

October 20, 2025

Coastal Waste & Recycling LLC

Attn: Maci Dean

mdean@coastalwasteinc.com

Re: Water - Stormwater Industrial Inspection (including Sector checklist(s))

PRO DISPOSAL USA (BARNWELL RESOURCES) CLASS 2 LANDFILL

County: Beaufort

NPDES Permit #: SCR006605 Inspection Start Date: 10/9/2025 Inspection End Date: 10/9/2025

Dear Maci Dean:

The South Carolina Department of Environmental Services (Department) conducted a routine Water - Stormwater Industrial Inspection (including Sector checklist(s)) of PRO DISPOSAL USA (BARNWELL RESOURCES) CLASS 2 LANDFILL on 10/9/2025 to determine compliance with R.61-9 Water Pollution Control Permits and corresponding NPDES permit. **During the inspection, deficiencies were observed.** Enclosed is a copy of the inspection report for your review. Observations and deficiencies are summarized on the last page(s) of the report.

The Department requires that you submit a Corrective Action Plan (CAP) through your ePermitting account by **November 7, 2025** that addresses the deficiencies noted in the inspection report. The CAP must include:

- 1. Details of corrective actions needed to address each deficiency and a timeline for completion, and
- 2. A summary or report stating the corrective actions that have already been taken.

Please note that failure to comply with the NPDES permit conditions places you in violation of Section 48-1-110 of the Code of Laws of South Carolina. Failure to properly correct the noted deficiencies or failure to fulfill the above actions may subject you to enforcement actions, which may include the assessment of civil penalties as set forth in the Pollution Control Act, S.C. Code Ann. § 48-1-330 (2008).

If you have any questions regarding the inspection, please contact me at Jackson.Warren@des.sc.gov or (843) 473-6189.



Please acknowledge receipt of this email and the attached documents by replying back to this email.

Sincerely,

Jackson Warren

Jackson D. Warren Environmental Health Manager II BRLS - Beaufort

Enclosure: Inspection Report

Reviewed By: Anthony Scott Wills



P1TJ-QJAP-426

Inspector: Jackson Warren

Start Date: 10/13/2025 Completed Date: 10/14/2025

Industrial Stormwater Inspection - SCR000000						
Ger	General Information					
Pe	Permit Number SCR006605					
1.	Inspection Start Date			10/09/2025		
1 a	ı. Inspection Start Tim	e		8:50 AM		
2.	Inspection End Date			10/09/2025		
2 a	a. Inspection End Time			10:15 AM		
3.	On-Site Representativ	ve Information				
Na	ame	Title	Telephone Number	Attended Closing Conference		
Ja	ckson Warren	SW Inspector	(843)860-8213	X		
Ma	aci Dean	Manager	(854)236-1002	Х		
5. If be	Permitting. Is there at least one A not get the appropriate sent. At least one of ser as well. If not the	Stormwater Contacts U Authorized User for the Ste name(s) and email(s) If the Authorized Users so point your contact to	Site in ePermitting? and an invite will hould be a Certified this form:			
Αι	ithorized Users will ne	ifieragreement. Also on ed to be a Notification F be the person to receiv	Recipient. Explain			
	Yes (Maci Dean)					
	Provide a general des tivities at the facility.	cription of the nature of	the industrial			
	Class 2 Landfill					
Sec	tion A					
	When a deficiency is identified, as needed, describe the problem that causes the deficiency in the comments area of each question.					
1.	Is the site active and	operating? See question	on 4 in this Section.	✓ Yes No		
	Does the facility have eneral Permit (IGP)?	coverage under the Ind	ustrial Stormwater	✓ Yes		



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Section A	
3. Does it appear that the facility can apply for a No Exposure Certification (NEC) (D 2616)?	☐ Yes ✓ No
4. Does the site appear to be eligible to apply for a Notice of Termination (NOT) (D 2609)?	☐ Yes ✓ No
5. Are the SIC codes provided on the latest Notice of Intent (NOI) correct? To aid you the SIC code manual is here: https://www.osha.gov/data/sic-manual	✓ Yes
Comments: 4953	
6. If the SIC codes are not correct, what are they and explain the change. Instruct your contact to file an Industrial Stormwater NOI modification in ePermitting to update any SIC code(s). The Stormwater Permitting group will be able to handle questions pertaining to applications and the procedures for processing.	
SIC Code provided on old NOI 4953	
Section B: SWPPP Details	
 Was there a SWPPP on site to review? If no SWPPP is available for review, do address Field Observations (Section L). 	✓ Yes
1a. Identify the date the SWPPP was prepared or last updated.	03/18/2011
1b. Is the plan up to date? The current version of the IGP was issued 5/26/22.	☐ Yes ✓ No
Violation Determined: 10/13/2025 Section 5, 5.2	
1c. Is the plan signed by the appropriate person?	✓ Yes No
1d. Is the plan certified?	✓ Yes
1e. Does the SWPPP have a site map for this facility? See Site Map Details (Section G).	✓ Yes
Section C: Pollution Prevention Team Details	
1. Are all Pollution Prevention Team details contained in the SWPPP?	✓ Yes
1a. Does the SWPPP identify each team member by name or title?	✓ Yes
1b. Does the SWPPP identify each team member's responsibilities?	✓ Yes No



