114

Exhibits (Bates COTTON CLAIM - ###):

- **Exhibit A** (COTTON CLAIM - 005 – COTTON CLAIM - 026) — County Sewage Hauler Operating Permit No. LSHOP-000063 (COTTON CLAIM - 006); the Orange County Sanitation District “no responsive records” determination and United Rentals’ 2020–2025 permit applications naming Fountain Valley / PS-1 (COTTON CLAIM - 013, COTTON CLAIM - 015); the December 11, 2025 application first naming El Cajon (COTTON CLAIM - 021); and the neighbor petition (COTTON CLAIM - 022) — the mandatory-duty and destination-mismatch record.
- **Exhibit B** (COTTON CLAIM - 027 – COTTON CLAIM - 036) — DEHQ’s handling record: Craig Caes’s August 4, 2026 site-visit report finding the operation “in compliance” (COTTON CLAIM - 028); Ernie Liwag’s August 14, 2026 closure with “no further action,” after review with the Regional Water Quality Control Board and County Counsel (COTTON CLAIM - 029); and Ryan Johnson’s August 18, 2026 written responses — the tank “evaluated because of the complaint,” the “no regulatory authority... to oversee... intermediary tanks” statement, the disposal-verification confirmation, and the annual-verification standard (COTTON CLAIM - 031–COTTON CLAIM - 036).
- **Exhibit C** (COTTON CLAIM - 037; incorporated by reference, furnished on request) — Cotton’s August 31, 2026 Report to the District Attorney (Bates DA-UNITED RENTALS-001–082) and September 1, 2026 Supplement (Bates DA SUPPLEMENT-001–032), with the August 13, 2026 complaint to the Board of Supervisors — the comprehensive documentary basis, incorporated by reference and furnished to the County on request.

EXHIBIT A

County Sewage Hauler Operating Permit No. LSHOP-000063
and the disposal-destination / permit record



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

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

2025

APPLICATION FOR ANNUAL SEWAGE HAULER PERMIT

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

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

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

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

Date: 9/18/2024

Jeffrey Walker

Print Name

Jeffrey Walker

Signature

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

FOR OFFICE USE ONLY

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

2025 SEWAGE HAULER TRUCK INVENTORY

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

5:55

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

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

¹lettering includes name of business and phone number

Additional Comments (To Be Completed By DEHQ):



DEPARTMENT OF ENVIRONMENTAL HEALTH & QUALITY
LAND AND WATER QUALITY DIVISION

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

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

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

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

¹lettering includes name of business and phone number

DARRYL COTTON

6176 Federal Boulevard, San Diego, California 92114
619.954.4447 · 151DarrylCotton@gmail.com

August 18, 2026

Ernie Liwag, REHS
Program Coordinator
County of San Diego
Department of Environmental Health and Quality
Food, Water, and Housing Division
Via email: Ernie.Liwag2@sdcounty.ca.gov
cc: Craig Caes; Jamelle McCullough; Ryan Johnson

Re: United Rentals (North America), Inc., dba Reliable Onsite Services — Sewage Hauler Operating Permit LSHOP-000063; 6144 Federal Boulevard, San Diego · Public Records Request No. 26-4763. New information: Orange County Sanitation District “No Responsive Records” determination (OC San Request No. P004671-080826), and United Rentals’ own 2020–2025 permit applications.

Ernie,

This letter presents **new information** and asks the Department for a written determination. It follows my August 13, 2026 complaint to the Board of Supervisors and my August 17, 2026 letter to the Department, both already on file; I do not re-enclose that prior correspondence here. Two exhibits accompany this letter.

1. United Rentals named OC San Fountain Valley on its own permit applications, year after year — six consecutive years; OC San has no record of it.

Exhibit 1 (OCSD-UNITED 005–013) is presented in two parts. **First** is the Orange County Sanitation District’s August 18, 2026 written determination of “**No Responsive Records**” (OC San Request No. P004671-080826), signed by Tania Moore, CMC, Assistant Clerk of the Board: OC San has **no wastehauler permit and no discharge, manifest, sampling, or billing record** for United Rentals / Reliable Onsite Services or its trucks, for December 1, 2022 to the present. **Second** are United Rentals’ own annual Sewage Hauler Permit applications for Permit LSHOP-000063 for **2020 through 2025 — six consecutive years** — each of which names the **Orange County Sanitation District (OC San) Wastehauler Station in Fountain Valley** as a designated liquid-waste disposal facility, and each signed under penalty of perjury on behalf of United Rentals by Jeffrey Walker. Placed side by side, the two halves establish the central fact: for six straight years United Rentals’ own applications named OC San Fountain Valley as a designated disposal destination — yet OC San, asked to search December 1, 2022 to the present, produced no responsive record of any kind for this operation. This was not an isolated entry on a single form. Exhibit 1 then concludes with a seventh application, dated December 11, 2025, which for the first time names a different facility — the City of El Cajon — as primary; I address that document, and its timing, in section 4 below.

2. The permit identifies two authorized destinations, neither of which reconciles with the disposal records now produced.

