White Cloud Acres

Public Information Briefing

Proposed data center and related energy infrastructure

Nodaway County, Missouri

Prepared for public use by the Nodaway County Commission

October 2026 • Information reflects publicly available records located through October 2, 2026

Purpose of this presentation

Provide a factual overview of the proposed White Cloud Acres project and related infrastructure.

Identify what has been formally filed with government agencies and what remains proposed or under study.

Summarize questions the County is reviewing during its due-diligence process.

Help residents distinguish documented information from developer projections, community concerns, and matters that remain unresolved.

Provide links and source references so residents can review the underlying documents.

Project Overview

The project is proposed in southern Nodaway County near Barnard.

What is proposed?

White Cloud Acres is described as a large-scale data infrastructure development.

Developer materials describe a 600-megawatt data center.

Related plans include a natural-gas-powered energy facility.

The developer's website describes a combined investment of more than $6 billion.

What is not yet established?

No hyperscale/end-use customer has been publicly identified in the sources reviewed.

Construction and operating dates remain subject to permitting, agreements, and project decisions.

Developer economic-impact figures are projections, not completed outcomes.

Some infrastructure plans remain under study or negotiation.

Sources: White Cloud Acres project website | KQ2, June 3, 2026

Where is it?

Publicly described location and related infrastructure

Proposed site: southern Nodaway County, along/near U.S. Highway 71 and 340th Street / Jet Road, near Barnard.

County meeting records identify the proposal as a data center in unincorporated Nodaway County.

The proposed energy facility's Missouri DNR application identifies the location as 340th Street and Jet Road, Barnard, Missouri 64423.

The U.S. Army Corps of Engineers database lists an action for “White Cloud Acres, LLC – White Cloud Acres” under DA No. NWK-2026-00145.

Related utility, water, road, and transmission infrastructure may extend beyond the primary campus footprint.

Sources: Nodaway County Commission minutes | Missouri DNR permit application | U.S. Army Corps of Engineers public database

The Energy Component

White Cloud Generating, LLC

Formal Filing

Missouri DNR construction-permit application: 2026-06-032.

DNR Site ID: 147-0052.

Application administratively complete July 20, 2026.

Facility is described as a greenfield natural-gas power-generation facility.

Application states the facility would sell up to 600 MW to the local bulk electric system.

Proposed Equipment

12 simple-cycle natural-gas combustion turbines.

Evaporative cooling associated with the turbines.

Emission-control equipment including SCR and oxidation catalysts.

Emergency diesel fire pumps and associated fuel storage.

Two 20,000-gallon aqueous-ammonia storage tanks are described in the application.

Sources: Missouri DNR, White Cloud Generating construction permit application, June 18, 2026 | DNR Pending Air Permits

Water and Wastewater

Several water-related questions remain part of the public record.

Water Supply

Public Water Supply District No. 1 commissioned a feasibility study in spring 2026.

The draft study evaluates potable and/or non-potable service alternatives.

Developer communications reported a requested service rate of up to 500 gallons/minute, with anticipated average demand of 100 gallons/minute.

Final service parameters have not been established in the sources reviewed.

Wastewater / Reclaimed water

Developer materials recommend reclaimed water for industrial operations and potable water for domestic use.

Maryville and PWSD No. 1 began discussions in September 2026 regarding potential sale of treated wastewater.

Potential use described publicly includes cooling and on-site power generation.

Any final agreements, rates, capacity and permitting requirements remain to be determined.

Sources: PWSD No. 1 draft feasibility study, July 13, 2026 | White Cloud water/wastewater study, July 14, 2026 | 104.9 The Cat, September 23, 2026

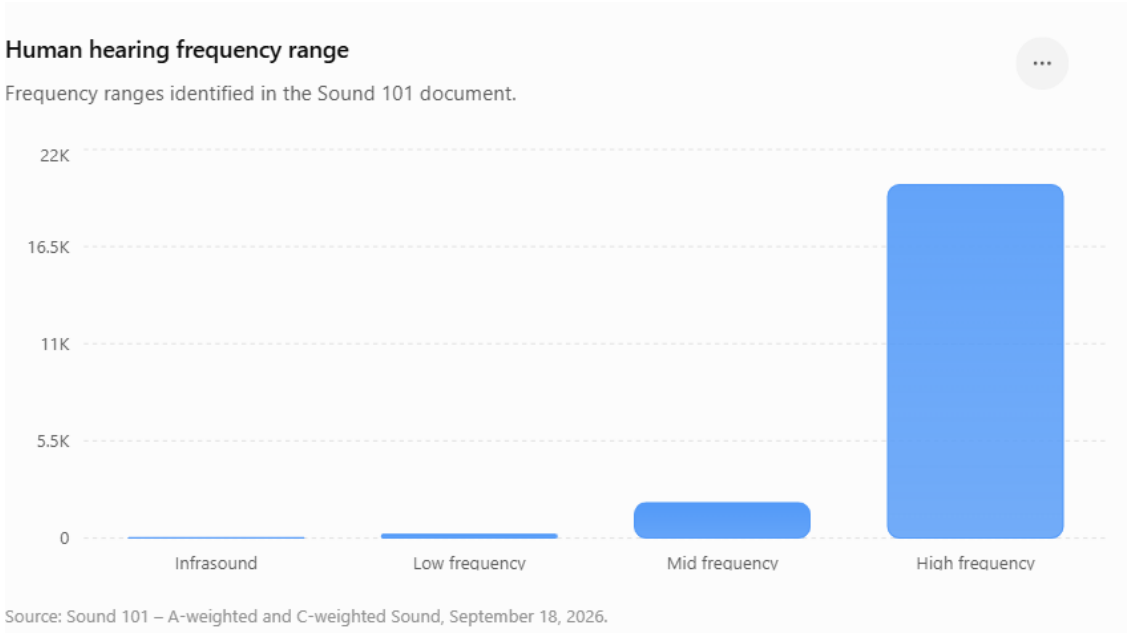
Electricity and Utility Infrastructure

- Developer materials describe an integrated data center and energy-generation concept.
- Public reporting indicates Evergy would serve the proposed data center.
- The DNR power-generation application describes an interconnection to the local bulk electric system.
- County meeting reporting in September described Grand River Mutual marking utility lines at the White Cloud Generating work site.
- Separate utility and transmission projects in the same general area may affect roads, construction traffic and infrastructure capacity; the County should distinguish project-specific work from other regional projects.

