



Andy Beshear  
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**ENERGY AND ENVIRONMENT CABINET**  
**DEPARTMENT FOR ENVIRONMENTAL PROTECTION**

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December 4, 2025

Mr. Kevin J. McOmber,  
Regional Administrator  
U.S. EPA, Region 4  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, Georgia 30303

RE: Submission of Initial Area Designation Recommendations for the 2024 Revised Secondary Annual Sulfur Dioxide National Ambient Air Quality Standard (NAAQS)

Dear Mr. McOmber:

On December 11, 2024, the U.S. Environmental Protection Agency (EPA) promulgated a revision of the existing secondary sulfur dioxide (SO<sub>2</sub>) standard of 0.5 parts per million (ppm) as a 3-hour average, not to be exceeded more than once in a year, to an annual standard with a level of 10 parts per billion (ppb), averaged over three consecutive years.<sup>1</sup> This action officially published in the Federal Register on December 27, 2024, and became effective on January 27, 2025. Pursuant to Section 107(d)(1)(A) of the Clean Air Act (CAA), states are required to submit initial area designation recommendations to the EPA no later than one year after promulgation of the new or revised NAAQS; thus, states must submit initial area designation recommendations for the 2024 revised secondary annual SO<sub>2</sub> standard by December 11, 2025.

Using certified air quality data that meets the applicable regulatory requirements, the 2022-2024 design values of all SO<sub>2</sub> monitors in Kentucky are provided in Attachment 1.<sup>2</sup> This corresponds to the initial area designations memorandum for the secondary annual SO<sub>2</sub> NAAQS issued by EPA that encourages states to submit recommendations based on the three most recent full calendar years of monitoring data (i.e. 2022-2024 monitoring data).<sup>3</sup> As demonstrated in Attachment 1, the most current three-year design values at all monitors with certified data are below the secondary SO<sub>2</sub> standard of 10 ppb. Therefore, the Energy and Environment Cabinet (Cabinet) recommends these counties be designated as attainment for the 2024 revised secondary annual SO<sub>2</sub> standard. The Cabinet recommends the remainder of the state be designated as attainment/unclassifiable. The complete list of all counties in the Commonwealth and their

<sup>1</sup> [89 FR 105692](#).

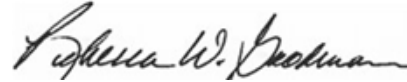
<sup>2</sup> Design values from six of the fourteen monitors evaluated are estimates because the monitors do not have three complete years of data during the design value period.

<sup>3</sup> U.S. Environmental Protection Agency. *Initial Area Designations for the 2024 Revised Secondary Annual Sulfur Dioxide National Ambient Air Quality Standard (Revised January 16, 2025)*, <https://www.epa.gov/system/files/documents/2025-01/2024-revised-secondary-so2-designations-memo-1-16b-24.pdf>.

respective designation recommendations are submitted and specified in the table listed in Attachment 2.

Your prompt attention to this letter is greatly appreciated. If you have any questions or comments concerning this matter, please contact Michael Kennedy, Division for Air Quality Director, at (502) 782-6997 or [michael.kennedy@ky.gov](mailto:michael.kennedy@ky.gov).

Sincerely,

A handwritten signature in dark ink, appearing to read "Rebecca W. Goodman".

Rebecca W. Goodman, Secretary  
Energy and Environment Cabinet

cc:

Denisse Diaz  
Lynorae Benjamin

Attachment 1  
Attachment 2

**Attachment 1: Kentucky Design Values  
for the Secondary SO<sub>2</sub> Annual NAAQS**

<b>County</b>	<b>AQS Site I.D.</b>	<b>2022-2024 Design Value</b>
Boyd	21-019-0017	0
Campbell	21-037-3002	1
Davies	21-059-0005	1*
	21-059-0015	0*
Edmonson	21-061-0501	0*
Fayette	21-067-0012	1
Greenup	21-089-0007	1
Henderson	21-101-1011	2
Jefferson	21-111-0051	1
	21-111-0067	1
	21-111-1041	1*
Jessamine	21-113-0001	1
McCracken	21-145-1024	1*
	21-145-1027	1*

\* The design values reported for these SO<sub>2</sub> monitors are considered estimates and are not valid because the monitors do not have three complete years of data for the design value period. For the secondary SO<sub>2</sub> NAAQS, valid design values must be based on a complete data record from a single, consistent monitoring location, or multiple monitors that have been formally linked due to relocation, over a continuous 3-year period. Data from multiple unlinked monitors, or from periods before and after an unlinked monitor relocation, cannot be combined to calculate a valid design value; the monitors listed in this table that have been relocated were not linked, invalidating their design values.