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Section C: Pollution Prevention Team Details	
1c. Do the team's responsibilities address all aspects of the SWPPP?	✓ Yes
Section D: Discharges to Impaired Waters on the 303(d) Lis	st
1. Are discharges to impaired waters on the 303(d) list present?	☐ Yes ✓ No
1a. Name of the impaired waterbody and the pollutant of concern. There can be more than one impaired waterbody. There can also be multiple impairments for any given waterbody.	
1b. Has the facility monitored at least once per year for the pollutant(s) of concern? Reminder: During the fourth year of coverage, a reset of this requirement occurs regardless of results in years one through three. Reference language in 6.2.4.2.a. in the IGP.	☐ Yes ☐ No ✓ NA
Comments: Facility does not discharge into any 303(d) water.	
1c. If needed, was follow up monitoring conducted and control measures modified to meet the water quality standard(s)?	☐ Yes ☐ No ✓ NA
Comments: Facility does not discharge into any 303(d) water.	
1d. Has the facility provided written documentation that the pollutant is detected but caused by natural background sources?	☐ Yes ☐ No ✔ NA
Comments: Facility does not discharge into any 303(d) water.	
1e. Has the facility provided written documentation that the pollutant is not present and not expected to be present in the facility's stormwater discharge?	☐ Yes ☐ No ✓ NA
Comments: Facility does not discharge into any 303(d) water.	



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Section D: Discharges to Impaired Waters on the 303(d) Li	ist	
1f. If the site is claiming the inactive and unstaffed exception, verify documentation and that all industrial materials/activities are not exposed to stormwater. See 6.2.4.3. in the IGP. Comments:	☐ Yes ☐ No ✔ N/	4
Facility is not claiming inactive and unstaffed exemption.		
Section E: Discharges to Impaired Waters that have an est Maximum Daily Load (TMDL)	tablished Total	
1. Are discharges to impaired waters with a TMDL present?	✓ Yes	
1a. Name of the impaired waterbody/watershed and the pollutant of concern.		
Broomfield Creek, Beaufort River / DO		
1b. Has the facility monitored for the pollutant of concern 4 times/12 month period? There must be at least 72 hours between monitoring events.	☐ Yes 🛂 No	
Violation Determined: 10/13/2025 6.2.4.2.b		
1c. If needed, was follow up monitoring conducted and control measures modified to meet the water quality standard(s)?	☐ Yes ☐ No ✔ N	4
Comments: Facility did not monitor for pollutant of concern.		
1d. Has the facility provided written documentation that their discharges to the nearest water quality monitoring station meets the water quality standard for the pollutant(s) of concern?	☐ Yes ☐ No ✔ N/	4
Comments: Facility did not monitor for pollutant of concern.		
1e. Has the facility provided written documentation that the pollutant is detected but caused by natural background sources?	☐ Yes ☐ No ✔ N/	4
Comments: Facility did not monitor for pollutant of concern.		



