To: Secretary, Pennsylvania Public Utility Commission
Re: Docket No. M-2026-3059601, PATER Report Part A, Comments regarding Cromby Generating Station (Chester County)
From: Black Rock Boat Club, Phoenixville, PA, and the undersigned members
Date: October 12, 2026

The Black Rock Boat Club is located on the Schuylkill River directly downstream of the former Cromby Generating Station. Our members boat, engage in wake sports, and fish on the Schuylkill River daily, April through October. The Black Rock Boat Club was established in 1950, before Cromby's first unit went into service in 1954. We have members who have been observing the river for longer than Cromby has existed. We submit these comments so that river impacts are fully weighed before Cromby advances to Part B.

1. Require no net evaporative water loss from the Schuylkill during low flows, measured at this reach.
Our members have observed extended summer periods with river flows at or below 560 cfs, the low-flow threshold the Delaware River Basin Commission applies to Limerick Generating Station upstream. Under that condition, Limerick must replace the water it consumes when Schuylkill flows at Pottstown are at or below 560 cfs with two units operating. Any generation or large-load configuration evaluated for Cromby should assume either air (dry) cooling or no net consumptive use of Schuylkill water under the same conditions, at a threshold at least as protective as Limerick's.

The nearest gauges, Pottstown upstream and Norristown downstream, bracket this reach but do not measure it. Pottstown is above both Limerick's withdrawal and the Cromby site, and Norristown is below major tributary inflows. Any low-flow condition for Cromby should be measured at or near the site itself. We ask that Part B require flow, temperature, and dissolved oxygen monitoring at or near Cromby before any withdrawal is permitted, and that low-flow limits be tied to that local monitoring rather than to a distant gauge.

2. Evaluate this reach of river and cumulative withdrawals.
Near the Cromby site, our members observe the river running slow, flat, and shallow through the summer. Shallow, slow water is especially sensitive to reduced flow and summer warming.

Part A's finding that nearby rivers could supply cooling water was a generic screening statement, not an assessment of this reach. Part B should specifically evaluate whether the Schuylkill near Cromby can supply cooling water during summer low flows without harm to depth, temperature, and dissolved oxygen.

Part B should also evaluate the combined consumptive use of Limerick Generating Station, data centers proposed along the river, and any Cromby redevelopment during drought conditions. Each facility's water use may appear minor when evaluated alone. The concern for this river is the combined effect of many such facilities during the same low-flow periods, and no single project review accounts for that.

3. Evaluate impacts on wildlife habitat (including food sources) that the river, its riparian buffers, and its wetlands provide.
This reach supports nesting bald eagles and peregrine falcons. Osprey and yellow-crowned night herons are present during their breeding seasons, with behavior strongly indicating nesting.

The yellow-crowned night heron is listed as endangered in Pennsylvania. The Game Commission identifies the only known breeding site in the state as being in Dauphin County, and names declining water quality and loss of crayfish as threats to the species. The reach also supports species the Pennsylvania Wildlife Action Plan identifies as Species of Greatest Conservation Need, including peregrine falcon, and American kestrel. It serves as migratory stopover habitat for endangered species including the blackpoll warbler.

The greatest risk to all of these species is loss of habitat (including food sources). Reduced flow, higher temperatures, and lower dissolved oxygen would negatively affect the riparian buffer and and the fish and crayfish some of these species depend on. This year's widespread osprey nest failures along the East Coast, tied to declining fish stocks, show how quickly fish-dependent species are harmed when their food supply falls.

Any redevelopment configuration should protect habitat at Cromby and where Cromby's activities impact the river downstream. Plans should account for the peregrine nest on the remaining stacks, and should coordinate with the Pennsylvania Game Commission on all species of concern. Part B should evaluate qualitative impacts on aquatic, riparian, and associated wetland habitat and dependent wildlife — it is insufficient to focus on water quantity alone.

