Submittal Guidelines
Montana Department of Environmental Quality
Coal and Uranium Program

Last Updated: February 3, 2012

Table of Contents

Purpose

These guidelines are intended to clarify the methods and manner in which materials are prepared and submitted to the Department, in an effort to improve efficiency.

Submittal Guidelines Checklist

The following list is meant to serve as a quick checklist for ensuring that your submittal conforms to the guidelines in this document.

— Has the Department received your *Designation of Agent* form?
— Did you include a cover letter on company letterhead?
— Did you complete your submittal using Department forms and guidelines?
— Do all corresponding document titles and file names match?
— Do all documents use approved file types?
— Are all PDFs documents OCR'ed, bookmarked (if feasible) and merged together into a single PDF (when practical), with maps attached?
— Are all proposed, new or revised layers for each map included?
— Do all map titles and file names match?
— Are all map layer names easily discernable, or have you submitted a data dictionary to the Department that explains your naming convention?

Materials Preparation

Please review the following guidelines before submitting materials to the Department in order to ensure that your submittal is reviewed in a timely manner and is not returned for re-submittal. All official correspondence must conform to Department standards, be sent by an approved contact, and be received by the Department as a complete package. Incomplete packages will either be returned as deficient, or review will be delayed until all materials are received.

Cover Letter

All official correspondence submitted to the Department must be accompanied by a cover letter. The cover letter conveys vital information about your submittal and ensures that the Department has a clear understanding of the purpose. The Department can provide you with a cover letter template that satisfies these requirements.

Special Instructions

- **One Cover Letter for each Submittal:** Please do not send a single cover letter for multiple submittals
- **One Cover Letter for each Permit:** Please do not send a single cover letter for multiple permits
- **Do not add values to the drop-down menus:** Instead, include pertinent information in the subject line

The following Required Information should be included on every cover letter:

1. **Company Letterhead**
   The cover letter must be composed on your company letterhead. Cover letters submitted without company letterhead will be considered unofficial
2. **Date**
3. **To (for DEQ, use the Permit Supervisor)**
   Include Title, Company/Agency, and Address
4. **Permit ID**
   Format example: C2011018
5. **Revision Type**
   Allowed Values: Amendment, Bond Release, Major Revision, Mid-term Review, Minor Revision, Renewal, Temporary Cessation, Transfer
   - Enter "N/A" if the submittal is not a revision
6. **Permitting Action**
   Allowed Values:
   - **Application** – use when applying for a revision
   - **Affidavit/Public Notice** – use when sending an affidavit or public notice document to the Department
   - **Permit Update** – use when sending in permit update materials (after the revision has been approved)
   - **Response** – use when responding to a deficiency, or when responding to comments from the Department
   - **Withdrawal** – use when withdrawing a revision application
7. **Subject**
   Be concise, yet highly descriptive, including unique identifiers
8. **Salutation**

9. **Body**
10. **Complimentary Close**
11. **From**
    Include Title, Company, Mine Name and Area Name, Phone #, FAX #, and Email Address
12. **Cc**
13. **List of Attachments**

See Appendix for cover letter examples.

Department Forms and Guidelines

Where applicable, submittals must be completed on Department forms, and must conform to Department guidelines. A list of available forms and guidelines (including this document) can be found on the Department's website: http://deq.mt.gov/CoalUranium/guidelines.mcpx

---

Consistency of File Names

The cover letter and all files contained with a submittal package must utilize consistent naming. Document titles, map titles, file names, and all references to them must be named consistently. Names should be concise, yet highly descriptive.

Example: *Annual Report*

1. **Subject Line on Cover Letter:**   "RE: 2010 Annual Report"
2. **Document Title:**   2010 Annual Report
3. **Electronic File Name:**   2010 Annual Report.pdf

Attachment Example: *Inspection Map*

1. **Reference on Cover Letter as:**   "Field Map 2010"
2. **Map Title:**   Field Map 2010
3. **Electronic File Name:**   Field Map 2010.pdf
4. **Native File Format:**   Field Map 2010.dwg

Year Designations

If the document is associated with a calendar period (e.g. year, water year, fiscal year etc.), include the year in the title (e.g. 2010 Annual Hydro Report). IMPORTANT NOTE: the title must refer to the report year, not the year in which the report is submitted (i.e. the 2010 Annual Report is for the 2010 calendar year, and is submitted in 2011).

File Types

Standardized file types allow the Department to process materials efficiently and reduce delays. The file types below are the most commonly used, ubiquitous file formats. Files that cannot be readily accessed in these formats will be returned.

