



WILMINGTON TUG, INC.

April 19, 2018

Division of Air Quality  
Delaware Department of Natural Resources and Environmental Control  
100 West Water Street, Suite 6A  
Dover, DE 19904

RE: Comments Regarding Proposed Beneficiary Mitigation Plan

Thank you for allowing us to comment and respond to the questionnaire.

We are a tugboat company that's located in the Port of Wilmington and handle the majority of ship dockings in Delaware. We also do stores delivery for ships on the Delaware River as well as provide all of the launch service at Bigstone Anchorage. We have a total of 14 tugs, supply vessels, and crewboats working, ranging from 400 to 5000 horsepower. The boats range in age from 1965 to 2008 with engines from early 1980 to 2014. One of our most recent re-powers was in 2013 with help from DNREC using a DERA grant. As you can see boats can last a long time if maintained.

Responding to the questionnaire:

1. The three phased approach is workable if the paperwork for the second phase can be started and approved in phase one with the money released during the second phase. I would suggest doing the same with the third phase.
2. We have to compare engine replacement with engine rebuilds. The new engines require larger cooling systems to meet the new tier ratings which requires shipyard service as well as new exhaust, mounts, alignments, etc. We have checked for upgrade kits but none are available for the type of engines currently in service. A simple rebuild will cost 25-30% of replacement so the 40/60 cost share makes it very difficult to decide on new engines. A 60/40 cost share would help to speed the transition to newer equipment.

The final item I would like to mention is the proposal only calls out "Ferries/Tugs" for help with cost share. Other marine commercial vessels should be included such as the service vessels and crewboats as mentioned above as well as passenger/dinner cruise vessels.

Thank you,

Bill Martin  
Wilmington Tug, Inc  
302 652 1666

