

SIGAR

**Special Inspector General for
Afghanistan Reconstruction**

SIGAR 19-09 Inspection Report

**Afghan National Army Camp Commando
Phase III: Facility Construction and Renovation
Generally Met Contract Requirements, but
Three Construction Deficiencies Increased
Safety Risks**



**DECEMBER
2018**

SIGAR

Special Inspector General for Afghanistan Reconstruction

WHAT SIGAR REVIEWED

On July 1, 2009, the Department of Defense awarded the first of four contracts to construct and renovate facilities at the Afghan National Army's (ANA) Camp Commando in Kabul, Afghanistan. The four contracts—corresponding to phases I through IV of the work—were funded through the Afghanistan Security Forces Fund and totaled \$57.1 million over 5 years.

On December 27, 2012, the U.S. Army Corps of Engineers (USACE) awarded a \$14.9 million firm-fixed-price contract to ECC CENTCOM Constructors LLC (ECC), an American company, to design, construct, and renovate the phase III facilities for approximately 1,950 personnel at Camp Commando. The contract required ECC to construct seven new facilities, such as the dining facility (DFAC) and warehouse, and renovate four existing buildings to use as training classrooms. After 11 modifications, the contract's value increased by \$2.5 million to \$17.4 million. ECC completed the phase III construction and renovation work on June 26, 2014. On July 18, 2014, the Combined Security Transition Command—Afghanistan (CSTC-A) transferred the phase III facilities to the Afghan Ministry of Defense. The warranty expired 1 year later.

The objectives for this inspection were to determine whether (1) the construction and renovation work was completed in accordance with contract requirements and applicable construction standards, and (2) the facilities are being used and maintained.

December 2018

Afghan National Army Camp Commando Phase III: Facility Construction and Renovation Generally Met Contract Requirements, but Three Construction Deficiencies Increased Safety Risks

SIGAR 19-09 INSPECTION REPORT

WHAT SIGAR FOUND

SIGAR found that the phase III construction and renovation work generally met contract requirements. However, SIGAR also identified three construction deficiencies listed below that raise safety concerns for building occupants should a fire occur.

- ECC installed 125 certified fire-rated doors in the four newly constructed barracks, but it did not install 40 certified fire-rated interior doors in the four renovated buildings. USACE photos, door product data, and daily reports show that ECC installed doors manufactured by Omran Steel Tech, which is not a certified fire-rated door manufacturer.
- USACE approved ECC's product submittal to purchase Alpine fire-rated rolling counter doors for the DFAC as part of the fire barrier that separates the kitchen, food preparation, and dishwashing area from the serving and dining areas. However, ECC installed noncertified doors instead. USACE acknowledged that the noncertified doors did not meet the contract requirements and that it did not discover the deficiency through its quality assurance process.
- SIGAR could not locate 6 of the 33 fire extinguishers ECC installed and found that 19 were counterfeit. Each of the 19 fire extinguishers had six to eight counterfeit indicators, such as the same serial number and canisters with welds or seams instead of a one-piece canister with a smooth finish. The eight remaining extinguishers did not meet contract requirements but were installed after the facilities were turned over to the Ministry of Defense.

Based on the contract documents and the counterfeit extinguishers identified, SIGAR determined that USACE paid ECC more than \$51,000 for the 33 fire extinguishers that should have cost less than \$2,000 if ECC had purchased the approved Amerex fire extinguishers. Due to the recurrence of counterfeit fire extinguishers at other sites, such as the Herat University women's dormitory, in April 2017 USACE sent a construction bulletin to its quality assurance personnel reinforcing previously disseminated information about counterfeit fire extinguishers and the need to ensure that contractors install only authentic fire extinguishers.

USACE may also have paid ECC more than it should have for the noncertified fire doors and rolling counter doors, but these amounts were not available because the costs were combined with other contract costs. In addition, SIGAR found that USACE did not perform effective quality assurance during the construction and renovation of Camp Commando phase III or fully adhere to its own three-phase quality assurance inspection process, which contributed to these deficiencies going undetected.

SIGAR found that the Camp Commando phase III facilities are being used and maintained. However, broken door hardware on the exit doors in the DFAC have resulted in three of the six exit doors being permanently locked

from the outside. The DFAC serves at least 400 people at each meal. However, only one of the three exits in the dining area is available during an emergency evacuation.

In addition, after CSTC-A transferred the phase III facilities to the Afghan Ministry of Defense, ANA personnel converted two of the renovated training classroom buildings into barracks and obstructed the only exit corridor by installing lockers. In one of the new barracks, the ANA constructed a permanent wall with a locker door in the only corridor of the building, blocking access to one of the building's exits. These conditions could increase safety risks to building occupants in the event of a fire or other emergency.

WHAT SIGAR RECOMMENDS

CSTC-A and USACE provided written comments on a draft of this report. The draft report included one recommendation for the CSTC-A Commander to notify the ANA of the following potential safety hazards: noncertified doors in the renovated buildings; noncertified rolling counter doors in the DFAC; counterfeit fire extinguishers installed throughout the phase III facilities; blocked exits in the DFAC and one of the new barracks; and obstructed exit corridors in the two training classroom buildings converted into barracks.

