# Orion's Way: The Transparency Standard

**Don't touch the farmland. Build on what's already here. Give back more than you take.**

Orion's Way builds high-density compute capacity on its own independent steel frame above existing large-format buildings, such as grocery stores and big-box retail, or on brownfield sites. It uses passive cooling and waste heat recovery instead of new construction on farmland, and the business below keeps operating. The conventional model asks a community to sign an NDA before it even sees a site plan. We ask for nothing. Every line below is public before a shovel goes in the ground, and for as long as the facility runs.

Version 6 · October 2026 · A work in progress, and a genuine attempt to do this better

| CATEGORY | WHAT WE SHOW | FORMAT | WHEN YOU SEE IT |
|---|---|---|---|
| **Site & Design** | Full 3D flyover of the finished facility, exterior and rooftop, from every angle | Rendered video or model | Public before permitting begins |
| **Footprint & Structure** | Square footage used, added height and volume, setback distances | Site plan diagram | Filed with the permit application; public record |
| **Construction-Phase Impacts** | Schedule, working hours, noise and dust controls, truck routes and traffic plan, and a staffed complaint line (detail below) | Plain-language plan plus running log | Published before groundbreaking; log updated during construction |
| **Power Draw** | Total facility load (MW), peak vs. average, source mix | Simple chart, updated annually | Public dashboard |
| **Grid Impact** | Plain-language summary of the interconnection study: does this trigger new power generation? | Summary of utility filing | Published before the interconnection agreement is signed |
| **Water Use, Discharge & Treatment** | Gallons per day and source, cooling method, coolants and any chemical treatment by name, wastewater, permits, drought plan (detail below) | Public one-pager with baseline comparison | Updated as engineering finalizes |
| **Heat Reuse Rate & Recovery Output** | Energy Reuse Factor (the share of facility energy put to use), each use the heat goes to, and how much was vented unused, by season (detail below) | Table plus running total; modeled figures clearly labeled | Modeled figure before permitting; measured quarterly once operating |
| **Noise & Emissions** | Decibel level at the property line, any emissions sources | Measured reading vs. local ordinance limit | Annual third-party test, published |
| **Jobs & Local Spend** | Construction jobs, permanent operational jobs, dollars spent with local contractors | Headcount plus dollar figure | Published at groundbreaking, updated annually |
| **Tax Contribution** | Estimated annual tax contribution to the host community | Dollar figure | Public before the site agreement is finalized |
| **Host Business Continuity** | Written confirmation the operating business below is not displaced: same hours, same parking | Signed commitment | Included in every site agreement; public |
| **Ownership & Contact** | The company that owns and operates the facility, listed by its legal name, plus a staffed community contact line and email that is required to respond within a set time (detail below) | Company name plus community contact line and email | Posted on-site and on the public site page |
| **Safety Plan Summary** | Fire and life-safety approach, in plain language | Plain-language summary | Filed with the fire marshal; summary public |
| **End-of-Life, Decommissioning & Site Remediation** | Lifespan, equipment and hazardous-material handling, remediation and who pays, public notice (detail below) | Public commitment | Filed as part of the initial site agreement |

## CONSTRUCTION-PHASE IMPACTS (detail)

Construction is where a community feels a project first. Before groundbreaking, the operator publishes:

1. Construction schedule and expected duration, including working hours and any weekend or night work.
2. Noise and dust controls, and how they will be measured during construction.
3. Truck routes, delivery windows, and the traffic plan for nearby streets and the host business's customers.
4. A staffed complaint line and email, and a public log of complaints and how each was resolved.

**Orion's Way's specifics:**

- Because we build over an operating business, construction is planned around the host business's hours and parking, consistent with the Host Business Continuity commitment above.
- Site-specific schedules and routes are published once a host site and its permits are in place.