Sources: Missouri DNR application | Nodaway County Commission minutes | Sheridan Express, September 3, 2026 | White Cloud Acres project materials

Understanding Sound & Frequency

- Sound is created by vibrations that travel through the air as sound waves.
- Frequency, measured in Hertz (Hz), describes how many vibrations occur each second.
- Typical human hearing ranges from approximately 20 Hz to 20,000 Hz.
- Sound is commonly described as infrasound, low frequency, mid-frequency, treble/high frequency, and ultrasound.

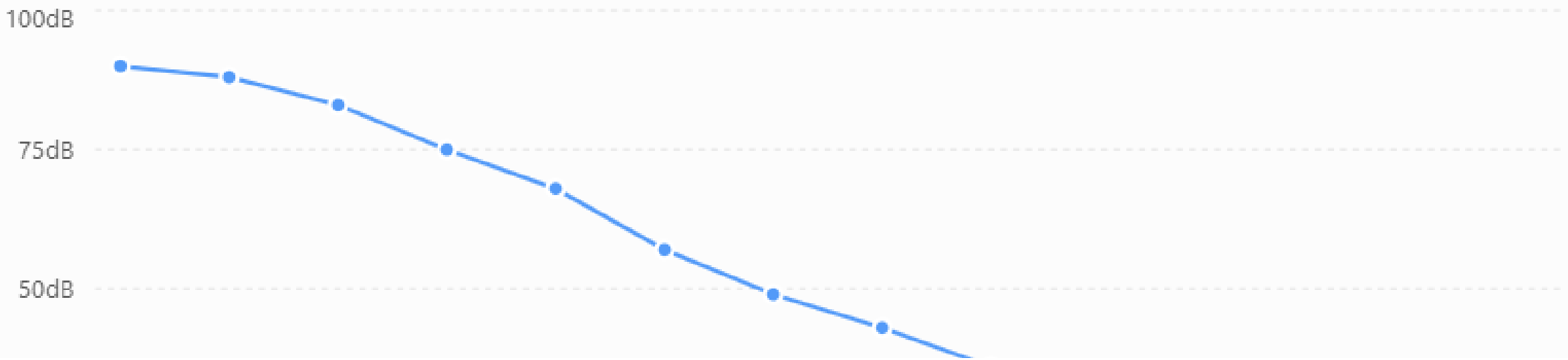


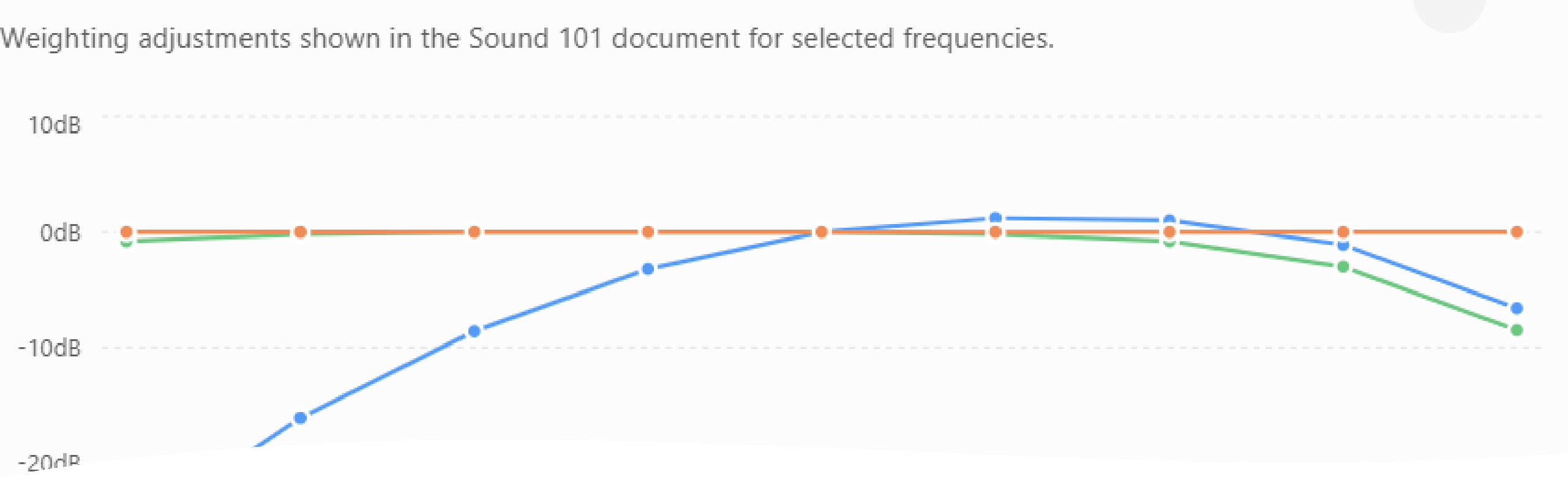
Human Hearing Is More Sensitive to Some Frequencies

- Human hearing does not perceive all frequencies equally.
- The document identifies approximately 250–5,000 Hz as the range where the human ear is typically most sensitive.
- Very low-frequency sounds require substantially higher sound-pressure levels to be heard.
- At 10 Hz, the document illustrates a hearing threshold of approximately 90 dB, compared with about 20 dB at 125 Hz.

Illustrated low-frequency hearing thresholds

Approximate values read from the hearing-threshold graph reproduced in the Sound 101 document.