Both CSTC-A and USACE described and provided documentation of actions taken to address the recommendation. For example, CSTC-A stated that it informed the Ministry of Defense of the potential life, health, and safety issues resulting from the noncertified doors, counterfeit fire extinguishers, and building egress hazards. Although the recommendation was for the CSTC-A Commander to notify the ANA of the potential hazards at Camp Commando, SIGAR determined that CSTC-A addressed the recommendation by notifying the Ministry of Defense to take action at its facilities. As a result, CSTC-A action met the intent of the recommendation, and SIGAR closed it as implemented and removed it from the final report.

USACE stated that it implemented a training program for its project engineers, quality assurance representatives, and local national quality assurance personnel on the comprehensive review of fire doors and extinguishers. USACE disagreed with SIGAR's use of the term "overpayment" to describe the \$49,000 it paid for nonconforming fire extinguishers because the project was awarded on a firm-fixed-price contract. Although we revised the conclusion of the report to omit the term "overpayment," we note that when the government accepts nonconforming goods, it is a standard practice to do so at a reduced price. We maintain that USACE paid for counterfeit, nonconforming goods that were billed in excess of their actual value without reducing the contract price accordingly, and that the contractor likely saved money by not abiding by the terms of the contract.



SIGAR

Office of the Special Inspector General
for Afghanistan Reconstruction

December 28, 2018

The Honorable James N. Mattis
Secretary of Defense

General Joseph L. Votel
Commander, U.S. Central Command

General Austin Scott Miller
Commander, U.S. Forces-Afghanistan and
Commander, Resolute Support

Lieutenant General Todd T. Semonite
Commanding General and Chief of Engineers,
U.S. Army Corps of Engineers

Lieutenant General James E. Rainey
Commander, Combined Security Transition Command-Afghanistan

This report discusses the results of SIGAR's inspection of the phase III construction and renovation at the Afghan National Army's (ANA) Camp Commando in Kabul, Afghanistan. On December 27, 2012, the U.S. Army Corps of Engineers (USACE) awarded a \$14.9 million firm-fixed-price contract to ECC CENTCOM Constructors LLC (ECC) to design, construct, and renovate facilities for approximately 1,950 personnel at Camp Commando. The Combined Security Transition Command-Afghanistan (CSTC-A) funded the project. After 11 modifications, the contract's value increased by \$2.5 million to \$17.4 million. ECC completed the construction and renovation on June 26, 2014. On July 18, 2014, CSTC-A transferred the phase III facilities to the Afghan Ministry of Defense. The warranty expired 1 year later.

We found that the Camp Commando phase III construction and renovation work generally met contract requirements. However, we also identified three construction deficiencies that raise safety concerns for building occupants should a fire occur. Specifically, we found that ECC did not install 40 certified fire-rated interior doors in the four renovated buildings or 2 certified fire-rated rolling counter doors in the dining facility (DFAC), and 27 fire extinguishers were counterfeit or did not meet contract requirements but were installed after the facilities were turned over to the Ministry of Defense. Although the phase III facilities are being used and maintained, blocked exits in the DFAC and one of the barracks, and obstructed exit corridors in two training classroom buildings converted into barracks also pose safety risks to building occupants in the event of a fire or other emergency.

We received written comments on a draft of this report from CSTC-A and USACE, which are reproduced in appendices II and III, respectively. The draft report included one recommendation for the CSTC-A Commander to notify the ANA of the following potential safety hazards: noncertified doors in the renovated buildings and noncertified rolling counter doors in the DFAC; counterfeit fire extinguishers installed throughout the phase III facilities; blocked exits in the DFAC and one of the new barracks; and obstructed exit corridors in the two training classroom buildings converted into barracks. Both CSTC-A and USACE described and provided documentation of actions taken to address the recommendation. For example, CSTC-A stated that it informed the Ministry of Defense of the potential life, health, and safety issues resulting from the noncertified doors, counterfeit fire extinguishers, and building egress hazards. Although the recommendation was for the CSTC-A



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Commander to notify the ANA of the potential hazards at Camp Commando, we determined that CSTC-A addressed the issue by notifying the Ministry of Defense to take action at its facilities. As a result, CSTC-A action met the intent of the recommendation, and we closed it as implemented and removed it from the final report.

USACE stated that it implemented a training program for its project engineers, quality assurance representatives, and local national quality assurance personnel on the comprehensive review of fire doors and extinguishers. USACE disagreed with our use of the term “overpayment” to describe the \$49,000 it paid for nonconforming fire extinguishers because the project was awarded on a firm-fixed-price contract. Although we revised the conclusion of the report to omit the term “overpayment,” we note that when the government accepts nonconforming goods, it is a standard practice to do so at a reduced price. We maintain that USACE paid for counterfeit, nonconforming goods that were billed in excess of their actual value without reducing the contract price accordingly, and that the contractor likely saved money by not abiding by the terms of the contract.

