

**Q: What is the district's threshold for protecting students - is collusion between county officials and industry not enough?**

A: The district remains committed to providing a safe and healthy learning environment for all students. We are working within our authority to address concerns at our school sites.

**Q: Does the district consider downplaying risks to children an acceptable form of communication?**

A: The district has not downplayed any risks related to this matter or any other matter facing our schools. We are working within the authority we have available to us and sharing all information we have with our community.

**Q: Over the past 10 months, why does the district often make references to a policy to not engage parents during open forum but then not create an opportunity to have open dialogue or at least follow up to questions later? Why do constituents have to pay \$15 thousand to talk through a consultant? Who created this policy - Fort Mill school board or is this guidance from attorneys? Note: Policy BEDH which references public participation at meetings permits the board "to discuss the matter within time limitations".**

A: As is stated in district policy, while they are held in public, school board meetings are not a public forum. They are intended to allow the school board to perform the duties assigned to them by law in a public setting. The operation of board meetings is in line with Robert's Rules of Order as provided by the South Carolina State Department of Education in policy BCBF.

**Q: Why has the district chosen not to formally oppose zoning decisions that allow heavy industrial operations directly adjacent to schools?**

A: The school district does not have any input or authority over zoning, permitting or licensing for commercial business.

**Q: How much weight does the district place on maintaining good relationships with county officials versus advocating for the health and safety of its students? Does the district understand it damaged its credibility by choosing to side with industry over its own families?**

A: The district works to maintain working relationships with all local, state and federal entities as well as a positive and supportive relationship with our community. The district has remained focused on our school sites and is working within our authority to address concerns.

**Q: What message does it send to parents when the district recognizes danger privately but stays silent publicly?**

A: The district has remained committed to transparency and has shared all available information with the public regarding this issue.

**Q: Why did Citadel EHS only run tests for the 8 or so chemicals rather than Silfab's full inventory? What source document is Citadel EHS using for your chemical inventory?**

A: Chemicals selected for inclusion in the Monitoring Plan were prioritized based on storage quantity, inherent toxicity, the existence of established human health screening levels, and the potential for airborne presence within the school environment.

**Q: Citadel EHS's work has been criticized by communities including in Glendale where it has been alleged that many small mistakes and assumptions that all added up to the original desired outcome of the entity that hired Citadel, related to a Lifecycle Analysis of natural grass vs astroturfing on a ball field. You were hired and paid by the Fort Mill school district. How can parents trust your findings are independent and not influenced by who funds the study?**

**A:** While Citadel's scope of work for the [\*City Of Glendale's Turf Lifecycle Analysis \(Lca\) & Triple Bottom Line Assessment \(3bl\)\*](#) is very different, in both scope and context, from that of the scope for the Fort Mill School District. With that in mind, two points are important to understand:

- Our recommendations for the City of Glendale were based on practical, science-based analysis tailored to the City's specific safety, maintenance, and usage requirements.
- That analysis included both natural grass recommendations and artificial turf recommendations, depending on which option best met each site's needs.
- Several groups had stated publicly that they would not support artificial turf in any scenario, regardless of evidence or trade-offs.
- As a result, our technical work became part of a larger policy disagreement, not a dispute about the accuracy or integrity of the scientific methods.

In short, those criticisms reflected policy preference, not factual errors or intentional bias in Citadel's work.

Beyond professional ethics, Citadel's work for the Fort Mill School District includes multiple independent safeguards, or checks, that prevent conclusions from being influenced by funding source or political pressure:

- All materials and air samples are analyzed by accredited, third-party laboratories that Citadel does not control.
- Certified Industrial Hygienists (CIHs) on the project team are bound by strict ethical and professional standards that prohibit altering, tailoring, or suppressing results.
- All methods are fully documented, transparent, and open to review, ensuring that findings are reproducible.

These protections exist specifically so that school districts, families, and communities receive unbiased, high-quality science, regardless of who hires us. Citadel cannot, and would not, shape conclusions based on who funds the study. Our reputation, certifications, and professional standing depend on accuracy and independence.

Citadel's responsibility in every project is to the science, the data, and the public's health, not to any predetermined outcome. We are committed to providing the Fort Mill School District and its families with:

- Clear, science-based information
- Transparent methods
- Data that can be independently verified
- Recommendations that prioritize student health, safety, and long-term sustainability

Citadel will continue to welcome questions from the community and are happy to explain our methodology, assumptions, and findings as the project continues. Your trust is important, and we will earn it through openness, professionalism, and high-quality work.