Permit LSHOP-000063 authorizes only two disposal destinations: OC San Fountain Valley and San Diego **Pump Station No. 1**. OC San Fountain Valley does not reconcile with Exhibit 1 — OC San reports no responsive record of it. And United Rentals’ out-of-state trucks were **barred from Pump Station No. 1 in November 2022** (City of San Diego records produced August 7, 2026). That leaves no

authorized destination. This is in addition to the anomalies already in the Department’s file: Mr. Walker signed the application under penalty of perjury naming those two sites roughly 21 months into the El Cajon billing; and United Rentals’ branch manager, David Perez, is the person who had my real-estate broker removed under a no-trespass order when he tried to raise the condition.

3. The material went off-permit to El Cajon, beginning December 2022.

Beginning the month after the Pump Station No. 1 bar, the City of El Cajon’s own records (produced August 3, 2026) show it accepted **43 consecutive months** of this operation’s septage — approximately **5.4 million gallons**, December 2022 through June 2026 — at **1050 Vernon Way**, a facility the permit does not name. The City’s account records for the first fourteen months are reproduced below; for each of those months the City produced **no daily disposal log**:

El Cajon Septage Discharge — PRE-FRAC-TANK (Direct-Haul) Era											
United Rentals / Reliable Onsite (Federal), Acct #5000032 — Dec 2022 – Jan 2024 (14 months) — PRA PRR26-583											
Period BEFORE the fixed FRAC tank appears (tank floor = Feb 2024). El Cajon produced no daily logs before Apr 2024, so op-day / service-truck columns are blank here. Rate \$9.86/100-gal unit.											
Month	Svc Period	EC Inv #	Invoice Date	Total Gallons Discharged	Units (100 gal)	Dumping Charge @ \$9.86/unit	After-Hours Fees (\$)	Op. Days (EC daily log)	Days > 7,180 gal (beyond full fleet load)	Era	Notes
Dec 2022	2022-12	605	02-22-2023	60,100	601	\$5,925.86	\$0			Direct-haul	no daily log produced
Jan 2023	2023-01	688	03-10-2023	70,300	703	\$6,931.58	\$0			Direct-haul	no daily log produced
Feb 2023	2023-02	824	04-24-2023	58,100	581	\$5,728.66	\$0			Direct-haul	no daily log produced
Mar 2023	2023-03	842	04-24-2023	96,600	966	\$9,524.76	\$0			Direct-haul	no daily log produced
Apr 2023	2023-04	969	06-02-2023	87,500	875	\$8,627.50	\$0			Direct-haul	no daily log produced
May 2023	2023-05	1047	06-29-2023	99,200	992	\$9,781.12	\$0			Direct-haul	no daily log produced
Jun 2023	2023-06	1150	08-14-2023	70,400	704	\$6,941.44	\$0			Direct-haul	no daily log produced
Jul 2023	2023-07	1173	08-21-2023	98,200	982	\$9,682.52	\$0			Direct-haul	no daily log produced
Aug 2023	2023-08	1227	09-25-2023	142,900	1,429	\$14,089.94	\$0			Direct-haul	no daily log produced
Sep 2023	2023-09	1260	10-09-2023	72,400	724	\$7,138.64	\$0			Direct-haul	no daily log produced
Oct 2023	2023-10	1307	11-17-2023	105,500	1,055	\$10,402.30	\$0			Direct-haul	no daily log produced
Nov 2023	2023-11	1541	02-06-2024	78,200	782	\$7,710.52	\$0			Direct-haul	no daily log produced
Dec 2023	2023-12	1566	02-12-2024	71,100	711	\$7,010.46	\$0			Direct-haul	no daily log produced
Jan 2024	2024-01	1622	03-11-2024	172,400	1,724	\$16,996.64	\$0			Direct-haul	no daily log produced
TOTAL — 14 months				1,282,900	12,829	\$126,493.94	\$0	0	0		

City of El Cajon account records for United Rentals / Reliable Onsite (Acct. No. 5000032), December 2022 – January 2024 — City of El Cajon Public Records Request No. 26-583; reproduced from my Supplement No. 4.1 to the Department, transmitted August 6, 2026, at Bates page 0114.

4. El Cajon is not named on any County application until December 11, 2025.

United Rentals had been disposing at El Cajon since December 2022, as the records above show. Yet El Cajon does not appear on any of United Rentals’ County permit applications until **December 11, 2025** — the seventh and last application in Exhibit 1 (**OCSD-UNITED 013**), which for the first time lists the City of El Cajon, 1050 Vernon Way, as the **primary** disposal facility — and, just as tellingly, **drops OC San Fountain Valley altogether** and demotes San Diego Pump Station No. 1 to the alternate. That application was signed not by Mr. Walker but by United Rentals’ branch manager, **David Perez** — the same person who had my real-estate broker removed under a no-trespass order. For the three preceding years — the entire period the trucks were hauling east to El Cajon — the County’s applications named only San Diego Pump Station No. 1 and OC San Fountain Valley, neither of which, on the records now assembled, can be reconciled with where the material actually went. Read together with OC San’s “No Responsive Records” determination, the plain result is that the Department’s permit file did not — until this single, late-2025 form — accurately reflect where this operation’s roughly **5.4 million gallons** of septage were actually going. Why the County was first told of the El Cajon destination only at the end of 2025, roughly three years after disposal there began, is a question I ask the Department to reconcile.

