



## Regulatory Compliance Services

**M**iller Consulting Services (MCS) offers an experienced team, familiar with the documentation requirements of the Pipelines and Hazardous Materials Safety Administration regulations for pipeline safety as found in 49 CFR 190-195.

### *How MCS Can Help You*

Keeping up with new and changing regulations and compliance issues is no small task. By applying our regulatory compliance expertise, **MCS** can effectively reduce the time and cost needed for compliance documentation.

Your documentation likely has information developed by numerous resources, including multiple in-house engineers, outside engineering firms, managers, attorneys, etc. Meeting regulatory requirements is important to maintaining your company's compliance status with federal and state regulatory agencies. However, massive data compilations can cause confusion and frustration, yielding documents that are hard to read and difficult to follow. **MCS** can help you

- ◆ Identify, gather, organize, and develop data from various sources
- ◆ Edit current documents for clarity, flow, and readability
- ◆ Format the documents to facilitate user navigation and subsequent updates
- ◆ Identify content gaps by providing a content analysis
- ◆ Provide recommendations for improvement
- ◆ Develop documentation to address Regulatory Inspection Protocols
- ◆ Prepare for regulatory inspections

### *Integrity Management Program Written Plan Development (Hazardous Liquid, Gas Transmission and Distribution)*

Our Regulatory Compliance team will document your Integrity Management Program written plan and associated processes and procedures to meet PHMSA and state requirements. **MCS** will use available client documentation; the **MCS** generic IMP plans; client subject matter experts; PHMSA regulation; PHMSA protocols; ASME, NACE, GPTC, and other applicable standards; and involved third-party contractors to fully develop and document your IMP written plan.



Our outstanding IMP team has developed generic IMP written plans available for purchase. The generic plans require customization, which **MCS** can provide or which you can complete internally. The generic plans address all required rule elements and incorporate content to address the PHMSA Inspection Protocols and other guidance for implementing Hazardous Liquid, Gas Transmission, and Distribution Integrity Management Plans.



### ***Public Awareness Plan***

**MCS** experienced team of compliance consultants developed a written Public Awareness Framework Plan to address all of the required components outlined in API RP 1162 and 192.616/195.440. The plan includes core information and identifies insertion or reference points requiring company-specific information. Additionally, **MCS** offers related services for program implementation, resulting in a turnkey solution to meet your compliance needs.

### ***Regulatory Compliance Records Management Services***

**MCS** experienced compliance team can assist your company in tracking, organizing, and archiving regulatory inspection records as well as reviewing records for completeness. Examples of records with which we have helped our clients include the following:

- ◆ Aerial patrols records
- ◆ Valve inspection and maintenance records
- ◆ Breakout tank inspection records
- ◆ Overpressure safety device inspection records
- ◆ Other inspection records

### ***MCS Regulatory Compliance Documentation***

- ◆ Integrity Management Manuals
- ◆ Process and Procedure Documentation
- ◆ Audit Presentation Materials
- ◆ Preparation of Audit Response Letters and Supporting Documentation
- ◆ Operations, Maintenance, and Emergency Manuals
- ◆ Operator Qualification Plans
- ◆ Public Awareness Plans
- ◆ Corrosion Manuals
- ◆ Welding Manuals

### ***Regulatory Inspection Support Services***

- ◆ Conduct external audit of Integrity Management plans, procedures, and records utilizing PHMSA Inspection Protocols
- ◆ Create cross-reference document, mapping client's documentation to inspection protocol questions
- ◆ Create action plan to address plan/procedure deficiencies
- ◆ Collaborate with Subject Matter Experts (SMEs) to address action items
- ◆ Conduct mock audits/inspections in preparation for regulatory inspectors
- ◆ Attend and provide support during an audit
- ◆ Prepare PowerPoint presentations for client overview
- ◆ Conduct comprehensive note taking during inspection
- ◆ Assist IMP Team in plan/procedure changes during and between audit sessions to address questions/issues
- ◆ Develop summary of inspectors' recommendations
- ◆ Assist in implementing post-audit plan and procedure changes
- ◆ Assist in preparing responses to regulatory notices (NOV, NOPV, NOA)

What one of our clients is saying about the **MCS** Inspection Support Services:

***"The thorough review of NW Natural's IMP Plan by the Miller Consulting Team was excellent preparation for a pending audit by the state regulatory agencies."***

-Ross Lisle, NorthWest Natural,  
Portland, Oregon

***For more information, please contact:***

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