SIGAR conducted this work under the authority of Public Law No. 110-181, as amended, and the Inspector General Act of 1978, as amended; and in accordance with the *Quality Standards for Inspection and Evaluation*, published by the Council of Inspectors General on Integrity and Efficiency.

John F. Sopko
Special Inspector General
for Afghanistan Reconstruction

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ABBREVIATIONS

ANA	Afghan National Army
CSTC-A	Combined Security Transition Command—Afghanistan
DFAC	dining facility
DFOW	definable feature of work
ECC	ECC CENTCOM Constructors LLC
UL	Underwriters Laboratories
USACE	U.S. Army Corps of Engineers

On July 1, 2009, the Department of Defense awarded the first of four contracts to construct and renovate facilities at the Afghan National Army's (ANA) Camp Commando in Kabul, Afghanistan.¹ The four contracts—corresponding to phases I through IV of the work—were funded through the Afghanistan Security Forces Fund and totaled \$57.1 million over 5 years.² The purpose of these contracts was to establish an operating base for the ANA Special Operations Command Division Headquarters, the Commando School of Excellence, the 6th Special Operations *Kandak*, the Military Intelligence *Kandak*, and the Garrison Support Unit.³ This report focuses on phase III.⁴

On December 27, 2012, the U.S. Army Corps of Engineers (USACE) awarded a \$14.9 million firm-fixed-price contract to ECC CENTCOM Constructors LLC (ECC), an American company, to design, construct, and renovate phase III facilities for approximately 1,950 personnel at Camp Commando.⁵ The contract required ECC to construct seven new facilities, such as a dining facility (DFAC), a warehouse, and four barracks, and renovate four existing buildings to use as training classrooms. In June 2013, USACE modified the contract to relocate the DFAC and officers' barracks, and de-scope demolition work. After 11 total modifications, the contract's value increased by \$2.5 million to \$17.4 million. ECC completed Camp Commando phase III on June 26, 2014.

The objectives for this inspection were to determine whether (1) the construction and renovation work was completed in accordance with contract requirements and applicable construction standards, and (2) the facilities are being used and maintained.

We conducted our work in Kabul, Afghanistan, from August 2015 through December 2018, in accordance with the *Quality Standards for Inspection and Evaluation*, published by the Council of the Inspectors General on Integrity and Efficiency. The engineering assessment was conducted by our professional engineers in accordance with the National Society of Professional Engineers' *Code of Ethics for Engineers*. Appendix I contains a discussion of our scope and methodology.

CAMP COMMANDO PHASE III GENERALLY MET CONTRACT REQUIREMENTS, BUT THREE CONSTRUCTION DEFICIENCIES HAVE CREATED SAFETY HAZARDS

We conducted eight site visits to Camp Commando to inspect the phase III facilities: one in June 2016, four in October 2016, two in November 2016, and a final one in March 2018. During those visits, we examined the barracks, the DFAC, the warehouse, the fuel point, the helicopter landing zone, interior building doors and walls, fire extinguishers, plumbing, and water heaters. We found that the phase III construction and renovation generally met contract requirements. For example, we found that the barracks; bathrooms in all buildings; heating, ventilation, and air-conditioning systems; electrical systems; and water systems were constructed as designed. However, we also identified three construction deficiencies involving doors, rolling counter doors, and fire extinguishers that did not meet requirements. Each of these deficiencies increases the safety risks to building occupants should a fire occur.

¹ The U.S. Army Corps of Engineers awarded the first three contracts, and the Air Force Civil Engineering Center awarded the fourth contract.

² Congress created the Afghanistan Security Forces Fund to provide the Afghan National Defense and Security Forces—made up of the ANA and the Afghan National Police—with equipment, supplies, services, and training, and facility and infrastructure repair, renovation, and construction.

³ A *kandak* is the Afghan equivalent to a U.S. Army battalion and consists of between 352 and 800 personnel.

⁴ We reported on phases II and IV in January 2015 and January 2018, respectively. Phase II included work that was not finished in phase I. See SIGAR, *ANA Camp Commando Phase II: Power Plant and Fuel Point Not Fully Operational Nearly Two Years after Project Completion*, SIGAR 15-25-IP, January 6, 2015; and SIGAR, *ANA Camp Commando Phase IV: Construction Met Contract Requirements and Most Facilities are Being Used, but Are Not Well Maintained*, SIGAR 18-28-IP, January 26, 2018.

⁵ The contract number is W912ER-11-D-0010, and the delivery order is DM01.

ECC Did Not Install Certified Fire-Rated Doors in the Phase III Renovated Buildings

The phase III contract required ECC to install certified fire-rated doors in the four new barracks and the renovated buildings, and that the doors be certified by one of three independent testing agencies: Underwriters Laboratories (UL), Factory Mutual Engineering and Research, or Warnock Hersey-Intertek International. Certified fire-rated doors protect the main paths of building egress if a fire occurs and are designed to limit the spread of smoke and flames. In January 2014, USACE approved ECC's product submittal to purchase and install certified fire-rated doors from Changchun Zhucheng, a Chinese manufacturer. During our site visits, we found that ECC installed 125 certified fire-rated doors manufactured by Changchun Zhucheng in the four new barracks. All of the doors had UL certification labels attached to them, and a UL representative confirmed that Changchun Zhucheng's fire door labels and certifications were authentic.

