

Activity	Time after triggering event
Inspector certification begins	14 months.
Begin final licensing of reinspection stations	15 months.
Initiate PR program including media blitz	16 months.
Initiate motorist notification mailings	16 months and 15 days.
Begin limited voluntary inspections at centralized test stations. Allow first month motorist to receive valid test. Reinspection stations begin to perform retests.	17 months.
Begin mandatory testing at centralized test stations	18 months.

Activity	Completion time after triggering event
NO _x RACT	
Identify and verify violation following implementation of OAC 3745-21-09 and automobile inspection and maintenance.	1 month.
Source demonstration of compliance or submittal of schedule to achieve compliance	3 months.
Achieve compliance with requirements of OAC 3745-14-03 or request extension	18 months.

6. Tracking Maintenance

The State plans to track monitored levels of ozone. Emissions inventories will be prepared every 3 years beginning with the year 1993. The point source inventory will be updated annually with facility and permit data. OEPA will update emissions estimates from the BP refinery wastewater system on an annual basis. The mobile source inventory will be updated annually with new VMT estimates and revised mobile emissions models if appropriate. Area source inventories will be updated annually using new census data. The OEPA will submit annual progress reports to USEPA which will include available emissions data and a comparison of projected and actual emissions. The Toledo Division of Pollution Control has committed to continue operating and maintaining the four existing ozone monitors in a manner consistent with Federal and State monitoring guidelines.

The USEPA has determined that the maintenance plan for Lucas and Wood Counties meets the requirements set forth by the CAA.

D. Section 107(d)(3)(E)(v). The Area must have met all applicable requirements under Section 110 and Part D. Section 107(d)(3)(E) requires that, for an area to be redesignated, an area must have met all applicable requirements under section 110 and Part D. The USEPA interprets section 107(d)(3)(E)(v) to mean that for a redesignation to be approved, the State must have met all requirements that applied to the subject area prior to or at the time of the submission of a complete redesignation request. Requirements of the Act that come due subsequently continue to be applicable to the area at those later dates (see section 175A(c)) and, if the redesignation of the area is disapproved, the State remains obligated to fulfill those requirements.

1. Section 110 Requirements

General SIP elements are delineated in section 110(a)(2) of Title I, Part A. These requirements include but are not limited to submittal of a SIP that has been adopted by the State after reasonable notice and public hearing, provisions for establishment and operation of appropriate apparatus, methods, systems and procedures necessary to monitor ambient air quality, implementation of a permit program, provisions for Part C (PSD) and D (NSR) permit programs, criteria for stationary source emission control measures, monitoring, and reporting, provisions for modeling, and provisions for public and local agency participation. For purposes of redesignation, the Ohio SIP was reviewed to ensure that all requirements under the amended Act were satisfied. Although section 110 was amended in 1990, the Toledo area SIP meets the requirements of the amended section 110(a)(2). A number of the requirements did not change in substance and, therefore, USEPA believes that the pre-1990 amendment SIP meets those requirements. As to those requirements that were amended in 1990, many are duplicative of other requirements in the Act and USEPA has determined that the Toledo SIP is consistent with the requirements of section 110 of the amended Act.

2. Part D Requirements

Before the Toledo area may be redesignated to attainment, it must have fulfilled the applicable requirements of part D. Under part D, an area's classification determines the requirements to which it is subject. Subpart 1 of part D sets forth the basic nonattainment requirements applicable to all nonattainment areas. Subpart 2 of part D establishes additional requirements for nonattainment areas

classified under Table 1 of section 181(a). As described in the General Preamble for the Implementation of Title 1, specific requirements of subpart 2 may override subpart 1's general provisions (57 FR 13501 (April 16, 1992)). The Toledo area was classified as moderate (56 FR 56694). Therefore, in order to be redesignated, the State must meet the applicable requirements of subpart 1 of part D—specifically sections 172(c) and 176, as well as the applicable requirements of subpart 2 of part D.

a. Section 172(c) Requirements

Section 172(c) sets forth general requirements applicable to all nonattainment areas. Under section 172(b), the section 172(c) requirements are applicable as determined by the Administrator, but no later than 3 years after an area has been designated as nonattainment under the amended Act. Furthermore, as noted above, some of these section 172(c) requirements are superseded by more specific requirements in subpart 2 of part D. In the case of Toledo, the State has satisfied all of the section 172(c) requirements necessary for Toledo to be redesignated upon the basis of the November 8, 1993 redesignation request.

USEPA has determined that the section 172(c)(2) reasonable further progress (RFP) requirement (with parallel requirements for a moderate ozone nonattainment area under subpart 2 of part D, due November 15, 1993) was not applicable as the State of Ohio submitted this redesignation request on November 8, 1993. Also the section 172(c)(9) contingency measures and additional section 172(c)(1) non-RACT reasonable available control measures beyond what may already be required in the SIP are no longer necessary, since no earlier date was set for these measures