OPPIDAN DATA CENTERS

COMMUNITY FAQ · NOVEMBER 2026

What the McDonald Data Center Campus Could mean for you

Answers to questions raised at the September 15, 2026 open house and since. McDonald Steel closed in 2024 and left a site that needs significant environmental cleanup. Oppidan proposes to pay 100% of the required cleanup, bring 250+ permanent jobs and thousands of construction jobs, and pay about $5.22 million a year in taxes, with no public money.

$5.22M
a year in taxes, vs. $64,769 today

250+
permanent jobs, $85K–$150K

100%
of required cleanup paid by Oppidan

$0
in abatements, PILOTs or grants

ECONOMY & TAXES

Why would I want a data center close to me?
The site has limited use and needs significant environmental cleanup. Oppidan would pay 100% of the cleanup the Ohio EPA requires and turn the land into an ongoing source of taxes and jobs for McDonald.

What does the site contribute today?
Very little. McDonald Steel shut down in July 2024, facing more than $60 million in needed upgrades. The site pays about $64,769 a year in taxes, supports few jobs, and can't be reused until it's cleaned up.

How much will the Data Center Campus pay in taxes?
About $5,217,000 a year in fully assessed property taxes once complete. This is a desktop estimate.

Are you asking for tax breaks or public money?
No: no incentives, abatements, PILOTs or grants. By comparison, Kimberly-Clark's Warren plant, another Valley steel-site reuse, received $40 million in grants and a 10-year, 60% tax abatement.

What jobs will there be?
More than 250 full-time jobs paying $85,000–$150,000, thousands of construction jobs, and third-party maintenance work for HVAC technicians, diesel mechanics, landscapers and more. All positions will be subject to the Village Municipal Tax. Oppidan will meet with local contractors and schools to help fill these jobs locally.

COMMUNITY BENEFITS AGREEMENT

Will you sign a Community Benefits Agreement?
Yes. Oppidan will propose a Community Benefits Agreement to the Village of McDonald.

What will it include?
Upcoming stakeholder meetings and listening sessions will inform what McDonald wants and needs, whether that's safety forces, schools, parks, seniors or infrastructure. We will propose an agreement based on those inputs.

Why not just announce a dollar figure?
Despite media reports, Oppidan held an open and honest public forum to hear directly from residents. As a next step, Oppidan will propose a Community Benefits Agreement based on what it learns.

What has Oppidan done in other communities?
Oppidan has given nearly $20 million to charities over 35 years. In McDonald, Oppidan will take the same approach and propose a benefits package tailored to fit McDonald's needs.

ELECTRICITY & YOUR BILL

Will my electric bill go up?
To protect ratepayers, the potential project will pay the full cost of transmission upgrades, grid upgrades, two new FirstEnergy substations and on-site infrastructure, so those costs are not passed on to residential customers. Oppidan will disclose the full scope and cost of the off-site work.

Will it affect power reliability for my home?
The Data Center Campus is served by its own new substations and dedicated infrastructure.

Where does the power come from?
About 40% renewable and 60% traditional sources from the PJM regional grid.

NOISE

How loud will it be?
Sound will be limited to 55 dBA or less at the property line: about as loud as moderate rainfall or a quiet suburban street during the day. That matches the level the U.S. EPA identified as protective of public health in residential areas. Sound drops off with distance, so homes beyond the property line will hear less.

What are the local noise rules?
The Village of McDonald does not currently have noise standards. Oppidan will partner with the Village to study noise on a regular schedule, share the results publicly, and meet or exceed all regulations.

What about a steady hum or whine?
This "tonal" noise is more noticeable than background sound. Following the ANSI/ASA S12.9 Part 4 national standard, the sound study treats tonal sounds as about 5 decibels louder than they measure, and the design must meet the property-line limit with that penalty added.

Will the sound study be public?
Yes. It measures the full frequency range, including low-pitched sound below human hearing and high-pitched sound above it. The full study will be public, along with the results submitted to the state.

How will noise be reduced?
- Low-noise, variable-speed fans that slow down when full cooling isn't needed
- Sound walls or barriers around cooling equipment
- Berms and landscaping along the property line
- Acoustic enclosures on backup generators, with testing limited to daytime hours
- The loudest equipment placed farthest from homes

AIR & DUST

What about emissions from backup generators?
The Data Center Campus must study emissions and go through a rigorous Ohio EPA permitting process as part of approval, and will meet or exceed every permit requirement. Generators run only for testing, Monday to Friday 8 AM–4 PM, or during a grid failure.