## Attachment 2: Secondary SO<sub>2</sub> Annual NAAQS Initial Area Designation Recommendations

County	Recommended Designation	County	Recommended Designation
Adair	Attainment/Unclassifiable	Elliot	Attainment/Unclassifiable
Allen	Attainment/Unclassifiable	Estill	Attainment/Unclassifiable
Anderson	Attainment/Unclassifiable	Fayette	Attainment
Ballard	Attainment/Unclassifiable	Fleming	Attainment/Unclassifiable
Barren	Attainment/Unclassifiable	Floyd	Attainment/Unclassifiable
Bath	Attainment/Unclassifiable	Franklin	Attainment/Unclassifiable
Bell	Attainment/Unclassifiable	Fulton	Attainment/Unclassifiable
Boone	Attainment/Unclassifiable	Gallatin	Attainment/Unclassifiable
Bourbon	Attainment/Unclassifiable	Garrard	Attainment/Unclassifiable
Boyd	Attainment	Grant	Attainment/Unclassifiable
Boyle	Attainment/Unclassifiable	Graves	Attainment/Unclassifiable
Bracken	Attainment/Unclassifiable	Grayson	Attainment/Unclassifiable
Breathitt	Attainment/Unclassifiable	Green	Attainment/Unclassifiable
Breckinridge	Attainment/Unclassifiable	Greenup	Attainment
Bullitt	Attainment/Unclassifiable	Hancock	Attainment/Unclassifiable
Butler	Attainment/Unclassifiable	Hardin	Attainment/Unclassifiable
Caldwell	Attainment/Unclassifiable	Harlan	Attainment/Unclassifiable
Calloway	Attainment/Unclassifiable	Harrison	Attainment/Unclassifiable
Campbell	Attainment	Hart	Attainment/Unclassifiable
Carlisle	Attainment/Unclassifiable	Henderson	Attainment
Carroll	Attainment/Unclassifiable	Henry	Attainment/Unclassifiable
Carter	Attainment/Unclassifiable	Hickman	Attainment/Unclassifiable
Casey	Attainment/Unclassifiable	Hopkins	Attainment/Unclassifiable
Christian	Attainment/Unclassifiable	Jackson	Attainment/Unclassifiable
Clark	Attainment/Unclassifiable	Jefferson	Attainment
Clay	Attainment/Unclassifiable	Jessamine	Attainment
Clinton	Attainment/Unclassifiable	Johnson	Attainment/Unclassifiable
Crittenden	Attainment/Unclassifiable	Kenton	Attainment/Unclassifiable
Cumberland	Attainment/Unclassifiable	Knott	Attainment/Unclassifiable
Daviess	Attainment	Knox	Attainment/Unclassifiable
Edmonson	Attainment	LaRue	Attainment/Unclassifiable

<b>County</b>	<b>Recommended Designation</b>	<b>County</b>	<b>Recommended Designation</b>
Laurel	Attainment/Unclassifiable	Ohio	Attainment/Unclassifiable
Lawrence	Attainment/Unclassifiable	Oldham	Attainment/Unclassifiable
Lee	Attainment/Unclassifiable	Owen	Attainment/Unclassifiable
Leslie	Attainment/Unclassifiable	Owsley	Attainment/Unclassifiable
Letcher	Attainment/Unclassifiable	Pendleton	Attainment/Unclassifiable
Lewis	Attainment/Unclassifiable	Perry	Attainment/Unclassifiable
Lincoln	Attainment/Unclassifiable	Pike	Attainment/Unclassifiable
Livingston	Attainment/Unclassifiable	Powell	Attainment/Unclassifiable
Logan	Attainment/Unclassifiable	Pulaski	Attainment/Unclassifiable
Lyon	Attainment/Unclassifiable	Robertson	Attainment/Unclassifiable
McCracken	Attainment	Rockcastle	Attainment/Unclassifiable
McCreary	Attainment/Unclassifiable	Rowan	Attainment/Unclassifiable
McLean	Attainment/Unclassifiable	Russell	Attainment/Unclassifiable
Madison	Attainment/Unclassifiable	Scott	Attainment/Unclassifiable
Magoffin	Attainment/Unclassifiable	Shelby	Attainment/Unclassifiable
Marion	Attainment/Unclassifiable	Simpson	Attainment/Unclassifiable
Marshall	Attainment/Unclassifiable	Spencer	Attainment/Unclassifiable
Martin	Attainment/Unclassifiable	Taylor	Attainment/Unclassifiable
Mason	Attainment/Unclassifiable	Todd	Attainment/Unclassifiable
Meade	Attainment/Unclassifiable	Trigg	Attainment/Unclassifiable
Menifee	Attainment/Unclassifiable	Trimble	Attainment/Unclassifiable
Mercer	Attainment/Unclassifiable	Union	Attainment/Unclassifiable
Metcalfe	Attainment/Unclassifiable	Warren	Attainment/Unclassifiable
Monroe	Attainment/Unclassifiable	Washington	Attainment/Unclassifiable
Montgomery	Attainment/Unclassifiable	Wayne	Attainment/Unclassifiable
Morgan	Attainment/Unclassifiable	Webster	Attainment/Unclassifiable
Muhlenberg	Attainment/Unclassifiable	Whitley	Attainment/Unclassifiable
Nelson	Attainment/Unclassifiable	Wolfe	Attainment/Unclassifiable
Nicholas	Attainment/Unclassifiable	Woodford	Attainment/Unclassifiable