

Delaware's CO₂ Budget Trading Program -- Regulation 1147

Public Workshop
August 7, 2008



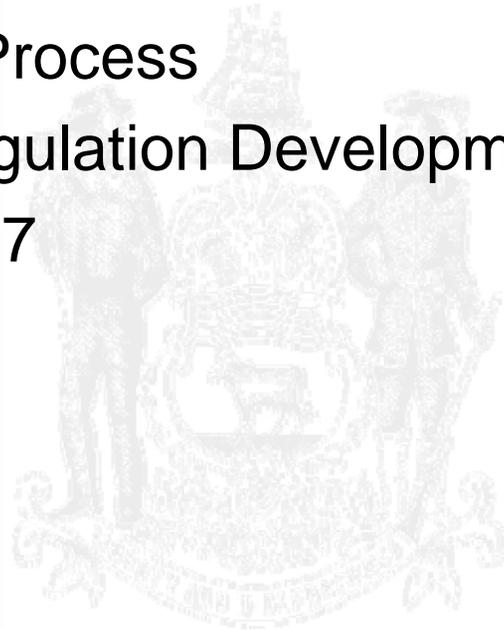
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and Environmental Control – Air Quality
Management Section*

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Overview

- Background Information
- RGGI Design Process
- Delaware's Regulation Development Process
- Regulation 1147



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Background Information

■ **Statistics**

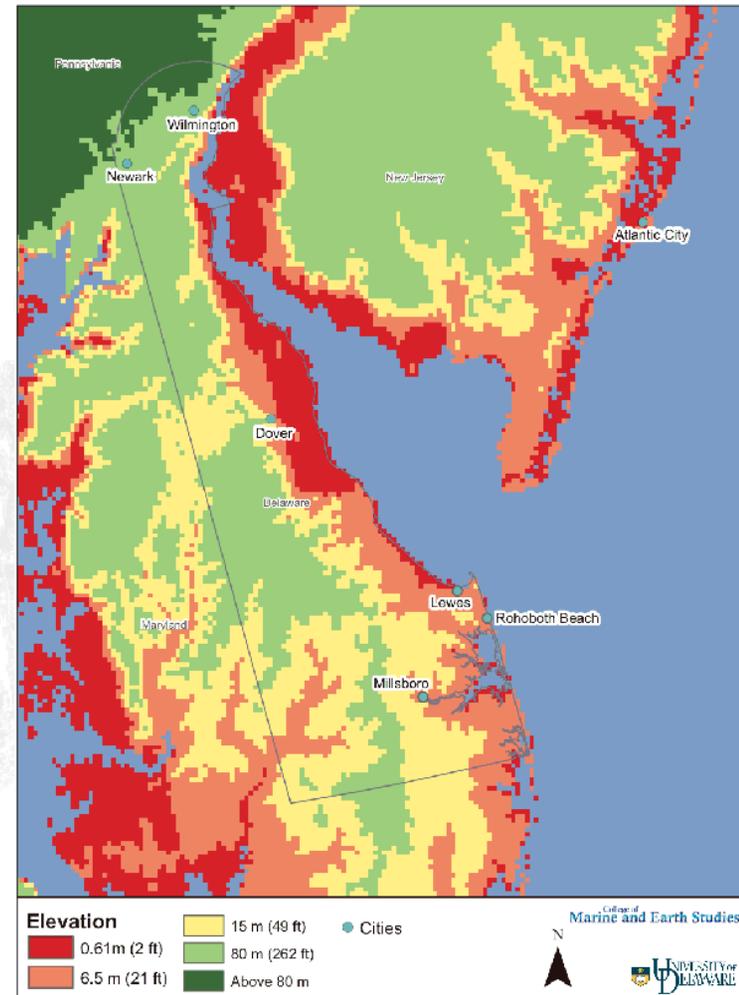
- 3rd Largest World Economy
- 14% of US Greenhouse Gas (GHG) Emissions
- 3.2% of World GHG Emissions (\cong Germany)



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Local & Regional Impacts from Climate Change

- Since 1900 the average temperature at Dover, DE has risen by 1.9° F and precipitation has increased by almost 10%.
- At Lewes, DE, sea level has risen 12 inches in the last century, and is likely to rise another 23 inches by 2100.
- Delaware's tidal coastline measures 381 miles: 357 miles on the Delaware Bay and 24 miles on the Atlantic Ocean.



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Potential Impacts From Climate Change - Delaware & the Mid-Atlantic Region

(<http://www.usgcrp.gov/usgcrp/Library/nationalassessment/newsletter/2000.06/midatl.html>)

Summary of MAR Impacts	Negative Impact	Positive Impact
Most Certain <ul style="list-style-type: none"> • <i>Agricultural production</i> • <i>Coastal zones</i> • <i>Temperature related health status</i> 		
Moderately Certain <ul style="list-style-type: none"> • <i>Forestry production</i> • <i>Temperature related health status</i> 		
Uncertain <ul style="list-style-type: none"> • <i>Biodiversity</i> • <i>Fresh water quantity</i> • <i>Fresh water quality</i> • <i>Ecological functioning</i> • <i>Vector and water-borne disease health status</i> • <i>Environmental effects from agriculture</i> 		

