



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue SE
Washington DC 20590

2011 Natural Gas State Program Evaluation

for

GEORGIA PUBLIC SERVICE COMMISSION

Document Legend

PART:

- O -- Representative Date and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- Program Performance
- D -- Compliance Activities
- E -- Incident Investigations
- F -- Damage Prevention
- G -- Field Inspections
- H -- Interstate Agent State (If Applicable)
- I -- 60106 Agreement State (If Applicable)



2011 Natural Gas State Program Evaluation -- CY 2011
Natural Gas

State Agency: Georgia

Agency Status:

Date of Visit: 05/21/2012 - 05/25/2012

Agency Representative: Michael C. Nantz, Director, Facilities Protection Unit
Jeff Baggett, Gas Safety Inspector
Chris Swann, Gas Safety Inspector

PHMSA Representative: Glynn Blanton, USDOT/PHMSA State Programs

Commission Chairman to whom follow up letter is to be sent:

Name/Title: Mr. Tim Echols, Chairman
Agency: Georgia Public Service Commission
Address: 244 Washington Street, SW
City/State/Zip: Atlanta, Georgia 30334

Rating:

60105(a): Yes **60106(a):** No **Interstate Agent:** No

INSTRUCTIONS:

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2011 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual progress report attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART G):

The field inspection form used will allow different areas of emphasis to be considered for each question. Question 13 is provided for scoring field observation areas. In completing PART G, the PHMSA representative should include a written summary which thoroughly documents the inspection.

Scoring Summary

PARTS

A Progress Report and Program Documentation Review
B Program Inspection Procedures
C Program Performance
D Compliance Activities
E Incident Investigations
F Damage Prevention
G Field Inspections
H Interstate Agent State (If Applicable)
I 60106 Agreement State (If Applicable)

Possible Points Points Scored

10 9
15 15
43 37
14 14
9 9
8 8
12 12
0 0
0 0

TOTALS

111 104

State Rating **93.7**

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- | | | | |
|----------|---|---|---|
| 1 | Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1 (A1a)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Conducted a review of their work papers, files and other data to confirm the operators and inspection units were correct and match Attachments 1, 2 & 3 in the 2011 Natural Gas base Grant Progress Report. GPSC uses the location of natural gas facilities in each county by operator as an inspection unit. No issues were noted or found.

- | | | | |
|----------|--|---|---|
| 2 | Review of Inspection Days for accuracy - Progress Report Attachment 2 (A1b)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 0 |
|----------|--|---|---|

Evaluator Notes:

In the review of Georgia Public Service Commission (GPSC) data base and work papers found an error in the number for Damage Prevention Activities shown in attachment 2. The number reported was total tickets reported by Georgia Utility Facility Protection Act (GUFPA) personnel for damage prevention. This number is not inspection person days and should not have been reported in this attachment. Therefore, one point was deducted.

- | | | | |
|----------|--|---|---|
| 3 | Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3 (A1c)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Reviewed and compared Attachment 3 of the 2011 Natural Gas Base Grant Progress Report with GPSC's database, files and work papers. Verification of information found no areas of concern.

- | | | | |
|----------|--|---|---|
| 4 | Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4 (A1d)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

In 2011, three incidents were reported in Attachment 4 of the 2011 Natural Gas Base Grant Progress Report for GPSC. Verification of the incidents was checked via ODES/Pipeline Data Mart. Two of the three incidents were determined to not be a reportable event. No issues were noted in this section of the review.

- | | | | |
|----------|--|---|---|
| 5 | Accuracy verification of Compliance Activities - Progress Report Attachment 5 (A1e)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

A review and verification of Attachment 5 of the 2011 Natural Gas Base Grant Progress Report compliance activities matched the records kept by GPSC. The calculation of probable violations to be corrected at the end of the year was verified by using the probable violations carried over from the previous year plus violations found less number corrected during the year. The number was correct.
A high number of carryover violations continue to increase. GPSC may concern taking steps to reduce this number in the current year.

- | | | | |
|----------|---|---|---|
| 6 | Were pipeline program files well-organized and accessible? - Progress Report Attachment 6 (A1f, A4)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

Yes, a review of their data base indicated all inspection reports, accident investigations and other relative information on the operator was well organized and accessible. In future filing of Attachment 6, please include additional information about the database program and the Pipeline Safety Inspection Program manual.

