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# FROM SUPERFUND TO SERVER HALL: CONSIDERATIONS FOR SUPERFUND AND BROWNFIELD SITE REDEVELOPMENT FOR DATA CENTERS

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# AGENDA

Overview

Opportunity and Value Proposition

Risks and Considerations

Risk Mitigation Approach

Outcome

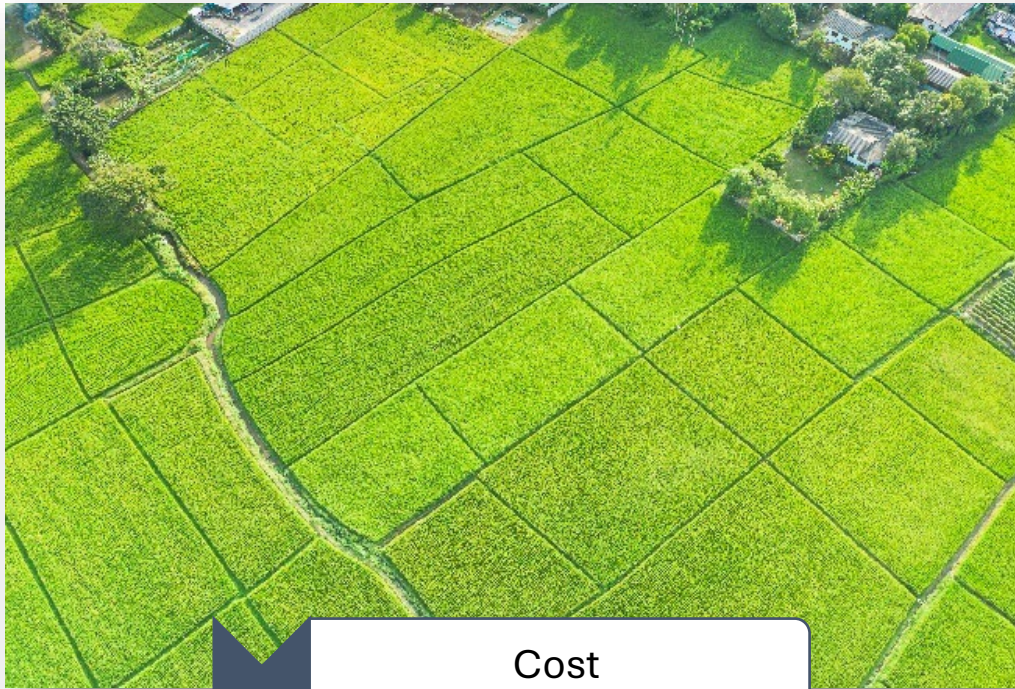
Conclusions



## ***EPA was directed to expedite Brownfield and Superfund Site redevelopment for data centers***

- July 2025 Executive Order directed Federal Agencies to take actions to streamline and accelerate data center development
- Actual impact remains to be seen
  - As an example, Army Corps of Engineers did not make any modifications to NHPs for data centers, just noting them as a type of development
- Superfund does remain an EPA priority with a specific focus on reuse

# Selecting Hidden Gems – Key Differentiators



Cost

Competition

Public Perception



Infrastructure

Flexibility

Incentives

# The Multi-Benefit Value Proposition

## *Benefits that Matter to Developers and Hyperscalers*



**Infrastructure  
Reuse**



**Funding  
Programs**



**Innovation**

# The Opportunity: Impacted / Underused Sites

## A Strategic Site Class

Impacted and unused properties can enable rapid implementation and multi-benefit outcomes

May be located away from key receptors → improved public support dynamics

May already have communication network established for community and local support.