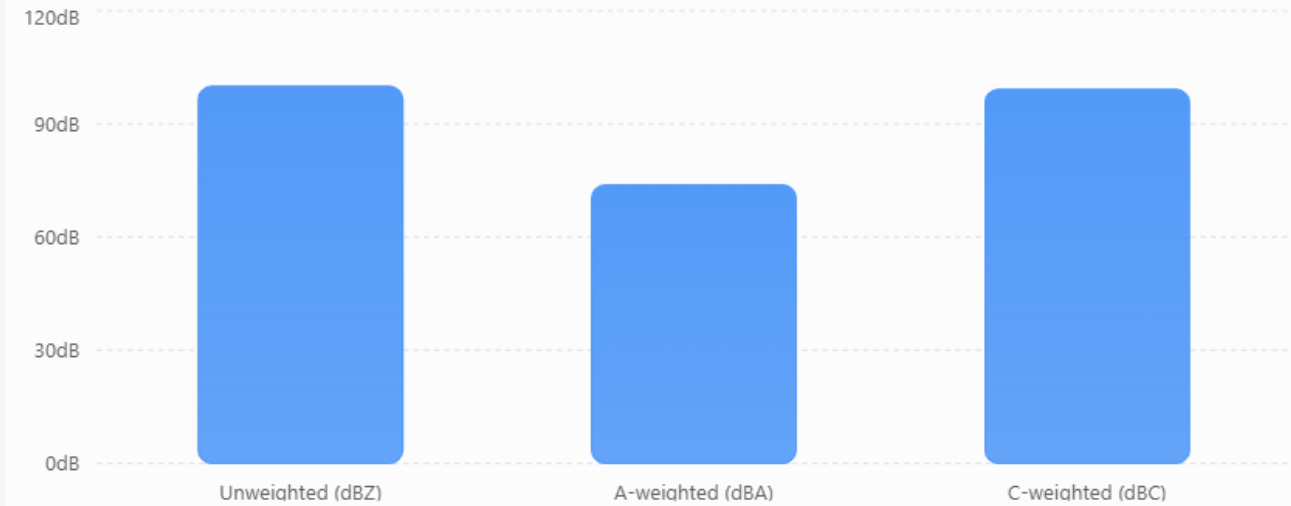


A-Weighted vs. C-Weighted Sound

- dBZ represents the unweighted sound level.
- dBA (A-weighting) adjusts sound measurements to approximate how humans perceive typical environmental sound.
- dBC (C-weighting) applies much less adjustment to low frequencies and therefore provides more information about low-frequency sound.
- The document recommends dBA as the primary compliance sound standard, while dBC can provide additional information about low-frequency noise.

Example: 100 dB sound at 63 Hz

Illustration from the document showing how A- and C-weighting affect the same unweighted sound level.



Example provided in Sound 101.

What This Means for Data Centers

- Low-frequency noise can be evaluated by comparing dBA and dBC measurements.
- The document identifies dBC − dBA greater than 20 dB as one criterion that can indicate potentially significant low-frequency noise.
- The document gives an example where 100 dB unweighted at 63 Hz becomes approximately 73.8 dBA and 99.2 dBC.
- The document states that data centers and natural-gas plants are not a significant source of infrasound and recommends that compliance standards remain based on dBA, with dBC used as supplemental information.

Sound 101 Memo

OLLSON
Environmental Health Management

September 18, 2026

Dan Scheffler
Vice President of Development, Data Centers
Scale Microgrids

Re: Sound 101 – A-weighted and C-weighted Sound

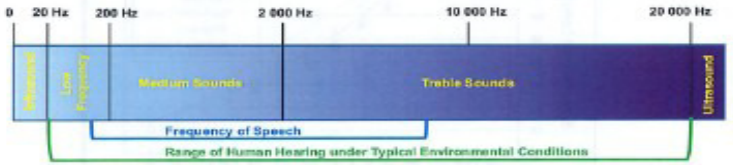
Mr. Scheffler,

As requested, Dr. Christopher Ollson of Ollson Environmental Health Management (OEHM) has prepared this brief overview of environmental sound and varying ways it can be reported.

Given that sound (mid to high frequency, low frequency noise and infrasound) is of primary importance to the community, it is important to provide a background on the varying terms that can be understood by all. Sound is simply a form of energy made when vibrations by an object cause movement in the surrounding air molecules. These air molecules collide with those next to them in a chain reaction that produces sound waves. This chain reaction continues until the molecules run out of energy. The number of vibrations per second is referred to as frequency and we measure this frequency in Hertz (Hz).

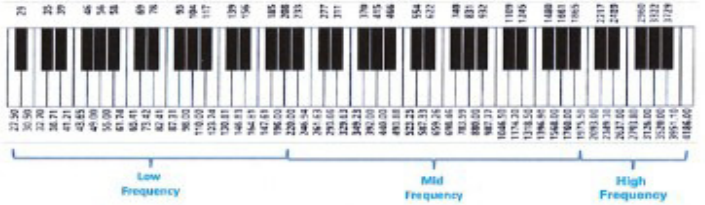
Sound is quantified by measuring the sound pressure in decibels (dB) at individual frequencies. The louder the sound, the higher the decibel readings. Specialized sound meters have been designed to measure the sound pressure levels (SPLs) across a wide range of frequencies. Human hearing is the function of these vibrations in the air entering the outer ear, which causes our eardrums to oscillate. These oscillations are then transferred to the middle ear that contains the ossicles bones that connect the eardrum to the inner ear (cochlea). The vibration of the ossicles causes movement of fluid in the inner ear. The movement of this fluid excites the ear hair cells that send electrical signals through the auditory nerve to our brains. Our brains then interpret these electrical signals as sound.

Under typical environmental sound conditions, the slowest vibrations that can be detected by a young human ear is in the range from 20 vibrations per second (20 Hz) up to the fastest of 20,000 vibrations per second (20 kHz). It is acknowledged that there is variation among people as to how we hear or perceive sound.

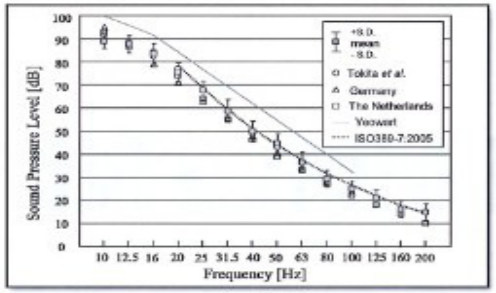


OLLSON
Environmental Health Management

The human ear perceives the loudness of a sound across a range of sound frequencies differently and is typically more sensitive to frequencies between 250 – 5,000 Hz. Sound frequencies are generally classified as infrasound (<20 Hz), Low Frequency Noise (20 to 200 Hz), medium and treble (high frequency) sounds (200 to 20,000 Hz) and ultrasound (>20,000 Hz). For example, the standard 88-key piano covers a frequency range of 27.4 Hz at key A0 (lowest key) to 4,186 Hz at key C8 (highest key), with middle C (C4) at 262 Hz.



The standardized hearing thresholds are established with a lower frequency range of 20 Hz, as shown below. The hearing threshold at frequencies below 20 Hz, described as infrasound, has been well studied. A summary example are the results from Tachibana (2012) as shown below, where at each individual frequency you would have to have a sound pressure level above the line in order to hear it. It can be seen that in order for a sound at 10 Hz to be above the hearing threshold, it would need to exceed a sound pressure level of approximately 90 dB, compared to 20 dB at 125 Hz. This 70 dB increase is substantial given the logarithmic nature of decibels and such high levels of infrasound are not commonly found in the environment. This is why infrasound is typically described as below the hearing threshold in our everyday environments.