We also found that ECC installed 40 interior doors in the renovated buildings. However, the doors were not manufactured by Changchun Zhucheng or any other company approved to manufacture certified fire-rated doors (see photo 1). The contract's technical specifications and design drawings required the 40 interior doors to be fire-rated for intervals of 20 to 45 minutes, depending on their location within the buildings. In addition, the technical specifications required door, frame, hardware, and other components of the fire door assembly to be (1) manufactured to the specifications needed to withstand a fire, (2) tested to National Fire Protection Agency or UL standards, and (3) certified by one of the independent testing agencies.

USACE's process requires the contractor to send product submittals to the designated USACE office before purchasing and installing those products. The office coordinates the technical review to ensure that the submittals meet contract requirement before the contracting officer's representative approves.

USACE photos, door product data, and daily reports confirm that ECC installed noncertified interior doors manufactured by Omran Steel Tech, an Afghan company, in the renovated buildings. We reviewed ECC's fire door submittals and found that USACE approved the Omran Steel Tech fire doors even though the company is not certified by one of the three independent testing agencies. USACE's approval of these noncertified doors raises safety concerns for occupants of the renovated buildings. We could not determine how much the Omran Steel Tech doors cost because the cost was combined with other construction items. Therefore, we could not determine whether USACE overpaid ECC for the noncertified doors.

Photo 1 - Non-Fire-Rated Door Installed in Renovated Training Classroom Building 402



Source: SIGAR, October 23, 2016

ECC Did Not Install Certified Fire-Rated Rolling Counter Doors in the DFAC

ECC constructed a 2-hour-rated firewall separating the kitchen, food preparation, and dishwashing area from the serving and dining areas, as the contract required. The construction contract also required ECC to install two labeled, 90-minute, fire-rated rolling counter doors certified by an independent testing agency complete with hardware, accessories, and an automatic closing device. However, we found that ECC installed noncertified rolling counter doors, which increases the risk of death or injury to DFAC staff and soldiers dining in the facility should a fire occur.

ECC's product submittal proposed using "Fire-Shut" rolling counter doors from Alpine, an American company, and the submittal showed that Alpine's proposed products complied with the contract requirements (see photo 2). In December 2013, USACE approved ECC's submittal for the Alpine doors. However, ECC did not install those doors in the DFAC. After reviewing photos we provided on March 9, 2017, an Alpine representative told us the doors were not Alpine's products. Instead, ECC installed noncertified rolling counter doors from an unknown manufacturer (see photo 3). After we informed USACE about the product substitution, USACE contacted Alpine to determine whether ECC had purchased fire-rated rolling doors from the company. Alpine informed USACE that it could not find any records showing that ECC had purchased its doors. USACE acknowledged that ECC substituted doors that did not meet the contract requirements and that its quality assurance process did not discover the deficiency.

Photo 2 - Certified Fire-Rated Rolling Counter Door Manufactured by Alpine



Source: ECC submittal of Alpine rolling door product data, December 24, 2013

Photo 3 - Noncertified Rolling Counter Door Installed in the DFAC



Source: SIGAR, October 18, 2016

An Alpine representative told us the Alpine rolling door in photo 2 costs \$3,481. Based on our research in the Kabul market, we found that the cost of a rolling door similar to the one in photo 3 is about \$1,550. However, we could not determine whether USACE paid ECC the higher amount because the costs for the doors were combined with other contract costs.

ECC Installed Counterfeit Fire Extinguishers in Eleven Phase III Buildings

The contract required ECC to install 32 certified fire extinguishers in 11 buildings: 4 barracks, the DFAC, 4 renovated buildings, the fuel operator's building, and the warehouse. In September 2013, USACE approved ECC's product submittal to purchase and install Amerex fire extinguishers. The information in the submittal said the fire extinguishers would comply with the contract's requirements. In addition, Amerex requires each fire extinguisher to have a unique serial number on the UL label, a key characteristic of the brand.

During our June 2016 site visit, we found 26 of the 32 required fire extinguishers. According to the Camp Commando facilities manager, the ANA removed 6 of the 32 extinguishers ECC installed after CSTC-A turned the facilities over to the Ministry of Defense. We also found 1 extra fire extinguisher installed in the fuel operator's building, bringing the total number of required fire extinguishers on site at the time of our visit to 27.

We inspected each of the 27 fire extinguishers and found that 8 were not made by Amerex and had been installed after the facilities were turned over to the Ministry of Defense. We determined that the remaining 19—installed in 11 buildings—were counterfeit Amerex extinguishers because each had six to eight counterfeit

indicators.⁶ None of the 19 fire extinguishers had a unique serial number on the UL label, and some of the UL labels had printing and spelling errors. Further, all 19 fire extinguishers had counterfeit pressure gauges, canisters with welds or seams, and non-Amerex nozzles and hoses. For example, some of the extinguishers had blue nozzles, which are not found on authentic Amerex extinguishers. In addition, we found extinguishers with two-piece canisters and rolled seams at the bottom instead of one-piece canisters with a straight, smooth finish—another characteristic of Amerex fire extinguishers.