5. Despite What the DEHQ Permit States, Why Did United Rentals Choose El Cajon Over San Diego?

The El Cajon records produced to date reflect gallonage and billing, but no waste-tracking manifest, no acceptance certification, and no testing of the pH, sulfide content, or other characteristics of what was

discharged. The national pretreatment standards prohibit introducing into a publicly owned treatment works any pollutant that creates a fire or explosion hazard (**40 C.F.R. § 403.5(b)(1)**) or that causes corrosive structural damage, and “in no case Discharges with pH lower than **5.0**” (**40 C.F.R. § 403.5(b)(2)**); and EPA guidance recognizes that domestic septage held in an enclosed tank turns anaerobic and generates hydrogen sulfide, which is toxic and corrosive (EPA/625/R-94/002). United Rentals’ branch manager, David Perez, asked the City of El Cajon on or about July 8, 2026 whether it performs pH testing. My pending request to El Cajon (PRR26-690) seeks any such testing and acceptance records; to date, none have been produced, and in telephone conversations with the City of El Cajon’s Deputy Director of Public Works, Aaron Jones, and its Public Works Operations Manager, Steven Raineri, I have been told those records do not exist because the City relies on the hauler to have conducted the testing and to have discharged only material within the lawful limits. That reliance is the City’s right: under the County’s (DEHQ) sewage-hauler permit program and the federal pretreatment standards, it is the hauler — not the receiving facility — that bears primary responsibility for characterizing its load and assuring that what it discharges meets the applicable pretreatment limits (40 C.F.R. § 403.5) for discharged waste. The result is a gap on both sides of the transaction: United Rentals’ applications did not disclose the El Cajon destination during the documented period, and the party the pretreatment framework looks to for characterizing the load — the hauler — has produced no record that it ever tested it. Nor does every receiving facility screen alike. El Cajon lies farther from the yard than San Diego’s Pump Station No. 1 and, on the records produced, charges more — yet it is where this material went, to a facility that performs no independent testing and relies entirely on the hauler. Why an operator would haul its waste farther, and pay more, to the one facility that would not test its load is a question I raise for the Department’s consideration.

6. While the agencies pointed to one another, my neighbors and I bore the exposure.

And all the while, those of us who own and work in the commercial corridor downwind of this operation are pummeled **seven days a week** by the odors, the noise, and the toxic and potentially explosive conditions that this unpermitted FRAC tank — never designed or approved for gaseous containment — subjects us, and the environment, to, while to date not a single agency will take accountability for any oversight of this part of United Rentals’ septage operation. For **over 29 months**, the fixed, open-top FRAC tank a few feet from my property line has emitted that evaporative sewer gas — hydrogen sulfide — day and night. Roughly ninety neighbors have signed a petition documenting it, enclosed as **Exhibit 2 (OCSD-UNITED 014-018)**.

7. Request.

I ask, as before, only for a written determination: please identify the specific written authority, if any, that makes United Rentals’ on-site FRAC-tank storage-and-transfer operation and its disposal at El Cajon an authorized part of Permit LSHOP-000063 — or state in writing that no such authorization exists. I am not asking the Department to adopt any legal conclusion; I ask only that these records be reconciled and answered. As with my prior correspondence, I am placing this letter and its exhibits in open Public Records Request No. 26-4763 and providing a copy to the Board of Supervisors.

Finally, the hazard does not end if United Rentals simply stops using the tank. The FRAC tank has served as the bulk-transfer and storage point for the septage collected from United Rentals’ two-compartment vacuum trucks; the operation could resume at any time; and for as long as septage remains in this fixed, open-top vessel — corroding in the far corner of their yard — it is a source of potential future release of odors, liquids, and solids. I therefore ask that the tank be treated as a hazardous equipment condition to be removed from the site, not merely a use to be paused. This is the very remedy my neighbors have asked for: the petition enclosed as **Exhibit 2** calls on United Rentals to

remove or relocate this waste-processing equipment.

Respectfully,

Darryl Cotton

Enclosures: Exhibit 1 — OC San “No Responsive Records” determination and United Rentals’ 2020–2025 Sewage Hauler Permit applications naming OC San Fountain Valley, together with United Rentals’ December 11, 2025 application naming the City of El Cajon (OCSD-UNITED 005–013); Exhibit 2 — neighbor petition with signatures (OCSD-UNITED 014–018).



