

U.S. Environmental Protection Agency  
Clean Air Act Risk Management Program  
Inspection Report

Silfab Solar Inc.  
**Fort Mill, South Carolina**

Facility RMP ID: 1000 0025 4752

Inspection Team: Jordan Noles, EPA  
Zachary Carfley, South Carolina Department of Environmental Services (SCDES)  
Rhonda Thompson, SCDES

Inspection Date: March 9, 2026

Inspection Report Prepared By:

---

Jordan Noles, Inspector  
North Air Enforcement Section  
U.S. EPA Region 4

Approved by:

---

Jason Dressler, Chief  
North Air Enforcement Section

## **Inspection Report**

### **1.0 Introduction**

The U.S. Environmental Protection Agency's efforts to reduce the likelihood and severity of chemical accidents include planning and legislative initiatives such as the National Contingency Plan, the Emergency Planning and Community Right-to-Know Act (EPCRA), and the Accidental Release Prevention requirements under Section 112(r) of the Clean Air Act (CAA), as amended in 1990. This report outlines an inspection of the Risk Management Program (RMP) as mandated by Section 112(r)(7) of the CAA.

The focus of this inspection was to assess the RMP for the photovoltaic (PV) cell manufacturing processes at the Silfab Solar Inc. facility (Silfab) located in Fort Mill, South Carolina. This facility was selected for inspection at the request of the SCDES. The inspection, which was conducted on March 9, 2026, consisted of an examination of program documentation as well as site reviews of various aspects of facility operations. Personnel from the facility participated throughout the inspection. This report will provide a background of the facility and a listing of observations.

### **2.0 Background**

Silfab is located in Fort Mill, York County, South Carolina. The facility, which will manufacture PV cells for solar panels, has yet to start production, but is starting to receive the RMP-covered substances onsite. The facility will use anhydrous ammonia, silane, and hydrogen chloride for its PV cell manufacturing processes. At the time of the inspection, the facility had already received the anhydrous ammonia and silane but had yet to receive the hydrogen chloride. The processes are regulated as program level 3. According to facility records, the facility has, or will have, a maximum of 45,000 pounds of anhydrous ammonia, 103,000 pounds of hydrogen chloride (anhydrous), and 26,000 pounds of silane on site. The PV cell manufacturing processes at the facility are subject to the RMP requirements of 40 C.F.R. Part 68 and EPCRA Section 302. The background specifics are summarized as follows.

#### **Facility Identification**

Name: Silfab Solar Inc.  
Street Address: 7149 Logistics Lane  
County: York  
EPA RMP Facility ID No: 1000 0025 4752  
Dun & Bradstreet (D&B) No: 246789478  
Latitude: 35.07187  
Longitude: -80.94328

Name, address and phone of corporate parent company:

Owner/Operator: Silfab Solar Inc.

Mailing Address: 240 Courtneypark Drive East Mississauga, Ontario, Canada

Phone: (905) 255-2501

Facility Personnel

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:

Name: Matt Korzelius

Title: Facilities Director

Phone: (716) 949-0241

Email: m.korzelius@silfabsolar.com

Name and title of emergency contact:

Name: Matt Korzelius

Title: Facilities Director

Day phone: (716) 949-0241

24-hour Phone:(716) 225-6822

Email: m.korzelius@silfabsolar.com

Name and titles of stationary source personnel and outside personnel involved in site inspection (*accompanied site tours, provided documents and explanations*):

<b>Name</b>	<b>Title/Company</b>	<b>Phone</b>	<b>Email</b>
Greg Basden	Director of Operations/Silfab	(205) 233-2085	g.basden@silfabsolar.com
T. MacDonald	COO/Silfab	(416) 788-8200	t.macdonlad@silfabsolar.com
Mike Boggs	CPO/Silfab	(864) 704-3905	m.boggs@silfabsolar.com
Jennifer Culver	Building Official/York County	(803) 909-7208	Jennifer.Culver@yorkcountysc.gov
Donnie Helms	Fire Marshall/York County	(803) 620-2270	Donnie.Helms@yorkcountysc.gov
Chuck Haynes	OEM Director/York County	(803) 288-3723	Chuck.Haynes@yorkcountysc.gov
David Garner	Ast. Co. Mng./York County	(839) 270-9195	David.Garner@yorkcountysc.gov
William Polino II	OEM EM Specialist/York Co.	(803) 207-0320	William.Polino@yorkcountysc.gov
Jimmy Graves	Project Manager/TRC	(864) 420-3850	jgraves@trccompanies.com
Dan Curry	Consulting	(864) 787-7923	dcurry@trccompanies.com
David Spencer	Training Consulting/Silfab	(252) 377-7414	d.spencer@silfabsolar.com
Richard Davis	H&S Mng./Silfab Solar	(803) 374-5811	r.davis@silfabsolar.com
Matt Korzelius	Facilities Director/Silfab	(716) 949-0241	m.korzelius@silfabsolar.com

*Note: This is not a union facility.*

## Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: October 5, 2024

Date of most recent submissions: October 5, 2024

Process: PV Cell Manufacturing

Process ID: 1000145861

RMP Program Level: Program Level 3

NAICS code: 334413 (Semiconductor and Related Devices Manufacturing)

### 3.0 Observations

The inspection of Silfab evaluated various sections of the RMP regulations (40 C.F.R. Part 68, Program Level 3) and the inspection checklist included in "Guidance for Conducting Risk Management Programs Inspections under Clean Air Act Section 112(r)." The inspection included an opening conference where inspectors reviewed documents associated with the facility's Risk Management Plan. The discussion was followed by a tour of the facility's PV cell manufacturing process areas. An inspection out-brief was conducted where inspectors described their observations. Observations from the RMP inspection at the Silfab facility are discussed below:

1. 40 C.F.R. § 68.65(a) requires the owner or operator to complete a compilation of written process safety information (PSI) before conducting any process hazard analysis (PHA) required by 40 C.F.R. Part 68 and to keep the PSI up to date. The compilation of written PSI is to enable the owner or operator and the employees involved in operating the process to identify and understand the hazards posed by those processes involving regulated substances. This PSI shall include information pertaining to the hazards of the regulated substances used or produced by the process, information pertaining to the technology of the process, and information pertaining to the equipment in the process.
  - At the time of the inspection, inspectors reviewed the facility's compiled PSI for the anhydrous ammonia and silane processes. PSI documentation was not available for the hydrogen chloride process. As noted above, hydrogen chloride was not yet onsite at the time of the inspection. All PSI required by 40 C.F.R. § 68.65 must be in place before the PHA is conducted, which must be completed before the hydrogen chloride is onsite.
2. 40 C.F.R. § 68.67(a) requires the owner or operator to perform an initial PHA (hazard evaluation) on processes covered by 40 C.F.R. Part 68. The PHA shall be appropriate to the complexity of the process and shall identify, evaluate, and control the hazards involved in the process. The owner or operator shall determine and document the priority order for conducting PHAs based on a rationale which includes such considerations as extent of the process hazards, number of potentially affected employees, age of the process, and operating history of the process.

- At the time of the inspection, the PHAs were reviewed for the anhydrous ammonia and silane processes. PHA documentation was not available for the hydrogen chloride process. The PHA for the hydrogen chloride process must be complete and onsite before the hydrogen chloride is delivered.