USACE maintains that ECC installed authentic Amerex fire extinguishers in the phase III facilities. However, USACE gave us two date-stamped construction progress photos showing that counterfeit Amerex products had been installed in the facilities before the project was completed.

The contract's technical specifications also required ECC to give USACE a written certificate guaranteeing that all of the fire extinguishers installed were free of material, fabrication, finish, and installation defects, and that they would remain free of defects for at least 3 years after Camp Commando phase III was completed.⁷ However, ECC did not provide the written guarantee, and USACE did not enforce the requirement. As a result, the counterfeit Amerex fire extinguishers went undetected at the final inspection and during warranty inspections. Based on the contract documents and the 19 counterfeit Amerex fire extinguishers we identified, we determined that USACE paid ECC more than \$51,000 for the 33 fire extinguishers that were counterfeit products the company installed, or more than \$1,500 per extinguisher.⁸ However, according to Amerex, the actual cost of an authentic Amerex fire extinguisher should be about \$56, or about \$1,850 for 33.

This is not the first time we have reported on counterfeit fire extinguishers installed in USACE projects.⁹ In October 2016, we reported finding 30 counterfeit Buckeye fire extinguishers at the Herat University women's dormitory.¹⁰ One of the counterfeit indicators was that all of the extinguishers had the same serial number. Due to the recurrence of this issue, in April 2017 USACE sent a construction bulletin to its quality assurance personnel reinforcing previously disseminated information about counterfeit fire extinguishers and the need to ensure that contractors install only authentic fire extinguishers.

Counterfeit fire extinguishers create a safety hazard because they may not work as intended if a fire occurs. For example, the extinguishers could accelerate a fire if they do not contain the proper fire suppressant materials. In addition, pressure gauges on counterfeit fire extinguishers may not function or may give false readings. Photo 4 shows a fire extinguisher installed at Camp Commando with at least three counterfeit indicators: seams near the bottom, a blue nozzle, and an off-center pressure gauge. Photo 5 shows an authentic Amerex fire extinguisher, which USACE approved for the Camp Commando facilities.

⁶ Indicators of counterfeit Amerex fire extinguisher are (1) two-piece cylinder construction with the seam around the canister; (2) a curved rounded lip on the bottom; (3) hoses with no UL labeling or hose markings; (4) blue hose nozzles and nozzles of varying shapes; (5) pressure gauges in the wrong position and in different styles; (6) text errors in the fire extinguisher labels; (7) non-self-destructive labels; (8) black or red handles; and (9) duplicate serial numbers.

⁷ Contract specification section 10 44 16, "FIRE EXTINGUISHERS," identifies the material and installation requirements for fire extinguishers, and refers to National Fire Protection Agency Codes 1, 10, and 101, and international fire codes.

⁸ USACE progress payment number 17 shows that ECC received \$51,423 for the 33 fire extinguishers, or about \$1,558 per extinguisher.

⁹ SIGAR, *Herat University Women's Dormitory: Generally Well-Constructed, but Instances of Contract Non-Compliance Should Be Addressed*, SIGAR 17-08-IP, October 25, 2016.

¹⁰ Buckeye is a brand of fire extinguisher.

Photo 4 - Counterfeit Amerex Fire Extinguisher



Source: Camp Commando official, October 26, 2016

Photo 5 - Authentic Amerex Fire Extinguisher that USACE Approved



Source: Amerex Counterfeit Product Alert, July 2016

USACE's Inadequate Quality Assurance Contributed to ECC's Noncompliance with Contract Requirements

We found that USACE did not perform effective quality assurance during the construction and renovation of Camp Commando's phase III. It also did not fully adhere to its three-phase quality assurance inspection process, which was designed to help contractors and USACE detect and correct construction deficiencies and deviations from contract requirements.¹¹ The process requires that a contractor identify every definable feature of work (DFOW) in its quality control plan. A DFOW is separate from other tasks and has different control requirements. The contractor is supposed to track and document each DFOW for the three phases of construction: preparatory, initial, and follow-up. The contractor's quality control staff, the foreman responsible for the DFOW, and a USACE quality assurance representative are to attend the preparatory and initial phase inspection meetings. The meetings take place before (preparatory phase) and at the beginning (initial phase) of each DFOW to review and discuss whether the contractor is prepared to perform the work safely and in accordance with contract requirements. The follow-up phase consists of daily checks to ensure compliance until the DFOW is completed.

Camp Commando phase III had 19 DFOWs, covering items such as the sanitary sewer system, the electrical systems, and the doors and windows. According to ECC's quality control reports, the preparatory inspection for the doors and windows occurred on December 8, 2013. Regarding the rolling counter doors in the DFAC, the reports show that they were delivered on June 3, 2014. The preparatory and initial quality control inspections required USACE and ECC to review the approved Alpine submittal, confirm that the approved doors were delivered, and examine the installation of those doors soon after construction began. None of the quality control or quality assurance reports showed that the initial inspection occurred when the doors were installed from June 4 through June 10, 2014, or before the DFAC's pre-final and final inspections on June 17 and 26,

¹¹ Section 01451, "Contractor Quality Control," of the USACE contract specifies the requirements for contractor quality control and discusses the three-phase inspection process.