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Section E: Discharges to Impaired Waters that have an established Total Maximum Daily Load (TMDL)					
1f. Has the facility provided written documentation that the pollutant is not present and not expected to be present in the facility's stormwater discharge?	☐ Yes ☐ No 🗸 NA				
Comments: Facility did not monitor for pollutant of concern.					
1g. If the site is claiming the inactive and unstaffed exception, verify documentation and that all industrial materials/activities are not exposed to stormwater. See 6.2.4.3. in the IGP.	☐ Yes ☐ No ✔ NA				
Comments: Facility is not claiming the inactive and unstaffed exception.					
Section F: Measures and Controls Details					
1a. Does the SWPPP describe the housekeeping procedures?	✓ Yes No NA				
1b. Was the preventative maintenance program in compliance? If no, explain in the comments section.	✓ Yes No NA				
1c. Were the spill prevention and response procedures in compliance? If no, explain in the comments section.	✓ Yes No NA				
1d. Was the employee training effort in compliance? If no, explain in the comments section.	☐ Yes ✓ No ☐ NA				
Violation Determined: 10/13/2025 5.1.5.1.a.iv.					
1e. Are erosion and sediment controls in compliance? If no, explain in the comments section.	✓ Yes				
1f. Is stormwater runoff management in compliance? If no, explain in the comments section.	✓ Yes				
Section G: Site Map Details					
1a. Size of the property in acres or square feet.	✓ Yes				
1b. Location of facility buildings, structures and impervious surfaces.	✓ Yes				
1c. Direction of stormwater flow (using arrows).	✓ Yes No				
1d. Locations of all existing structural control measures.	✓ Yes No NA				
1e. Identify receiving waters, if they are impaired, and if impaired, at what level (303(d) or TMDL).	✓ Yes				



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S	Section G: Site Map Details					
	1f. Location of all stormwater conveyances (e.g. pipes, ditches, swales)	✓ \	e s	No		NA
-	1g. Locations of potential pollutant sources.	✓ \	′e s	No		NA
	1h. Locations of past significant spills or leaks.		e s	No	✓	NA
>-	Comments: No past spills or leaks.					
	1i. Locations of stormwater monitoring points.	✓ \	′e s	No		
	1j. Stormwater inlet locations.	✓ \	′e s	No		NA
-	1k. Locations of outfalls including a unique ID.	✓ \	′e s	No		
-	11. Drainage area for each outfall.	✓ \	′e s	No		
	1m. If stormwater discharges from the site to an MS4, is the name of the MS4 listed on the site map?	<u> </u>	′e s	No	✓	NA
3-	Comments: Facility does not discharge into an MS4.					
	1n. Location and description of non-stormwater discharges.	<u> </u>	e s	No	✓	NA
	Comments: Facility does not discharge anything but stormwater.					
	10. Locations of fueling stations, equipment maintenance, loading and unloading areas, treatment/disposal/storage of waste, liquid storage tanks, processing/storage areas, access roads and rail lines used by carriers of raw materials, finished products, by-products and wastes, transfer areas, and machinery.	✓ \	/e s	No		NA
	1p. Location and source of run-on of pollutants from adjacent property.	<u> </u>	e s	No	✓	NA
	Comments: No run-on pollutants from adjacent property.					
S	Section H: Routine Facility Inspections					
	1. Are routine facility inspections conducted at least once/quarter? If the site is claiming the inactive and unstaffed exception, verify documentation and that all industrial materials/activities are not exposed to stormwater. See 4.1.3.a. in the IGP.	✓ \	e s	No		



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Section H: Routine Facility Inspections	
2. During each year was at least one inspection conducted when a stormwater discharge was occurring? If not enough time has passed since the site has been authorized to discharge under the IGP for this to occur, either by a new coverage or a recertification, explain in the comments section and mark "NA."	✓ Yes
Routine inspection documentation must include the following:	
3a. Inspection date and time.	✓ Yes
3b. Full name and signature of inspector	✓ Yes
3c. Weather information and description of any discharge at time of inspection.	✓ Yes
If evidence of any of the following is found and no documentation is available, violation:	, answer "Yes" to report the
4a. Previously unidentified discharges of pollutants from site.	☐ Yes ✔ No ☐ NA
4b. Control measures needing maintenance or repair.	☐ Yes ✔ No ☐ NA
4c. Failed control measures that needed replacement.	☐ Yes ✓ No ☐ NA
4d. Incidents of noncompliance observed.	☐ Yes ✓ No ☐ NA
4e. Additional control measures needed to comply with the permit.	☐ Yes ✓ No ☐ NA
Section I: Potential Pollutant Sources Details	
Does the SWPPP:	
1a. List industrial activities exposed to stormwater?	✓ Yes No
1b. Have an inventory of potential pollutants exposed to stormwater in the 3 years prior to the last update of the SWPPP?	Yes V No
Violation Determined: 10/13/2025 5.1.3.2	
1c. Identify where leaks/spills could occur that would contribute pollutants to stormwater discharges and outfall(s) that may be affected?	✓ Yes
1d. Identify where leaks/spill occurred in the 3 years prior to the last update of the SWPPP? Comments: No spills/leaks to document.	☐ Yes ☐ No ✔ NA