- **PDF Format:** All "official" documents must be submitted in PDF format, including maps, photos, etc.

- **Supporting Data:** Relevant tabular and map data contained in the official PDF copy must also be attached in native format, for example:

    o **MS Office:** Allows for inputting into databases, analysis purposes, and for making modifications, such as track changes.

    o **CAD:** Used for analysis and to update Department databases –.dwg format is highly preferable

    o **GIS:** Used for analysis and to update Department databases – .shp (shape file format), .mdb (personal geodatabase), or .gdb (file geodatabase) are most preferable

- **Videos:** Contact the department to determine an acceptable format prior to submitting videos

PDF File Preparation

The Department prepares all official electronic documents (i.e. PDFs) for enhanced editing and searching purposes by performing Optical Character Recognition (OCR) on text, and bookmarking sections. When feasible, <u>applying the following preparation to your documents will expedite the processing of your submittal</u>.

- **OCR:** Documents generated directly from MS Office products are already OCR enabled. However, scanned documents must be set up for OCR

- **PDF Bookmarks:** When saving MS Word documents to PDF, Word will automatically bookmark your document using section headers. However, when manually bookmarking documents use the following guidelines:
    - Use common names rather than file names or shorthand titles
    - Be careful not to bookmark too excessively or too sparsely

- **Combine Files:** with the exception of maps, combine files into single document where practical; for example, a submittal that consists of a cover letter, table of contents, report and an addendum, can be combined into a single PDF, bookmarked accordingly

    Important Note: <u>Cultural Resources must not be combined</u> with other documents as above. Due to the sensitive nature of these materials, please keep them separated as independent files within the package. They should be clearly labeled as cultural, and should be marked as confidential on the document

- **Attachments:** maps larger than 11 x 17 should be included as separate PDFs, attached to the master PDF document. Smaller maps can be included in the body of the main PDF.

Notary Public Seals and P.E. Stamps

All documents requiring Notary Public or Professional Engineer (P.E.) certification may now be submitted electronically to the Department without the need for submitting a hardcopy.

P.E. Stamp

Certain maps and drawings require certification by a Professional Engineer. Two options exist:

1. Apply an electronic P.E. Stamp and electronic signature to the document while still in its native file format (e.g. CAD drawing), then convert directly to PDF; or,
2. Print/plot the document, and apply the physical stamp and signature to the paper copy, then scan to PDF.

Notary Public Seal

The State of Montana does not currently have electronic Notary Public capability; however, the Department will accept scanned copies of documents that have been physically notarized.

> **Affidavits:** whenever multiple documents require notarization, a single affidavit may be submitted in lieu of individually notarizing each document. The affidavit must list the exact names of each individual document it covers, and may be scanned and submitted electronically.

> **Maps:** Electronic maps requiring notary public seals can be prepared as follows:
>
> 1. Print/plot the map, apply the notary public seal, then scan to PDF; or,
> 2. Submit an affidavit that lists each map individually.

Bond Documents

Bond documents must be submitted in their original hardcopy format. Copies will not be accepted.

SPECIAL NOTE: for electronic submittals, Bonds are the ONLY documents required in hardcopy format.

Map Standards

Map standards help ensure that the appropriate maps are reviewed, approved and updated in the permit. Furthermore, standards help reduce incomplete submittals, and facilitate immediate staff access to maps.

Map & Spatial Data Submittals

All maps submitted to the Department must be accompanied by corresponding spatial data in GIS or CAD format. The submittal must include a CAD drawing or geodatabase (GDB) which contains a layer or feature class for each newly proposed, revised or updated feature. All maps and spatial data must conform to the standards described in this document.

Examples

New Revision Application:

An operator submits a Minor Revision to change the path of a Haul Road. Included with the Minor Revision application is a list of revised layers, a PDF map that shows the proposed changes, and a CAD file or GDB that includes the proposed layers. For example:

- **Map:** "Exhibit_5_Transportation_Plan_Map_MR121102_20110625.pdf"
- **Spatial Data:** "MR121102_20110625.dwg," which includes a single "Haul Road" layer

Deficiency Response:

An operator submits a Deficiency Response to the Minor Revision above. Included with the response is a list of revised layers, a PDF map, and a CAD file or GDB that includes the revised layers. For example:

- **Map:** "Exhibit_5_Transportation_Plan_Map_MR121102_20110715.pdf"
- **Spatial Data:** "MR121102_20110715.dwg," which includes the revised "Haul Road" layer

  Note that the dates in the file names in this example have been updated from the original application (example at top), in accordance with the "Layer Tracking" section below.