Low Frequency and Infrasonic Hearing Thresholds for Pure Tones - age range of 20's (Tachibana, 2012)

Sound 101 Memo

OLLSON
Environmental Health Management

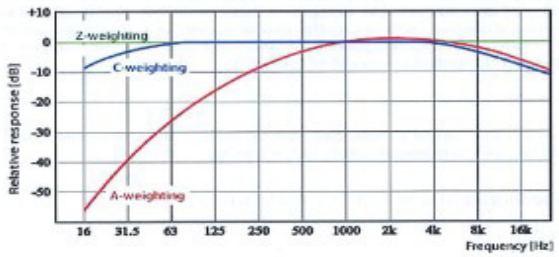
Over the years, researchers have developed adjustment factors or scales that weight varying sound frequencies to try and represent how people, our ears and our brains perceive noise. The acousticians measure or model the unweighted dB sound level at each of the individual frequencies. These unweighted sound levels in dB (known as dBZ) are then corrected at each frequency for the varying scales and then combined to give a single value. The unweighted sound measurements (dB or dBZ) across these frequencies can then be scaled, most commonly on the A- weighted (dBA) and C- weighted (dBC) scales.

To do this correction, an electronic filter can be applied to the unweighted sound. The unweighted sound (dBZ) is corrected at each frequency depending on which scale is applied and then combined to give an overall single value of weighted sound level.

Most commonly, sound is measured on the A- weighted scale (dBA). This scale provides greater weight to the mid and higher (treble) frequencies and less importance to the lower frequencies to which the ear is less sensitive. We use the A- weighted scale to describe the loudness of common everyday sounds in our lives and to evaluate the potential for hearing loss in occupational environments. The overall A- weighted sound level has been adopted by regulatory bodies worldwide, including in Missouri, given that it best approximates how humans perceive sound across the spectra at typical environmental sound levels

Comparison of the Z, C, and A Weighting Scale at Various Individual Frequencies

Frequency (Hz)	63	125	250	500	1k	2k	4k	8k	16k
A-weighting [dB]	-26.2	-16.1	-8.6	-3.2	0	1.2	1	-1.1	-6.6
C-weighting [dB]	-0.8	-0.2	0	0	0	-0.2	-0.8	-3.0	-8.5
Z-weighting [dB]	0	0	0	0	0	0	0	0	0



Sound scale weighting

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Environmental Health Management

The C-weighted sound curve has a much flatter response (smaller adjustments than the A-weighted curve) and represents the human response to loud sounds. Given this flatter response, the C-weighted sound levels may provide an indication of high levels of low frequency noise, particularly when the difference between the C-weighted and A-weighted sound level is evaluated.

The C-weighted scale can be used in combination with the A-Weighted scale to provide an indication of the potential community annoyance if the low frequency noise is to loud. One criteria is to ensure that dBC – dBA = <20 dB. Although not required, if one was to set a dBC sound limit, a typical target would be to set the appropriate A-weighted (e.g., 50 dBA) and then add 20 dB to create a C-weighted target of 70 dBC.

An example of how the weightings are used, if one measured 100 dB unweighted (dB or dBZ) from a sound that only included the 63 Hz frequency, then you would subtract -26.2 dB for adjusting to the A- weighted sound level yielding 73.8 dBA while only subtracting -0.8 for the C- weighted scale yielding 99.2 dBC. In this case, the dBC-dBA difference would be 25.4 which would indicate a higher level of low frequency noise as will be discussed in subsequent sections.

Another way to think about the difference in using the A-Weighted and C-Weighted scales is if you struck all the keys on the piano with equal strength, the human ear hears better the mid to high frequency keys better than the in the lower frequencies. Therefore, the A-weighted value would skew towards the loudness of how the ear hears the higher frequencies. The C-Weighted value for the same scenario would typically be between 8-15 db higher the A-Weighted value.

Some consideration should be provided to considering the contribution of low frequency noise (best reported by dBC) from data centers. This can be reported in the modeling sound study. I would recommend that the actual compliance sound standard be based on the dBA standard and that there is no need to set a dBC standard.

Infrasound is too low to be heard by the human ear at common everyday levels. It is typically reported as unweighted (dBZ) or on the G-weighted scale (dBG), a scale specifically designed for the assessment of infrasound where each frequency is weighted in accordance with its relative contribution to perception. It is a common misunderstanding that infrasound is inaudible. Although this is true for typical environmental infrasound levels, the audibility threshold on the dBG scale is between 85 to 95 dBG. For example, to approach these levels, one must usually be in a car with the windows rolled down and with very audible throbbing noise, or in an occupational or laboratory setting with mechanical equipment operating at very low frequencies. Data Centers and Natural Gas Plants are not a significant source of infrasound.

Closure

I recognize that sound can be a challenging topic to unravel. Let me know if this suits your needs or if it would be easier to discuss in person or in a meeting.

Sincerely,

OLLSON ENVIRONMENTAL HEALTH MANAGEMENT

Christopher Ollson, PhD

WHERE ARE WE NOW?

July 21, 2026

Moratorium enacted

October 13, 2026

(Day 84)

Information gathering & review

January 21, 2027

6-month period concludes

3 1/4 months remain for research and engagement

The moratorium can be extended for an additional 6 months

WHAT THE MORATORIUM DOES NOT MEAN

✕ It is not a permanent ban.

✕ It does not mean economic development is stopping.

✕ It is not a final decision about future data centers.

✓ It provides time for research, discussion and planning.

County Regulatory Context

What the public record shows about the County’s due diligence process?

On July 21, 2026, the County adopted an order and ordinance establishing a temporary moratorium on data centers in Nodaway County for purposes of due diligence.

→

County Commission minutes document resident questions and concerns regarding water, jobs, taxation, environmental effects, roads and other impacts.

→

Commissioners have reported submitting questions to the developer and attorneys and considering independent technical expertise.

→

County officials have discussed development agreements, permitting, possible zoning/planning tools and the scope of the County's authority.

→

Any legal or regulatory authority should be evaluated with County counsel and applicable state/federal law; this presentation does not provide a legal opinion.

Sources: Nodaway County Commission website and July 21, 2026 moratorium | Nodaway County Commission minutes | September 3, 2026 public reporting of Commission discussion

Potential Local Impacts Being Reviewed

This slide separates issues for analysis from conclusions.

Infrastructure & Environment

Water supply, groundwater and wastewater capacity.