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,

COTTON CLAIM - 013**OCSD-UNITED 005**

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](#)





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

5500 Overland Ave., Suite # 201, San Diego, CA 92123
P.O. Box 129261, San Diego, CA 92112-9261
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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		
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Date: 9/17/2021

Jeff Walker

Print Name

Signature

FOR OFFICE USE ONLY

Permit Number	# of Vehicles	Date
DEH2020-LSHOP-000013	6	9-17-21

Decals
2464-2469



County of San Diego

DEPARTMENT OF ENVIRONMENTAL HEALTH & QUALITY LAND AND WATER QUALITY DIVISION

5500 Overland Ave., Suite # 201, San Diego, CA 92123
P.O. Box 129261, San Diego, CA 92112-9261
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Phone Number:	(619) 210-2850	Email:	environmental@ur.com
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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: 3/23/2022

Jeff Walker

Print Name

Signature

FOR OFFICE USE ONLY

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



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

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City:	San Diego	State:	CA Zip Code: 92114
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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

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Date: 10/26/2022

Jeffrey Walker

Print Name

Jeffrey Walker
Signature

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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 # 201, San Diego, CA 92123

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APPLICATION FOR ANNUAL SEWAGE HAULER PERMIT

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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

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Primary Liquid Waste Disposal Facility Name:	Pump Station #1		
Facility Address:	3550 East Harbor Drive		
City:	San Diego	State:	CA Zip Code: 92101
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Facility Address:	10844 Ellis Dr		
City:	Fountain Valley	State:	CA Zip Code: 92708

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Date: 9/13/2023

Jeffrey Walker

Print Name

Jeffrey Walker

Signature

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



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

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

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

Date:	9/18/2024	Jeffrey Walker	Jeffrey Walker	Digitally signed by Jeffrey Walker Date: 2024.09.18 08:43:31 -0400
		Print Name	Signature	

FOR OFFICE USE ONLY

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



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 12/10/25

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

What is that FOUL SMELL?



Porta-Potty Rentals Main Human Waste Processing Center at 6144 Federal Blvd. SD CA 92114



Tucked tightly in the corner, hidden behind a tree, with IBC totes and porta-potties staged in front of it, sits the FRAC tank which is where all the United vacuum trucks transfer their human waste into.

This is the United Rentals yard at 6144 Federal Blvd. looking Northeast. United Rentals did not place their human waste processing equipment at the West end of their property where they and their customers would have to smell the waste processing from their massive rental fleet of porta-potties. Instead, they located their main pump out station for their 10 or more of their waste hauling trucks, each carrying up to 4,000 gallons of rental porta-potty waste to the farthest Southeastern corner of their property in blatant disregard to their downwind neighbors. From morning until night these United vacuum trucks are continuously pumping that waste right next to Federal Blvd. and any easterly blowing wind moves that obnoxious odor into property all around Federal Blvd.

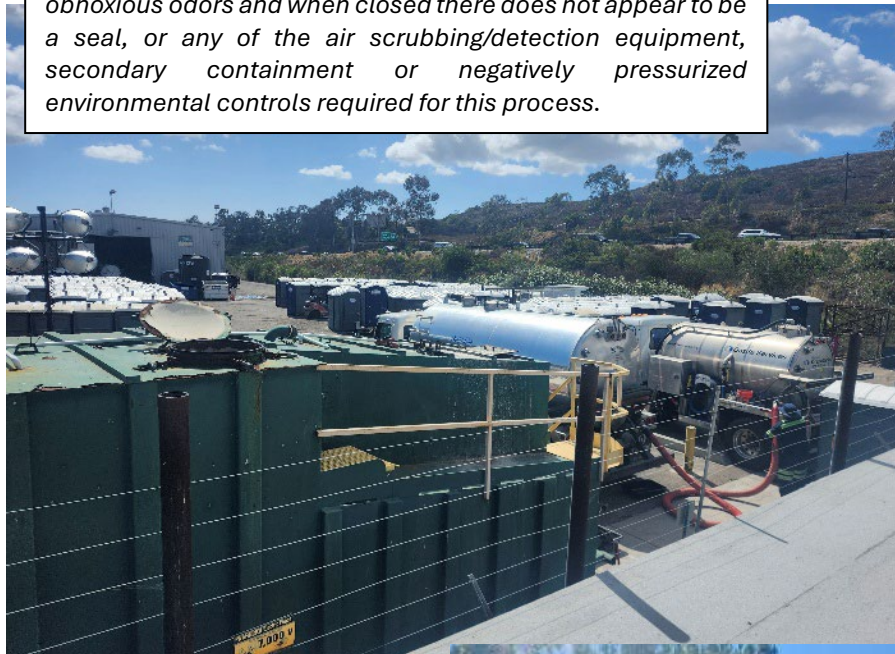
There are laws that are broken with these activities such as SDAPCD Rule 51 and CA Health and Safety Code Section 41,700 that absolutely prohibit these types of odors from becoming a nuisance to anyone outside their processing area.

We, who have been affected by this process, would ask that United Rentals immediately come into compliance with these operations and remove and/or relocate their waste processing equipment to the opposite side of their yard and cease creating the unbearable stench that is an affront to those residential and business properties in our community.