- | | | | |
|----------|---|---|---|
| 7 | Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 (A1g) | 1 | 1 |
|----------|---|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A review of Attachment 7 of the 2011 Natural Gas Base Grant Progress Report for GPSC found employees listed and their qualification categories were correct. The information listed by GPSC matched their personnel files maintained by the Program Manager.

8	Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8 (A1h)	1	1
----------	--	---	---

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

GPSC has automatic adoption of the pipeline safety regulations and a damage prevention law with a civil penalty not to exceed \$10,000 for each violation. However, a review of GPSC Rules and Regulations indicate the civil penalty amount for violations of the Pipeline Safety Regulations are not the same as PHMSA. In CY 2013 all civil penalty amounts must be \$100,000 to a maximum amount of \$1.0 million to insure a two point award in this section of the evaluation.

9	List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 (H1-3)	1	1
----------	--	---	---

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, a description was provided on Attachment 10 of the 2011 Natural Gas Base Grant Progress Report. Additionally, GPSC stated, "they have developed a by-county listing which identifies all counties in the state and shows the number of operators by type and category. This information is applied as one measurement of ranking in the annual risk assessment. Pipeline safety inspectors have started to provide training on pipeline emergency response during training classes for fire chiefs and state fire trainers at the GA Public Safety Training Center."

NOTE: The breakdown of units is currently being re-evaluated by the State Program Director to include the miles of main and number of facilities (i.e. taps, regulator stations, emergency valves) that are in each county.

10	General Comments:	Info Only	Info Only
-----------	-------------------	-----------	-----------

Info Only = No Points

Evaluator Notes:

A.2 In the review of Georgia Public Service Commission (GPSC) data base and work papers found an error in the number for Damage Prevention Activities shown in attachment 2. The number reported was total tickets reported by Georgia Utility Facility Protection Act (GUFPA) personnel for damage prevention. This number is not inspection person days and should not have been reported in this attachment. Therefore, one point was deducted.

Total points scored for this section: 9
Total possible points for this section: 10



PART B - Program Inspection Procedures

Points(MAX) Score

- | | | | |
|----------|--|---|---|
| 1 | Standard Inspections (B1a)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Yes, a review of GPSC Pipeline Safety Inspection Program Manual indicated this item is located on page 9, entitled, Inspection Procedures. The procedures for frequencies or risk based methods to schedule standard inspections are located on page 6, under Standard Inspection Time Frames.

- | | | | |
|----------|---|---|---|
| 2 | IMP Inspections (including DIMP) (B1b)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes, GPSC Pipeline Safety Inspection Program Manual page 10-11 address this procedure on IMP and DIMP inspections. The procedures identify frequencies of inspections which are listed on page 7, once each 60 months.

- | | | | |
|----------|---|---|---|
| 3 | OQ Inspections (B1c)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes, this item is located on page 11, item 5 in their Pipeline Safety Inspection Program document.

- | | | | |
|----------|--|---|---|
| 4 | Damage Prevention Inspections (B1d)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, this item is located on page 11, item 7 in their Pipeline Safety Inspection Program document.

- | | | | |
|----------|--|---|---|
| 5 | On-Site Operator Training (B1e)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, this item is located on page 10, item C, 2 in GPSC Pipeline Safety Inspection Program document

- | | | | |
|----------|---|---|---|
| 6 | Construction Inspections (B1f)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes, this item is located on page 10; item C, 1 in GPSC Pipeline Safety Inspection Program document.

- | | | | |
|----------|--|---|---|
| 7 | Incident/Accident Investigations (B1g)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Yes, this item is located on page 11, item C, 6 in GPSCr Pipeline Safety Inspection Program document.

- | | | | |
|----------|---|---|---|
| 8 | Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? (B2a-d, G1,2,4)
Yes = 6 No = 0 Needs Improvement = 1-5 | 6 | 6 |
|----------|---|---|---|

- | | | | | |
|----|--|--------------------------------------|--------------------------|---|
| a. | Length of time since last inspection | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Type of activity being undertaken by operators (i.e. construction) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. | Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors)

Yes ☒ No ☐ Needs Improvement ☐

f. Are inspection units broken down appropriately?

Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

Yes, these items are addressed in GPSC's Pipeline Safety Inspection Program procedures manual on pages 3-6.