**Q: What safeguards, other than Citadel EHS's word, exist to ensure your conclusions aren't shaped by financial pressure from the district?**

A: Citadel's conclusions are not based on internal judgment alone. Every part of the air monitoring and health-safety process involves independent oversight, standardized methods, and third-party verification.

For air quality monitoring, sampling media and laboratory analysis are provided by third-party laboratories that are independently accredited through the American Industrial Hygiene Association (AIHA). These labs operate under nationally recognized methods established by the EPA, NIOSH, and OSHA, which govern testing thresholds, calibration standards, and analytical quality control. Each sampling event includes field blanks, unused media opened and resealed on-site, to confirm that no contamination occurred during collection or transport. Air quality monitoring equipment is manufactured, calibrated, and performance-checked by independent sensor providers, ensuring all units operate within their certified specifications.

Citadel's professionals hold credentials governed by independent certification boards, such as Certified Industrial Hygienist (CIH), Certified Hazardous Materials Manager (CHMM), and Safety and Compliance Professional (SCP), which require adherence to strict codes of ethics and continuing education.

Beyond air quality, the District's broader health and safety work is also reviewed externally through the WELL Health-Safety Rating, administered by the International WELL Building Institute (IWBI). IWBI requires documented evidence, including District policies, procedures, and photographs, before independently verifying that all 15 health and safety features are met.

Together, these external checks, from accredited labs and certified equipment to third-party credentialing and independent health-safety review, create multiple safeguards ensuring that Citadel's findings remain objective, transparent, and scientifically defensible.

**Q: Citadel EHS sampling is scheduled quarterly and over limited 24-hour periods. If a release occurs between those times, isn't it true that the monitoring will not detect it?**

A: The quarterly laboratory sampling is just one part of a layered monitoring system. In addition to those scheduled 24-hour sampling events, continuous perimeter monitors operate 24 hours a day, every day, measuring fine particles, total VOCs, and gases that are cross-sensitive to compounds like silane and other flammable gases.

If a release were to occur between scheduled lab tests, the real-time perimeter sensors would immediately record the change and alert Citadel, allowing the data to be reviewed and verified right away. The quarterly laboratory testing then serves to confirm long-term air quality trends and validate that the continuous monitoring remains accurate and reliable.

**Q: Citadel EHS proposed comparing results to screening levels like EPA's Regional Screening Levels and DHEC/DES's Toxic Air Pollutant standards. Are these guaranteed to protect sensitive children, including those with asthma or other vulnerabilities, or are they generalized regulatory thresholds?**

A: No health-based air standard can promise complete protection for every individual. However, the federal EPA Regional Screening Levels and state SCDHEC/DES Toxic Air Pollutant standards used in Citadel's monitoring plan are among the lowest and most health-protective levels available.

These federal and state screening levels are built using research specific to children, accounting for faster breathing rates, smaller body size, and developing lungs, and assume continuous exposure, 24 hours a day, 365 days a year. Given students and staff spend only a fraction of that time at school, the actual exposure potential is far lower.

These values are intentionally set far below the limits used for adult workers in factories or laboratories. That's because workplace standards were designed decades ago for healthy adults, while these public-health values are written to protect against possible long-term effects in children and other sensitive groups, not just short-term comfort.

When both federal and state values exist, Citadel uses the stricter one, the level that offers the greater margin of safety. This means the district's decisions are guided by the most protective standard available, not simply what's required by regulation.

In practical terms: Air testing at the schools is compared to numbers that already include large safety cushions, enough to protect children, including those with asthma, even if they were exposed every day for years.

If any result ever approaches these health-based levels, Citadel would immediately verify the data and coordinate with the Fort Mill School District, Silfab Solar, and county official, as needed, to investigate the source and take any needed corrective actions.

**Q: Hydrogen fluoride is a highly corrosive gas. Can Citadel EHS confirm that even short-term exposure at relatively low concentrations can cause severe lung damage, blindness, or death?**

A: Citadel cannot confirm that short-term exposure of Hydrogen Fluoride (HF) at relatively low concentrations would cause those outcomes, because the health effects of HF depend on both concentration and duration of exposure, not simply the presence of the chemical.