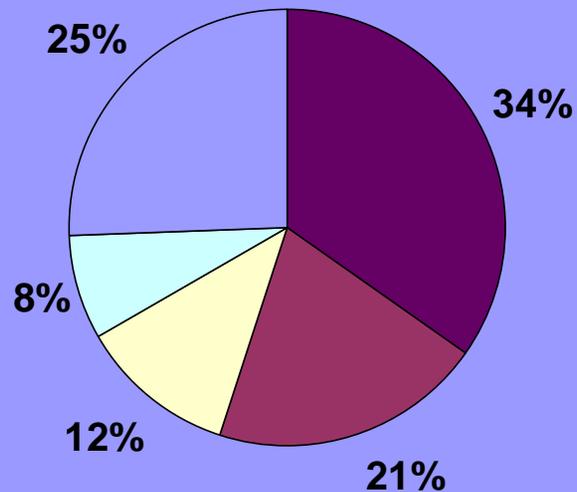
Summary of impacts from climate variability and change that might occur in the MAR by the year 2100.
The size of an arrow indicates an impact's expected magnitude in relative terms.



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Environmental Impacts from Delaware's Energy Sector - CO₂

Relative CO₂ Emissions



■ Utilities ■ Industry ■ Residential
■ Commercial ■ Transportation



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Regional Greenhouse Gas Initiative

An Initiative of the Northeast & Mid-Atlantic States of the U.S.

■ RGGI Timeline

- April 2003 Invitation from NY Governor Pataki
- August 2003 Staff Working Group began development of the RGGI Design Principles
- December 2005 Memorandum of Understanding signed by Governors
- August 2006 Model Rule drafted to aid participating states in the development of their individual regulations
- September 2008 First RGGI Auction of CO₂ Allowances



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Regional Greenhouse Gas Initiative

An Initiative of the Northeast & Mid-Atlantic States of the U.S.

■ Program Goal

- Central to this initiative is the implementation of the multi-state cap-and trade program with a market-based emissions trading system.
- The proposed program will require electric power generators in participating states to reduce carbon dioxide emissions beginning January 1, 2009.



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RGGI Design Principles

- Reduce CO₂ with flexible, market-based program to achieve least cost reductions.
- Create model for federal program.
- Maintain electricity affordability, reliability and fuel diversity.
- Make expandable to other states.
- Build on programs in place.



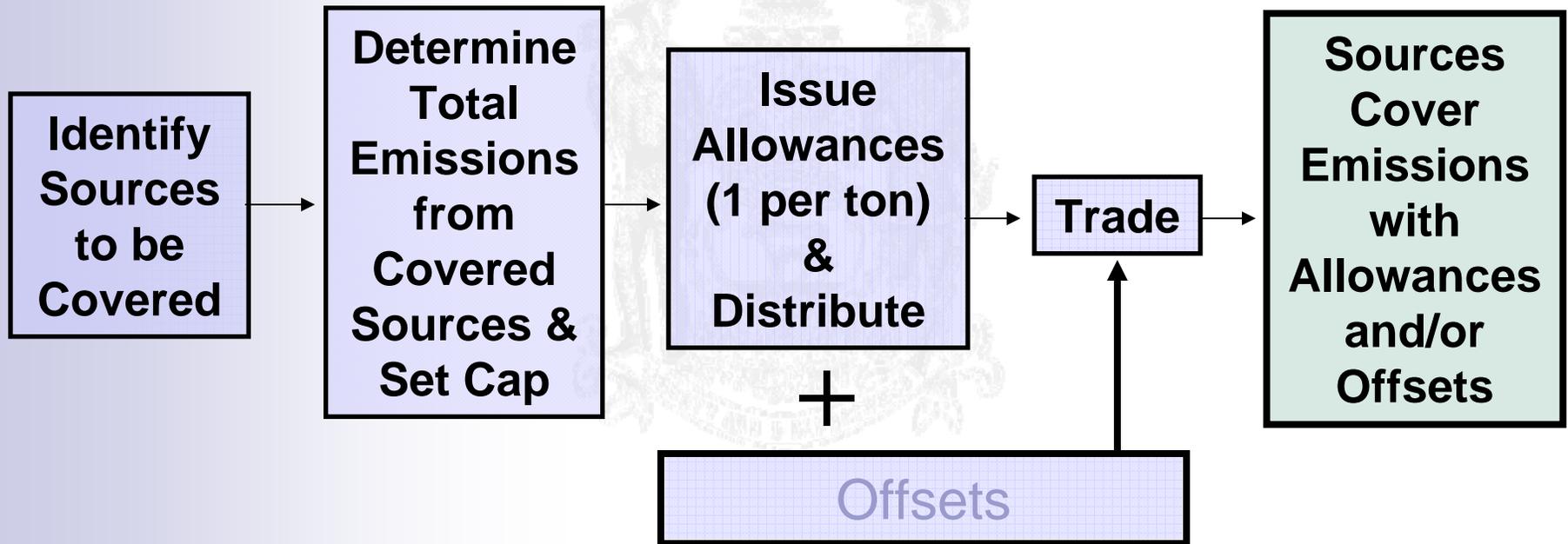
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Designing RGGI: A Cap-and-Trade Program



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RGGI Program Components

- Start Date of January 1, 2009.
- Electric Generating Units 25 Megawatts+
- Two-Phase Cap
 - Stabilize Emissions through 2015
 - Reduce 10% by 2019.
- Offsets allowed to provide some flexibility.
- Price trigger safety valves to control costs.