9 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No areas of concern were noted or found in this section of the review.

Total points scored for this section: 15
Total possible points for this section: 15



PART C - Program Performance

Points(MAX) Score

- 1 Was ratio of Total Inspection person-days to total person days acceptable? (Director of State Programs may modify with just cause) Chapter 4.3 (A12) 5 5
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):
2841.50

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 6.75 = 1485.00

Ratio: A / B
2841.50 / 1485.00 = 1.91

If Ratio \geq 0.38 Then Points = 5, If Ratio $<$ 0.38 Then Points = 0
Points = 5

Evaluator Notes:

We deducted 2,123 damage prevention inspection days from total number inspection days shown in attachment 2 because they were not pipeline safety inspection days. They were found to be damage prevention tickets reported by Georgia Utility Facility Protection Act (GUFPA) to the GPSC.

A. Total inspection person days number is 2841.5 - 2123 = 718.5.

B. Total inspection person days charged to the program 220 X 6.75 = 1,485.

A/B = 718.5/1485 = 0.4838. This number exceeds the 0.38 requirement. Therefore, five points is awarded.

- 2 Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines for requirements) Chapter 4.4 (A8-A11, G19) 5 2
Yes = 5 No = 0 Needs Improvement = 1-4

- | | | | |
|---|--------------------------------------|--------------------------|--|
| a. Completion of Required OQ Training before conducting inspection as lead? | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. Completion of Required DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013 | Yes <input type="radio"/> | No <input type="radio"/> | Needs Improvement <input checked="" type="radio"/> |
| c. Root Cause Training by at least one inspector/program manager | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. Note any outside training completed | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

A review of Attachment 7 showed all inspectors have not completed the required training. It was found Joshua Lairsey did not complete the Hazwoper training course. Alan Towe and John McCarter did not complete the Gas IMP training courses to be the lead inspectors. Needs improvement and therefore, three points were deducted due to failure to complete the mandatory Hazwoper and Gas IMP training courses.

- 3 Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1 (A5) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, a verbal discussion with Mike Nantz indicated he has a good working knowledge about the Guidelines for States Participating in the Pipeline Safety Program, how to monitor inspection and enforcement actions of inspections performed by his agency and an understanding on the submission of the pipeline safety grant application, certification (Base Grant Progress Report) and year end payment request. Mr. Nantz was previously employed with the Kentucky Public Service Commission in the pipeline safety division prior to coming to the GPSC. Please note, program manager will have a period of five years from date of appointment to complete T&Q training courses as described in Appendix C of the "2012 Guidelines for States Participating in the Pipeline Safety Programs".

- 4 Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1 (A6-7) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

PHMSA State Program letter to GPSC Chairman Stan Wise dated July 27, 2011 did not require a response to Zach Barrett, Director PHMSA State Programs.

5	Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5 (A3)	2	2
Yes = 2 No = 0			

Evaluator Notes:

Yes, GPSC held a pipeline safety seminar in Macon, Georgia on April 11-15, 2011. The number of attendees was over two hundred individuals representing the majority of the operators in Georgia.

6	Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 (B3)	5	5
Yes = 5 No = 0 Needs Improvement = 1-4			

Evaluator Notes:

Yes, a review of Attachment 1 in 2011 Natural Gas Base Grant Progress Report and office records indicate all operator types were inspected in CY 2011 and in accordance with time intervals described in GPSC inspection program manual.

7	Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1 (B4-5)	2	2
Yes = 2 No = 0 Needs Improvement = 1			

Evaluator Notes:

A review of 2011 inspection documents for City of Toccoa Natural Gas Department, Elberton Utilities Natural Gas Systems, Atlanta Gas Company and twenty-five other operators indicated all code requirements were reviewed on the Federal Standard Inspection forms used by GPSC inspector staff.

8	Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Chapter 5.1 (B7)	1	1
Yes = 1 No = 0			

Evaluator Notes:

Yes, this item is located on page 18 of the federal gas distribution standard inspection form which staff members use when performing an inspection. GPSC also has a Commission order that requires each operator to examine cast iron mains that have been exposed. If graphitization is found the pipeline must be replaced.

9	Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Chapter 5.1 (B8)	1	1
Yes = 1 No = 0			

Evaluator Notes:

Yes, this item is listed on page 4 of the federal gas distribution standard inspection form used by GPSC staff members.