Annual Report:

An operator submits their Annual Report. Included with the Annual Report is a list of new layers, a PDF map, and a CAD file or GDB that includes the layers. For example:

- **Map:** "2011_Annual_Report_Map.pdf"
- **Spatial Data:** "2011_Annual_Report.dwg," which includes layers for "Active Mining," "Complete Backfill and Regrade," "Soiled and Seeded Areas," etc.

A Complete Map must include:

TITLE	The title must effectively and concisely describe the subject of the map **(EXAMPLE: 2010 Field Map)**
FILE NAME	The file name must match the map title **(EXAMPLE: 2010 Field Map.pdf)**
LEGEND	The map must contain a legend that describes all features in the map
BACKGROUND IMAGERY & TOPOGRAPHY	• Any map that requires a background aerial image must show the date the image was flown • Any map that contains topography must show the vintage of topography (e.g. pre-mine, as-built, post-mine), and the contour interval. As-built topography must state the date it describes. Post-mine topography must include the revision number under which the PMT was approved
NORTH ARROW	
SCALE	Inclusion of both a scale bar and reference scale (e.g. 1" = 400') helps verify that maps are printed at the correct scale
SIGNATURES P.E. STAMPS NOTARY SEALS CERTIFICATION	(if applicable) *"I, the undersigned, hereby certify that this map is correct and shows to the best of my knowledge and belief all the information required by the mining laws of this state."*
REVISION NUMBER	If the map is part of a revision application, the Revision Number must be clearly shown on the map
DATE	• Use any format on the map layout • Use the following format in the file name: **YYYMMDD (e.g. 20110625 = June 25th, 2011)**
DATUM & PROJECTION (i.e. Coordinate System)	(e.g. NAD 83 Montana State Plane) **NOTE:** Maps that have had a coordinate system transformation applied to them must contain a description of the transformation methods
UNIT OF MEASURE	(e.g. U.S. Feet, International Feet, Meters)
MINE INFORMATION	Company Name, Mine Name, Area Name (when applicable), Permit ID Number

Clearly Defined Features and Layers

The following conventions help ensure that all features and layers are complete and accurate:

Single Layers: Distinct feature types must be entirely contained within a single layer

> **Example:** all ponds contained in a single polygon layer

Layer Names: Layer names should be easily decipherable and discernable. If not, the Department may request that you submit a **Data Dictionary** that cross-references your layer naming convention with Department naming conventions (see Appendix C).

> **Example:** a layer containing Air Quality Monitoring Stations could be named "Air_Quality" or "Air_Monitoring"; however, "aqm" is not acceptable

Geometry Type: Features must be drawn using their appropriate geometry type (e.g. Points, Lines, & Polygons)

> Examples of appropriate geometry types:
>
> - Monitoring well points are stored as points rather than as line symbols
>
> - Conveyor belts are drawn as lines rather than polygons
>
> - Soil stockpiles are drawn as closed polygons rather than lines

Topology: Features must be topologically correct, ensuring accurate representation and measurements

> **Containment**
> - o Features that are inherently contained within another feature must not have parts that fall outside of the containing feature (e.g. disturbance boundaries do not fall outside of the permit boundary)
>
> **Connectivity**
> - o Line nodes and vertices must be snapped together, where appropriate (e.g. two fence lines that meet at a corner must be snapped together)
>
> **Adjacency**
> - o Adjacent shared boundaries should be snapped together (e.g. reclamation fields must be snapped together and must not have slivers between them)
> - o Polygons in the same layer should not overlap (e.g. two adjacent soil stockpile polygons must not overlap to create a third sliver polygon)

Layer Tracking

During the permitting process, map layers may be edited multiple times. The following measures are designed to ensure that changes are tracked accurately:

- **Layers List:** All map submittals (e.g. applications, deficiency responses, annual reports, permit updates, etc.) must be accompanied by a list of layers for features that are proposed to be added or revised

- **Layer Name Identifiers** must indicate the revision number as well as the date the edits were completed
    - Example: PMT_MR101704_20110728

Map Title and File Naming Convention

Maps titles, file names, and all references to them, must contain the following basic information:

- Exhibit #, Plate #, etc. (if applicable)
- Map Title
- Revision # (if applicable)
- Date (YYYYMMDD format for PDF file and layer names)

Example

- **Map Title:**

> **Exhibit A1**
> **Mine Plan**
> **Application 195**
> **June 25th, 2011**

- **File Name:**

    - Exhibit_A1_MinePlan_ App195_20110625.pdf

Coordinate Systems

Preferred Coordinate System Definition:

- **State Standard Coordination System:** *NAD83 Montana State Plane Meters*

File Transfer

The physical or electronic transfer of correspondence between operators and the Department presents one of the most significant opportunities for the introduction of error and confusion into the process. Submittal packages that arrive at the Department in multiple formats and at multiple times confuse and slow the process (e.g. When is the package complete; which version is the official copy; do the electronic files match the paper copies; are materials that were sent from other mine staff also part of the official submittal, and are they accurate and complete?).