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S	Section I: Potential Pollutant Sources Details				
	1e. Identify the location of any salt storage piles? Comments: Salt is not stored at Facility.	☐ Yes	☐ No	✓ NA	
	1f. Include a summary of discharge sampling data from the previous IGP term?	☐ Yes	✓ No		
	Violation Determined: 10/14/2025 5.1.3.6				
	2. Was a Non-Stormwater Discharge Evaluation completed?	✓ Yes	☐ No		
	2a. Was the date of the evaluation documented?	✓ Yes	☐ No	□ NA	
	2b. Include a description of the evaluation criteria that was used?	✓ Yes	☐ No		
	2c. Include a list of the outfalls or onsite drainage points that were observed?	✓ Yes	☐ No		
	2d. Include a list of the different types of non-stormwater discharge(s) and source locations?	✓ Yes	☐ No	☐ NA	
	2e. Include a description of the action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), if any were identified.	✓ Yes	☐ No	□ NA	
S	Section J: Quarterly Visual Assessments				
5-	1. Are stormwater sample visual assessments conducted at least once/quarter? If the site is claiming the inactive and unstaffed exception, verify documentation and that all industrial materials/activities are not exposed to stormwater. See 4.2.3.b. in the IGP.	✓ Yes	□ No	□ NA	
	Quarterly visual assessment documentation must include the following:				
	2a. Sample location.	✓ Yes	☐ No	■ NA	
	2b. Collection date/time and visual assessment date/time for each sample.	✓ Yes	☐ No		
	2c. Name and signature of person(s) collecting the sample and performing the assessment.	✓ Yes	☐ No		
	2d. Nature of the discharge (e.g. runoff, snowmelt).	✓ Yes	☐ No		
	2e. Observation results (e.g. color, odor, solids present, foam, oil sheen, etc)	✓ Yes	☐ No		
	2f. Probable source of any observed results.	✓ Yes	☐ No		



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Section J: Quarterly Visual Assessments	
2g. If applicable, documentation explaining why it was not possible to take samples within the first 30 minutes of discharge.	☐ Yes ☐ No 🗸 NA
Comments: Facility was able to take samples in first 30 minutes of discharge.	
Section K: Annual Comprehensive Site Inspections	
1. Are Annual Comprehensive Inspections conducted at this facility?	✓ Yes
1a. What was the most recent inspection date?	01/16/2025
Comprehensive site inspection documentation must include the following:	
2a. Date of inspection.	✓ Yes No
2b. Name and title of personnel performing the inspection.	✓ Yes
2c. Findings from inspection of areas identified in Part 4.3.1 of the Permit.	✓ Yes
2d. Observations related to implementation of control measures including previously unidentified discharges, previously unidentified pollutants in discharges, evidence of pollutants discharging from facility outfalls and general condition of each outfall and its immediate area, or the addition of control measures.	✓ Yes
2e. If SWPPP revisions were needed during the previous year, were they documented during the annual inspection? Comments: No SWPPP revisions documented on annual inspection.	☐ Yes ☐ No ✔ NA
2f. Any incidents of noncompliance or certification that the facility is in compliance.	☐ Yes ✓ No
2g. Certification statement from Appendix B of the IGP.	✓ Yes
3. Did the facility review the most recently approved 303(d) and TMDL lists?	☐ Yes ✓ No
Violation Determined: 10/13/2025 4.3.1.e.vi.	



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Section L: Field Observation Details	
When a deficiency is identified, describe the problem that causes the defeach question.	ficiency in the comments section of
1. Did the Field Observations show the site in compliance?	✓ Yes
Photo Taken: GPS Latitude: GPS Altitude: Photo Comment:	-80.647675
1a. Were the receiving areas maintained?	✓ Yes
1b. Were the shipping areas maintained?	✓ Yes
1c. Were the process areas maintained?	✓ Yes
1d. Were the storage areas maintained?	✓ Yes
1e. Were the fueling areas maintained?	✓ Yes
1f. Were the maintenance areas maintained?	✓ Yes
1g. Were the drainage structures maintained?	✓ Yes
1h. Was erosion controlled?	✓ Yes
2. Were all pollutants controlled from leaving the site?	✓ Yes
2a. Were pollutants kept off public streets and highways?	✓ Yes
2b. Were pollutants kept off adjacent property?	✓ Yes
2c. Were pollutants kept out of waterbodies?	✓ Yes
Closing Conference	
1. Has a closing conference with the RO been performed (either person or via phone call)?	in Yes No



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Closing Conference

1a. Provide a summary of the closing conference discussion that includes who was present (include phone number if by phone), a summary of inspection findings discussed, and any other pertinent details. As applicable, also include what must be submitted to reach compliance, a summary of any compliance assistance given, and a list of educational materials provided.