Electrical generation, transmission and large-load requirements.

Road capacity, construction traffic and bridge impacts.

Stormwater, drainage and land disturbance.

Noise, air emissions and other environmental permitting.

Community & Fiscal

Construction and permanent employment.

Property-tax and other local revenue implications.

Potential tax incentives or development agreements.

Effects on schools and other taxing jurisdictions.

Emergency services, public safety and long-term infrastructure costs.

Economic information: What is Documented vs. Projected

Developer/Project Projections

Public project materials describe major capital investment.

Developer-presented materials have cited construction and long-term employment projections.

Developer materials also describe projected local tax contributions.

These figures are estimates and should be evaluated against final design, agreements, assessment methodology and actual project performance.

Sources: White Cloud Acres project materials | Nodaway County Commission minutes | KQ2, June 3, 2026

Questions for Verification

What portion of construction labor is expected to be local?

What permanent jobs will be located in Nodaway County?

What taxable property will be subject to local assessment?

What incentives, abatements or agreements are proposed?

What public infrastructure costs could fall on local entities?

What guarantees, performance requirements or security mechanisms would apply?

Key Questions for Due Diligence

1. Land ownership and site control: What property has actually been purchased, optioned, or otherwise controlled?

2. Water: What source, capacity, rates, backup supply, and protections will apply?

3. Wastewater: What treatment, discharge/reuse system and agreements are proposed?

4. Roads: What improvements, maintenance responsibilities, and construction traffic controls are needed?

5. Power: What generation, transmission, and interconnection facilities are required?

6. Environment: What state and federal permits are required, and what conditions will apply?

7. Fiscal: What are the assessed values, incentives, costs and net local fiscal effects?

8. Accountability: What development agreement, performance standards, bonding, or other protections are available to the County?

Scale Microgrid Responds to Local Concerns -- Water Use & Supply

Commission Question	Scale Microgrids / White Cloud Response
What is the anticipated water demand?	Up to 500 GPM requested service; approximately 100 GPM average annual demand. The 500 GPM capacity is primarily for periodic operational needs, including system filling.
Will the project use potable or reclaimed water?	Two alternatives are currently identified: reclaimed water from the Maryville wastewater treatment facility or potable water from Savannah.
What will be the water source? Will Mozingo Lake be used?	The final source has not been determined. The Rural Water District will establish final service parameters based on system capabilities and requirements.
Will the project drill wells?	White Cloud is comfortable with reasonable verification that wells are not drilled to serve the project.

Scale Microgrid Responds to Local Concerns -- Water Protections & Compliance

Commission Question	Scale Microgrids / White Cloud Response
How will the 102 River provision be addressed?	The Development Agreement is intended to ensure the project does not directly withdraw water from or discharge water into the 102 River within the project boundaries.
How will compliance be verified?	White Cloud is open to discussing reasonable independent verification of water discharge and well drilling, as well as annual compliance reporting.
Who determines water service requirements?	The Rural Water District will determine appropriate service parameters based on system capacity, existing customers and overall system requirements.
Who pays for required infrastructure improvements?	White Cloud Generating LLC will be responsible for capital improvements required to serve the project. Costs will not be passed to existing District customers.

Scale Microgrid Responds to Local Concerns – Sound Levels

Commission Question	Scale Microgrids / White Cloud Response
How will sound levels be measured and evaluated at non-participating residences?	Background sound levels were measured for seven days at several locations along the proposed project boundary representing nearby non-participating residences. Type 1 sound meters measure dBA, dBC and one-third octave bands.
How will operational sound levels be predicted?	The project will use CadnaA noise modeling software and the ISO 9613-2 sound propagation standard. The model will account for major equipment, distance, ground effects, atmospheric absorption, barriers and reflections.
What equipment will be included in the analysis?	Major outdoor sources including data center chillers, large electric transformers and power generation equipment. The analysis assumes equipment operates simultaneously under worst-case conditions.
What residences will be evaluated?	Sound levels will be calculated at participating and non-participating residences and across the surrounding area, with results shown as sound contours over aerial imagery.

Scale Microgrid Reponds to Local Concerns – Low-Frequency Sound & Compliance

Commission Question	Scale Microgrids / White Cloud Response
What information is available regarding low-frequency sound?	Both dBA and dBC measurements are being evaluated. dBA reflects human hearing response, while dBC gives greater consideration to low-frequency sound. The dBC–dBA difference is used to evaluate the presence of low-frequency energy.
What did existing measurements show?	Seven-day measurements conducted in July showed dBC–dBA levels frequently between 10 and 15 dB, with higher levels occurring at times. Additional details will be included in the consultant's sound study.
How will compliance be evaluated?	The modeled project sound levels will be compared with the 50 dBA sound limit. The study will provide predicted dBA and dBC levels from the proposed project.
How often should sound testing occur?	Scale Microgrids indicates that testing within 120 days following commercial operation and every four years thereafter would provide an appropriate compliance mechanism. They state that sound levels should not vary annually or semi-annually once the facility is fully constructed and operating.

Scale Microgrid Responds to Local Concerns – Setbacks

Commission Question	Scale Microgrids / White Cloud Response
Can the setback for the natural gas generation facilities be increased?	Scale Microgrids/White Cloud indicated they can consider a 1,250-foot setback for the natural gas generation facility from occupied residential dwellings.
Can setbacks for data center buildings be increased from adjacent property lines?	A 100-foot setback from property lines is considered reasonable for data center buildings.
Can setbacks from public roadways be increased?	The response specifically addresses a 100-foot property-line setback for principal data center buildings. Additional roadway setback requirements were not specifically addressed.
What infrastructure would the data center setback apply to?	The 100-foot setback would apply to principal data center buildings and would not apply to pipelines, transmission facilities, utilities, access improvements, fencing or similar infrastructure that may need to be located closer to property lines.

Scale Microgrid Responds to Local Concerns – Lighting

Commission Question	Scale Microgrids / White Cloud Response
Can you provide additional information regarding the project's exterior lighting plan?	The current draft addresses lighting in Section C.4, including limitations on color temperature and requirements for shielding or baffling.
Can the project incorporate downward-directed lighting and other measures to minimize off-site impacts?	The draft includes shielding or baffling requirements designed to direct lighting downward and minimize off-site impacts.
Can motion-activated lighting be used where appropriate?	White Cloud can agree to utilize motion-activated lighting where legally permissible and operationally appropriate.
Can additional lighting practices be included to reduce impacts on neighboring properties and the environment?	Additional requirements can be considered, provided they preserve lighting necessary for safety, security, emergency response, and facility operations.