In order to streamline this critical step and avoid opportunities for introducing error, the Department will only accept materials that are submitted by approved company contacts, are submitted as complete packages, and that are sent by a single, approved mode of delivery.

Complete Packages

A Complete Package submittal must:

1. Contain a cover letter that adheres to the Cover Letter guidelines
2. Be in either Hardcopy or Electronic format, but not both
3. Contain all required materials (i.e. all sections and exhibits, maps, tables, etc., must be received by the department as a single, complete package)
4. Be submitted by an Approved Contact

Paper or Electronic

Operators must choose to submit materials in either hardcopy or electronic format. The Department will not accept submittals that contain both formats.

Single Mode of Delivery

Electronic

Direct Email (for small packages)

DEQCoal@mt.gov – all electronic submittals less than approximately 8Mb as a complete package should be sent directly to the coal program email address

State of Montana – File Transfer Service

Packages that are too large to be sent directly to the coal program email address in complete form must be sent via the State of Montana File Transfer Service

https://transfer.mt.gov/default.aspx

Packages sent via the File Transfer Service must be addressed to the DEQCoal@mt.gov email address

Hardcopy

Hardcopy submittals can be sent by U.S. Mail, FedEx, UPS, etc. using the addresses below:

Via the U.S. Postal Service

> P.O. Box 200901
> Helena, MT 59620-0901

Via FedEx, UPS, etc.

> 2001 11th Avenue
> Helena, MT 59620-0901

Important Note: Bonds must be sent in Hardcopy format

Approved Mine Contacts – Designation of Agent

*A **Designation of Agent** form must be submitted and approved by the Department before any submittals can be accepted.*

State of Montana
Department of Environmental Quality
Coal and Uranium Program

P.O. Box 200901 Helena, MT 59620-0901

Designation of Agent Form

Any party acting as an agent of a coal mining or prospecting operation shall have a valid Designation of Agent Form on file with the Department. Individual access will not be granted until this form is received by mail at the address above. This designation shall remain in effect until written notice is provided by the owner to terminate the agent or representative. Approved persons to submit documents as employees of the company should be listed below. Designation of this agent does not supersede the identified Registered Agent relating to service of documents in accordance with the Montana Rules of Civil Procedure.

Principal Agent

A Principal Agent serves as the representative of the operator, to accept and be served with notices from the Department, or from other persons authorized by the Department. Furthermore, the Principal Agent agrees to immediately notify the Department in writing of any changes of contact information or termination of authority of the Principal Agent or Representative(s).

Action: ☐ Add   ☐ Modify   ☐ Delete

Agent Company Name

| *Address* | *City* | *State* | *Zip* |

| *Name of Principal Agent* | *Signature* | *Title* |

| *Phone* | *Fax* | *Email* |

Representatives

The below listed individuals are designated as Representatives, authorized to sign and submit materials on behalf of the operator:

Primary Representative

Action: ☐ Add   ☐ Modify   ☐ Delete

| *Name* | *Signature* | *Title* |

| *Phone* | *Fax* | *Email* |

Secondary Representative

Action: ☐ Add   ☐ Modify   ☐ Delete

| *Name* | *Signature* | *Title* |

| *Phone* | *Fax* | *Email* |

Authorization

I, the undersigned, hereby designate the above-listed Agent and/or Representative(s) to act on behalf of the company as authorized.

| *Authorizing Company Name* | *Approval Date* |

| *Print Authorizing Name* | *Authorizing Signature* | *Authorizing Title (must be an officer)* |

Appendices

Appendix A: Cover Letter Example

Montana Coal Company

Somewhere, Montana

December 15, 2010

Chris Yde
Program Supervisor
Department of Environmental Quality
P.O. Box 200901
Helena, MT 59620-0901

Permit ID: C2010019
Revision Type: Amendment
Permitting Action: Response
Subject: Response to 1st round Technical Deficiency, App 00198

Dear Mr. Yde,

Enclosed please find our response to the first round of technical deficiencies to Application 198. Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

Jane McKay

Jane McKay
Permit Coordinator
Montana Coal Company
Montana Coal Mine
Ph: 406-555-5555
Fax: 406-333-3333
E-mail: jmckay@montanacoalco.com

Cc:

Attachments:

Appendix B: Cover Letter Template

The Department can provide this document in Word format.

