



CITADEL EHS

assess resolve strengthen

Joe Burke
Chief Communications Officer
FORT MILL SCHOOL DISTRICT
2233 Deerfield Drive
Fort Mill, South Carolina 29715

Re: Citadel Project No. 2732.1001.0
Fort Mill School District, Flint Hill Elementary and Middle Schools
Health, Safety, and Emergency Planning Recommendations

Dear Mr. Burke:

Citadel EHS is pleased to submit the attached Health, Safety, and Emergency Planning Recommendations for Flint Hill Elementary and Middle Schools. This document summarizes key activities, findings, and site-specific recommendations developed to support safe school operations, emergency preparedness, and community engagement.

If after your review you have any questions or require additional information, please do not hesitate to telephone me at (414) 233-2866.

Sincerely,
CITADEL EHS

Julie Wojnowski

Julie Wojnowski
Practice Leader, ESG & Sustainability

Enclosure



Fort Mill School District
2233 Deerfield Drive
Fort Mill, South Carolina 29715

Flint Hill Elementary and Middle Schools Health, Safety, and Emergency Planning Recommendations

July 21, 2025,

Citadel Project Number 2732.1001.0

Site:

Flint Hill Elementary School #12
392 Gold Hill Road
Fort Mill, SC 29715

and

Flint Hill Middle School #7
360 Gold Hill Road
Fort Mill, SC 29715

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1.0 INTRODUCTION

Opening new schools in proximity to industrial activity requires more than technical oversight—it demands operational readiness, coordinated planning, and clear communication with the community. This Health, Safety, and Stakeholder Engagement Plan was developed to help the Fort Mill School District (District) prepare for the opening of Flint Hill Elementary (#12) and Flint Hill Middle School (#7), day-to-day operations, and for unexpected events that may require swift, informed response.

Built alongside Citadel's Air Quality Monitoring Plan (Project No. 2732.1001.0) and Implementation Plan (Project No. 2732.1002.P), this document focuses on turning environmental insight into practical action. It outlines the activities completed to assess community concerns, evaluate interagency coordination, and strengthen site-level systems, while offering targeted recommendations that support staff training, emergency procedures, public communication, and student safety.

The strategies detailed in this plan are grounded in national safety frameworks, aligned with local operational practices, and designed to empower everyone, from facilities staff to families, with the information and tools they need to respond with confidence. Readers are encouraged to read Citadel's Air Quality Monitoring Plan (Citadel Project No. 2732.1001.0) and the Air Quality Monitoring Implementation Plan (Project No. 2732.1002.P) to understand the full scope of air quality monitoring and reporting that inform the engagement, preparedness, and communication strategies outlined in this plan.

2.0 BACKGROUND AND SUPPORTING ACTIVITIES

The development of this plan was informed by a range of activities designed to ensure a comprehensive understanding of site-specific risks, community concerns, and operational needs. These activities included:

Stakeholder Engagement and Institutional Coordination

As part of its support to the District, Citadel engaged a wide range of stakeholders, including District leadership, organized community groups, parents and grandparents, Silfab Solar representatives, and York County Emergency Management officials to better understand local priorities and to build alignment across the institutions responsible for school and community safety. Citadel also attended the City of Rock Hill's public hearing regarding Silfab Solar's proposed Industrial Pretreatment Wastewater Permit to observe the regulatory review process and gain additional insight into public concerns related to wastewater and regulatory oversight.

Through these engagements, Citadel gathered valuable perspectives on public understanding, expectations, and areas of concern. Families with students set to attend Flint Hill Elementary raised thoughtful questions about air quality monitoring, the role of nearby industrial activity, and the coordination between the District and external emergency response agencies. Of particular concern were potential events such as gas leaks, fires, or chemical releases, scenarios that prompted questions about how the District, Silfab Solar, the Town of Fort Mill, and the York County Office of Emergency Management would make decisions, notify the public, and coordinate protective actions for students, staff, and the surrounding neighborhoods.

In addition, many parents and grandparents voiced a desire for greater clarity around the District's Emergency Operations Plan (EOP), specifically, how and when shelter-in-place, evacuation, reunification, or displacement procedures would be activated and communicated. Several also expressed concern about longer-term disruptions, such as the possibility of school closures lasting a week or more, and how continuity of learning and family logistics would be maintained under those circumstances.

To further support institutional alignment, Citadel conducted an informal site walk of the Silfab Solar facility with the Plant Facilities Director to better understand chemical handling practices, onsite safety systems, and emergency infrastructure. Follow-up meetings with Silfab leadership provided opportunities to discuss the recommendations contained in the Air Quality Monitoring Plan (Project No. 2732.1001.0), [the Air Quality Monitoring Implementation Plan \(Project No. 2732.1002.P\)](#), and this plan. Citadel also spoke with Chuck Haynes, Emergency Management Director for York County, to emphasize the importance of a unified, coordinated approach to emergency preparedness across jurisdictions.