Scale Microgrid Responds to Local Concerns – Fire Protection & Emergency Response

Commission Question	Scale Microgrids / White Cloud Response
Please provide details regarding the fire suppression systems that will be installed within the buildings and associated facilities.	The Project will incorporate fire detection, suppression, and life-safety systems appropriate for each building and its intended use, in accordance with applicable codes and standards. Specific fire protection systems will be determined during final design and may include automatic sprinkler systems, pre-action systems within data halls, and other specialized suppression systems appropriate for the equipment and materials present.
What training, equipment, technical information, and support will be provided to local emergency response agencies?	Prior to commencement of operations, White Cloud will coordinate closely with local fire departments and emergency responders regarding facility emergency response planning. This coordination may include information regarding site access, fire protection systems, hazardous materials inventory, emergency procedures, and incident response considerations.

Scale Microgrid Responds to Local Concerns – Stormwater & Runoff Management

Commission Question	Scale Microgrids / White Cloud Response
Please provide information regarding the project's stormwater management plan, including how runoff from buildings, paved surfaces, and parking areas will be collected, controlled, and mitigated.	Stormwater runoff from the project will be addressed through the project's civil engineering design and Stormwater Pollution Prevention Plan (SWPPP). Prior to land disturbance, the project will obtain the applicable Missouri Department of Natural Resources (MDNR) Construction Land Disturbance Stormwater Permit.
How will stormwater be controlled during construction?	The SWPPP will establish site-specific Best Management Practices (BMPs) to control erosion, sediment, and other potential pollutants during construction. Measures may include sediment basins, silt fencing, stabilized construction entrances, and erosion controls.

Scale Microgrid Responds to Local Concerns – Turbines & Emissions

Commission Question	Scale Microgrids / White Cloud Response
Please identify the specific make and model of the natural gas turbines proposed for use at the facility.	The project is designed to utilize exactly twelve (12) PROENERGY PE6000 simple-cycle natural gas-fired combustion turbines.
Please provide information regarding emissions controls, pollution mitigation measures, and applicable environmental compliance standards associated with the turbines.	Air emissions from the facility will be strictly regulated by the Missouri Department of Natural Resources (“MDNR”) and the U.S. Environmental Protection Agency (“EPA”). Nodaway County is currently classified as in attainment for all criteria pollutants. The project's air permit application establishes its Potential to Emit (“PTE”) and identifies the specific emissions-control technologies proposed for the facility.

Scale Microgrid Responds to Local Concerns –Emissions Controls & Pollution Mitigation

Scale Microgrids / White Cloud Response

The proposed emissions-control technologies include:

- **Oxidation Catalysts:** Installed on every turbine to control emissions of **Carbon Monoxide (“CO”)** and **Volatile Organic Compounds (“VOCs”)**.
- **Selective Catalytic Reduction (“SCR”):** A **“Hot SCR” system utilizing 19% aqueous ammonia injection** to actively control **Nitrogen Oxides (“NOx”)**.
- **Pipeline-Quality Natural Gas Fuel:** Exclusive use of pipeline-quality natural gas with a maximum sulfur content of **0.5 grains/100 standard cubic feet**, which minimizes **Sulfur Dioxide and Particulate Matter**.
- **Water Injection:** Demineralized water will be injected directly into the combustor section to **further abate emissions during operations**.

Scale Microgrid Responds to Local Concerns –Emissions Monitoring & Compliance

Scale Microgrids / White Cloud Response

To ensure **accuracy, transparency, and ongoing compliance** with applicable standards, the facility will employ:

- **Continuous Emission Monitoring Systems ("CEMS"):** Installed and operated on turbine exhaust stacks to provide **real-time, continuous tracking**, measured in 1-hour averages, of emissions including **CO**.
- **Performance Stack Testing:** White Cloud Generating must conduct **initial and periodic physical stack tests** to verify pollutant emissions and ensure they meet **vendor guarantees**.
- **Fuel Monitoring & Reporting:** The facility must continuously **monitor and record fuel usage** and submit mandatory reports for any **excess emissions or monitoring downtime** to both **MDNR and EPA**.

Scale Microgrid Responds to Local Concerns – Real Estate Structure

Commission Question	Scale Microgrids / White Cloud Response
Is the intention of White Cloud/Scale to lease the ground and buildings to a third party once constructed, or is White Cloud/Scale going to retain the ground and buildings and lease the infrastructure to one or more tenants?	Neither of the two options described above reflects the intended structure. Scale is performing all horizontal development of the site. Upon completion, Scale will assign the land and materials to a hyperscaler, who will be the owner and operator of the data center facility outright, rather than leasing it from Scale or subleasing infrastructure from Scale. Scale will separately retain ownership and operation of the natural gas facility supporting the data center.

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Scale Microgrid Responds to Local Concerns – Fire Suppression

Commission Question	Scale Microgrids / White Cloud Response
On fire protection and emergency response, No. 5 — the response states that specific systems will be determined during final design and may include automatic sprinkler systems, pre-action systems within data halls, and other specialized suppression systems where appropriate. Can you tell us whether the Developer intends to include automatic sprinklers and pre-action systems based on its preliminary project plans?	We expect further responses from our third-party fire subject matter expert. Our preliminary answer is yes.

White Cloud Questions

1. Water Use and Supply

- Please confirm the anticipated maximum daily water demand for the project.
- Will the project utilize potable water, reclaimed water, or a combination of both?
- What will be the source(s) of water serving the project? Specifically, will any water be supplied from Mozingo Lake or facilities associated with Mozingo Lake?
- We will need to address the provision stating that the project "shall not withdraw or discharge water from or into the One Hundred and Two River within the boundaries of the Project."
- Can you confirm that the project does not contemplate drilling of wells on or off site?
- We need to discuss an initial means of independent verification of compliance with these water-related provisions and annual compliance reporting.

The Rural Water District will ultimately have the authority to determine appropriate service parameters based on its system capabilities, existing customer needs, and overall system requirements.

From a project standpoint, White Cloud Generation LLC is requesting service of up to 500 gallons per minute ("GPM"), which would establish the maximum flow rate for the facility. The Project is being planned and operated with an anticipated average demand of approximately 100 GPM over the course of the year. The additional capacity up to the 500 GPM limit would primarily accommodate periodic operational needs, including system filling, rather than represent the facility's typical or sustained water demand.
Final service parameters will be established in coordination with the Rural Water District.