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RGGI Program Components

- Allocations/Auctions:
 - Requires a minimum 25% of the state's budget to be auctioned for Consumer Benefit and/or Strategic Energy Purpose
 - Remaining 75% of the allocations left to each state to allocate
- 3-Year Compliance Period
- Banking Allowed
- Comprehensive Program Review occurs 2012



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RGGI State Allocations

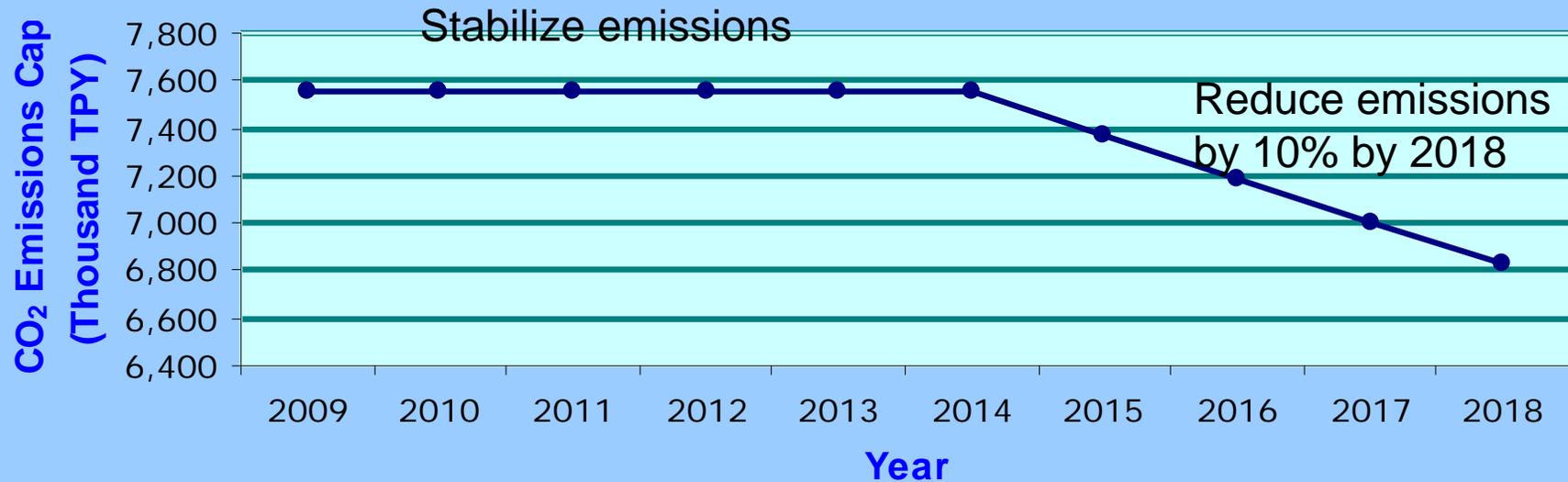
Connecticut:	10,695,036 tons
<i>Delaware:</i>	<i>7,559,787</i>
Maine:	5,948,902
Maryland:	37,503,983
Massachusetts:	26,660,204
New Hampshire:	8,620,460
New Jersey:	22,892,730
New York:	64,310,805
Rhode Island:	2,659,239
Vermont:	<u>1,225,830</u>
	188,076,976 tons

*Based on adjusted actual annual average emissions from all affected facilities (2000-2002)



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Delaware's RGGI CO₂ Emissions Allocation 7,559,787 tons



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RGGI Program Components

- **Offsets—project-based reductions:**
 1. Landfill methane capture & destruction.
 2. Reduction in emissions of sulfur hexafluoride (SF6)
 3. Sequestration of carbon due afforestation
 4. Reduction/avoidance of CO2 emissions from natural gas, oil or propane end-use combustion due to end use energy efficiency.
 5. Avoided methane emissions from agricultural manure management.



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RGGI Program Components

- **Safety Valves – *If after the Market Settling Period, the average regional spot price exceeds...***
 - \$7.00 Trigger
 - Limit on offset use increased from 3.3% to 5% of a source's reported emissions
 - \$10.00 trigger
 - Offset limit goes to 10%
 - Retirement of international credits allowed
 - Compliance period may be extended 1 year for a maximum compliance period of 4 years
 - No program suspension, alternative compliance payments or additional allowances



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Model Rule

- Model Rule finalized August 2006 and corrected January 2007. (see www.rggi.org for information regarding the Model Rule)
- States have begun to initiate state-specific legislative and/or rulemaking processes.