Citadel's role is to identify, through its air quality monitoring plan, if HF is present in the air inside or outside the schools at levels near or above the U.S. Environmental Protection Agency (EPA) Regional Screening Levels and South Carolina Toxic Air Pollution levels established. HF is included in the air quality monitoring plan and is sampled quarterly indoors and outdoors, with results compared to conservative EPA and South Carolina screening levels. In all sampling events to date, HF has not been detected, and there is no evidence of HF in school air at concentrations associated with acute health effects for students or staff.

If future monitoring ever showed HF trending upward or approaching health-based thresholds, Citadel would immediately review and verify the measurements and advise the district on appropriate next steps in coordination with public-health agencies.

**Q: Silane is described as "pyrophoric and toxic." Isn't it true that silane ignites spontaneously in air, meaning a release could result in fire or explosion near the school?**

A: Silane can ignite on its own when it mixes with air, which is why it must be handled inside specialized, enclosed equipment and under strict engineering controls that follow CGA/ANSI G-13 standards for silane systems, among others. At Silfab, this equipment includes multiple automatic safety mechanisms. If a leak begins inside the system, several sensors detect it immediately, gas detectors, pressure sensors in the contained double-layer gas piping, and leak detectors inside the gas storage containers. When any of these sensors detect a specific pressure changes or leaks, the system automatically shuts off silane at the source as a containment measure. If a leak were to ignite inside the containment systems or enclosures, ultra violet/infrared radiation (UV/IR) flame detectors, which identify the specific light and heat given off by a silane flame, instantly activate wet-fire-suppression and other built-in fire-protection controls, to keep the event contained.

Off-site fire or explosion scenarios are evaluated through Silfab's federally required Risk Management Plan (RMP) and fire-protection engineering reviews conducted by the EPA, South Carolina DHEC/SCDES, county officials. Citadel's role is to provide independent air-quality monitoring at the schools and to support the district in school-site emergency preparedness and coordination with Silfab and county responders.

**Q: Formaldehyde and lead are included in Citadel EHS's Chemicals of Potential Concern (COPC) list. Is there any safe level of exposure to a carcinogen like formaldehyde or a neurotoxin like lead for a child?**

A: For lead, there is broad agreement among public health and scientific experts that exposure should be kept as low as possible, especially for children. That is why the U.S. Environmental Protection Agency (EPA) sets national air-quality standards for lead under the Clean Air Act to protect public health with an adequate margin of safety, meaning those limits are set well below the levels where health effects have been observed and include an added buffer for sensitive groups such as children.

For formaldehyde, small amounts are commonly found in indoor air because it can be released in very low quantities from everyday materials, such as certain wood products, paints, fabrics, and cleaning agents. These background levels are present in nearly all buildings, not just schools, and they typically decline naturally over time as new materials finish curing and ventilation continues.

At Flint Hill, measured formaldehyde levels were low and consistent with what is normally seen in new, well-ventilated school buildings. To evaluate those results, Citadel compared them against two conservative, health-based benchmarks, EPA's Regional Screening Levels and South Carolina's Toxic Air Pollutant standards, and used whichever value was more protective. Both sets of standards are designed to be highly conservative, serving as early indicators for further review rather than thresholds of immediate health concern.

Citadel's role is to apply the most health-protective, science-based standards available, continue monitoring over time, and recommend additional review or precautionary actions if results ever suggest that might be needed.

**Q: What are the financial costs of monitoring air quality indefinitely? Where will these sensors and other equipment be sourced from?**

A: The overall cost of air quality monitoring depends on how long the program continues, how often quarterly sampling events are conducted, and whether any additional testing is needed based on data

trends or unusual readings from the continuous monitors. If testing continues on the same schedule in future years, costs are expected to remain generally consistent, with normal variability due to inflation, equipment maintenance, or laboratory fees.

The district's current program was developed to balance scientific thoroughness and financial sustainability, and any future extensions or modifications will include updated cost projections to maintain transparency and data-driven decision-making.

**Q: Does FMSD recognize that it is a body politic and corporate, a property owner with rights?**

A: Yes.

**Q: Is the district's legal obligation to ensure a safe learning environment being compromised by political considerations?**

A: No, the district is not under any political pressure in this or any other matter. The district operates in accordance with all state and federal laws.

**Q: What specific steps has the district taken to evaluate whether current zoning decisions comply with state and local laws designed to protect schools?**

A: The district has no authority related to zoning, permitting or licensing of commercial businesses.