How will dust be controlled and monitored?
A Dust Control Plan sets controls, responsibilities, monitoring and record keeping, and dust control is an ongoing requirement for the general contractor.

How would residents be told if vapors were released?
The Remediation Action Plan sets rules and strategies to keep contaminants from being released during cleanup.

Will it create steam or a heat island?
The Data Center Campus would not produce steam output.

WATER

Where will the water come from?
Cooling water could come from the Mahoning River under the site's existing permit for up to 10 million gallons a day. Drinking water comes from McDonald Water through three existing 18-inch mains, and sanitary wastewater goes to McDonald Sewer.

How much water will it use?
At most about 25 million gallons a year: about 4% of the 622 million gallons McDonald Steel used in 2022 (Ohio DNR), roughly what a mid-size hospital uses. The steel mill used that much in about two weeks.

Will dirty water be discharged into the river?
No. Cooling water is treated on site and kept far cleaner than the river, so what returns is cleaner than what was taken out. Discharge must also meet Ohio EPA's late-2025 draft permit for data centers, which limits pH, dissolved solids, chlorine and oxidants, requires monitoring for temperature, oil and grease, and suspended solids, and bars discharges that would exceed a water-quality standard or sit just upstream of a drinking-water intake.

SITE CLEANUP & OVERSIGHT

Who is responsible for the contamination there now?
The contamination predates Oppidan. Environmental testing documents that baseline before any construction begins.

Who pays for the cleanup, and what will it cost?
Oppidan would pay 100% of the cleanup the Ohio EPA requires, which could cost $10 million to $50 million. Reports are being finalized and the work will be priced by the appropriate parties.

Where does it stand, and when will it start?
The potential project is in environmental due diligence. A full investigation is under way, and the report will go to the public and the Ohio EPA for review. Cleanup would start as soon as the Village of McDonald approves.

Who oversees the cleanup and the project?
The Ohio EPA helps develop the Remediation Action Plan and oversees the cleanup under its Voluntary Action Program, with ongoing groundwater monitoring. Regulators at several levels of government will issue permits and enforce local and state rules, and Oppidan will work with independent sources to study the economic and environmental impact.

How will environmental data be shared?
Atlas Engineering has collected the site data. Reports will be submitted to the Ohio EPA and made public, along with the independent study results.

Will the cleanup happen if the Data Center Campus doesn't?
Oppidan's cleanup is tied to its investment in the Data Center Campus. **Without it, Oppidan cannot say whether or when the site would be cleaned up.**

SITE PLAN & BUILDINGS

How many buildings, and how big?
The site plan is not final and based off feedback we received from the public meeting Oppidan is now proposing a 5-building site plan, a **nearly 50% reduction in square footage.** Oppidan is still working on the land-use analysis to set the proposed size.

How far will buildings be from homes?
At least 500 feet. On the draft site plan, the closest home is about 900 feet away, roughly three football fields.

Will I be able to see the buildings?
Berms, landscaping and trees will screen the site, which also has existing natural barriers. Lighting is downcast, with zero foot-candles at the property line.

Where will stormwater go?
It will be managed on site, as state and local rules require.

TRAFFIC

How much traffic will there be?
About 255 trips a day when fully operating, compared with about 1,050 at Kimberly-Clark's Warren plant. Truck traffic will be screened with berms.

Where will traffic be routed?
North to Robbins Avenue and south toward Salt Springs Road. The potential project will pay for any required road upgrades.

Can traffic avoid the school and football field?
Before, during and after construction, Oppidan will meet with the school district on bus routes and will meet every year to address student safety.

What time of day will traffic and hauling happen?
Oppidan will work with the Village to manage traffic before construction, during construction and once operating.

CONSTRUCTION & THE LONG TERM

How long will construction take?
Phasing has not been set; full development could take five years. In Hilliard, Oppidan built with local contractors and union labor.

How would it be zoned?
The site is zoned Light and Heavy Industrial, where data centers are not specifically permitted. The next step is a data center ordinance or a Conditional Use Permit application, and the potential project will follow all McDonald, county, state and federal rules.

How long will it operate, and what if it closes?
These projects have a minimum of 50 years of useful life.

Built right, built here, and here to stay. Oppidan has developed 600+ projects in 43 states and Canada since 1991, including 794 MW of data centers, and its Hilliard, Ohio data center is operating today. No eminent domain, no NDAs, no secret deals.