10	Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Chapter 5.1 (B9)	1	1
Yes = 1 No = 0			

Evaluator Notes:

Yes, this item is listed and checked on page 5 of the federal gas distribution standard inspection form.

11	Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? Chapter 5.1 (B10,E5)	1	1
Yes = 1 No = 0			

Evaluator Notes:

Yes, this item is located on the standard comprehensive inspection form (PHMSA Form 2) under both the Failure Investigation Procedures and Operations and Maintenance Performance and Records. Additionally, GPSC Rule 515-9-4-.05

states, "all facility owners and operators are required to report third party damages to the GUFPA section, where reported damages are evaluated on an on-going basis". Data from GUFPA and the Utilities Protection Center is compared and reviewed annually for risk-ranking. Reporting of GUFPA damages is an inspection item on the GPSC rules inspection checklist.

- | | | | |
|-----------|---|---|---|
| 12 | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues? Data Initiative (G6-9,G16)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Yes, this item is accomplished during the GPSC annual risk ranking as described in Pipeline Safety Inspection Program Manual under the section entitled, "Procedures for Determining Inspection Priorities" and in the States Risk Ranking Spreadsheet.

- | | | | |
|-----------|--|---|---|
| 13 | Did state input all applicable OQ, IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 (G10-12)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 1 |
|-----------|--|---|---|

Evaluator Notes:

A review of PHMSA Operator Qualification Database on May 14, 2012 indicated thirty-three inspections were uploaded into the database. However, a review of attachment 2 and discussion with Program Manager indicated not all reports have not been uploaded. One point was deducted.

- | | | | |
|-----------|---|---|---|
| 14 | Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission? (G14)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes, this item is located in PHMSA Standard Inspection Report of a Gas Transmission Pipeline form used by the GPSC inspectors. A review of the National Pipeline Mapping System website verified all Georgia operators have submitted information and updated recent changes.

- | | | | |
|-----------|--|---|---|
| 15 | Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199 (I1-3)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

Yes, this item is accomplished during inspection of the operator's drug and alcohol programs. Additionally, the GPSC is currently working to implement a commission rule requiring an annual submission of this information from all operators. They plan to gather this information through an on-line web based system.

- | | | | |
|-----------|--|---|---|
| 16 | Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals determined in the operators plan. 49 CFR 192 Part N (I4-7)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

Yes, this item is accomplished during the standard OQ inspection.

- | | | | |
|-----------|--|---|---|
| 17 | Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart 0 (I8-12)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 0 |
|-----------|--|---|---|

Evaluator Notes:

No, this item was not performed in CY2011. A review of PHMSA Gas Transmission Integrity Management website found the last entry made by GPSC was on October 27, 2009 pertaining to the Southern Company. Two points were deduction due to the failure to perform and enter information in a timely manner.

A review of Attachment 1 indicated 15 intrastate operators are located in the State of Georgia. All operators need to have a Protocol "A" inspection performed and uploaded into the PHMSA database.

- | | | |
|-----------|---|--------------------|
| 18 | Is state verifying operator's gas distribution integrity management Programs (DIMP)? This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart P
Info Only = No Points | Info OnlyInfo Only |
|-----------|---|--------------------|

Evaluator Notes:

Yes, GPSC is currently submitting the completed inspection form/check list to Chris McLaren, PHMSA State Programs via email.

- | | | |
|-----------|---|----|
| 19 | Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. 49 CFR 192.616 (I13-16)
Yes = 2 No = 0 Needs Improvement = 1 | 22 |
|-----------|---|----|

Evaluator Notes:

Yes. All operators are scheduled on a 5-year plan for a Public Awareness Program audit. Two state pipeline inspectors, Lynn Buffington and Alan Towe, attended T&Q pipeline awareness training in August, 2011. Following this training, they performed three PAP inspections in 2011. GPSC has 25 operators scheduled for PAP inspections during 2012.

- | | | |
|-----------|---|----|
| 20 | Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public). (G20-21)
Yes = 1 No = 0 Needs Improvement = .5 | 11 |
|-----------|---|----|

Evaluator Notes:

Yes, this item is on the GPSC state facility protection web site at <http://fp.psc.state.ga.us/> and the Commissions Docket Search page.