Important to note that any capital improvements required to serve the project would be the financial responsibility of White Cloud Generating. The costs associated with those improvements would be borne by the project and would not be passed on to the District's existing customers or local constituents.

White Cloud is willing to make its executed water service agreement with the Rural Water District available, as the District will be the entity responsible for providing water service to the project. For domestic uses, this water will be sourced from the District, like any other customer of the District. The precise source of that water is not known at this time. The currently identified service alternatives for the gas facility are reclaimed water from the wastewater treatment facility in Maryville or potable water from Savannah.

The proposed Development Agreement language is intended to make clear that the project will not directly withdraw water from, or discharge water into, the 102 River within the project boundary. White Cloud is also comfortable with reasonable verification that water wells are not being drilled to serve the project.

We are open to discussing reasonable compliance verification for water discharge and drilling of wells. Water demand and supply is the purview of the District.

2. Sound Levels

- Please provide additional information regarding the methodology used to measure and evaluate sound levels at non-participating residential dwellings.
- The County would also appreciate any available information regarding low-frequency sound impacts and associated dBA measurements.
- Similar to the water issue, we need to discuss the initial means of independent verification of compliance and annual or semi-annual sound compliance testing and reporting.

Continuous sound level measurements will be made for about one week at four locations in essentially the four corners of the Project property to determine the background (ambient) sound levels in the vicinity of some of the closest non-participating residences. Sound levels will be measured using Type 1 sound level meters programmed to log data every hour with a one-second time history. Microphones will be positioned five feet above ground. The meters will measure various broadband A-weighted (dBA) and C-weighted (dBC) sound levels along with one-third octave band sound levels. The meters will be calibrated before and after the measurement program. Meteorological conditions will be measured two meters above ground during the program such that periods of high winds or precipitation could be excluded from the analysis following industry standard.

The operational sound level impacts associated with the proposed Project will be predicted using the CadnaA (Computer Aided Noise Abatement) noise calculation software program developed by DataKustik GmbH. CadnaA uses the ISO 9613-2 international standard for sound propagation (Acoustics - Attenuation of sound during propagation outdoors - Part 2: Engineering method for the prediction of sound pressure levels outdoors). The software allows for calculation from multiple sound sources, as well as computation of diffraction, drop-off with distance, ground attenuation, atmospheric absorption, multiple reflections, and barrier effects. The CadnaA software package has been widely used by the acoustical consulting community for analyzing sound impacts from industrial and energy developments.

The CadnaA model will include the major outdoor equipment at the facility that is expected to generate sound. This includes data center building chillers, large electric transformers, and the power generation portion of the site. To be conservative, the analysis will assume that all of this equipment is operating at the same time under worst-case conditions, and the predicted sound levels will be compared with the 50 dBA sound limit. The model will also include other conservative assumptions, so the results do not understate potential sound levels. Sound levels will be calculated at nearby residences, non-participating and participating, and across the surrounding area and shown as sound level contours over aerial imagery.

A non-participating residential dwelling is a residence whose owner has not entered into an agreement with the Developer. The nearest non-participating residence is approximately 2,000 feet from the primary Project equipment, with additional residences generally located one-half mile or more from the Project and the majority located more than one mile away. These distances provide substantial separation between Project operations and surrounding residences.

There are several ways that sound levels can be measured and quantified. All of them use the logarithmic decibel scale (dB). The most commonly reported sound level is the A-weighted level (dBA) because it most closely approximates how the human ear responds to sound at various frequencies (low, middle, and high). A-weighted sound levels emphasize middle frequency sounds and de-emphasize low and high frequency sounds. The C-weighted level (dBC) quantifies the same sound a little differently. C-weighted levels treat a wide range of frequencies equally and therefore do not deemphasize low frequency energy. The difference between the dBC level and the dBA level (dBC – dBA) tells us how dominant low frequency sound is. A difference of about 15 to 20 dB indicates that low frequency sound is dominant.

Both dBA and dBC levels can be measured in the existing acoustic environment. We contracted our acoustic consultants to measure existing sound levels for seven days in July at several locations along the edge of our proposed site. The locations were selected to represent the closest non-participating residences. Results from the measurement program show that the dBC-dBA levels are frequently between 10 and 15 dB and were higher at times. Further details of the existing sound levels will be presented in a sound study report by the consultant. The study will also present predicted dBA and dBC sound levels from the proposed project.

The proposed sound monitoring requirement of testing within 120 days following commercial operation and every four years thereafter provides an appropriate compliance mechanism. Once the facility is fully constructed and operating, sound levels should not vary on an annual or semi-annual basis.

3. Setbacks

- We want to discuss setbacks for the natural gas generation facilities than those currently proposed.
- We also want to discuss increased setbacks for data center structures from adjacent property lines and public roadways.

We can consider a setback of 1,250 feet, for the natural gas generation facility from occupied residential dwellings.

For data center buildings, a 100-foot setback from property lines appears reasonable. The setback should apply to principal buildings and should not apply to pipelines, transmission facilities, utilities, access improvements, fencing or similar infrastructure that may need to be located closer to property lines.

4. Lighting

- Please provide additional information regarding the project's exterior lighting plan.
- The County would like to consider requirements for downward-directed lighting and other measures designed to minimize off-site impacts, including motion-activated lighting where appropriate and additional practices that reduce environmental and neighboring property impacts.

Scale Microgrids Responds Source Document

points will be incorporated as necessary to appropriately manage runoff. These systems will be designed in accordance with applicable MODNR requirements and finalized as part of the project's detailed engineering.

7. Turbines and Emissions

- Please identify the specific make and model of the natural gas turbines proposed for use at the facility.
- Please provide information regarding emissions controls, pollution mitigation measures, and any applicable environmental compliance standards associated with the turbines.

The project is designed to utilize exactly twelve (12) PROENERGY PE6000 simple-cycle natural gas-fired combustion turbines.

Air emissions from the facility will be strictly regulated by the Missouri Department of Natural Resources ("MODNR") and the U.S. Environmental Protection Agency ("EPA"). Nodaway County is currently classified as in attainment for all criteria pollutants. The project's air permit application establishes its Potential to Emit ("PTE") and identifies the specific emissions-control technologies proposed for the facility. These include:

- Oxidation Catalysts: Installed on every turbine to control emissions of Carbon Monoxide ("CO") and Volatile Organic Compounds ("VOCs").
- Selective Catalytic Reduction ("SCR"): A "Hot SCR" system utilizing a 19% aqueous ammonia injection to actively control Nitrogen Oxides ("NoX").
- Pipeline-quality Natural Gas Fuel: Exclusive use of pipeline-quality natural gas with a maximum sulfur content of 0.5 grains/100 standard cubic feet, which minimizes Sulfur Dioxide and Particulate Matter.
- Water Injection: Demineralized water will be injected directly into the combustor section to further abate emissions during operations.