Oppidan Connect · 400 Water Street, Suite 200, Excelsior, MN 55331 · 952.294.0353 · [illegible]

November 11, 2026

Pete Carbonneau
Developer
KTJ 445, LLC, C/O Oppidan Investment Company
400 Water Street, Suite 200
Excelsior, MN 55331

Subject: **US Steel Property and OAC 3745-513 Landfill Disturbance Notification**

Dear Mr. Carbonneau:

This letter concerns the former US Steel Property located in McDonald, Ohio, at which Atlas has been performing environmental investigations under Ohio EPA's Voluntary Action Program (VAP) on your behalf. I understand that concerns have been expressed to Oppidan that "Atlas is wanting to lift the landfill designation on the US Steel property" and the purpose of this letter is to address an apparent misunderstanding of a letter that I sent to Ohio EPA on March 31, 2026, requesting their review and concurrence regarding applicability of Ohio Adminstrative Code (OAC) 3745-513 to the property.

I believe the misunderstanding in the email is that "Atlas is wanting to lift the landfill designation." The US Steel property is not designated as a landfill by Ohio EPA or any other regulatory agency, and we have not to date found evidence that it should be designated as a landfill. The only designation of the site as a "landfill" was made during a poorly recorded interview with a former employee. Based on Atlas's review of data, reports, and additional investigations, the area appears to have been used as a staging area for waste materials (such as used drums and equipment), but not for landfilling activities subject to Ohio landfill law (OAC 3745-513, aka "Rule 513").

Previous investigations performed in 2012 sought to determine whether the landfilling did take place. Ohio law requires notification to Ohio EPA's Division of Materials and Waste Management prior to disturbing a landfill, regardless of whether it is known to Ohio EPA, licensed, or otherwise regulated. Because the test pits and drilling planned during the 2012 investigation would have disturbed potential landfill materials based on presumptions at that time, a previous consultant provided the requisite notification to Ohio EPA. They subsequently performed their investigations but did not find evidence of landfilling.

When Atlas was preparing to perform our investigations, we initially thought that we would need to make the same notification to Ohio EPA's Division of Materials and Waste Management because "landfill" had been noted in prior reports. However, upon deeper review as we were considering a "Rule 513 Notification", there was no empirical evidence of landfilled materials at the property in any of the test pit or drilling data. The historical interview was the only evidence

ATLAS

of a landfill being present – no agency had designated the site as a landfill and no landfilling was discovered during investigations. This raised a question as to whether any notification was needed prior to our investigations and, if notification was needed, what area it should apply to.

Although we likely could have proceeded without notification based upon the findings of the previous consultant, we wanted to be sure that we proceeded cautiously, appropriately, and in the open. Prior to Atlas field sampling activities, we submitted a letter to Ohio EPA explaining why we did not feel that notification to Ohio EPA's Division of Materials and Waste Management under OAC 3745-513 was necessary prior to the Ohio EPA Voluntary Action Program (VAP) investigation activities. This had no effect on the way we performed the investigation – it was intended to avoid an appearance that we were disturbing a landfill when evidence indicated that a landfill was not truly present. Ohio EPA Division of Materials and Waste Management (DWMW) reviewed the request and stated in their reply (attached) that **"DWMW has no information that a landfill exists at this property. So long as that remains the case, OAC 3745-513 does not apply to the Property."**

We have since performed a significant amount of additional investigation throughout the purported landfill areas. During our investigation, we did not find landfilling. There were a few buried drums in two shallow test pits excavated 25 feet apart, but at this point, the few drums do not appear to qualify as a landfill per Rule 513. We intend to develop and implement appropriate risk management plans and strategies, in coordination with Ohio EPA, to ensure that any new and significant discoveries in the area would be appropriately responded to and reported to Ohio EPA. Per Rule 513, if any landfilling is discovered it would trigger notification requirements prior to disturbance, but Ohio EPA would still not view the site as a "licensed" landfill.

We are committed to following Ohio landfill rules. Ohio EPA has not designated the site as a landfill, and we have not to date found evidence that it should be designated as a landfill. However, we will be working closely with Ohio EPA to ensure that all appropriate precautions are taken when working at the site, and if there should be any future discovery of landfilling activities, that it will be appropriately reported to Ohio EPA. In the meantime, contamination associated with historical waste staging will be addressed through Ohio EPA's VAP.

Sincerely,

Nate Wanner, CP
Midwest Brownfield Program Manager

Enclosure: Letter from Madison Graham of Ohio EPA dated April 17, 2026

April 17, 2026

Nathaniel Wanner
Atlas Technical Consultants LLC
685 Grandview Ave.
Columbus, Ohio 43215

Re: US Steel Corp McDonald Works
Technical Assistance
Correspondence
Voluntary Action Program
Trumbull County
278000869008

Transmitted electronically to: Nathaniel.Wanner@oneatlas.com

Subject: Technical Assistance Review of US Steel Corp McDonald Works

Dear Mr. Wanner:

Please be advised that the following constitute comments developed by Ohio Environmental Protection Agency (Ohio EPA) as guidance to assist the volunteer or the Certified Professional (CP) assisting with the voluntary action in determining compliance with applicable aspects of the Voluntary Action Program (VAP) rules.