Together, these efforts shaped the structure and priorities of this plan, reinforcing the need for more clearly defined roles and responsibilities, consistent protocols, and accessible communication tools that can be activated quickly and clearly during an emergency.

Documents Review

In addition to stakeholder engagement, Citadel reviewed a wide range of technical, regulatory, and planning documents related to Silfab Solar's operations, chemical safety protocols, environmental health standards, and emergency preparedness systems.

The review of the following resources provided essential context for understanding site-specific risks, applicable safety practices, and the degree of alignment across industrial, educational, and public-sector entities.

- Fort Mill School District Policy Manual, and Emergency Operations Policies and associated annexes
- Silfab Solar documentation, including the Fire Emergency Action Plan (FEAP), Risk Management Plan (RMP), hazardous materials inventory, and facility emissions reports
- Regulatory materials and public disclosures from the South Carolina Department of Health and Environmental Control (DHEC) and the U.S. Environmental Protection Agency (EPA), including permitting documents and community presentation materials, including but not limited to what information outlined and linked by DHEC on their [Silfab Solar Environmental Sites & Projects](#) page.
- University of South Carolina Phase 1 and Phase 2 Health Risk Assessments
- Southeast Pediatric Environmental Health Specialty Unit letter in response to Silfab Facility Near Child Learning Centers
- Information and resources provided by the Citizens Alliance for Government Integrity (CAGI) and the Coalition to Protect Fort Mill (CPFM) via www.movesilfab.com
- ANSI/CGA G-13-2016, Storage and Handling of Silane and Silane Mixtures, the recognized industry standard for the safe handling of silane gas

Together with input gathered through public engagement, these materials offered a comprehensive view of the current state of emergency preparedness and environmental planning across the District and its institutional partners. While community members raised important questions about roles, communication protocols, and coordinated response, the documentation reviewed also reflected a strong baseline of planning, consistent with national standards and best practices.

The following section outlines areas where existing emergency plans already align—providing a solid foundation for the recommendations and enhancements presented throughout this document.

3.0 EXISTING EMERGENCY PLANNING ALIGNMENT

Both the District and Silfab Solar have established emergency response plans that reflect a strong operational foundation and alignment with nationally recognized safety and incident management standards. These plans demonstrate a clear understanding of each organization's respective risks and a shared commitment to coordinated, well-structured preparedness.

Each entity has adopted the National Incident Management System (NIMS) and incorporates the Incident Command System (ICS) as the core framework for emergency response. Roles and responsibilities are clearly defined to support interagency communication, decision-making, and operational coordination in accordance with NIMS/ICS best practices.

Personnel from both the District and Silfab Solar complete Federal Emergency Management Agency (FEMA) IS-100 and IS-700 training, which establishes a shared baseline for understanding emergency roles, terminology, and procedures. These trainings are reinforced through regular drills and tabletop exercises, allowing staff to practice roles, test coordination protocols, and build operational familiarity in preparation for real-world incidents.

Both plans also reflect coordination with external emergency response partners, including the York County OEM, local fire departments, emergency medical services (EMS), and law enforcement agencies. These partnerships are evident in joint planning efforts, facility safety reviews, and the development of integrated response protocols that address both school-specific and adjacent industrial risks.

With this alignment in place, District, Silfab Solar, and local emergency response partners are well-positioned to refine roles, communication pathways, and coordinated response procedures for incidents that could affect the Flint Hill Schools campus and surrounding area. This shared foundation enhances their ability to respond collaboratively to emergencies and provides a solid platform for continued coordination around site-specific risks and operational planning.

4.0 PLAN COMPONENTS

Building on the strengths identified in this plan and informed by stakeholder input, document review, and coordination efforts, the following components represent targeted opportunities to enhance emergency readiness, environmental health, and community trust at the Flint Hill campuses. Each is designed to address site-specific needs while aligning with established best practices in school and industrial safety. Together, these recommendations support a more integrated, transparent, and actionable preparedness strategy.

4.1 Emergency Protocol Coordination

While the District and its partners each maintain their own emergency response plans, effective coordination depends on how well those plans align—and function together—at the school-site level. It is not enough for procedures to exist on paper; they must be consistent, compatible, and ready to operate in tandem during a real-world event. Just as important, the ways in which these plans connect should be clear with a consolidated version being made accessible to the public. The recommendations below are intended to formalize shared expectations, strengthen

interagency coordination, and increase transparency around how emergency decisions are made and communicated, specifically for Flint Hill Elementary and Middle Schools.