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RGGI States Rulemaking Status, 08/07/08

State	Cap & Trade Rule Status			Auction Rule Status		
	Proposed?	Adopted?	Comments	Proposed?	Adopted?	Comments
Connecticut	1/2008	5/30/2008	Final	N/A		No auction rule
Delaware	9/2008		To propose 9/2008	N/A		Auction provisions within cap & trade regulation
Maine	8/2007	12/2007	Final	4/15/2008	6/15/2008	Final
Maryland	2/2008	4/7/2008	Final	4/11/2008	6/16/2008	Final
Massachusetts	8/2007	2/5/2008	Final	8/2007	6/03/2008	Final
New Hampshire	7/2008		Legislation complete, Draft rule	N/A		Auction provisions within cap & trade rule
New Jersey	7/2008		Proposed 7/2008	N/A		Auction provisions within cap & trade rule
New York	10/2007		To re-notice rule (delay 12/2008)	10/2007		Plan to re-notice rule (delay)
Rhode Island	1/2008	7/2/2008	Final	1/2008	7/2/2008	Final
Vermont	10/2007	5/15/2008	Final	N/A		No Auction Rule.



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Regulation Development Process

- Workgroup meetings
 1. February 27th
 2. March 19th
 3. April 16th
 4. May 21st
 5. June 18th
- Public Workshop
 - Aug 7, 2008
- Planned Public Hearing
 - Sep 1, 2008 published Delaware Register
 - Sep 22, 2008 Public Hearing
R/R Auditorium 6 pm
- Planned Final Rule
 - December 1, 2008 published Delaware Register
- Planned Rule Effective Date
 - December 11, 2008

Workgroup Participants

- Conectiv
- DEMEC
- NRG
- Valero
- Sierra Club
- Mid-Atlantic Law Center
- PSC – Public Advocate
- PSC



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Proposed Reg. 1147 Overview

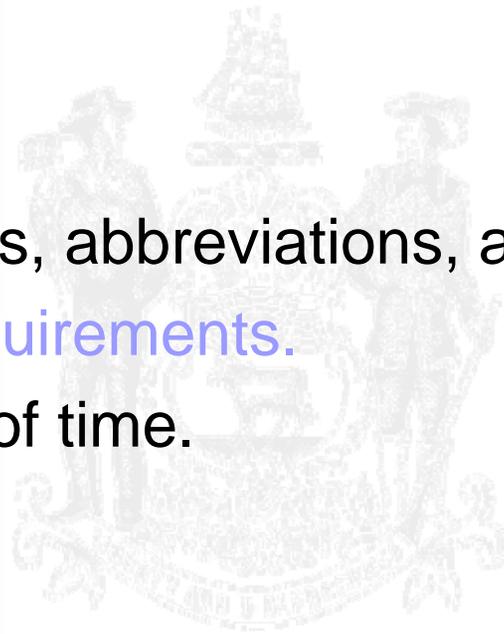
- Section 1 – General Provisions
- Section 2 – Authorized Account Representative
- Section 3 – Permits
- Section 4 – Compliance Certification
- Section 5 – Allowance Allocations
- Section 6 – Allowance Tracking System
- Section 7 – Allowance Transfers
- Section 8 – Monitoring and Reporting
- Section 9 – RESERVED
- Section 10 – Emission Offset Projects
- Section 11 – Auction



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Section 1- General Provisions

- 1.1 Purpose.
- 1.2 *Applicability.*
- 1.3 Definitions.
- 1.4 Measurements, abbreviations, and acronyms.
- 1.5 *Standard Requirements.*
- 1.6 Computation of time.
- 1.7 Severability.



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Section 1- General Provisions

1.2 Applicability.

Any unit at any time on or after January 1, 2005, serves an electricity generator with a nameplate capacity equal to or greater than 25 MWe...



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Delaware Power Plant Specifics

Facility (units)	Unit types	Generation (MGW)	Fuel type	2000-2002 Average CO ₂ Emissions (Tons/year)
NRG Indian River (4)	ST	82, 82, 177, 442	Coal	3,063,258
Conectiv Christiana	CT	25, 25	Diesel Oil	4,588
Conectiv Edge Moor (3)	ST	75, 177, 446	Coal (Residual Oil)	2,293,849
Conectiv Hay Road (8)	CC WH	115, 115, 115, 115, 122, 122, 195, 200	Natural Gas/ waste heat	1,017,746
Dover - McKee Run (1)	ST	114	Residual Oil	154,711
Dover - Van Sant (1)	CT	45	Diesel Oil	5,290
DEMEC - W. Beasley (1)	CT	45	Natural Gas	13,946
NRG Dover (2)	CT	50, 50	Natural Gas	19,726
Valero – Delaware City Refinery (6)	ST CT	28, 28, 63, 63, 90, 90	Residual Oil, Syn Gas	1,207,544