**Q: If the district didn't believe there was a real risk, why did it spend taxpayer money to hire a consultant?**

A: The district initiated the contract with Citadel EHS to perform this project in response to community concerns regarding this issue.

**Q: How can the district justify enough concern to hire a consultant but still refuse to advocate for zoning protections?**

A: The district initiated the contract with Citadel EHS to perform this project in response to community concerns regarding this issue. The district has no authority related to zoning, permitting or licensing of commercial businesses.

**Q: Why did the district ignore documented evidence of collusion between the county and Silfab as it relates to zoning?**

A: The district does not have authority or investigative powers in these matters. If evidence of wrong doing exists, it should be provided to the appropriate agency for proper investigation.

**Q: What school assignment accommodations are being made for students with respiratory issues?**

A: Student assignment process and requirements for a transfer request are outlined in Policy JCA. All district policies are available on the district's website under the leadership section.

**Q: Can Citadel EHS state clearly: does this project increase cancer risk for students, yes or no?**

A: To date, based on the pre and post occupancy air quality monitoring results and data analysis, there is no evidence of an elevated cancer risk among students or staff. Federal guidance considers a cancer risk estimated at one-in-a-million, or  $1 \times 10^{-6}$ , to generally not be a public health concern. This means, that no

more one individual out of a population of one million people, exposed to the same level of site-related chemical contaminants over a lifetime, is statistically predicted to develop cancer as a result of that exposure.

**Q: Why is the district publicly broadcasting the dates testing will be done at FHES? How can you ensure Silfab doesn't halt illegal production on those days, similar to the Whistleblower's affidavit?**

A: The district provided the information regarding testing to families and staff at Flint Hill Elementary School shortly before the testing date to make them aware of the testing process, ensure testing equipment was not disturbed and provide an understanding of what was taking place at their child's school. The district did not provide testing dates to Silfab Solar in advance.

**Q: If children or staff experience health symptoms consistent with chemical exposure but the monitors don't exceed thresholds, what actions would your plan trigger-if any?**

A: The air monitoring system uses screening thresholds set well below the EPA's Regional Screening Levels (RSLs) and South Carolina DHEC/DES health-based standards, allowing Citadel to proactively review even modest changes in readings. If the District alerts Citadel that staff or students have reported health symptoms of concern, but the monitors do not show an exceedance, Citadel will still conduct a data review and trend analysis to identify any short-term fluctuations or gradual increases compared with historical data and previous sampling events.

If results appear elevated relative to past trends or trending toward health-based benchmarks, Citadel will evaluate potential external factors that may influence local air quality. Based on the findings, Citadel may recommend targeted laboratory sampling, adjustments to monitoring parameters, or a focused investigation to verify that indoor and outdoor air conditions remain within health-protective ranges.

**Q: Citadel EHS's own plan admits that many of these contaminants can cause "respiratory irritation, corrosivity to skin and mucous membranes, systemic toxicity, and in some cases carcinogenicity" . For parents who aren't toxicologists-doesn't that mean these chemicals can injure or even kill people at certain levels?**

A: Like many industrial and even household chemicals, these substances can be harmful at high concentrations. That's why they are tightly controlled, stored, and monitored under strict safety and environmental regulations. What's important to understand is that toxicity describes a chemical's potential to cause harm, not the actual risk in a real-world setting. Risk level depends on how much of a chemical someone is exposed to and for how long. Citadel's air quality monitoring plan is designed to detect very low concentrations, well below health-based screening levels established by the EPA and South Carolina DHEC/DES, and to provide timely data that can be reviewed by experts if any unexpected change occurs. In practical terms, while these materials are hazardous in concentrated industrial use, the monitoring and safeguards in place are structured to provide early awareness and scientific evaluation if measurable levels were ever observed.

**Q: Parents don't want technical jargon. We want clarity: is there a possibility that our kids could get sick, develop long-term health problems, or even die from exposure to these chemicals? Why isn't that spelled out in your plan? Where is a comprehensive and complete risk register?**

A: When chemicals are stored or used at a facility, there is some level of inherent hazard. However, risk is not determined only by a substance's toxicity, it depends on exposure: how much, how long, and under what conditions people might come into contact with it. The EPA Regional Screening Levels and South Carolina's Toxic Air Pollutant standards are specifically designed to limit emissions to levels that are protective of public health, including for sensitive populations such as children. For clarification purposes:

- Citadel was not contracted by the District to conduct a human health risk assessment or to deliver a "comprehensive risk register."
- No credible data currently indicates that students or staff are being exposed to concentrations capable of causing illness, long-term health effects, or fatal outcomes.
- The air monitoring program was developed precisely to confirm that these safe conditions remain true as the Silfab Solar facility begins production and into the future.