# Reality Check: The Risk Categories



**Environmental  
Uncertainties**



**Remedy  
Compatibility**



**Worker  
Exposure Risks**



**Aged  
Infrastructure**



**Lingering  
Liabilities**



# Risk Registration Framework: Evaluate + Mitigate Early

**Speed through disciplined risk management:**

**Evaluate and  
Mitigate Risks**

**Register and  
Manage Risks**

**Tie Risk Decisions  
to Schedule**

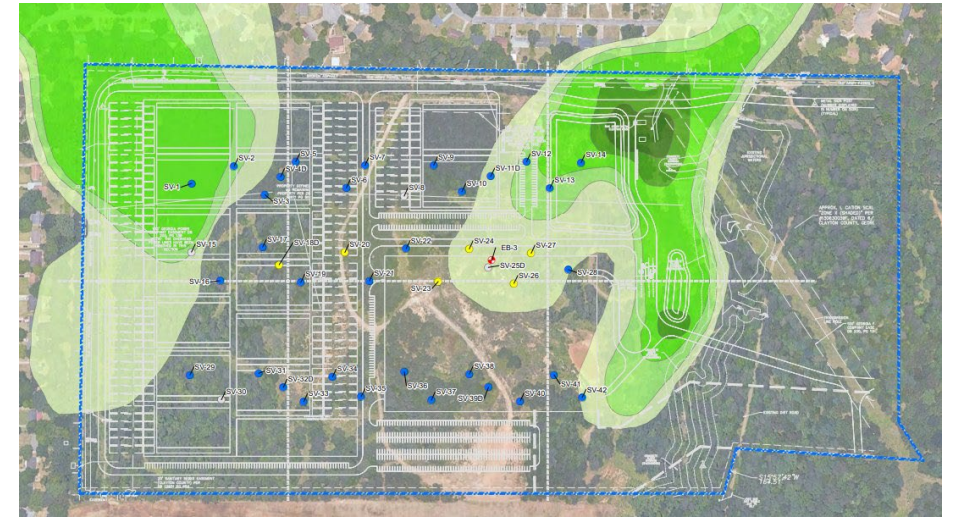
**How Teams Keep Momentum:**

- Use strategies for registering the variety of potential risks
- Repeatability: **Screen** → **Register** → **Mitigate** → **Document**

# Case Study

## Data Center Brownfields Redevelopment VOC and Methane-Impacted Site

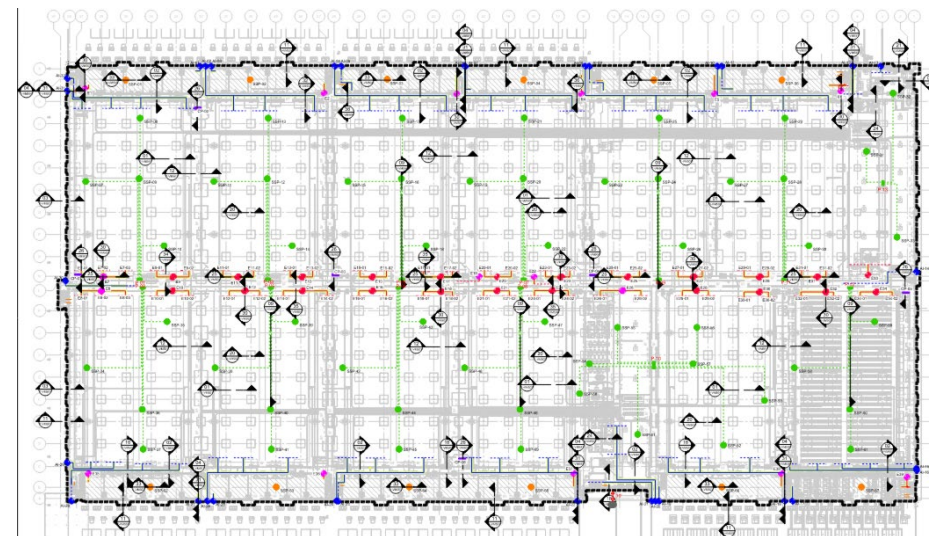
- Context – what made it hard:
  - Extensive VOC plume variability across site
  - Thick vadose zone
  - Compounded by use as former dump site – Methane issues



# Case Study

## Data Center Brownfields Redevelopment VOC and Methane-Impacted Site

- What we did:
  - Voluntary Cleanup Program support
  - Environmental contamination risk evaluation & remedial costing
  - Excavation, extraction wells, vapor intrusion evaluation and mitigation system design



# Takeaways

## Impacted Sites

- Are not shortcuts
- Can be hidden gems when risks are evaluated and mitigated early

## What “done well” creates

- Multi-benefit outcomes + positive perceptions
- Stronger “social license to operate” for data centers





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**THANK YOU!**

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