## WATER USE, DISCHARGE & TREATMENT (detail)

Any operator following this standard should disclose:

1. Total water use per day and per month for cooling, and the source (municipal supply, groundwater well, surface water, recycled or gray water).
2. Whether cooling is water-based (cooling towers, evaporative cooling) or water-free (air-based, passive, closed-loop).
3. If water-based: volume of wastewater discharged, discharge frequency, and destination (municipal sewer, on-site treatment, surface water body).
4. Every coolant and chemical used in any cooling loop (including chip-level liquid cooling, biocides, corrosion inhibitors, scale inhibitors), by product name and disclosed concentrations.
5. Any permits held or required for water withdrawal or discharge (state DNR, local utility).
6. Contingency plan for water use during drought or municipal water restrictions.

**Orion's Way's specifics:**

- Cooling method: passive wind-catcher (badgir and malqaf) cooling combined with waste heat recovery. This is air-based, not water-based cooling towers. Typical hyperscale data centers commonly cycle large volumes of water through cooling towers with ongoing chemical treatment and discharge; this is a structural difference.
- Chip-level cooling: the servers use a sealed liquid loop of water and food-grade propylene glycol (roughly 75 percent water, 25 percent glycol), filled once and recirculated rather than evaporated. No PFAS coolants and no HFC refrigerants. The exact product, including any corrosion inhibitors, will be named here once selected, along with the loop volume and how small top-offs are tracked.
- Water use: expected to be limited to standard building water use rather than a dedicated cooling water cycle. Final figures are pending engineering and a review of backup cooling steps, including whether any evaporative assist during extreme heat introduces water use that must be disclosed here.
- Wastewater discharge and chemical treatment: none anticipated without a water-based cooling loop. If any is introduced during design, it will be disclosed by name and concentration.

## HEAT REUSE RATE & RECOVERY OUTPUT (detail)

Nearly all the electricity a data center uses turns into heat. Most facilities vent it. The community deserves to know how much is put to work and how much is simply dumped into the local air. Any operator following this standard should disclose:

1. The facility's Energy Reuse Factor (ERF), the industry measure defined in ISO/IEC 30134: the share of total facility energy that is captured and put to use. Before permitting this is a modeled figure, clearly labeled as modeled. Once operating it is a measured figure.
2. What counts as reused. Heat used outside the facility (by a neighbor or a district heating loop) is reported separately from heat used inside the site, such as the host building or an on-site greenhouse, so the number can be compared fairly with standards that only count off-site use.
3. Each use the heat goes to, in order from hottest to coolest (for example: host building heating, hot water, greenhouse, snow melt), and how much each one received.
4. How much heat was rejected to the outdoors unused, and when. Most reuse is seasonal, so report by month or season, not only as a yearly average.
5. How ERF is measured, so anyone can check the math: at a minimum, the water temperature going to and coming back from the heat reuse system, the difference between them, the flow rate, and where each meter is located.
6. Any heat reuse partner or customer, and whether that arrangement is contracted or informal.

**Orion's Way's specifics:**

- Cooling and heat reuse are not one fixed design. Each site's setup is chosen from a menu of options based on its climate, geography, the heat demand nearby, and local water stress. A cold-climate site might lean on building heat and snow melt; a dry site might turn waste heat into water; a humid site might use it for dehumidification. Each site publishes which options it chose and why.
- Whatever the mix, heat is reused in a cascade: the hottest heat goes to the highest-value use first, and what is left moves down the line before anything is vented. Menu options include backup power from waste heat, heating the host building and its hot water, a rooftop greenhouse, a district heating loop, water harvesting from air, seasonal ground storage, and lower-temperature uses such as snow and ice melt.
- Heat reuse is never relied on to keep the servers cool. The facility's cooling system is designed to carry the full load on its own, so on days when nobody needs the heat, reliability is unaffected.
- Because each site's mix is different, heat reuse rates are reported per site and per season. A Wisconsin site's summer number should not be compared to a desert site's, and we will say so whenever we publish one.
- All heat reuse figures today are modeled, not measured. We will not publish a target percentage as a promise until pilot data supports it.
- For context only: Germany requires new data centers to reuse at least 10% of their energy starting July 2026, rising to 20% by 2028. We are not aware of any U.S. requirement for data centers to even report this figure. We report it anyway.
- If a quarter's measured ERF falls short of the modeled figure, the shortfall is published with an explanation, the same way a failed noise or emissions reading is handled below.