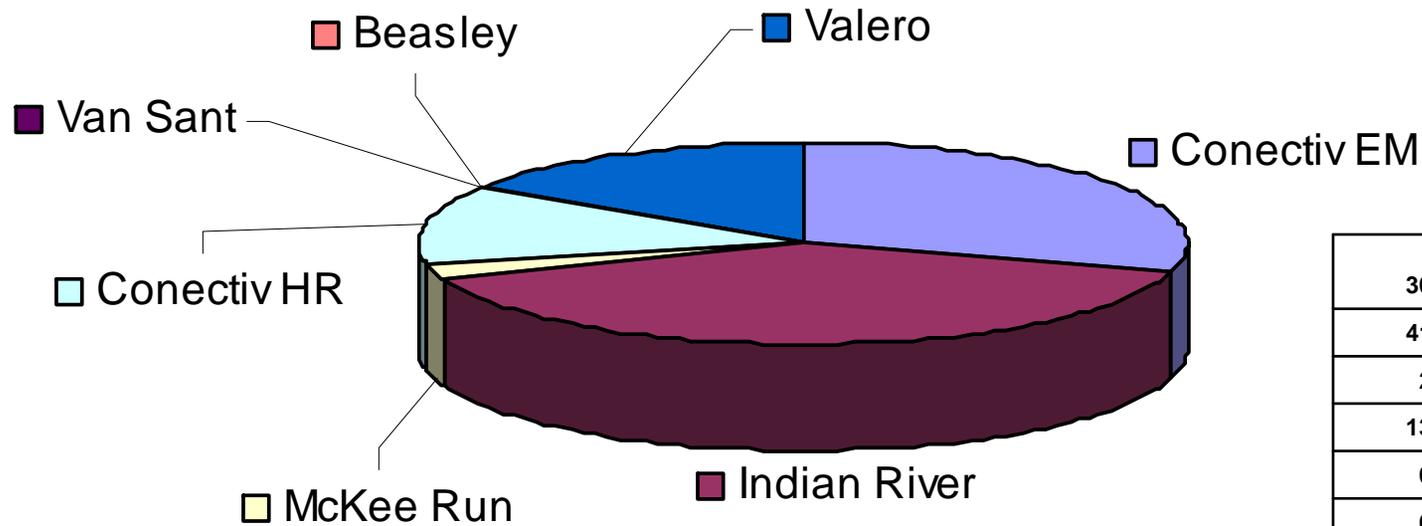
- Units over 25 MGW – nameplate capacity
- CC – Combined Cycle
- CT – Combustion Turbine
- WH – Waste Heat
- ST – Steam Turbine

*Non-Acid Rain Units

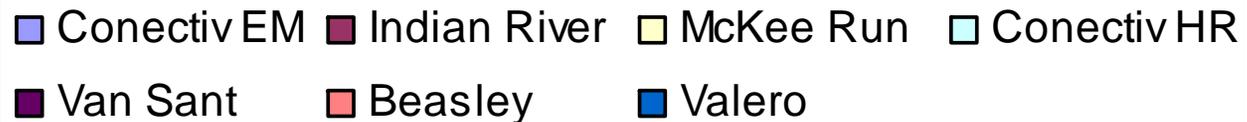


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CO₂ emissions 2000-2002 from Delaware EGU's



30.98%	Conectiv EM
41.37%	Indian River
2.09%	McKee Run
13.37%	Conectiv HR
0.07%	Van Sant
0.27%	Beasley
16.31%	Valero



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1.2 Applicability

1.2.2 Limited exemption for units with electrical output to the electric grid restricted by permit conditions.

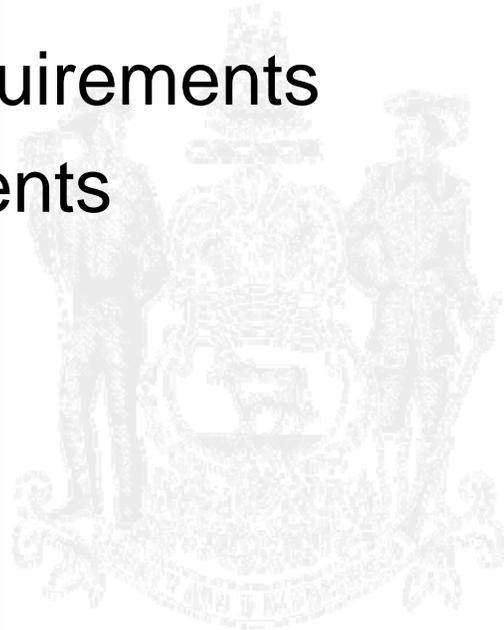
a unit...that is covered by a permit...containing a practically enforceable condition restricting the supply of the unit's annual electrical output to the electric grid to less than or equal to 10 percent of the annual gross generation of the unit...shall be exempt...



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Section 1.5 Standard Requirements

- Permit Requirements
- Monitoring Requirements
- CO₂ Requirements
- Liability



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Section 2 – Authorized Account Representative

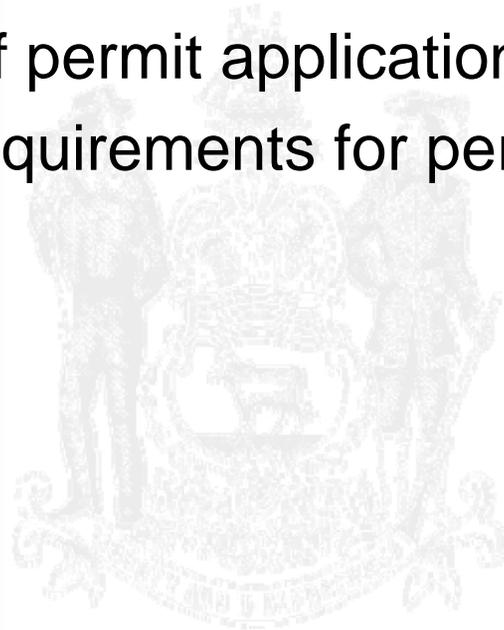
- 2.1 Authorization and responsibilities.
- 2.2 Alternate authorized account representative.
- 2.3 Changing account representative.
- 2.4 Account certificate of representation.
- 2.5 Objections concerning account representative.
- 2.6 Delegation by account representative and alternate account representative.