- | | | |
|-----------|--|-----|
| 21 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 (B6)
Yes = 1 No = 0 Needs Improvement = .5 | 1NA |
|-----------|--|-----|

Evaluator Notes:

No safety related condition reports were submitted in CY2011. This information was verified in the Safety Monitoring and Reporting Tool (SMART) website.

- | | | |
|-----------|---|----|
| 22 | Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? (G13)
Yes = 1 No = 0 Needs Improvement = .5 | 11 |
|-----------|---|----|

Evaluator Notes:

Yes. This issue is addressed under 192.617 on the standard inspection form. However, since this item is receiving added emphasis by PHMSA GPSC added this item as a stand-alone question on their inspection form.

- | | | |
|-----------|---|----|
| 23 | Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA? (H4)
Yes = 1 No = 0 Needs Improvement = .5 | 11 |
|-----------|---|----|

Evaluator Notes:

Yes. The Program Manager responded to all NAPSRS surveys and inquiries from PHMSA State Programs on Base Grant Progress Report and Financial grant awards.

- | | | |
|-----------|--|--------------------|
| 24 | General Comments:
Info Only = No Points | Info OnlyInfo Only |
|-----------|--|--------------------|

Evaluator Notes:

C.1 We deducted 2,123 damage prevention inspection days from total number inspection days shown in attachment 2 because they were not pipeline safety inspection days. They were found to be damage prevention tickets reported by Georgia Utility Facility Protection Act (GUFPA) to the GPSC.

A. Total inspection person days number is $2841.5 - 2123 = 718.5$.

B. Total inspection person days charged to the program $220 \times 6.75 = 1,485$.

$A/B = 718.5/1485 = 0.4838$. This number exceeds the 0.38 requirement. Therefore, five points is awarded. In the future, do not include damage tickets in attachment 2.

C.2 A review of Attachment 7 found all inspectors have not completed the required training. It was found Joshua Lairsey did not complete the Hazwoper training course. Alan Towe and John McCarter did not complete the Gas IMP training courses to be the lead inspectors. Three points were deductions due to failure to complete the mandatory Hazwoper and Gas IMP training courses.

C. 13 A review of PHMSA Operator Qualification Database on May 14, 2012 indicated thirty-three inspections were uploaded into the database. However, a review of attachment 2 and discussion with Program Manager indicated not all reports have not been uploaded. One point was deducted.

C.17 No, this item was not performed in CY2011. A review of PHMSA Gas Transmission Integrity Management website found the last entry made by GPSC was on October 27, 2009 pertaining to the Southern Company. Two points were deduction due to failure to perform and enter information in a timely manner.

Total points scored for this section: 37
Total possible points for this section: 43



PART D - Compliance Activities

Points(MAX) Score

- 1 Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1 (B12-14, B16, B1h) 4 4
Yes = 4 No = 0 Needs Improvement = 1-3
- a. Procedures to notify an operator (company officer) when a noncompliance is identified Yes ☒ No ☐ Needs Improvement ☐
- b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

a. Yes, this is identified in GPSC Pipeline Safety Inspection Program Manual on page 16, and listed in PSC Rule 515-9-3. The following procedures are taken after discovery of a probable violation. Verbal and written communication is provided to the operator of the alleged probable violation(s). Operators are given the opportunity to respond to the written notification of violations. Follow up steps in making corrections to the probable violations and verification that correction action has been taken is monitored. The operator may request an informal meeting with the Director or a ruling from the Commission about the violation. Written notification to the company officer about probable violations and inspection reports is listed on page 17, Completed Inspection Reports. A review of inspection reports for calendar year 2011 found reports were being sent to the company officer.

b. Yes, this is addressed in the Pipeline Safety Inspection Program manual page 18, Section 4, Response from the operator.

- 2 Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1 (B11,B18,B19) 4 4
Yes = 4 No = 0 Needs Improvement = 1-3
- a. Were compliance actions sent to company officer or manager/board member if municipal/government system? Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

A random review of the 2011 inspection reports for Atlanta Gas Light Company, City of Toccoa Natural Gas Department, Elberton Utilities Natural Gas System, Dalton Utilities and Eastman Housing Authority indicate the letters were sent to the company officer or board member.