If marking "NO", explain why a conference could not be held and what efforts were made to conduct a conference (detail dates and times of attempted contact).

Jackson Warren and Maci Dean discussed that the field portion of the inspection was satisfactory. However, it was also discussed that there were several problems in the on-site SWPPP including out of date.



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S	W Sector L - Landfills, Land Application Sites, and Open D	Dumps					
Ι	Instructions						
-	Use the comments section of each question to provide additional feedback. The any violations.	This should include explanation of					
>	The requirements in Subpart L apply to storm water discharges associated with industrial activity from Landfills and Land Application Sites and Open Dumps as identified by the Activity Code specified under Sector L in Table D-1 of Appendix D of the permit.						
>	This permit may authorize storm water discharges for Sector L facilities associated with waste disposal at landfills, land application sites, and open dumps that receive or have received industrial waste, including sites subject to regulation under Subtitle D of RCRA.						
Þ	Prohibition of Non-Storm Water Discharges. (See also Part 1.1.4) The following by this permit: leachate, gas collection condensate, drained free liquids, contaboratory wastewater, and contact washwater from washing truck and railed that have come in direct contact with solid waste at the landfill facility.	taminated ground water,					
S	Sector L: Landfills, Land Application Sites, and Open Dumps						
	1. Are the Preventive Maintenance Program concerns addressed?	✓ Yes					
	2. Are Erosion and Sedimentation Control concerns addressed?	✓ Yes					
	3. Is the Discharge Test Certification concern addressed?	✓ Yes					
	4. Are the Drainage Area Site Map concerns addressed?	✓ Yes					
	5. Are the Potential Pollutant Sources concerns addressed?	✓ Yes					
>-	6. Are the Inspections of Active Sites concerns addressed?	✓ Yes					
-	7. Are the Documentation Requirements concerns addressed?	✓ Yes					
В	Senchmark Monitoring						
	1. Has the facility conducted quarterly benchmark monitoring for the constituents listed on the permit?	☐ Yes ✓ No ☐ NA					
	Violation Determined: 10/13/2025 6.2.1.1						
	2. Was the average of the 4 samples below the benchmark concentration?	☐ Yes ☐ No ✔ NA					
	Comments: Facility did not conduct benchmark monitoring.						



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3. If needed, was follow-up monitoring conducted and control measures modified to meet the benchmarks? Comments: Facility did not conduct benchmark monitoring. Yes No ✓ No	IA
	^
Facility did not conduct benchmark monitoring.	Λ
	۸
Effluent Limits Monitoring	۸
1. If applicable, has the facility conducted annual monitoring for the parameters listed on the permit?	^
Comments:	
Facility is not subject to effluent monitoring.	
2. If applicable, has the facility submitted the monitoring data to the Department as required in Part 7.1 ii of the Permit?	Α
Comments:	
Facility is not subject to effluent monitoring.	
3. Was the monitoring data below the numeric effluent limits listed Yes No on the permit?	IA
Comments: Facility is not subject to effluent monitoring.	
4. If the monitoring data was above the numeric effluent limits, was an exceedance report submitted to the Department as required in Part 6.3.1?	Α
Comments:	
Facility is not subject to effluent monitoring.	
5. Has follow-up monitoring been conducted at least quarterly until the discharge is in compliance with the effluent limit?	IA
Comments:	
Facility is not subject to effluent monitoring.	

PRO DISPOSAL USA (BARNWELL RESOURCES) CLASS 2 LANDFILL (P1TJ-QJAP-426)



Violation List

Form	Determined	Description	Sec. #
Industrial Stormwater Inspection - SCR000000	10/13/2025	Reference: Section 5, 5.2	
Industrial Stormwater Inspection - SCR000000	10/13/2025	Reference: 6.2.4.2.b	
Industrial Stormwater Inspection - SCR000000	10/13/2025	Reference: 5.1.5.1.a.iv.	
Industrial Stormwater Inspection - SCR000000	10/13/2025	Reference: 5.1.3.2	
Industrial Stormwater Inspection - SCR000000	10/14/2025	Reference: 5.1.3.6	
Industrial Stormwater Inspection - SCR000000	10/13/2025	Reference: 4.3.1.e.vi.	
SW Sector L - Landfills, Land Application Sites, and Open Dumps	10/13/2025	Reference: 6.2.1.1	