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PHASE 1B PRELIMINARY LAND DEVELOPMENT PLAN SOUND STUDY REVIEW LETTER #1

MIDDLESEX TOWNSHIP, CUMBERLAND COUNTY, PA

Attn: Mr. Bud Grove, Township Engineer

Preliminary Land Development Plan for Pennsylvania Digital 1 (PAX-1) Phase 1-B

Middlesex Twp. Plan No. TPF 25-25

April 23, 2026

We have completed our review of the following information for the above-referenced project:

Submission:	Dated:	Last Revised:
Sound Study	4/13/2026	--

We offer the following comments (* - Indicates comments not addressed from previous review letters):

SOUND

Background Information

As requested by Herbert, Rowland & Grubic, Inc., (HRG) and in conjunction with Middlesex Township, ATCS, Inc. (ATCS) has performed a thorough review of the draft *PAX1 Noise Memo 041326*, recommendations and findings for compliance with the Township Noise Ordinance. As part of this effort, ATCS has generated a list of comments to ensure the citizens of the township are protected, and the goals of the noise portion of the ordinance are met. The following sections of the memo outline our comments for your consideration.

1.0 Comments and suggestions for PAX1 – Noise Study, Middlesex Township, Pennsylvania

ATCS reviewed PAX-1 – Noise Study, primarily focusing on the technical noise portions of the report. ATCS offers the following comments and suggestions for your consideration:

Comment 1, Figure 3, Site Layout – It would be beneficial to have an additional figure showing the locations of the proposed noise walls to document their positioning for the township. This will allow the township to easily understand the mitigation locations, as well as once developed, confirm the developer has installed all the necessary mitigation as shown and documented in the technical noise analysis. In addition to the figure,

it would be beneficial to have a table that has the recommended heights and lengths of proposed noise barriers as well as the NRC/STC minimum standards of the material being used.

Comment 2, Table 2, Modeled Equipment Noise Levels – The noise study appears to rely on assumed equipment performance and mitigation measures; however, it is unclear whether the specific site equipment has already been selected. Please clarify whether the modeled equipment reflects actual specified units to be installed at the proposed facility. If equipment has not yet been finalized, describe how the developer will ensure that the installed equipment meets or exceeds the sound performance levels used in the analysis.

Additionally, please provide the source data and supporting documentation for the assumed noise reduction performance of the proposed louvers. In the absence of referenced manufacturer data or other verifiable sources, it is difficult to confirm that the modeled attenuation is achievable.

Finally, additional documentation is needed to demonstrate that the as-built condition will be consistent with the assumptions used in the noise model.

Comment 3, Ambient Monitored Noise Levels – While not a requirement of the Ordinance, there are significant issues with the field collection techniques. In several areas, snow is present during the testing duration, which can create a reflective or absorptive ground cover, depending on the characteristics of the snow, thus not accurately representing the typical ambient environment. Furthermore, review of weather data for the dates where noise levels were collected indicate rain was prevalent in the area, which causes wet roads, road spray and can magnify the effect of roadway noise on the ambient environment, thus not accurately representing the ambient acoustic environment.

2.0 Conclusion

Based on the information provided, the developer has demonstrated that the proposed site is expected to operate in compliance with the Township's Noise Ordinance. However, additional supporting documentation would be beneficial to enable the Township to verify that the as-built installation is consistent with the assumptions and standards used in the noise modeling analysis.

The observations and comments contained herein are intended to assist in confirming and maintaining compliance and should be taken into consideration, as appropriate, for future submissions and final design documentation.

PAX-1 Data Center Phase 1B
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This review is based solely on the documents referenced above and does not relieve the design professional of any responsibility, nor does it imply any design responsibility by Herbert, Rowland & Grubic, Inc. HRG reserves the right to make additional comments in the future based on newly-supplied or revised information as provided by the applicant or their representative(s).

Sincerely,

Herbert, Rowland & Grubic, Inc.

A handwritten signature in blue ink, appearing to read "J. Michael Hess".

J. Michael Hess, PE
Team Leader

JMH/ARK

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