Citadel's Air Quality Monitoring Plan itself does not attempt to predict disease or list every conceivable health outcome because it is a measurement and verification approach, not a medical or human health risk-assessment. Its role is to define how to collect, analyze, and interpret air data in accordance with professional industrial-hygiene and environmental-science standards (NIOSH, OSHA, AIHA).

In short: while no scientific process can claim "zero risk," the combination of regulatory emission limits, continuous perimeter monitoring, independent laboratory testing, and coordinated emergency planning provides a higher level of assurance that students and staff will remain safe, and that any deviation from normal air quality would be detected and addressed immediately.

**Q: If Silfab is detected to have leaked chemicals or caused harm to Flint Hill students/ teachers, what are the consequences legal or otherwise that FMSD will enforce? How do you plan to enforce a Memorandum of Understanding (MOU)?**

A: The MOUs being developed are focused on clarifying and coordinating emergency responses between the district, York County Emergency Management and Silfab. The district does not have regulatory or legal authority regarding Silfab. Should an incident arise, we will cooperate fully with the regulatory and legal authorities to address it.

**Q: If levels of HF or any other chemical of concern are found higher than OSHA Permissible Exposure Limit (PELs) or Short-Term Exposure Limit (STELs), what is the district's plan to keep the kids and staff safe?**

A: In the event of a chemical release the district will follow the emergency plans in place depending on the level of the event and take direction from York County Emergency Management as needed. If the air quality monitoring indicates levels above the permitted limit the school district will follow the protocols outlined in the emergency response plans and report the issue to the proper regulatory authority for further investigation.

**Q: Why is FMSD pursuing an International Well Building Institute rating instead of consulting with zoning attorneys?**

A: The Well Health Safety Rating is an extra effort by the district to ensure our schools meet the highest health and safety standards. Separately and unrelated to the Well Health Safety Rating, the district has consulted with multiple attorneys in this matter.

**Q: Would Citadel EHS agree that this monitoring does not eliminate risk, it only measures risk after exposures may have occurred?**

A: The air monitoring program does not eliminate all risk on its own, it is one part of a broader safety system designed to detect and manage risk early through continuous observation and verification. The purpose of the monitoring is not to wait until a problem occurs, but to identify any changes in air quality conditions as soon as they happen and confirm that air quality remains well within health-protective levels.

Monitoring is not the absence of prevention, it's the verification of protection. It allows the District and Citadel EHS to continuously measure, confirm, and communicate air quality conditions in a transparent, science-based way that aligns with best practices set by the AIHA, ACGIH, and EPA for protecting health in community and educational environments.

**Q: Citadel EHS's plan is described as monitoring and surveillance. Can you point to any measures in your plan that actually prevent or reduce emissions reaching students and staff, rather than just detecting them after the fact?**

A: Emission prevention and reduction are only fully effective when implemented at the source. We do not possess the regulatory authority to mandate changes to a private company's operational processes such as Silfab Solar. This oversight responsibility belongs solely to the appropriate regulatory agencies. Citadel's role is to provide consulting support to FMSD.

**Q: Significant industrial accidents occur when a series of failures happen in safety systems, not just a single failure. What assurances do we have from Silfab that there are more than two- or three-way redundancy in their safety systems?**

A: Verification of industrial safety systems and equipment redundancies at the Silfab facility falls under the oversight of regulatory agencies, including the South Carolina Department of Environmental Services (DES) and the York County Fire Marshal's Office.

Silfab has publicly detailed its safety and redundancy systems, including automatic shutoffs, gas leak detection, double-contained piping, emergency isolation, redundant scrubber fans and pumps, and process safety management controls, in its Material Safety Response Summary, available on York County's [website here](#).

These systems are also addressed through required regulatory documents such as Silfab's Air Emissions Permit, Risk Management Plan (RMP), Performance-Based Engineering Fire Protection Plan, and Facility Emergency Action Plan (FEAP), all of which are reviewed by the appropriate agencies.

Citadel's role is to provide independent environmental monitoring for the district, not to certify or enforce the facility's internal engineering controls. The district relies on state and county oversight to confirm compliance with these industrial safety requirements.