Recommended actions include:

- **Define shared emergency scenarios** such as gas leaks, fires, or chemical releases—under which shelter-in-place or evacuation procedures would be initiated at the Flint Hill Schools campus. Develop written protocols that detail how District, Silfab Solar, and York County OEM will coordinate actions and communications in these situations.
- **Develop a Flint Hill Schools–specific Emergency Response Plan and Implementation Charter** to outline roles and responsibilities for all school-based personnel (including facilities, safety, administrative, and instructional staff), specify response procedures, and include reunification and student relocation logistics, such as pre-identified alternate learning sites and transportation plans for extended closures.
- **Arrange and conduct annual joint drills and tabletop exercises** involving the District, Silfab Solar, and York County OEM to rehearse the defined scenarios and test coordination, communication, and decision-making in real time. These exercises should be planned collaboratively and used to identify operational improvements prior to formal documentation.
- **Update the District’s EOP** to formally reference and integrate the District’s existing Chemical Incident Response Plan Annex. Revisions should reflect Flint Hill–specific scenarios and coordination protocols, clarify how external notifications will lead to campus-based decisions, and include role-specific procedures and training requirements for all responding staff.
- **Establish a formal Memorandum of Understanding (MOU) among District, Silfab Solar, and the York County Office of Emergency Management** to document the shared emergency scenarios, response protocols, communication procedures, and joint training commitments described above. The MOU should serve as the operational foundation for site-level response and a durable framework for ongoing collaboration.

4.2 Indoor Environmental Quality and Operations

Maintaining optimal indoor conditions requires more than reactive maintenance, it demands proactive, measurable systems that support student and staff wellbeing. In areas near industrial or high-traffic zones, indoor air and water quality, moisture control, and background noise can all impact the learning environment.

These considerations are especially important in school settings, as noted by the Southeast Pediatric Environmental Health Specialty Unit (PEHSU), which has recommended enhanced monitoring and mitigation measures for schools located near industrial operations. Informed by this guidance and aligned with the WELL Health-Safety Rating, the actions below are designed to help Flint Hill Schools sustain healthy, high-performing indoor spaces.

Recommended actions include:

- **Review quarterly air sampling results to evaluate whether stand-alone HEPA and activated carbon filtration units** are necessary to reduce exposure to airborne pollutants such as fine particulate matter (PM2.5/PM10) and volatile organic compounds (VOCs), as recommended in pediatric environmental health guidance.
- **Perform the following as required to earn the maximum number of points in the WELL Health-Safety Rating:**

- Conduct annual drinking water quality testing at select drinking water dispensers to evaluate turbidity, pH, residual (free) chlorine, and total coliforms (if chlorine is not detected)
- Implement a mold and moisture plan and a legionella management plan, to prevent microbial exposure, particularly during periods of high humidity or reduced occupancy
- **Consider conducting indoor sound testing** to evaluate ambient noise levels from nearby construction, industrial activity, or traffic, should exterior noise intrusion become disruptive.

4.3 Community Engagement and Continuity Planning

Building on the District's EOP and the recommendations outlined in the Emergency Protocol Coordination and Indoor Environmental Quality and Operations sections, this component focuses on making preparedness and health-protective actions visible, understandable, and actionable for the broader school community.

Many of the systems and protocols described in this plan, such as indoor air filtration, emergency thresholds, and communication procedures, are only effective if families and staff know what to expect, why these measures matter, and how to respond when activated. Clear, consistent outreach must be paired with communication that is accessible, practical, and relatable. The following actions are intended to strengthen family-facing readiness, reinforce continuity of operations, and build public confidence through proactive engagement and education.

Recommended actions include:

- **Host a facilitated public comment and discussion session**, led by Citadel and attended by District and school leadership, with participation from school board members when possible. The session is intended to:
 - Offer families a structured forum to raise questions about school safety, environmental monitoring, and construction-related considerations
 - Promote transparency and respectful dialogue
 - Ensure community feedback is captured and integrated into future planning

- **Create clear communication templates and visual instructions** to support family navigation during shelter-in-place, evacuation, or school displacement events.
- **Deliver targeted training for school staff** to support confident execution of site-based emergency procedures. Training should focus on recognizing signs of chemical exposure or environmental distress in students, applying basic protective action principles drawn from HAZWOPER awareness (such as time, distance, and shielding), understanding communication protocols during incidents, and supporting students with access or functional needs during emergencies, and implementing shelter-in-place or evacuation procedures.
- **Integrate environmental health awareness into student education** using age-appropriate programming that explains emergency preparedness and environmental safety in a calm and constructive manner.
- **Conduct regular informational sessions for families and staff** to share air quality monitoring results, preparedness updates, and upcoming health and safety planning activities.

5.0 CONCLUSION

This plan is not a prediction of what will happen, but provides an outline for how to respond to emergencies. Its value lies in the groundwork it sets: clear roles, coordinated systems, and consistent communication, all ready to activate when needed. As Flint Hill Elementary and Middle Schools welcome students, the Fort Mill School District and its partners are equipped not only with plans on paper, but with the capacity to act with clarity, with alignment, and with the trust of the community they serve.

6.0 SIGNATURES

This Flint Hill Elementary and Middle Schools Health, Safety, and Emergency Planning Recommendations was Prepared by:

Julie Wojnowski
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Reviewed by:

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