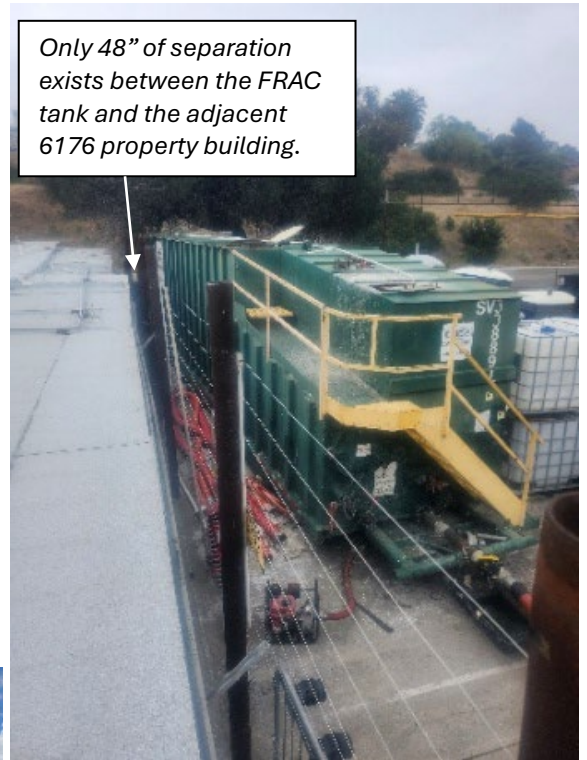


Compare this happy healthy pine tree to the distressed one next to the FRAC tank in the image below.

The FRAC tank trailer is estimated to be rated for 21,000 gallons temporary waste storage capacity. With the rusted out vent cover being left open the stored human waste emits foul obnoxious odors and when closed there does not appear to be a seal, or any of the air scrubbing/detection equipment, secondary containment or negatively pressurized environmental controls required for this process.



This mature pine tree shows classic stress from what may be the airborne toxic levels of Hydrogen Sulfide, Carbon Dioxide, Ammonia and Methane. All gasses generated by the anaerobic digestion of human waste. **These gasses also represent highly flammable and explosive risks under the current conditions.**



Only 48" of separation exists between the FRAC tank and the adjacent 6176 property building.

Located within feet of the property line, the FRAC tank is meant to be camouflaged for its intents and purposes, with the United vacuum trucks backing up to pump out and not be seen performing this operation. Not having the required environmental controls for this process creates serious public and United Rentals employee risks.



A single large event rental can generate enough human waste to completely fill the FRAC tank. **Where does all that waste go?**

The following list of names includes those who have been subjected to these unhealthy and obnoxious odors emanating from the United Rental yard. We hereby demand that United Rentals follow the law by immediately remediating the situation into full regulatory compliance and relocate the equipment away from the Federal Blvd. property line and properly setback distanced from any neighbor

I hereby affirm that by signing this petition, I have personally experienced the obnoxious nuisance odor and/or noise that emanates from the human waste being constantly processed at the United Rentals 6144 Federal Blvd. yard and ask that corrective measures immediately be aken to remediate the situation.

	Date	Print Name	Signature	Contact Number or Email
1-	5/18	Robert Hamlin	Robert Hamlin	(619) 977-6000
2-	6/10	DARRYL COTTON	Darryl Cotton	619-954-4447
3-	5/18	AKL JACKSON	Akl Jackson	(858) 463-8798
4-	6/12	JUNE PYHALA	June Pyhala	(619) 573-0322
5-	6/12	William Campos	William Campos	(619) 3181820
6-	6/12	Eusebio Torres	Eusebio Torres	(619) 822-9390
7-	6/12	AURELIO ZUMUTHAL	Aurelio Zumuthal	619-658-0254
8-	6/12	Angela Jimenez	Angela Jimenez	619-602-52-37
9-	6/12	Daniel Flores	Daniel Flores	619-341-66-29
10	6/12	Francisco Flores	Francisco Flores	619-418-5955
11-	6/12	Berardo Gonzalez	Berardo Gonzalez	619-665-0486
12	6/12	JOSE RODRIGUEZ	Jose Rodriguez	619-755-5167
13-	6/12	Wasseem Behar	Wasseem Behar	619-6325509
14-	6/12	Carlo Hernandez	Carlo Hernandez	619-382-6553
15-	6/12	Abul Omos	Abul Omos	619-309-5825
16	6/12	Kimberly Carranza	Kimberly Carranza	213 574-7799
17-	6/12	Alana Holmes	Alana Holmes	619-606-2949
18-	6/12	Cody Cartwright	Cody Cartwright	808 854 0878
19-	6/12	GEORGE SANCHEZ	George Sanchez	619-551-8313
20	6/13	Bob Morrow	Bob Morrow	928-279-4369
21	6/13	Ruby Carranza	Ruby Carranza	619-414-9083
22	6/13	DALE ROBLE	Dale Roble	619-445-4735
23-	6/14	CANDACE BOOTS	Candace Boots	360-241-0456
24-	6/14	Michael Wolf	Michael Wolf	(503) 349-7867
25-	6/15	MARIA DIEZ	Maria Diez	619-240-5775
26-	6/15	TONIA SANCHEZ	Tonia Sanchez	(619) 457 0414
27-	6/15	DAVID ZEVERA	David Zevera	619-455-6466
28-	6/15	Santiago Torres	Santiago Torres	(619) 455-6565
29-	6/15	CHRIS ABAT	Chris Abat	619-852-1803
30-	6/15	Jeff Davis	Jeff Davis	619-287-5270
31-	6/15	Steve McDough	Steve McDough	619-823-5616
32-	6/15	Tamera Seber McDough	Tamera Seber McDough	619-844-7601
33-	6/15	Kris Turner	Kris Turner	619-787-9846
34-	6/16	Luis Sandoval	Luis Sandoval	619-943-0704
35-	6/16	Samantha McDough	Samantha McDough	619-755-1424
36-	6/16	Rafael Cardenas	Rafael Cardenas	619-776-1444
37-	6/20	RICH NABATANO	Rich Nabatano	619-755-5880

I hereby affirm that by my signing this petition, I have personally experienced the obnoxious odor and/or noise that emanates from the human waste being constantly processed at the United Rentals 6144 Federal Blvd. yard and ask that corrective measures immediately be taken to remediate the situation.