- 3 Did the state issue compliance actions for all probable violations discovered? (B15) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, a random selection of inspection reports for the following operators were reviewed and indicated compliance action was taken by GPSC after a violation was cited.
Atlanta Gas Light Company LNG facility, City of Fort Gaines Gas System, City of Adel Gas Department, City of Warner Robins Gas Department, City of Camila Gas System, City of Richland Gas Department, City of Blakely Gas Department, Tri-County Natural Gas Department, City of Buford Gas Department, City of Madison Natural Gas System, Fairburn & Gordon Apartments, AGL Headquarters, Savannah Technical College, City of Cartersville Gas Department and City of Bainbridge Gas Department. No issues were found in this review.

- 4 Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary. (B17, B20) 2 2
Yes = 2 No = 0

Evaluator Notes:

Yes, a review of 2011 inspection reports where a violation was cited indicated the operator was given due process to correct the violation or request a hearing. In 2011, no show cause hearings were requested by the operators cited for non-compliance.

- 5 Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken) (B27) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Mike Nantz is familiar with GPSC Rules and Regulations on imposing civil penalties for non-compliance with the

pipeline safety regulations. In Docket number 35665, AGLC's incident at 13809 East Cherokee Drive on June 7, 2011, the program manager has recommended a civil penalty in the amount of \$705,000 for two violations found.

- 6** Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? (new question) Info OnlyInfo Only
Info Only = No Points

Evaluator Notes:

Yes, Docket number 35665, AGLC's incident at 13809 East Cherokee Drive on June 7, 2011 is a good example of enforcement fining authority. GPSC has issued a civil penalty against Atlanta Gas Light Company in the amount of \$705,000 for two violations found during their investigation of the incident.

- 7** General Comments: Info OnlyInfo Only
Info Only = No Points

Evaluator Notes:

No areas of concern were noted in this section of the evaluation.

Total points scored for this section: 14
Total possible points for this section: 14



PART E - Incident Investigations

Points(MAX) Score

- | | | | |
|----------|---|---|---|
| 1 | Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 (A2,D1-3)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| a. | Acknowledgement of MOU between NTSB and PHMSA (Appendix D) | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

GPSC Pipeline Safety Inspection Program manual on page 19, under "Procedures for receiving reporting of incidents" describes how GPSC staff will respond to all incidents and telephonic calls. The information was very descriptive. A discussion with Program Manager and inspectors determined they were familiar with the MOU between NTSB and PHMSA and the Federal/State Cooperation agreement located in the 2011 Guidelines For States Participating in the Pipeline Safety Program.

- | | | | |
|----------|---|---|---|
| 2 | If onsite investigation was not made, did state obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 (D4)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

In 2011, there were three incidents reported to the GPSC Pipeline Safety Office. All three incidents were investigated by GPSC inspectors and a separate report of their findings on each incident was released.

- | | | | |
|----------|--|---|---|
| 3 | Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? (D5)
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| a. | Observations and document review | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Contributing Factors | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Recommendations to prevent recurrences when appropriate | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

Yes, all three incidents reported in 2011 was investigated thoroughly and documented with findings of facts.

- | | | | |
|----------|--|---|---|
| 4 | Did the state initiate compliance action for violations found during any incident/accident investigation? (D6)
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, in Docket number 35665, AGLC's incident at 13809 East Cherokee Drive on June 7, 2011, the program manager has recommended a civil penalty in the amount of \$705,000 for two violations found.

- | | | | |
|----------|--|---|---|
| 5 | Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 (D7)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, GPSC received several calls and responded to their request.

- | | | | |
|----------|---|---|---|
| 6 | Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPS Region meetings, state seminars, etc) (G15)
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes, information on incidents/accidents was shared with their state partners at the NAPS Southern Region meeting and other related state seminars.

7 General Comments:

Info Only = No Points

Info Only

Evaluator Notes:

No issues found in this section of the review.

Total points scored for this section: 9
Total possible points for this section: 9



PART F - Damage Prevention

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 1 | Has the state reviewed directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies? NTSB (E1)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Yes, this item is listed separately on GPSC rules inspection check list, page 2 of 2. This information is also listed in GPSC Pipeline Safety Inspection Program manual located on page 10.