2014, respectively. However, the pre-final and final inspection checklists for the doors stated that the contracting officer's representative checked the material delivered against the approved submittals.

Further, in reviewing ECC's warranty management plan, we found that ECC provided a warranty for Alpine rolling counter doors certified by UL. Specifically, on April 18, 2014, ECC submitted its first warranty management plan, and USACE approved it on April 26, 2014. The warranty management plan indicated that Alpine rolling counter doors had a 1-year warranty. Less than 1 month later, ECC submitted a revised warranty management plan and changed the warranty period to 2 years for the Alpine rolling counter doors. However, ECC never purchased or installed Alpine doors.

Even though ECC's quality control representatives and USACE quality assurance staff conducted the pre-final and final inspections, no one identified the noncompliant rolling counter doors. In addition, neither USACE nor any of the other parties involved in the inspection process discovered that ECC did not install certified fire-rated doors in the renovated buildings or that counterfeit fire extinguishers were installed in the phase III facilities.

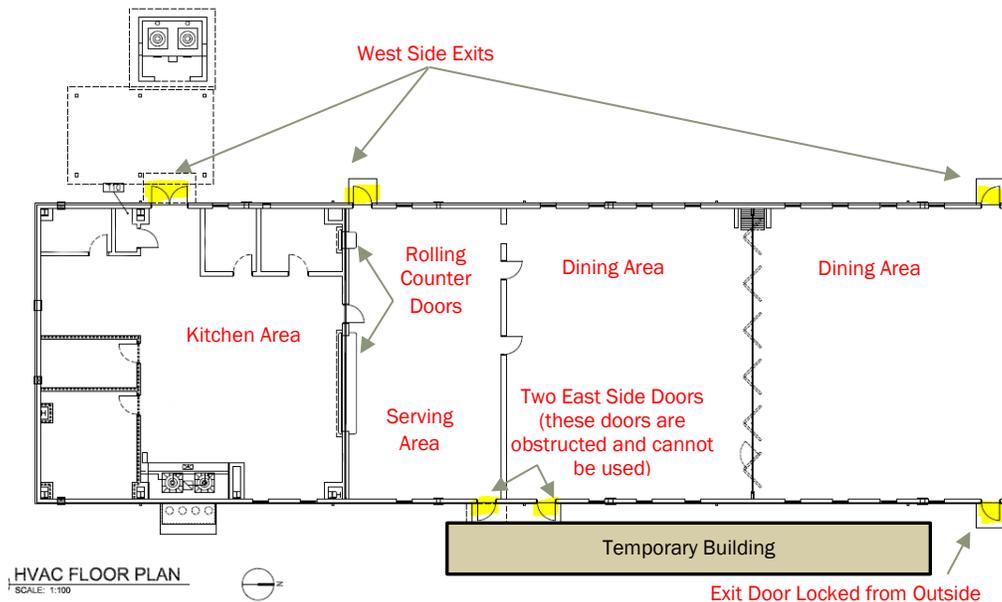
CAMP COMMANDO PHASE III FACILITIES ARE BEING USED AND MAINTAINED, BUT LOCKED EXIT DOORS IN THE DFAC AND CHANGES TO THREE OTHER BUILDINGS HAVE CREATED SAFETY HAZARDS

During our 2016 and 2018 site visits, we found that the Camp Commando phase III facilities were being used. For example, we found that the four new barracks and the renovated buildings were being used, as were the DFAC and warehouse. We also found that most of the facilities were being maintained. However, we identified one maintenance issue involving broken door hardware in the DFAC that resulted in some exit doors being permanently locked. In addition, after CSTC-A transferred the phase III facilities to the Ministry of Defense, ANA personnel converted two of the renovated training classroom buildings into barracks and constructed a wall in the main corridor of another barrack that blocked access to one of the building's exits. These conditions have created safety hazards for building occupants.

Only Three of the DFAC's Six Exit Doors Can Be Used, Increasing the Safety Risks to Occupants during an Emergency Evacuation

ECC installed panic hardware on each of the six DFAC exit doors, as the contract required. Panic hardware, also known as an exit device, is designed to give building occupants fast, easy egress from buildings during an emergency, such as a fire. ECC constructed the DFAC with one exit in the kitchen, two exits in the serving area, and three exits in the dining area. Three of the exits are on the east side of the DFAC, and the other three are on the west side (see figure 1).

Figure 1 - Design Drawing of Camp Commando Phase III DFAC



Source: USACE with annotations by SIGAR

During our October 2016 and March 2018 site visits, we found that the panic hardware was broken on all three exit doors on the DFAC's east side and that slide bolts were added to lock the doors from the outside (see photo 6). According to DFAC staff, the three east side exits are locked at all times. As a result, occupants cannot use two exit doors from the dining area and one exit door from the serving area. In addition, during our March 2018 site visit, we found that a temporary building had been built next to the DFAC's east wall, which would prevent two of the exit doors—one from the serving area and one from the dining area—from opening even if they were unlocked. We also found that the panic hardware on all three doors on the west side of the DFAC was broken, and slide bolt locks had been installed on the outside of these doors. The facility manager told us the west side doors are locked when the facility is not in use, but unlocked when personnel are dining.