<div style="border:1px solid #000; padding:1em;">

<div align="center">***INSERT LETTERHEAD***</div>

<div align="center">NOTE: You must lock this form in order to use form fields</div>

\<DATE\>

\<TO\>
\<TITLE\>
Department of Environmental Quality
P.O. Box 200901
Helena, MT 59620-0901

Permit ID: |
Revision Type: |
Permitting Action: |
Subject: (HINT: be concise and highly descriptive, including any Application #s or ID #s)

Dear \<NAME\>,

<div align="center">**Narrative**</div>

Sincerely,

\<FROM\>
\<TITLE\>
\<COMPANY/AGENCY\>
\<MINE NAME\>\<AREA NAME\>
Ph: \<NUMBER\>
Fax: \<FAX\>
E-mail: \<EMAIL ADDRESS\>

Cc:

Attachments:

</div>

Appendix C: Data Dictionary

The Department can provide this document in Excel format.

Data Dictionary	
Instructions: list all layer names that differ from the Department's naming convention, and include naming convention for additional layers used by your operation. Layer names should be clear and easy to understand. Cryptic or counterintuitive names may be rejected by the Department.	
DEQ Layer Name	**Operator Layer Name**
Adjacent Permits	
Agricultural Land Use	
Air Pollution Control Facilities	
Air Quality Monitoring Stations	
Alluvial Valley Floors	
Aquifers	
Bridges	
Buildings & Facilities	
Cemeteries	
Cleaning & Loading Areas	
Coal Processing Facilities	
Coal Seams	
Coal Storage Areas	
Conveyors	
Cropline	
Cultural and Archaeological Features	
Culverts	
Cumulative Bond Release Areas	
Domestic Water Supplies	
Drainage & Irrigation Ditches, Diversions, & Structures	
Drainage Basins (Divides)	
Excess Spoil Disposal Sites/Fill Locations	
Existing Disturbance Areas	
Explosives Storage Facilities	
Farms and Ranches	
Flood Irrigated Lands	
Garbage Dump	
Geologic Cross Sections	
Geologic Maps (Geologic Units)	
Groundwater Contours	
Groundwater Flow Direction	

Data Dictionary	
Groundwater Wells	
Historic Mine Plan with Mined Out Areas	
Historic Mine Plan with Unmined Areas	
Interburden	
Lakes, Impoundments, Ponds, Dams, Traps, Reservoirs	
Landfarm	
Lands Designated Unsuitable	
LOM Disturbance Area	
LOM Mine Plan	
LOM Permit Boundary	
Mine Plan	
Mineral Ownership	
National Historic Sites	
National Trails	
Occupied Dwellings	
Oil & Gas Wells	
Overburden	
Permit Boundary	
Pipelines	
Postmine Drainages	
Postmine Streams	
Postmine Topography (PMT)	
Postmine Revegetation Communities	
Premine Drainages	
Premine Land Use	
Premine Streams	
Premine Topography	
Premine Veg Community Types	
Public Parks	
Rail Loop	
Ramps and Haul Roads	
Reclamation Fields	
Reclamation Plan	
Renewable Resource Lands	
Roads (including Public Roads and ROW)	
Sealed Bore Holes, Sealed Mine Openings, Sealed Wells, and Other Sealed Openings	
Seeded/Planted Areas	
Soil & Spoil Stockpiles	
Soil Mapping Units	

Data Dictionary	
Soil Sample Locations & Depths	
Spill Site	
Springs	
Streamlaid Deposits	
Streams	
Subsidence Areas	
Subsidence Monitoring Point	
Surface Ownership	
Surface Water Discharge Locations (MPDES)	
Surface Water Intakes	
Surface Water Monitoring Stations	
Test Bore Hole/Pit Locations	
Township, Range, Section	
Unconsolidated Deposits	
Underground Mine Plan/Workings (including pillar locations, entries, and areas of full extraction)	
Utility Lines and Corridors	
Vegetation Reference Areas	
Waste Disposal Area	
Waste Disposal Structures	
Water Quality Treatment Facilities	
Water Supply Locations	
Water Tanks	
Watersheds	
Wild & Scenic Rivers	
Wildlife Enhancement Features	
Wildlife Habitat	
Wildlife Survey Area	
Additional Mine-Specific Layer Names	