- | | | | |
|---|--|---|---|
| 2 | Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? (E2)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes. Damage prevention is inspected during comprehensive audits. Under state law and GPSC rules, all facility owners and operators are required to not only be a member of the state UPC, but must also investigate all third-party damages to determine if there were any violations of the law. As a part of the annual risk ranking process Staff compares all reported damages to both the Utility Protection Center and GUFPA against the operators DOT 7100 1.1 annual reports to verify compliance. In addition, GUFPA staff reviews reported gas damages for issues which should be investigated further by a pipeline safety inspector.

- | | | | |
|---|---|---|---|
| 3 | Did the state encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (i.e. such as promoting/adopting the CGA Best Practices encouraging adoption of the 9 Elements, etc.) (E3)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Yes. GPSC adopted the Common Ground Alliance Best Practices under Commission Rule 515-9-6-.01. This adoption occurred on October 14, 2009 and became effective to all natural gas operators on November 3, 2009.

- | | | | |
|---|--|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests? (This can include DIRT and other data shared and reviewed by the pipeline safety program) (E4,G5)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes. This information is reviewed annually for the purposes of risk ranking in GPSC inspection program.

- | | | | |
|---|--|-----------|-----------|
| 5 | General Comments:
Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

No loss of points occurred in this section of the evaluation.

Total points scored for this section: 8
Total possible points for this section: 8

PART G - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative Info Only Info Only
Info Only = No Points

Name of Operator Inspected:

City of Thomson Gas Department

Name of State Inspector(s) Observed:

Lynn Buffington, Senior Pipeline Safety Investigator

Location of Inspection:

Thomson, Georgia

Date of Inspection:

May 24, 2012

Name of PHMSA Representative:

Glynn Blanton, USDOT/PHMSA State Programs

Evaluator Notes:

A standard natural gas inspection was performed. The following individuals were presented: Mr. Chuck Cason, Gas Superintendent and Rodney Dunway, Gas Helper.

- 2 Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? (F2) 1 1
Yes = 1 No = 0

Evaluator Notes:

Yes, the City of Thomson was notified one month in advance of the scheduled standard inspection visit. The notification was sent to the Gas Superintendent by Lynn Buffington, Senior Gas Safety Investigator.

- 3 Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) (F3) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Lynn Buffington, Senior Gas Safety Investigator used the federal standard inspection form to conduct the inspection. All information was recorded and entered into the form located on his laptop computer

- 4 Did the inspector thoroughly document results of the inspection? (F4) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, the inspector asked several questions and requested information from the Gas Superintendent on compliance with the safety standards as he proceeded through the inspection form.

- 5 Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps,pyrometer,soap spray,CGI,etc.) (F5) 1 1
Yes = 1 No = 0

Evaluator Notes:

Yes, the City of Thomson provided their Operations & Manual Procedures and Emergency Plans for review during the audit.

- 6 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) (F7) 2 2
Yes = 2 No = 0 Needs Improvement = 1

a. Procedures ☒

b. Records ☒

c. Field Activities ☐

d. Other (please comment) ☐

Evaluator Notes:

This was a standard inspection with a review of office records and manuals. The field portion of the inspection was scheduled the next week.

7	Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) (F8) Yes = 2 No = 0 Needs Improvement = 1	2	2
---	--	---	---

Evaluator Notes:

Lynn Buffington demonstrated an excellent knowledge about the pipeline safety regulations and was very helpful to the operator in explaining areas of concern or potential violations of the pipeline safety regulations.

8	Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) (F9) Yes = 1 No = 0	1	1
---	--	---	---

Evaluator Notes:

Yes, at the end of the day, Lynn Buffington reviewed with the operator all areas of concern and probable violations.

9	During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) (F10) Yes = 1 No = 0	1	1
---	---	---	---

Evaluator Notes:

Yes, he mentioned two areas of concern and reviewed a previous violation cited against the operator.

10	General Comments: What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) Other. Info Only = No Points	Info Only	Info Only
----	--	-----------	-----------