**Q: Formaldehyde will be given off at FHES because of the adhesives and glues used during construction. Why not make this known during your project updates?**

A: The presence of Formaldehyde is a common occurrence for any new residential or public construction or renovation project. The chemical is used in construction materials, furnishings and personal items. The levels associated with these projects do not pose a health concern to individuals however, it was listed as a chemical to test for in the initial presentations made by Citadel EHS as an additional precaution.

**Q: Why is the district choosing "proactive" air monitoring, risk mitigation instead of risk elimination of a potential industrial or chemical accident 1300 feet from our school district facilities at FHES and FHMS?**

A: The district has no authority over zoning, permitting or licensing of commercial business. We are working within our authority to provide a safe and healthy learning environment for students, staff and the community.

**Q: When is the Targeted Perimeter Monitoring scheduled to begin?**

A: The perimeter monitoring is scheduled to begin at or before Silfab receives their final certificate of occupancy (CO), which is the point at which they can begin operations.

**Q: Could you please clarify what "production" means in this context?**

A: Production is the point at which Silfab receives final CO for the facility and is permitted to begin operations.

**Q: Who will have access to the Targeted Perimeter Monitoring data in real time? You said the Citadel. The proposal says Citadel will be reviewing data remotely once a week, but can give remote access to authorized users from FMSD. Please tell me someone is going to be watching more closely than once a week. How frequently is it being checked? Is there 24/7 active monitoring? If not, how often is it being reviewed? Are the alerts for the EPA/OSHA thresholds for exposure over time or something else? When a reading "warrants action or further investigation," what specifically happens? (e.g. is there an automatic alert? Is it reported to EPA/OSHA? Are there school evacuations?)**

A: The continuous outdoor air perimeter monitors, once installed, will operate continuously, 24 hours a day, and record new readings every minute. Those readings go directly to a secure monitoring platform managed by Citadel where the data is automatically screened for anything unusual. Each sensor is programmed with set screening levels and corresponding notification triggers for key air-quality indicators such as particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>), total volatile organic compounds (TVOCs), and combustible gases. These screening levels are based on U.S. Environmental Protection Agency (EPA) Regional Screening Levels and South Carolina Department of Environmental Services (DHEC/DES) health-based reference values, chosen to provide an added margin of safety for students and staff.

If results begin trending upward, are approaching or exceed a set screening level or threshold, Citadel receives an immediate alert. The data is then reviewed in real time to verify accuracy, determine if any immediate action is necessary, identify possible causes, evaluate whether additional conformational testing via laboratory sampling is needed, or if a formal multi-agency investigation must be conducted.

Citadel will perform routine weekly data reviews and routine on-site equipment inspections to ensure all systems remain calibrated and fully operational.

Citadel will serve as the data conservator who manages, stores, and validates the monitoring data to ensure that what is shared is accurate, complete, and clearly interpreted. Authorized Fort Mill School District (FMSD) staff may have secure access to verified results and receive summary reports and notifications if any readings require closer review.

Because air-quality readings naturally fluctuate with wind, weather and other background factors, Citadel's review process helps verify that data is interpreted in the right context before any action is taken or information is shared publicly. This approach prevents confusion, maintains scientific accuracy, and ensures that families and staff receive clear, scientifically sound, fact-based and reliable information.

If a public information request is ever made, Citadel will work with the district to provide verified and understandable data that meet transparency and legal requirements.

**Q: Will this data be available to the public?**

A: Citadel will provide regular reports to the district at specific intervals that are being determined. In the event of elevated levels Citadel will notify the district immediately if appropriate action is needed. Reports will be made available on the district's website when received.

**Q: Could someone help explain how sampling a few locations once per quarter is sufficient to ensure air quality at all times?**

A: Quarterly sampling is meant to work in conjunction with the continuous monitoring system.