During our March 2018 site visit, we learned that the DFAC was serving between 400 and 450 personnel at each meal, even though it was designed to serve 218. This raises concerns about how quickly a staff this size will be able to evacuate through the one usable exit door on the west side of the dining area in the event of a fire or other emergency. In addition, we found that ECC installed two gas stoves in the DFAC as required and the Camp Commando staff added five more stoves. We also found that neither of the two heat detectors in the kitchen was functioning.

Photo 6 - East Side Exit Door Slide Locked from Outside



Source: SIGAR, March 10, 2018

The ANA Converted Two Training Classroom Buildings into Barracks, Which Has Created a Safety Hazard

ECC renovated four existing buildings into training classrooms as the contract required.¹² During our March 2018 site visit, we found that two of the renovated buildings (402 and 404) were being used as barracks to house ANA personnel (see photo 7). An ANA official said the lack of adequate housing space for new Commando students made it necessary to convert the two buildings into barracks. This conversion occurred after CSTC-A transferred the phase III facilities to the Ministry of Defense. New students live in these barracks for 3 months, after which time they depart and are replaced by another group of students.

In accordance with codes for design and construction applicable to the contract, the renovated training classroom buildings were intended to be used for assembly purposes. However, they are now being used for residential purposes. The International Building Code and Life Safety Code have different design requirements for assembly and residential areas. Furthermore, the heating, ventilation, and air conditioning systems in these converted classrooms may not be able to provide adequate living conditions for occupants residing in the spaces for longer periods than originally intended.

Our greatest concern is that the occupants of the renovated Classroom Building 402 can exit only through an obstructed central corridor to a single exit door on the west end of the building and a double exit door on the east end. According to the design, the corridor should have an unobstructed width of about 8.2 feet, and 6.5 feet near the west exit because of the storage room. We found that ECC constructed the corridor according to these requirements. However, during our October 2016 site visit, we found that the ANA had installed lockers on both sides of the wall for the entire length of the corridor to serve as personal storage for the 244 students occupying the building. In March 2018, we saw that the lockers were still on both sides of the corridor. The addition of these lockers has reduced the corridor width to 5.2 feet (see photo 8). As a result, fewer building occupants can pass through the corridor simultaneously, which could increase safety risks in the event of a fire or other emergency.

Photo 7 - Renovated Building 404 Used as Barrack Instead of Training Classroom Building



Source: SIGAR, March 10, 2018

Photo 8 - Lockers on Both Sides of Corridor Walls in Renovated Classroom Building 402



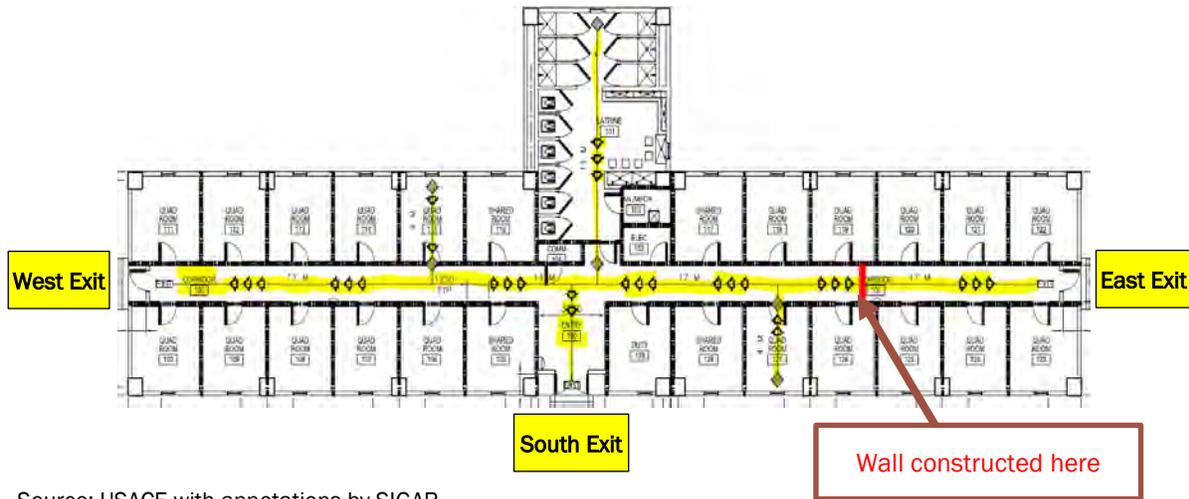
Source: SIGAR, March 10, 2018

¹² The four renovated classroom training buildings are 402, 402A, 403, and 404.

ANA Personnel Created a Special Operations Area in a Barrack with a Wall Blocking a Building Exit

ECC constructed noncommissioned officers' Barrack 603 with three building exits in accordance with the design drawings. ECC installed a single exit door on the building's east and west ends, and a double exit door on the south end, which serves as the main entrance. The building's intended egress path is highlighted in yellow in figure 3.