- | | | |
|----|-----------------------------------|--------------------------|
| a. | Abandonment | <input type="checkbox"/> |
| b. | Abnormal Operations | <input type="checkbox"/> |
| c. | Break-Out Tanks | <input type="checkbox"/> |
| d. | Compressor or Pump Stations | <input type="checkbox"/> |
| e. | Change in Class Location | <input type="checkbox"/> |
| f. | Casings | <input type="checkbox"/> |
| g. | Cathodic Protection | <input type="checkbox"/> |
| h. | Cast-iron Replacement | <input type="checkbox"/> |
| i. | Damage Prevention | <input type="checkbox"/> |
| j. | Deactivation | <input type="checkbox"/> |
| k. | Emergency Procedures | <input type="checkbox"/> |
| l. | Inspection of Right-of-Way | <input type="checkbox"/> |
| m. | Line Markers | <input type="checkbox"/> |
| n. | Liaison with Public Officials | <input type="checkbox"/> |
| o. | Leak Surveys | <input type="checkbox"/> |
| p. | MOP | <input type="checkbox"/> |
| q. | MAOP | <input type="checkbox"/> |
| r. | Moving Pipe | <input type="checkbox"/> |
| s. | New Construction | <input type="checkbox"/> |
| t. | Navigable Waterway Crossings | <input type="checkbox"/> |
| u. | Odorization | <input type="checkbox"/> |
| v. | Overpressure Safety Devices | <input type="checkbox"/> |
| w. | Plastic Pipe Installation | <input type="checkbox"/> |
| x. | Public Education | <input type="checkbox"/> |
| y. | Purging | <input type="checkbox"/> |
| z. | Prevention of Accidental Ignition | <input type="checkbox"/> |
| A. | Repairs | <input type="checkbox"/> |
| B. | Signs | <input type="checkbox"/> |
| C. | Tapping | <input type="checkbox"/> |

- | | | |
|----|-----------------------------|-------------------------------------|
| D. | Valve Maintenance | <input type="checkbox"/> |
| E. | Vault Maintenance | <input type="checkbox"/> |
| F. | Welding | <input type="checkbox"/> |
| G. | OQ - Operator Qualification | <input type="checkbox"/> |
| H. | Compliance Follow-up | <input type="checkbox"/> |
| I. | Atmospheric Corrosion | <input type="checkbox"/> |
| J. | Other | <input checked="" type="checkbox"/> |

Evaluator Notes:

This was a standard office records review. No outside field inspection was performed during this visit but was scheduled the following week. It was anticipated a leak survey, valve, odorization, cathodic protection and regulator station reviews would be conducted to insure compliance with the pipeline safety regulations.

Total points scored for this section: 12
Total possible points for this section: 12



PART H - Interstate Agent State (If Applicable)**Points(MAX) Score**

- | | | | |
|----------|---|---|----|
| 1 | Did the state use the current federal inspection form(s)? (C1)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

- | | | | |
|----------|--|---|----|
| 2 | Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? (C2)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

- | | | | |
|----------|---|---|----|
| 3 | Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? (C3)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

- | | | | |
|----------|--|---|----|
| 4 | Were probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (C4)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

- | | | | |
|----------|--|---|----|
| 5 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (C5)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

- | | | | |
|----------|---|---|----|
| 6 | Did the state give written notice to PHMSA within 60 days of all probable violations found? (C6)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

- | | | | |
|----------|--|---|----|
| 7 | Did the state initially submit documentation to support compliance action by PHMSA on probable violations? (C7)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

- | | | | |
|----------|--|-----------|-----------|
| 8 | General Comments:
Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

Total points scored for this section: 0
Total possible points for this section: 0

PART I - 60106 Agreement State (If Applicable)**Points(MAX) Score**

- | | | | |
|----------|--|---|----|
| 1 | Did the state use the current federal inspection form(s)? (B21)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

GPSC does not have a 60106 Agreement with PHMSA.

- | | | | |
|----------|--|---|----|
| 2 | Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan? (B22)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

GPSC does not have a 60106 Agreement with PHMSA.

- | | | | |
|----------|---|---|----|
| 3 | Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (B23)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

GPSC does not have a 60106 Agreement with PHMSA.

- | | | | |
|----------|---|---|----|
| 4 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (B24)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

GPSC does not have a 60106 Agreement with PHMSA.

- | | | | |
|----------|--|---|----|
| 5 | Did the state give written notice to PHMSA within 60 days of all probable violations found? (B25)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

GPSC does not have a 60106 Agreement with PHMSA.

- | | | | |
|----------|--|---|----|
| 6 | Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? (B26)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

GPSC does not have a 60106 Agreement with PHMSA.

- | | | | |
|----------|--|-----------|-----------|
| 7 | General Comments:
Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

GPSC does not have a 60106 Agreement with PHMSA.

Total points scored for this section: 0
Total possible points for this section: 0