Line	Date	Print Name	Signature	Contact Phone or Email
1	6/20/26	Robert J Gaddard	Robert Gaddard	619-327-6536
2	6/20/26	Pablo Huerta	Pablo Huerta	619-529-6347
3	6/20/26	John P DAVIS	John P Davis	855-285-9817
4	6/20/26	MARLENE MADARIS	Marlene Madaris	mmadaris1956@gmail.com
5	6/20/2026	Susan Zimmermann	Susan Zimmermann	ZIMMERMANN.SUSAN754@gmail.com
6	6/20/2026	Erin Kalbety	Erin Kalbety	619-344-1016
7	6/20/26	CAETANO MACHAVA	Caetano Machava	(619) 231-8489
8	6/21/26	Carlos Gonzalez	Carlos Gonzalez	760-720-6091
9	6/21/26	AMBER FERRIER	Amber Ferrer	760-430-3100
10	6/21-26	VIC RITTER	Vic Ritter	142-472-9726
11	6/21/26	JARRO FARIAS	Jarro Farias	619-273-7969
12	6/21/26	Jelly Hagen	Kelly Hagen	619-343-9611
13	6-21-26	Laura Wilson	Laura Wilson	619-917-6884
14	6-21-26	Thomas Wolf	Thomas Wolf	619-348-1731
15	6-21-26	Kelley Hagen	Kelley Hagen	619-343-9611
16	6-22-26	John Beckett	John S. Beckett	(619) 638-9494
17	6/22/26	AIKEA PYLE	Aikea Pyle	(619) 847-3045
18	6/22/26	Maria Black	Maria Black	858-424-0272
19	6/22/26	Desiree Valera	Desiree Valera	760-460-2515
20	6-25-26	John Black	John Black	702-416-7321
21	6/25/26	ANN RATHMAN	Ann Rathman	619-617-1400
22	6/26/26	Baudy Itasca	Baudy Itasca	(619) 379-6256
23	6/26	MARK HAYS	Mark Hays	619-905-2850
24	6/26	Emily Miller	Emily Miller	858-288-5603
25	6/26	Eugene Miller	Eugene Miller	619-990-9152
26	6/26	Christina Jackson	Christina Jackson	619-288-5611
27	6/26	Kenneth Jackson	Kenneth Jackson	619-521-2614
28	6/26	LAUREN	Lauren	858-591-858-289-5603
29	6/26	Brenda Sumner	Brenda Sumner	619-403-8970
30	6/26/26	NANAY ELITE	Nanay Elite	702-772-4329
31	6/26/26	Linda Hamilton	Linda Hamilton	(619) 622-1638
32	6/26/26	Linda Ruiz	Linda Ruiz	(562) 246-1652
33	6/26/26	Neil Kelly	Neil Kelly	(562) 246-1652
34	7/8/26	BRENNAN BENOUICK	Brennan Benouick	443-983-0522
35	7/15/26	Kaleb Koster	Kaleb Koster	209-769-2993
36	7/27/26	F.O. Koplede	F.O. Koplede	(619) 616-1091
37				

I hereby affirm that by my signing this petition, I have personally experienced the obnoxious odor and/or noise that emanates from the human waste being constantly processed at the United Rentals 6144 Federal Blvd. yard and ask that corrective measures immediately be taken to remediate the situation.

Line	Date	Print Name	Signature	Contact Phone or Email
1	6-20-26	Donald BREAU LT	Donald Breault	619-598-8022
2	6-20-26	Daniel Hendrick	[Signature]	541-787-0425
3	6-20-26	Kim Cotter	[Signature]	619-465-2453
4	6/22/26	SERGE PAIGNE	[Signature]	619-458-5467
5	6/22/26	Angela Ramirez	[Signature]	619-672-8779
6	6/23/26	RANDY CARDENAS	[Signature]	619-770-1444
7	6/23/26	Justin Johnson	[Signature]	310 808 -5140
8	6-29-26	DONOVAN BOLZANO	[Signature]	619-577-5723
9	7-2-26	Enrique Delgadillo Franco	[Signature]	619-818-8328
10	7-7-26	Heather McCall	[Signature]	619-602-3475
11	7-8-26	Thomas Brewer	[Signature]	858-988-9745
12	7/8/26	Rick Medina	Rick Medina	619 (577-8651)
13	7/11/26	Natasha Mazon	Natasha Mazon	619-793-8773
14	7-11-26	Sharon Noda	Sharon Noda	619-510-310-3277
15	7/12	Tom Roonover	[Signature]	619 964 1746
16	7/12	Carmen Garcia	[Signature]	972-571-7107
17	7/12	Pete Anderson	[Signature]	619-376-0554
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EXHIBIT B