4. Contamination at Cromby is documented, not hypothetical.
Part A lists Cromby's soil and groundwater contamination as "to be determined." DEP's 2022 review of the site's stormwater permit (NPDES PA0011631) documents PCBs leaving the site:

- In December 2021, wet-weather PCB samples measured 854,458 pg/L at Outfall 002, 27,330 pg/L at Outfall 004, and 845 pg/L at Outfall 009.
- Pennsylvania's human-health water quality criterion for PCBs is 0.000064 µg/L (64 pg/L) (25 Pa. Code § 93.8c, Table 5). That criterion applies to in-stream concentrations rather than undiluted stormwater, but the Outfall 002 sample was roughly 13,000 times that value.
- DEP required a PCB pollutant minimization plan "based on the PCB sampling results," and noted the permittee "was not aware of this requirement and has not followed the requirement."
- The permit sets no numeric PCB limit, only annual reporting.
- These outfalls discharge to a segment of the Schuylkill listed as impaired for PCBs.

Part A also places the site in a FEMA floodway. We ask that Part B treat Cromby's contamination as documented, require soil and groundwater sampling before ranking the site,

and require a cleanup plan protective of the river before any redevelopment configuration advances.

5. Rule out once-through cooling.
When generating, Cromby drew its cooling water from the Schuylkill. Our members recall the water near the plant being very warm and algae-laden during those years. Any future configuration should exclude once-through cooling.

6. Engage river users before Part B decisions.
We request a public session in the Phoenixville area, and that recreational river users be included in the stakeholder process for any Schuylkill River site.

7. Identify current operations at the site.
DEP's 2022 permit review described the Cromby site as "largely cleared, dismantled, and unoccupied," and Part A classifies it as deactivated. Yet structures that have stood on the site throughout that period, including the stacks, remain visible from the river and the Schuylkill River Trail. The owner advertises lease income from an existing long-term tenant. Our members observe ongoing activity: a full parking lot and a loud, metallic, vibrating noise audible from the river and the trail, comparable to noise levels when the plant was generating power. We ask that Part B identify what is currently operating at Cromby, under what permits, and how existing uses would interact with any redevelopment configuration.

We ask that the Schuylkill River be treated as a primary consideration in evaluating any redevelopment of Cromby.

Respectfully submitted,

M. Kirsten Snyder (document author, conservation consultant)
President, Black Rock Boat Club, Phoenixville, PA

Sam Greenlee, BRBC Vice President, Schwenksville, PA
Ward Kerlin, BRBC Treasurer, Spring City, PA
David Schubert, BRBC Dock Chair, Royersford, PA

And Undersigned Members, continued on next page:

Robert W. Grubb, Auburn, PA
Jack Cisick, Collegeville, PA
Patrick O'Neill, Exton, PA
John Naile, Phoenixville, PA
Cynthia Naile, Phoenixville, PA
Alan Grover, Phoenixville, PA
Zadie Young, Phoenixville, PA
Graydon Young, Phoenixville, PA
Craig Gillen Bangor, PA
Rebecca Gillen, Bangor, PA
Mike Neff, Schwenksville, PA
Bob Cullum, Pottstown, PA
Eric Stout, Phoenixville, PA
Mike Schneider, Phoenixville, PA
Sara Schneider, Phoenixville, PA
Thomas P. Kauffman, Hatfield, PA
Tracy L. Kauffman, Hatfield, PA
Carol Igler, Phoenixville, PA

Continued, Black Rock Boat Club Undersigned Members:

Erik Igler, Phoenixville, PA
Greg Pollick, Pottstown, PA
Ryan Quinby, Pottstown, PA
Julie Quinby, Pottstown, PA
Abe Quinby, (under 18), Pottstown, PA
Chris Holmes, Malvern, PA
Amy Mellinger, Malvern, PA
David Holmes, Valley Forge, PA
Jason Angelides, Wayne, PA
Robert Bonney Jr, Downingtown, PA
Jeff Lotz, Collegeville, PA
Shannon Lotz, Collegeville, PA
Mark Capirano, Richboro, PA
Ryan Steckle, Royersford, PA
Erin Steckle, Royersford, PA
Scott Schubert, Royersford, PA
Mark Ott, Graterford, PA
Stephanie Ott, Graterford, PA
Gary Noll, Phoenixville, PA
Scott Beman, Foglesville, PA
Suzy Beman, Foglesville, PA
Charles Ziegler, North Wales. PA
Joseph F. Smith, Collegeville, PA