



<b>Source:</b>	Silfab Solar	<b>Date/Time:</b>	3/9/2026 8:45:00 AM
<b>Source No:</b>	RMPID100000254752	<b>Type:</b>	112r - Comprehensive
<b>Source Address:</b>	7149 Logistics Lane Fort Mill, SC 29715	<b>Inspection Contact:</b>	Matthew Korzelius
<b>County:</b>	York	<b>Inspection Email:</b>	m.korzelius@silfabsolar.com
<b>Inspector:</b>	Zachary Carfley	<b>Air Number:</b>	2440-0293

**Evaluation Decision:** Follow Up

Silfab Solar is a solar panel assembly facility with plans to begin manufacturing solar panels. The manufacturing process uses silane, anhydrous ammonia, and hydrogen chloride. Silane, anhydrous ammonia, and hydrogen chloride are subject to the SC R61-62.68, Chemical Accident Prevention Provisions. The facility submitted its original Risk Management Plan (RMP) to the U.S. Environmental Protection Agency (EPA) on October 5, 2024. The facility claimed no confidential business information in its submitted RMP. As required by the Clean Air Act section 112(r)(6)(L), the facility was given the opportunity to provide an employee representative to participate in the inspection. Matthew Korzelius, Greg Basden, Mike Boggs, Treff Macdonald, David Spencer, and Richard Davis of the facility were present for the inspection. Jimmy Graves and Daniel Curry of TRC Companies, Inc. were present for the inspection. Jennifer Culver, Donnie Helms, Chuck Haynes, David Garner, and William Polino of York County were present for the inspection. I was accompanied by Rhonda Thompson of the Bureau and Jordan Noles of EPA Region 4.

Today's inspection was a comprehensive inspection of the facility's risk management program documentation. All processes covered by the risk management program that were onsite during the inspection were also visually observed. The results of the inspection were as follows:

§68.15: The facility provided documentation of the management system as required by this section.

§68.25: The facility prepared the worst-case release scenario analysis as required by this section.

§68.28: The facility prepared the alternative release scenario analysis as required by this section.

- §68.30: The facility defined offsite impacts – population as required by this section.
- §68.33: The facility defined offsite impacts – environment as required by this section.
- §68.39: The facility provided documentation for the offsite consequence analysis for both the worst-case release scenario and the alternative release scenario as required by this section.
- §68.42: The facility reported no accidents as defined in 68.42(a) in the last five years.
- §68.69: The facility provided documentation of the written operating procedures as required by this section.
- §68.71: The facility provided documentation of training as required by this section.
- §68.73: The facility provided documentation of the mechanical integrity procedures and implementation as required by this section.
- §68.75: The facility provided documentation of the management of change procedures and implementation as required by this section.
- §68.79: The facility is reminded to complete internal compliance audits every three years as required by this section.
- §68.81: The facility provided documentation of the incident investigation reporting procedures as required by this section.
- §68.83: The facility provided a written plan of action regarding the implementation of the employee participation as required by this section.
- §68.85: The facility provided documentation of hot works as required by this section.
- §68.87: The facility provided documentation for contractors as required by this section.

§68.93: The facility has coordinated response needs with local emergency planning and response organizations as required by this section.

§68.95: The facility developed and implemented procedures for emergency response and stated they had coordinated it with York County Emergency Management and the LEPC as required by this section.

§68.210: The facility indicated there has not been a RMP reportable accident with known offsite impacts.

The following items were noted during the inspection:

The facility was not operating the manufacturing process at the time of the inspection. One isotainer of anhydrous ammonia and one tube truck of silane were present at the time of the inspection. Neither container was connected to the facility's chemical distribution system. No hydrogen chloride was observed on site at the time of the inspection.

§68.65: The facility provided documentation for process safety information (PSI) as required by this section for both silane and anhydrous ammonia. PSI documentation for hydrogen chloride was not available for review during the inspection.

§68.67: The facility provided documentation for the process hazard analysis (PHA) as required by this section for both silane and anhydrous ammonia. PHA documentation for hydrogen chloride was not available for review during the inspection.

§68.77: The facility provided documentation of the pre-startup review as required by this section. The facility is reminded 68.77(b)(3) requires a process hazard analysis to be performed and recommendations have been resolved or implemented before hydrogen chloride is brought onsite.

§68.160(b)(7): The facility lists hydrogen chloride (anhydrous) (CAS Number 7647-01-0) as a process chemical. The facility is reminded to verify accuracy of submitted plan information before the chemical is brought on site.

§68.190: The facility is reminded to submit an updated Risk Management Plan to the EPA at least once every five years as required by this section.

The facility is required to submit the following documentation to the Bureau by Monday April 20, 2026:

1. Documentation of the completed process safety information and process hazard analysis of the hydrogen chloride process.

The compliance status for this facility will be determined once the above requested information is received and reviewed by the Bureau.

In addition to the Risk Management Program inspection, the assembly lines were evaluated for compliance with the facility's air permit.