## OWNERSHIP & CONTACT (detail)

A community should always know who is responsible for a facility and have a real way to reach them. Not everyone will welcome a data center, and the people who work on one deserve to be safe at home. This standard balances both:

1. The owning and operating company is published by its legal name, along with its registered business address. Company ownership is also public record through the state.
2. A staffed community contact line and email, monitored during business hours, with a published response time. The contact is a role, such as a community liaison, not a private individual's personal phone number.
3. Every inquiry and complaint is logged, and the public log shows how and when each was resolved.
4. If the owner or operator changes, the new company's name and contact line are published within 30 days.
5. Personal home addresses and personal phone numbers of owners and staff are not published, for their safety. This protects people, not information: every disclosure on this page about the facility itself stays public.

## END-OF-LIFE, DECOMMISSIONING & SITE REMEDIATION (detail)

Any operator following this standard should disclose:

1. Expected operational lifespan of the facility and equipment.
2. What happens to the physical structure at end of life (removed, repurposed, or left in place).
3. What happens to equipment, including battery storage, waste-heat equipment, servers, and cabling, and whether it is disposed of, recycled, or resold.
4. Any hazardous materials involved in decommissioning (battery chemicals, refrigerants, coolants) and how they will be handled.
5. Site remediation commitments: will the site be restored to its prior use, and who is financially responsible if the operator cannot or will not do this (bond, escrow, insurance).
6. Timeline and public notice process if a decommissioning decision is made. This should never be a surprise to the host community.

**Orion's Way's specifics:**

- Because the facility stands on its own frame and does not alter the host building, decommissioning means removing the frame and the added infrastructure (battery storage, waste-heat equipment, greenhouse, wind-catcher towers) and restoring the site around the host building, which keeps operating normally.

- Still being finalized before any site agreement: financial responsibility (bonding or escrow for removal costs), hazardous-material handling for battery units, and the public notice timeline.

## WHAT WE DON'T PUBLISH

- **Granular security and access-system specifications**, meaning anything that would hand a bad actor a blueprint.
- **Patented and proprietary design details**, such as exact engineering geometry and control logic. What the facility does and how it performs (its footprint, load, water, heat, noise, and emissions) is always public. Only how specific protected parts are engineered is withheld.
- **Personal home addresses and personal phone numbers** of owners and staff, as described under Ownership & Contact.

That's it. Footprint, load, water, coolants, heat, heat reuse, noise, jobs, tax, ownership, and end of life are all public by default, not by request.

## QUESTIONS WE EXPECT, AND ANSWER UP FRONT

**What happens if the facility is sold?** The Transparency Standard is a binding condition of the site agreement, not a policy of the current owner. It transfers with the facility: any new owner or operator inherits the same public reporting obligations, or the agreement is in breach.

**What happens when a test shows a violation in noise, emissions, or water, or heat reuse falls short of its modeled figure?** The failed reading is published alongside the passing ones, not suppressed. We publish a remediation plan and timeline within 30 days, and re-test on the same public schedule until it clears. A missed number is disclosed, not hidden.

**Why isn't a named person's phone number listed?** Because some people feel strongly about data centers, and nobody's family should pay for that. You still get a real, staffed line that has to answer you, a public record of every complaint and how it was handled, and the company's legal name. Accountability stays with the company, where it belongs.

**How does this survive real utility, security, or patent constraints?** Utility interconnection filings and fire and life-safety plans already have confidentiality provisions we don't control. Where that applies, we publish the plain-language summary a regulator would allow, not the underlying filing itself. Security and patented design details are the only categories withheld outright, for the same reason a bank publishes that it has a vault without publishing the combination. Everything else on this page is published in full.

**Is this finished?** No. This is a work in progress and a genuine attempt to help communities get a better deal. We expect to keep improving it based on what people tell us is missing.

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