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Section 3 - Permits

- 3.1 Permit requirements.
- 3.2 Submission of permit applications.
- 3.3 Information requirements for permit applications.



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Section 4 – Compliance Certification

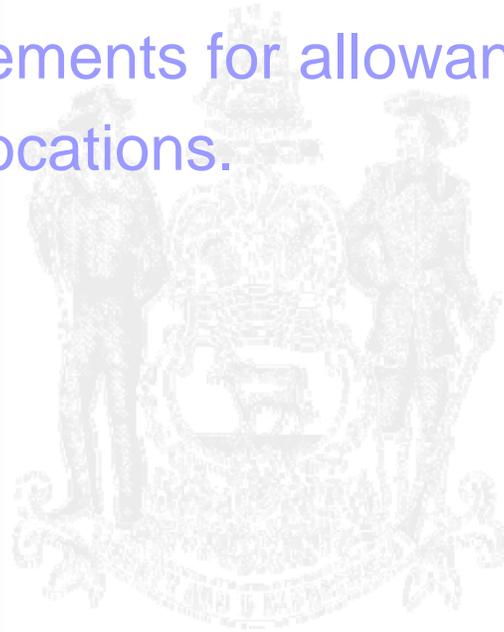
- 4.1 Compliance certification report.
- 4.2 Action on compliance certifications.



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Section 5 – Allowance Allocations

- 5.1 Base Budget.
- 5.2 Timing requirements for allowance allocations.
- 5.3 Allowance allocations.



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5.1 State of Delaware CO₂ trading program base budget.

- 5.1.1 For the 2009 through 2014 allocation years, the STATE OF DELAWARE CO₂ Budget Trading Program annual base budget is 7,559,787 tons.
- 5.1.2 For the 2015 allocation year, the STATE OF DELAWARE CO₂ Budget Trading Program annual base budget is 7,370,792 tons.
- 5.1.3 For the 2016 allocation year, the STATE OF DELAWARE CO₂ Budget Trading Program annual base budget is 7,181,798 tons.
- 5.1.4 For the 2017 allocation year, the STATE OF DELAWARE CO₂ Budget Trading Program annual base budget is 6,992,803 tons.
- 5.1.5 For the 2018 allocation year and each succeeding allocation year, the STATE OF DELAWARE CO₂ Budget Trading Program annual base budget is 6,803,808 tons.



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5.2 Timing requirements for CO2 allowance allocations.

- 5.2.1 By January 1, 2009, the Department will determine the CO2 allowance allocations under 5.3.1 and 5.3.2 for the 2009, 2010, 2011, and 2012 allocation years.
- 5.2.2 By January 1, 2010 and January 1 of each year thereafter, the Department will allocate CO2 allowances under 5.3.1 and 5.3.2 of this regulation for the allocation year that commences in the year that is three years after the applicable deadline for allocation under this regulation.



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5.3 CO₂ allowance allocations.

Year	Delaware CO ₂ Budget (tons)	Auctioned (%)	Allocated (%)
2009	7,559,787	60%	40%
2010	7,559,787	68%	32%
2011	7,559,787	76%	24%
2012	7,559,787	84%	16%
2013	7,559,787	92%	8%
2014	7,559,787	100%	0%
2015	7,370,792	100%	0%
2016	7,181,798	100%	0%
2017	6,992,803	100%	0%
2018	6,803,808	100%	0%



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Analysis with Valero RGGI Units			2009	2010	2011	2012	2013	2014
Plant Name	Boiler ID	Gen. ID	40% Allocation (60% Auction)	32% Allocation (68% Auction)	24% Allocation (76% Auction)	16% Allocation (84% Auction)	8% Allocation (92% Auction)	100% Auction
Conectiv Christina	3		907	725	544	408	227	0
Conectiv Christina	4		876	701	526	394	219	0
Conectiv Edge Moor	3	3	236,979	189,583	142,187	106,640	59,245	0
Conectiv Edge Moor	4	4	388,482	310,785	233,089	174,817	97,120	0
Conectiv Edge Moor	5	5	266,033	212,826	159,620	119,715	66,508	0
NRG Indian River	1	1	174,107	139,286	104,464	78,348	43,527	0
NRG Indian River	2	2	189,267	151,413	113,560	85,170	47,317	0
NRG Indian River	3	3	204,590	163,672	122,754	92,065	51,147	0
NRG Indian River	4	4	622,557	498,045	373,534	280,151	155,639	0
City of Dover McKee Run	3	3	60,128	48,102	36,077	27,058	15,032	0
Conectiv Hay Road	1	1	69,398	55,519	41,639	31,229	17,350	0
Conectiv Hay Road	2	2	72,576	58,061	43,546	32,659	18,144	0
Conectiv Hay Road	3	3	75,105	60,084	45,063	33,797	18,776	0
Conectiv Hay Road	4	4	-	-	-	-	-	0
Conectiv Hay Road	5	5	58,216	46,572	34,929	26,197	14,554	0
Conectiv Hay Road	6	6	59,261	47,409	35,557	26,667	14,815	0
Conectiv Hay Road	7	7	60,986	48,789	36,592	27,444	15,247	0
Conectiv Hay Road	8	8	-	-	-	-	-	0
City of Dover Van Sant	11	1	2,056	1,645	1,234	925	514	0
Warren F. Beasley Station	1	1	5,420	4,336	3,252	2,439	1,355	0
NRG Energy Center Dover	2	2	4,068	3,255	2,441	1,831	1,017	0
NRG Energy Center Dover	3	3	3,598	2,878	2,159	1,619	900	0
Valero - Delaware City Refine	BLR1	G1	115,803	92,643	69,482	52,111	28,951	0
Valero - Delaware City Refine	BLR2	G2	90,173	72,138	54,104	40,578	22,543	0
Valero - Delaware City Refine	BLR3	G3	95,791	76,633	57,475	43,106	23,948	0
Valero - Delaware City Refine	DCPP4	G4	125,163	100,130	75,098	56,323	31,291	0
Valero - Delaware City Refine	MECCU1	CT1	27,188	21,750	16,313	12,234	6,797	0
Valero - Delaware City Refine	MECCU2	CT2	15,188	12,151	9,113	6,835	3,797	0