To ensure accuracy, transparency, and ongoing compliance with these standards, the facility will employ rigorous verification mechanisms:

- Continuous Emission Monitoring Systems ("CEMS"): The facility will install and operate CEMS on the turbine exhaust stacks to provide real-time, continuous tracking (measured in 1-hour averages) of and CO levels.
- Performance Stack Testing: White Cloud Generating must conduct initial and periodic physical stack tests to verify the emissions of pollutants, ensuring they meet vendor guarantees.
- Fuel Monitoring Reporting: The facility must continuously monitor and record fuel usage and submit mandatory reports for any excess emissions or monitoring downtime to both MODNR and the EPA.

8. Real Estate Structure

- Is the intention of White Cloud/Scale to lease the ground and buildings to a third party once constructed, or is White Cloud/Scale going to retain the ground and buildings and lease the infrastructure to one or more tenants.

Neither of the two options described above reflects the intended structure. Scale is performing all horizontal development of the site. Upon completion, Scale will assign the land and materials to a hyperscaler, who will be the owner and operator of the data center facility outright, rather than leasing it from Scale or subleasing infrastructure from Scale. Scale will separately retain ownership and operation of the natural gas facility supporting the data center.

9. Fire Suppression

- On fire protection and emergency response, No. 5 - the response states that specific systems will be determined during final design and may include automatic sprinkler systems, pre-action systems within data halls, and other specialized suppression systems where appropriate - can you tell us whether the Developer intends to include automatic sprinklers and pre-action systems based on its preliminary project plans?

We expect further responses from our third-party fire subject matter expert. Our preliminary answer is yes.

The current draft addresses lighting in Section C.4, including limitations on color temperature and addresses downward-directed lighting through requirements for shielding or baffling. White Cloud can also agree to utilize motion-activated lighting where legally permissible and operationally appropriate. Any additional lighting requirements should preserve necessary lighting for safety, security, emergency response, and facility operations.

5. Fire Protection and Emergency Response

- Please provide details regarding the fire suppression systems that will be installed within the buildings and associated facilities.
- The County would also like to understand what training, equipment, technical information, and support will be provided to local emergency response agencies to address potential incidents involving equipment or materials used at the project.

The Project will incorporate fire detection, suppression, and life-safety systems appropriate for each building and its intended use, in accordance with applicable codes and standards. The specific fire protection systems will be determined during final design and may include automatic sprinkler systems, pre-action systems within data halls, and other specialized suppression systems where appropriate based on the equipment and materials present.

Prior to commencement of operations, White Cloud will coordinate closely with local fire departments and emergency responders regarding facility emergency response planning. This coordination may consist information related to site access, fire protection systems, hazardous materials inventory, emergency procedures, and incident response considerations. White Cloud will make commercially reasonable efforts to provide information and orientation regarding significant on-site hazards, including the storage and handling of aqueous ammonia and other regulated materials. Any specialized training, equipment, or response resources for emergency responders shall be subject to mutual coordination and agreement between White Cloud and the applicable responding agencies.

6. Stormwater and Runoff Management

- Please provide information regarding the project's stormwater management plan, including how runoff from buildings, paved surfaces, and parking areas will be collected, controlled, and mitigated.

Stormwater runoff from the project will be addressed through the project's civil engineering design and Stormwater Pollution Prevention Plan ("SWPPP"). Prior to land disturbance, the project will obtain the applicable Missouri Department of Natural Resources ("MODNR") Construction Land Disturbance Stormwater Permit. The SWPPP will establish site-specific Best Management Practices to control erosion, sediment, and other potential pollutants during construction, including measures such as sediment basins, silt fencing, stabilized construction entrances, and erosion controls.

The final civil design will address permanent stormwater runoff from buildings, roads, parking areas, and other impervious surfaces. Based on the site's drainage analysis, engineered controls such as detention or retention areas, swales, culverts, drainage systems, and stabilized discharge

Scale Microgrid Source Document

Public Record: Key Documents to Review

Missouri DNR — White Cloud Generating LLC construction permit application (2026-06-032).

U.S. Army Corps of Engineers — NWK-2026-00145, White Cloud Acres, LLC – White Cloud Acres.

Nodaway County Commission — July 21, 2026 temporary data-center moratorium.

Nodaway County Commission — 2026 meeting minutes and agendas.

PWSD No. 1 — Draft Water Feasibility Study.

White Cloud Acres — Water Use & Wastewater Management Study and project information.

Publicly reported Maryville/PWSD wastewater discussions.

Public Record: Key Documents to Review

Scale Microgrids Responses to Nodaway County Commission Document

Ollson Environmental Health Management –Sound 101 Memo

Primary Sources and Public Links

Nodaway County Commission — Data Center Information / Minutes
https://nodawaycountymo.us/commission-minutes/

White Cloud Acres — Project Website

https://whitecloudacres.com/

Missouri DNR — Pending Air Permits

https://dnr.mo.gov/air/business-industry/permits/pending

White Cloud Generating — DNR Application

https://dnr.mo.gov/sites/dnr/themes/dnr_2020/mo-viewer/viewer.html?file=https%3A%2F%2Fdnr.mo.gov%2Fsites%2Fdnr%2Ffiles%2Fvfc%2F2026%2F07%2Fmain%2Fwhite-cloud-generating-barnard-cp-application-complete-july-2026.pdf

U.S. Army Corps of Engineers — Public Regulatory Database

https://permits.ops.usace.army.mil/orm-public?mode=table&org=NWK&type=jds

PWSD / White Cloud — Draft Water Feasibility Study

https://whitecloudacres.com/water-feasibility-study/

Important Note for the Public

This presentation is intended to summarize publicly available information, not to advocate for or against the project.

Some information comes from developer materials, government records, Commission minutes, and news reporting. Those sources do not all have the same status or purpose.

Where information is a projection, proposal, discussion point or reported statement, it should not be treated as a final fact.

Permits, agreements, infrastructure plans, assessments and project details can change as review proceeds.

Residents are encouraged to review the underlying documents and participate in applicable public meetings and comment opportunities.