On April 6, 2026[1], Ohio EPA received your submittal of a request for technical assistance (TA) for the US Steel Corp McDonald Works located on Ohio Ave., McDonald, Trumbull County, Ohio. The technical assistance you requested included review of Ohio Administrative Code (OAC) 3745-513's applicability to the Property.

Given the scope of the request, Ohio EPA staff assigned to conduct the review consisted of a site coordinator and engineer from the Division of Materials and Waste Management (DMWM). The comments provided herein were developed from the staff's collective review of the documents submitted as part of the TA request. Should the volunteer decide to pursue a covenant not to sue (CNS), these comments represent issues and best practices to be addressed by the volunteer, or CP, as appropriate, before the CP may issue a No Further Action (NFA) letter for the project under OAC 3745-300-13.

[1] http://edocpub.epa.ohio.gov/publicportal/ViewDocument.aspx?docid=4084045

Issue A: **OAC 3645-513 – Construction and operation authorization at former solid and/or hazardous waste landfills**

Comment 1:

OAC 3745-513 applies to any location where a hazardous or solid waste landfill was operated (whether licensed/permitted or open dumped) unless the waste has been removed. DMWM has no information that a landfill exists at this location. The report submitted with the application for TA indicates that research has been conducted to demonstrate that waste does not currently exist at this property. So long as that remains the case, OAC 3745-513 does not apply to the Property. However, if waste defined under OAC 3745-513 is discovered at the Property, please cease all work and contact Ohio EPA at the number below.

CONCLUSION

This letter does not constitute an action of the Director; it is only intended to serve as guidance based on the current VAP rules on the draft documents that were submitted for Ohio EPA's review. Moreover, the guidance provided by this letter is not concluding that applicable standards have been met or that the property will meet VAP applicable standards, given Ohio EPA's limited role in the project. Finally, please note that the CP engaged by the volunteer is responsible for verifying that the Property has achieved and will continue in the future to maintain compliance with VAP applicable standards and that the voluntary action has complied with all other applicable laws before the CP may issue a no further action (NFA) letter in accordance with ORC 3746.11 and OAC Chapter 3745-300, including 3745-300-13(D), 13(E) and 13(Q).

Ohio EPA's review and comments herein are based only upon the evaluation of the submitted draft documents. The property-specific guidance provided was based on the information and drawings provided by the CP to Ohio EPA about the conditions or circumstances at the property. Therefore, the provided guidance may not be accurate if actual conditions or circumstances at the property are different from those represented, or if additional or newly discovered conditions or circumstances are subsequently identified.

If you have any questions related to the comments or would like to schedule a meeting to review the comments, please feel free to contact me at madison.graham@epa.ohio.gov or 614.644.2927.

Sincerely,

Madison T. Graham

Madison Graham, VAP Coordinator

Division of Environmental Response and Revitalization

ec: Julie Carpenter, CP, Atlas Technical Consultants LLC, Julie.Carpenter@oneatlas.com
Emily Johnson, DERR
Corin Fogle, DERR

Voluntary Action Program

Ohio's Voluntary Action Program (VAP) allows companies to investigate and clean up environmental contamination and, if necessary, receive a legal release from the State of Ohio confirming no further cleanup is required.

Benefits of the VAP

Ohio recognized the need to remove the environmental and legal barriers that stalled the redevelopment and reuse of contaminated properties. The VAP maximizes resources and expertise in the private sector. Now, if someone wants to clean up a piece of property, they may follow specific standards developed by Ohio EPA and be assured that it meets environmental standards without direct oversight from Ohio EPA.

Certified Professionals

The VAP utilizes qualified, experienced professionals such as engineers and scientists certified by Ohio EPA. These certified professionals (CPs) ensure that properties are cleaned up to the standards set by the VAP program rules. The detailed program rules allow these qualified professionals and the volunteers they represent to carry out the work without ongoing Agency involvement.

Ohio EPA operates a certification program to ensure that only professionals with the appropriate qualifications and experience are licensed as CPs. To maintain high standards, CPs must meet annual continuing education requirements and undergo recertification each year. Information about CPs can be found here: ***https://epa.ohio.gov/divisions-and-offices/environmental-response-revitalization/cleanup-and-investigation/certified-professional***.