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Analysis without Valero RGGI Units					2009	2010	2011	2012	2013	2014
Plant Name	Boiler ID	Gen. ID	2000 - 2002 3-yr. ave.	% per unit	40% Allocation (60% Auction)	32% Allocation (68% Auction)	24% Allocation (76% Auction)	16% Allocation (84% Auction)	8% Allocation (92% Auction)	100% Auction
Conectiv Christina	3		2,333	0.04%	902	722	541	406	225	0
Conectiv Christina	4		2,255	0.03%	872	697	523	392	218	0
Conectiv Edge Moor	3	3	609,756	9.28%	235,707	188,565	141,424	106,068	58,927	0
Conectiv Edge Moor	4	4	999,580	15.21%	386,397	309,117	231,838	173,878	114,962	0
Conectiv Edge Moor	5	5	684,513	10.41%	264,605	211,684	158,763	119,072	78,726	0
NRG Indian River	1	1	447,985	6.82%	173,173	138,538	103,904	77,928	51,523	0
NRG Indian River	2	2	486,991	7.41%	188,251	150,601	112,950	84,713	56,009	0
NRG Indian River	3	3	526,418	8.01%	203,492	162,793	122,095	91,571	60,544	0
NRG Indian River	4	4	1,601,864	24.37%	619,215	495,372	371,529	278,647	184,232	0
City of Dover McKee Run	3	3	154,711	2.35%	59,805	47,844	35,883	26,912	17,793	0
Conectiv Hay Road	1	1	178,564	2.72%	69,026	55,221	41,415	31,062	20,537	0
Conectiv Hay Road	2	2	186,742	2.84%	72,187	57,749	43,312	32,484	21,477	0
Conectiv Hay Road	3	3	193,248	2.94%	74,702	59,761	44,821	33,616	22,226	0
Conectiv Hay Road	4	4	0	0.00%	-	-	-	-	-	0
Conectiv Hay Road	5	5	149,791	2.28%	57,903	46,322	34,742	26,056	17,228	0
Conectiv Hay Road	6	6	152,481	2.32%	58,943	47,154	35,366	26,524	17,537	0
Conectiv Hay Road	7	7	156,921	2.39%	60,659	48,527	36,395	27,297	18,048	0
Conectiv Hay Road	8	8	0	0.00%	-	-	-	-	-	0
City of Dover Van Sant	11	1	5,290	0.08%	2,045	1,636	1,227	920	608	0
Warren F. Beasley Station	1	1	13,946	0.21%	5,391	4,313	3,235	2,426	1,604	0
NRG Energy Center Dover	2	2	10,468	0.16%	4,046	3,237	2,428	1,821	1,204	0
NRG Energy Center Dover	3	3	9,258	0.14%	3,579	2,863	2,147	1,610	1,065	0
Valero - Delaware City Refii	BLR1	G1			-	-	-	-	-	
Valero - Delaware City Refii	BLR2	G2			-	-	-	-	-	
Valero - Delaware City Refii	BLR3	G3			-	-	-	-	-	
Valero - Delaware City Refii	DCPP4	G4			-	-	-	-	-	
Valero - Delaware City Refii	MECCU1	CT1			-	-	-	-	-	
Valero - Delaware City Refii	MECCU2	CT2			-	-	-	-	-	



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5.3.3 Early reduction CO₂ allowances.

5.3.3 Early reduction CO₂ allowances. The Department may award early reduction CO₂ allowances (ERAs) to a CO₂ budget source for reductions in the CO₂ budget source's CO₂ emissions (inclusive of all emissions from CO₂ budget units at the CO₂ budget source) that are achieved by the source during the early reduction period (2006, 2007, and 2008), subject to the requirements of this regulation. Total facility shutdowns shall not be eligible for ERAs.



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5.3.4 Limited industrial exemption set-a-side allocation.