**Q: I understand the Continuous Perimeter Monitoring supplements this, but from my understanding, its scope is significantly more limited: I understand the Targeted perimeter monitoring is meant to supplement with real-time data. However,**

**Targeted Perimeter Monitoring (Option 2) currently includes:**

**Particulate Matter (PM2.5, PM10)**

**Total Volatile Organic Compounds (TVOCs)**

**Wind Speed and Direction**

**Optional Gases: Nitrogen Dioxide (NO<sub>2</sub>), Sulfur Dioxide (SO<sub>2</sub>), Carbon Monoxide (CO)**

**24 Hour Quarterly Testing covered:**

**Hydrochloric Acid (HCl)**

**Hydrogen Fluoride (HF)**

**Volatile Organic Compounds (VOCs)**

**Ammonia (NH<sub>3</sub>)**

**Formaldehyde (CH<sub>2</sub>O)**

**Silane**

**Particulate Matter (PM)**

**Carbon Monoxide (CO)**

**While there is some overlap (e.g. PM, VOCs, and CO), there are also significant differences.**

**For example:**

**Hydrochloric Acid, Hydrogen Fluoride, Ammonia, Formaldehyde, and Silane are not currently included in the perimeter monitoring parameters.**

**Conversely, NO<sub>2</sub> and SO<sub>2</sub> are listed as optional gases for perimeter monitoring but were not included in the pre-occupancy list.**

**So how do we know what's happening with air quality between scheduled tests based off the information provided by the continuous monitoring when they are addressing different things? Additionally, my understanding is that while some of the risks are exposure over time, some are hazardous immediately (silane explosion, HF inhalation) and not on the continuously monitored list.**

A. Quarterly air sampling is one part of a layered monitoring system designed to track air quality both continuously and over time. The purpose isn't to take an occasional "snapshot," but to build a detailed picture of air quality trends throughout the year.

Each quarterly event includes indoor samples from multiple classrooms and ventilation zones to confirm that air quality remains stable and that no unexpected changes have occurred. These samples are analyzed by independent, third-party accredited laboratories that have no affiliation with Citadel or the District. Testing is scheduled across different seasons, when heating, cooling, and outdoor weather conditions vary, to evaluate how those factors influence indoor air.

Continuous outdoor air perimeter monitors, once installed, will operate 24 hours a day around each campus. These sensors measure fine particles (PM<sub>2.5</sub> and PM<sub>10</sub>), total volatile organic compounds (TVOCs), methane (which also detects other flammable gases like silane through cross-sensitivity), and wind speed and direction. The monitors record data every minute and send it remotely to Citadel for active review.

If the monitors ever detect an unusual rise in particles or gases, the system automatically alerts Citadel, who will immediately check the data, verify the equipment is intact and properly operating, and, if needed, coordinate with the District, Silfab Solar, and local officials to take precautions and identify and resolve the cause.

Citadel will compare data from continuous monitors with the quarterly event sampling results to confirm that air quality remains consistent and well below EPA and South Carolina health-based standards. By using two complementary layers of monitoring, continuous real-time tracking plus

detailed lab analysis, the district ensures that both short-term changes and long-term trends are caught early and verified.

**Q: How long does it take to process and analyze data from the quarterly sampling and the weekly check/monthly report for continuous monitoring? Where and when that data will be made available?**

A: After each quarterly sampling event, Citadel receives results from the contracted third-party laboratories and conducts a detailed data review. It typically takes about three to four weeks for the laboratories to complete their analyses and deliver validated results. Once received, Citadel processes the data, performs trend analysis, and prepares a comprehensive report, which is reviewed by a Certified Industrial Hygienist (CIH) for accuracy and quality assurance before it is provided to the district.

For continuous perimeter monitoring, Citadel conducts regular data checks to verify equipment performance and identify any unusual readings. Monthly summary reports are prepared to evaluate trends and compare results against EPA and South Carolina health-based screening levels. All finalized air monitoring reports and summaries will be posted by the Fort Mill School District on its Health and Safety Assessment page to maintain transparency and public access to ongoing results.

**Q: I understand that Flint Hill has general emergency response plans in place, but is there a school-specific plan for chemical incidents at the nearby facility?**

A: The district has chemical response plans in place for all schools. In the event of a chemical incident, the district works with first responders and York County Emergency management to determine the response based on the level of the incident.

**Q: What is the goal evacuation time if such an event were to occur?**

A: In the event an evacuation is required, the goal is to have all individuals removed from the school as quickly and safely as possible. This is done in coordination with first responders, to move students and staff from the impacted area to a safe site.

**Q: How will parents, staff, and students be informed in real time during a chemical-related emergency?**

A: In the event of any emergency situation the district communicates directly with parents of the impacted school using all available systems via phone, text, and email. It is important that all parents update their contact information anytime a change has been made.