No Further Action Letter

When a CP determines that a property meets the cleanup standards set forth in the program rules (OAC Chapter 3745-300) after conducting an investigation and necessary remediation, they prepare a No Further Action (NFA) letter. This letter outlines the environmental issues identified at the property, the investigative process, and the cleanup or remediation efforts undertaken.

The NFA letter includes a VAP Phase I property assessment, which details the CP's investigation into the property's historical and current uses. This assessment helps the CP determine whether there is a reason to suspect a release of hazardous substances or petroleum has occurred or may have occurred on the property.

If there is reason to believe contamination exists, a VAP Phase II property assessment is conducted. This assessment involves collecting soil, ground water, surface water, and sediment samples, as necessary. The Phase II assessment ensures that all potential contaminants identified in the Phase I investigation are evaluated against the appropriate VAP cleanup standards. If the Phase II assessment confirms the property meets these standards and protects human health and the environment, the CP will finalize the voluntary cleanup and prepare the NFA letter.

If additional remediation is required to meet the standards, further actions will be taken to ensure the property's safety. These actions may not always involve soil removal or ground water treatment. Still, they could include land use restrictions or implementing barriers, such as soil covers or asphalt/concrete caps, to prevent exposure to contamination.

Technical Assistance

Ohio EPA offers technical assistance to volunteers participating in the Voluntary Action Program (VAP), helping with any questions or guidance related to the program. Since the VAP is funded through user fees, volunteers are required to cover the cost of the Agency's assistance. Volunteers may utilize VAP rules and technical support for property cleanup and redevelopment, even if an NFA letter is not submitted. Applications for technical assistance are available here: ***https://epa.ohio.gov/divisions-and-offices/environmental-response-revitalization/derr-programs/voluntary-action-program*** **> Programs Info/Services > TA**

Memorandum of Agreement

Volunteers seeking assurance that U.S. EPA will not require additional cleanup must follow the additional steps outlined in the agreement negotiated between Ohio EPA and U.S. EPA. These steps include direct oversight of investigation and cleanup

activities by Ohio EPA, as well as opportunities for public review of property documents produced by the volunteer. For more information on the Memorandum of Agreement process, please see ***https://epa.ohio.gov/static/Portals/30/vap/docs/MOA%20Track.pdf***

Covenant Not to Sue

To obtain a legal release from the State of Ohio, the certified professional submits the No Further Action (NFA) letter to Ohio EPA for review. Ohio EPA's technical staff evaluates the NFA letter to ensure that the property meets program standards and is protective of public health, safety, and the environment. Once cleanup requirements are satisfied, Ohio EPA's director issues a Covenant Not to Sue. This covenant protects the property owner, operator, and future owners from legal responsibility for further investigation or cleanup as long as the property is used and maintained as it was when the covenant was issued.

The covenant is recorded with the county recorder's office and is attached to the property deed, transferring ownership. Any use restrictions are filed along with the deed prior to the issuance of the covenant. When a covenant is issued or denied, a notice is published in the local newspaper to inform residents and other interested parties. Both issuances and denials can be appealed to the Environmental Review Appeals Commission.

Ohio EPA audits at least 25 percent of VAP properties annually to ensure proper cleanup and that certified professionals (CPs) and laboratories have met all standards. Ohio EPA may review all relevant documents during these audits and conduct on-site sampling to verify compliance with cleanup standards. Volunteers may lose their covenant if issues identified in an audit are not addressed. CPs and laboratories that fail to meet VAP requirements or engage in misconduct, such as falsifying or withholding information, may face civil or criminal penalties.

For a list of all NFA letters and their status, visit ***Complete NFA Summary List.***

Public Participation

All information submitted to Ohio EPA as part of the Voluntary Action Program (VAP) is publicly accessible. This includes materials provided by companies seeking technical assistance before submitting an NFA letter, all documentation included in the NFA letter, and any agency comments. At any point during the review of an NFA letter, the public can request and receive any cleanup-related documents from Ohio EPA.

Additionally, each NFA letter must include a list of all data, information, and documentation used to support the voluntary cleanup, even if some of this information is not part of the NFA submission. This information is available to the public upon request.

While the law protects the volunteer from having this documentation used in civil or administrative proceedings, it does not permit the volunteer to claim confidentiality over any of the information or limit the public's right to access these documents.

Contact

For more information about the program, go to ***https://epa.ohio.gov/divisions-and-offices/environmental-response-revitalization/derr-programs/voluntary-action-program*** or contact VAP staff at (614) 644-2924.