The County's handling record — Department of Environmental Health and Quality
(Caes · Liwag · Johnson, August 2026)



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>

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

Liwag, Ernie <Ernie.Liwag2@sdcounty.ca.gov>

Fri, Aug 14, 2026 at 4:29 PM

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>

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 Liwag, 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>

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

4 messages

Darryl Cotton <151darrylcotton@gmail.com>

Thu, Aug 13, 2026 at 12:49 PM

To: PublicComment@sdcounty.ca.gov

Cc: lwqduty.deh@sdcounty.ca.gov, hmdutyeh@sdcounty.ca.gov, "Caes, Craig" <Craig.Caes@sdcounty.ca.gov>, Summer.Stephan@sdcdca.org

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>

Fri, Aug 14, 2026 at 4:29 PM

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>

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.

COTTON CLAIM - 031

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 Liwag, REHS

Program Coordinator

Department of Environmental Health & Quality

Food, Water, and Housing Division

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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]

--

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 truckto-

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 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

COTTON CLAIM - 034

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 your 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]

EXHIBIT C

The comprehensive documentary basis — incorporated by reference

The following instruments are incorporated into this claim by reference and are furnished to the County on request. Each is a discrete, separately Bates-numbered package already served on the offices identified below:

1. Report to the District Attorney. Cotton to District Attorney Summer Stephan — “Report & Request for Reply” re United Rentals / Reliable Onsite Services, dated August 31, 2026 (82 pages; Bates DA-UNITED RENTALS-001 through -082).

2. Supplement to the Report. Cotton to District Attorney Summer Stephan — Supplement to the August 31, 2026 Report (continuous letter with Exhibits 1–2), dated September 1, 2026 (32 pages; Bates DA SUPPLEMENT-001 through -032), including the City of El Cajon disposal records and the El Cajon discharge-volume ledger.

3. Complaint to the Board of Supervisors. Cotton to the San Diego County Board of Supervisors — complaint re the 6144 Federal Boulevard operation, dated August 13, 2026.

These materials set out, in full, the permit record, the destination mismatch, the El Cajon disposal volumes, and the County correspondence summarized above, and are available to the County’s investigators in complete, bookmarked form upon request.

ATTACHMENT 2

SD County Claim Summary

DARRYL COTTON

6176 Federal Boulevard, San Diego, California 92114
619.954.4447 · 151DarrylCotton@gmail.com

COTTON — SD COUNTY CLAIM SUMMARY

The record on the County's handling of Sewage Hauler Operating Permit No. LSHOP-000063

Department of Environmental Health and Quality · 6144 Federal Boulevard, San Diego

A related Government Claims Act (§ 910) claim was presented to the County on September 14, 2026

This document sets out, in plain terms, what the record shows about the County's handling of the septage-hauling operation at 6144 Federal Boulevard, and why it matters beyond my property. Nothing here is a legal conclusion — those are for counsel — but the facts below come from the County's own records. A related Government Claims Act (§ 910) claim has been presented to the County separately.

The operation and the hazard.

United Rentals (North America), Inc., operating as Reliable Onsite Services, runs a porta-potty septage operation at 6144 Federal Boulevard, immediately next to my property at 6176 Federal. At its center is a large, open-top "FRAC" tank of hauled human waste, about four feet from my building — approximately 21,000 gallons on United Rentals' own published specifications, and 40,000 gallons on the figure the County itself reported to the Regional Water Quality Control Board (a figure the County never measured). Held in a warm, enclosed tank, the waste turns septic and off-gasses hydrogen sulfide, methane, carbon dioxide and ammonia — toxic, and in the case of methane and hydrogen sulfide flammable — vented uncontrolled into the air at the property line.

The harm.

The condition has made my property unsellable and unlistable at value: a fully executed \$935,000 sale fell through in escrow, the tank is now a required disclosure to every future buyer, and my broker has taken the property off the market. The property is also effectively uninsurable: at least eleven carriers declined to quote coverage over the fire and explosion risk — even the surplus-lines market, the insurers of last resort for hard-to-place risks, would not take it on (the written carrier denials are in the record). The harm is not mine alone — roughly ninety neighbors have signed a petition against the operation.

The County inspected the tank — and then said it has no authority over it.

This is the heart of the matter. The County did not deal with this operation at a distance. Its inspector made three site visits (June 22, June 29, and July 8, 2026); the FRAC tank was, in the County's own words, "recently evaluated because of the complaint"; and the County reported the tank's volume in writing to the Regional Water Quality Control Board. On that record the County found the operation "in compliance with [its] current pumper truck permit" and closed the matter with "no further action" — a closure it says it reached only after reviewing the operation with the Regional Water Quality Control Board and its own County Counsel. Yet in the same correspondence the County states that the tank "is not part of the pumper truck permit" and that "there is no regulatory authority established to oversee the use of these intermediary tanks."

