

GUIDANCE DOCUMENT FOR PERMITTEES

Alternative Baseline Monitoring Timeframe, Duration, and/or Frequency, [R18-9-A215\(D\)](#)

Alternative Baseline Monitoring Request

Please prepare the Alternative Baseline Monitoring Request in the format of a technical memorandum, or similar. The suggested sections and content are provided below.

1. Purpose and Scope

1.1. Provide the following

- Applicant name (AAC R18-1-503(1))
- The Individual APP number
- Facility name
- Facility Operator
- Authorized Agent, if applicable (AAC R18-1-503(A)(3))
- Landowner (if different than applicant)

1.2. List and describe the permit-required monitoring points included in this request

1.3. Provide a map and/or process flow diagram for the POC and/or discharge monitoring locations

1.4. List and describe which of the seven new or adjusted AWQS parameters are part of the scope of this alternative baseline monitoring request

2. Alternative Baseline Monitoring: Timeframe

2.1. The requirement for beginning Baseline Monitoring for a new or adjusted AWQS is within three months of the new or adjusted standard's effective date (R18-9-A215(C)).

- **Effective Date: August 4, 2025.**
- Three months from the effective date is **November 4, 2025** (this is the latest date that baseline monitoring should start).
- If an alternative timeframe is the request, please summarize why an alternative timeframe is being requested.
 - Propose the alternative start and end date for the baseline monitoring timeframe (Note: proposal must meet the deadline for an administratively complete application submission (R18-9-A215(B)(1)).
 - Note that an administratively complete application must be submitted to the Department no later than August 4, 2029, to incorporate changes based on the baseline monitoring.

3. Alternative Baseline Monitoring: Duration and Frequency

3.1. The duration and frequency requirements for baseline monitoring in the rule are:

- Groundwater monitoring: eight quarterly samples (R18-9-A215(E)(5)) which equates to 2 years of groundwater monitoring.
- Discharge monitoring: twelve monthly samples (R18-9-A215(E)(6)), which equates to 1 year of discharge monitoring.
- If an alternative monitoring duration and frequency is the request, please summarize why an alternative monitoring duration and frequency is being requested and propose the alternative monitoring frequency and duration for the baseline monitoring timeframe.

- *Provide a discussion of why the alternative frequency and duration will provide adequate data to establish groundwater or discharge monitoring permit conditions including alert levels, discharge limits and aquifer water quality limits pursuant to R18-9-A205.*
 - *Please compare the proposed duration or frequency to the standard duration or frequency in the rule at R18-9-A215(E)(5) and (6).*
4. *Alternative Baseline Monitoring: Prior Relevant Samples*
- 4.1. *The Baseline Monitoring requirements allow for relevant, prior collected samples to be submitted in lieu of part or all Baseline Monitoring requirements under certain conditions (R18-9-A215(E)(3)).*
- *Indicate which parameter(s) with new or adjusted AWQS are being proposed for a shortened or eliminated Baseline Monitoring period through the utilization of prior sampling,*
 - *Indicate a proposed shortened or eliminated Baseline Monitoring period for each parameter with a new or adjusted AWQS,*
 - *Demonstrate that prior samples were taken pursuant to R18-9-A215(E)(4),*
 - *Demonstrate that samples were analyzed using industry standard quality assurance and quality control procedures,*
 - *Demonstrate that, collectively, samples are representative of a complete data set per the applicable requirements of Baseline Monitoring, as applicable (R18-9-A215(E)(5) and (6)), and*
 - *Demonstrate that, collectively, samples meet other applicable requirements of Baseline Monitoring.*
5. *Closing*
- 5.1. *Contact information*
- *Include who ADEQ should contact to provide either approval or denial, or ask follow up questions pertaining to the request.*