**Q: Will future air testing include all chemicals Silfab plans to use or store, including trimethylaluminum and any other highly flammable or toxic materials? AND Q: Will future monitoring include real-time detection of key chemicals like silane, hydrofluoric acid, and hydrochloric acid, not just general air particles?**

A: Citadel's Certified Industrial Hygienists and Certified Hazardous Material Managers (CHMMs) reviewed Silfab's complete chemical inventory and based on their analysis, current and future monitoring targets the compounds most relevant for off-site outdoor air detection or health protection, including hydrochloric acid (HCl), hydrofluoric acid (HF), ammonia, formaldehyde, and a broad range of volatile organic compounds (VOCs). These are measured during quarterly sampling events, with samples

collected over a 24-hour period using Summa canisters and specialized media that together capture more than 70 individual VOCs.

While trimethylaluminum (TMA) is not directly sampled because it reacts almost instantly on contact with air, the continuous outdoor air perimeter monitors, once installed, will be equipped with methane gas sensors that are cross-sensitive to silane and other pyrophoric or flammable gases. This provides an early-warning layer capable of detecting even trace releases of reactive materials such as TMA or silane.

In addition, continuous outdoor air monitors will sense total VOCs (TVOCs), a surrogate indicator for any change in volatile organic compounds, as well as fine particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>), and meteorological data (wind speed and direction). Together, these measurements enable Citadel to detect and evaluate changes in outdoor air composition.

**Q: How will the testing plan change as production increases, for example, more test sites or added lab analyses?**

A: The testing methods and lab analyses are expected to stay the same even as Silfab's production increases. Keeping the same testing approach is important because it allows Citadel to compare results over time and quickly spot any unusual changes or upward trends in air quality.

If air readings ever start to rise or show more variation as production grows, Citadel will review and adjust the monitoring plan, for example, by increasing how often samples are collected or adding extra confirmation points, to confirm what's causing the change.

**Q: How will the district keep parents informed about routine testing results and overall air quality?**

A: The district will share reports received from Citadel EHS on our website for community review.

**Q: If unsafe levels are detected, what air-quality limits would trigger a public alert, and how will parents be notified (for example, email, text, or website updates)?**

A: If the monitoring indicates results above the limit standards the district will communicate directly with parents and staff via all communication channels to share details regarding the necessary response.

**Q: Has a worst-case scenario study been completed for an accident involving silane, trimethylaluminum, or hydrofluoric acid? If yes, what is the protective distance around the plant in that scenario, and does it reach Flint Hill schools or nearby homes?**

A: Neither Citadel nor the Fort Mill School District has conducted a separate worst-case scenario study for silane, trimethylaluminum, or hydrofluoric acid. Those evaluations are required to be completed by Silfab as part of its federal Risk Management Plan (RMP) and are reviewed by the U.S. EPA, DHEC/DES, and local emergency response agencies.

Silfab's RMP must include both worst-case and more realistic release scenarios, modeled using EPA-approved software and current population data, and identify any protective distances and potential off-site impacts. Because that modeling is part of Silfab's regulatory requirements, Citadel and the district do not set or certify release scenarios or distances.

Citadel's role is to provide independent air-quality monitoring in and around the schools, and supporting the district in coordinating school-site emergency procedures with Silfab and local emergency officials, including planning a joint drill, so that if regulatory modeling ever indicates a potential impact, school and county responses are aligned.

**Q: Will parents receive a written emergency plan that clearly explains what will happen if there is a chemical release, fire, or explosion?**

A: The district does not release safety plans to the general public as this poses an additional safety risk. In the event of an emergency the district will communicate information directly to parents to keep them informed of the situation and provide instructions for reunification if the situation requires an evacuation.

**Q: Who is the person or agency responsible for deciding when to shelter or evacuate the schools in that situation?**

A: This determination is made in conjunction with first responders and York County Emergency Management.

**Q: Will air testing continue for at least three years after Silfab starts production, not just during the start-up period?**

A: The district has signed an initial one-year contract with Citadel EHS and is committed to continuing the contract as long as necessary.

**Q: Will an independent third party (not funded by Silfab) review the testing results and safety procedures?**

A: Yes, Citadel EHS is an independent third party and their work is not being funded by Silfab Solar.

**Q: Who will confirm that all of Silfab's required safety systems and shutoffs are installed, tested, and regularly inspected?**

A: This is done by the local, state and federal regulatory agencies that have the authority to perform these inspections.