An agency does not send an inspector onto a property to examine, evaluate, and measure a structure — and then clear it as requiring no further action — over a structure it has no authority to oversee. Either the County had authority over the tank and exercised it, in which case clearing an open, decomposing human-waste tank of this size a few feet from an occupied building as requiring "no further action" is a

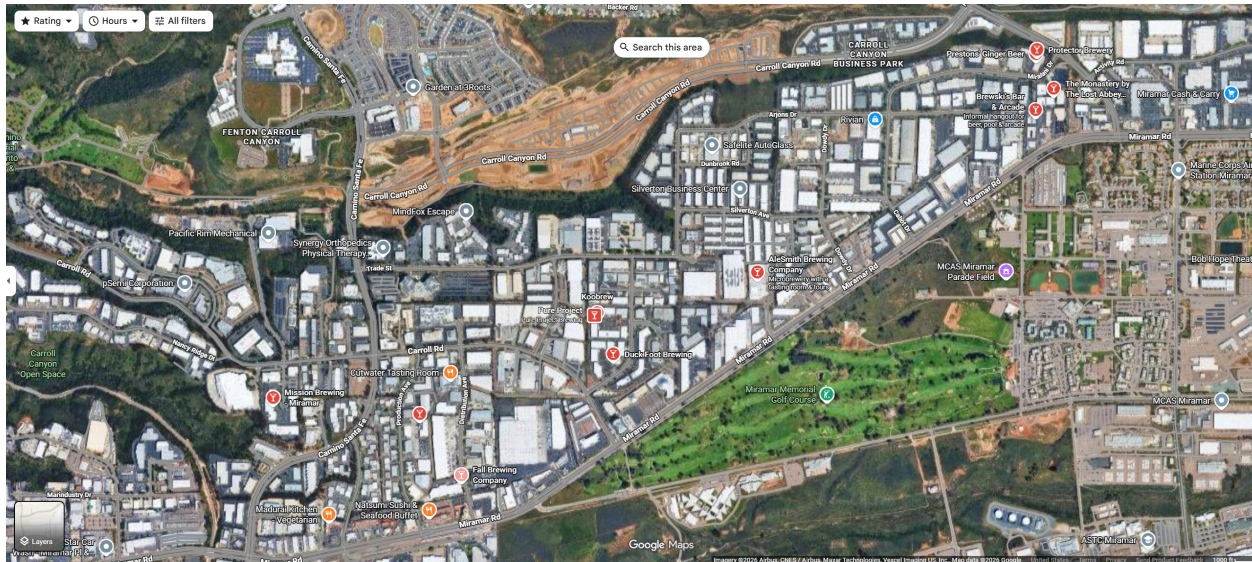
determination it must answer for; or it had no such authority, in which case its inspection and its clearance were a nullity on which no one — the County or United Rentals — may rely. It cannot be both.

The jurisdictional gap: each agency points at the other.

When the operation finally drew scrutiny, the City of San Diego and the County of San Diego each pointed responsibility at the other, and neither has taken it up. The County's own permit and the application it requires place the responsibility for approving and verifying this operation on the County; the City is the fire authority over an explosive-gas condition and opened, then abandoned, its own code-enforcement matter. Between the two, no agency will say the operation cannot lawfully continue — even though the County's own permit is the instrument under which it runs.

Why this reaches far beyond one property.

If the County may disclaim jurisdiction over a permitted hauler's on-site human-waste accumulator tank — a tank it inspected, evaluated, and measured — then every such tank the County permits is exempt from the oversight the permit scheme exists to provide, and the same void the City has left within its limits extends countywide. On the positions both agencies have taken, nothing would prevent this operation, or any like it, from being set up the same way anywhere in the City or County. The Miramar brewery district shown below is **only one regional example** — a place where an open, decomposing human-waste tank set beside dozens of breweries and food-and-beverage businesses would be unthinkable — yet, by the agencies' own account, no agency would hold jurisdiction to stop it there either; the identical gap applies to any comparable district across San Diego. The practical result is that the operation on Federal Boulevard is, on this record, protected from any government oversight whatsoever — and only a firm, on-the-record determination of responsibility can correct that, the determination both agencies have so far withheld.



One regional example only — the Miramar brewery district (“Beeramar”), San Diego: a dense cluster of breweries and food-and-beverage businesses beside MCAS Miramar. On the agencies’ stated positions, nothing would prevent the same open human-waste operation from being placed here — and the identical jurisdictional gap applies to any comparable district across the City and County. (Imagery: Google Maps.)

What I have done, and what I am asking.

I have presented Government Claims Act (§ 910) claims to both the City of San Diego (acknowledged as Claim No. 43952) and the County of San Diego; submitted a Report and a supplement to the District Attorney; and filed two verified writ petitions against the City of San Diego to compel it to act (Cotton v. City of San Diego, Nos. 26CU043242C and 26CU045721C, San Diego Superior Court). What I seek is a determination of who is responsible for this operation and whether it may lawfully continue, and an order that it cease if it may not. My claims against the City and the County are presented separately and speak for themselves. My August 31, 2026 [Report to the District Attorney](#) is published online; the balance of the documentary record — the permit, the disposal-destination mismatch, and the County’s handling of the complaint — is available on request.

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