Basis:
2000-2002 average
CO2 emissions for the
refinery units

5.3.4 *Limited industrial exemption set-a-side allocation.* The limited industrial exemption set-a-side allocation will consist of **1,207,544** tons from the State of Delaware CO2 Budget Trading Program base budget set forth in section XX5.1, as applicable. For each control period, the Department will determine CO2 allowance allocations in accordance with the following procedures.

5.3.4.1 The Department will open and manage a general account for the limited exemption set-a-side for each control period.

5.3.4.2 As of the January 1 that is after the date that an exemption under subdivision 1.2.2 has been granted, for each allocation year the Department may retire CO2 allowances in the limited industrial exemption set-a-side General account as determined pursuant to paragraph 1.2.2.4.



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Section 6 – Allowance Tracking System (COATS – CO2 Allowance Tracking System)

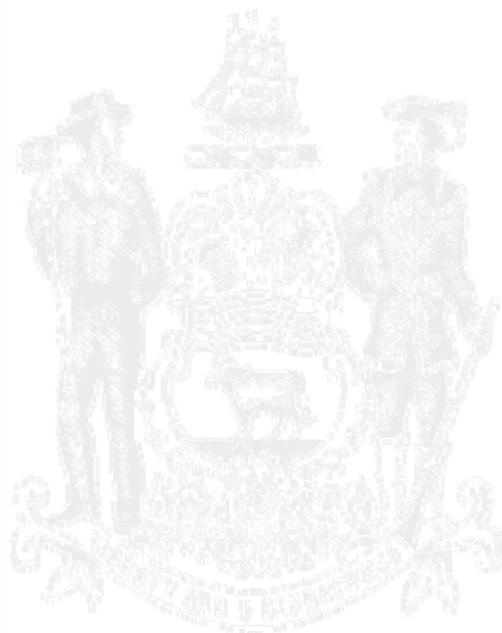
- 6.1 Allowance Tracking System accounts.
- 6.2 Establishment of accounts.
- 6.3 Allowance Tracking System responsibilities of authorized account representative.
- 6.4 Recordation of allowance allocations.
- 6.5 Compliance.
- 6.6 Banking.
- 6.7 Account error.
- 6.8 Closing of general accounts.



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Section 7 – Allowance Transfers

- 7.1 Submission of allowance transfers.
- 7.2 Recordation.
- 7.3 Notification.



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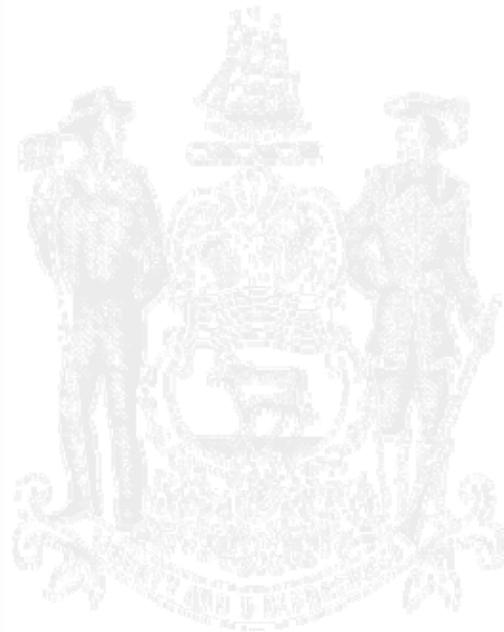
Section 8 – Monitoring and Reporting

- 8.1 General requirements.
- 8.2 Initial certification and recertification procedures.
- 8.3 Out-of-control periods.
- 8.4 Notifications.
- 8.5 Recordkeeping and reporting.
- 8.6 Petitions.
- 8.7 Budget units that co-fire eligible biomass.
- 8.8 Additional requirements to provide output data.



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Section 9 – [Reserved]



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Section 10 – Offset Projects

- 10.1 Purpose.
- 10.2 [Reserved]
- 10.3 General Requirements.
- 10.4 Application Process.
- 10.5 Emission offset project standards.
- 10.6 Accreditation of independent verifiers.
- 10.7 Award of emissions offset allowances.



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Section 11 – Delaware Auction Language

- Delaware is committed to participation in a regional auction.
- First RGGI Auction – Sep 25, 2008 with six states participating (CT, MA, MD, ME, RI, VT)
- Delaware anticipates participating in the 1st qtr auction of 2009.



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Section 11.0 - CO₂ Emissions Auction

- 11.1 Purpose
- 11.2 Multi-State Auctions
- 11.3 Implementation of Allowances
- 11.4 Commencement, Frequency and Quality of CO₂ Allowance Auctions
- 11.5 Auction Format
- 11.6 Participant Eligibility and Limitations
- 11.7 Participant Requirements
- 11.8 Notice of Auctions
- 11.9 Auction Reporting and Transfer of CO₂ Allowances
- 11.10 Auction and Secondary Market Monitoring



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Path Forward

- Public Hearing
 - Planned September 1, 2008 publication in Delaware Register
 - Planned late September 2008 Public Hearing
- Planned Final Action
 - November 1, 2008 Secretary's Order
- Planned Regulation 1147 Effective Date
 - December 11, 2008



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Questions?



If you should have any additional questions after this workshop, please do not hesitate to contact – Valerie Gray at 302-739-9402 or via email at Valerie.gray@state.de.us

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