Figure 2 - Planned Egress Route in Noncommissioned Officers' Barrack 603



Source: USACE with annotations by SIGAR

During our June 2016 site visit, we found that ANA personnel had used furniture, bookcases, and boxes to construct a wall across the width of the corridor that restricted access to six rooms and the east exit. A locker door served as the entry to the restricted area. During our October 2016 site visit, we found that the ANA had replaced the makeshift wall with a permanent wooden wall and locker door for entry (see photo 9). An ANA official told us the ANA installed the wall and door to create a restricted area to use as a radio and communications room and planning area for special operations. However, the permanent wall and door have reduced the width of the egress path from the unrestricted area to the east exit from 67 inches to 17.8 inches. In addition, ANA officials deactivated the smoke detectors in that section of the building because the special operation equipment was causing the detectors to go off. The reduced size of the corridor and deactivated smoke detectors have created a safety hazard for building occupants.

Photo 9 - Permanent Wooden Wall Blocking Main Corridor of Noncommissioned Officers' Barrack 603



Source: SIGAR, October 18, 2016

CONCLUSION

Overall, the Camp Commando phase III construction and renovation generally met contract requirements, and the facilities are being used and generally maintained. However, we identified three construction deficiencies involving noncertified fire doors and rolling counter doors, and counterfeit fire extinguishers that resulted from ECC's noncompliance with contract requirements and USACE's inadequate project oversight. These deficiencies have created safety hazards for ANA personnel on the compound. For the counterfeit fire extinguishers alone, we estimate that USACE paid ECC more than \$51,000 for 33 fire extinguishers that should have cost less than \$2,000 if ECC had purchased and installed the approved Amerex fire extinguishers. USACE paid ECC for nonconforming goods billed in excess of their actual value, such as the noncertified fire doors and rolling counter doors. However, it is unlikely that the U.S. government can recoup any funds paid for these nonconforming goods because it has been more than 3 years since CSTC-A transferred the facilities to the Ministry of Defense, and the warranty period has expired. Even though Camp Commando's phase III facilities are no longer the U.S. government's responsibility, it is important that the ANA know about the potential safety hazards resulting from these construction deficiencies so it can reduce the risks to its personnel should a fire occur.

AGENCY COMMENTS

We provided a draft of this report to the Department of Defense for review and comment. CSTC-A and USACE provided written comments, which are reproduced in appendices II and III, respectively. USACE also provided technical comments, which we incorporated, as appropriate.

Our draft report included one recommendation for the CSTC-A Commander to notify the ANA of the potential safety hazards resulting from the noncertified doors in the renovated buildings and noncertified rolling counter doors in the DFAC; counterfeit fire extinguishers installed throughout the phase III facilities; blocked exits in the DFAC and one of the new barracks; and obstructed exit corridors in the two training classrooms converted into barracks.

CSTC-A did not state whether it concurred or did not concur with the recommendation. CSTC-A stated that it informed the Ministry of Defense's Director of Construction and Property Management of the potential life, health, and safety issues resulting from noncertified doors, counterfeit fire extinguishers, and building egress hazards. CSTC-A further stated that it recommended that the director (1) appoint primary and alternate fire wardens at each Ministry of Defense facility to identify and resolve fire safety issues, and (2) conduct monthly fire and safety inspections of Ministry of Defense facilities using the CSTC-A checklist provided, and resolve fire and safety issues identified to ensure that facilities and personnel are not placed at undue risk. Based on our review of the response and documentation provided, we determined that CSTC-A's actions addressed the recommendation. Although the recommendation was for the CSTC-A Commander to notify the ANA of the potential hazards at Camp Commando, we determined that CSTC-A addressed the issue by notifying the Ministry of Defense to take action at its facilities. As a result, CSTC-A action met the intent of the recommendation, and we closed it as implemented and removed it from the final report.

In its comments, USACE stated that it implemented a training program for its project engineers, quality assurance representatives, and local national quality assurance personnel on the comprehensive review of fire doors and extinguishers. USACE disagreed with our use of the term "overpayment" to describe the \$49,000 paid for nonconforming fire extinguishers because the project was awarded on a firm-fixed-price contract. Although we revised the conclusion of the report to omit the term "overpayment," we note that when the government accepts nonconforming goods, it is a standard practice to do so at a reduced price.¹³ We maintain

¹³ For example, see *Blount Bros. Corp., Armed Services Board of Contract Appeals, No. 29862, 88-2 BCA ¶ 20,644* (government entitled to a credit totaling the amount saved by contractor for using nonconforming concrete).

that USACE paid for counterfeit, nonconforming goods that were billed in excess of their actual value without reducing the contract price accordingly, and that the contractor likely saved money by not abiding by the terms of the contract.

APPENDIX I - SCOPE AND METHODOLOGY

This report provides the results of SIGAR's inspection of the phase III construction and renovation at the Afghan National Army's Camp Commando in Kabul, Afghanistan. The objectives of this inspection were to determine whether (1) the construction and renovation work was completed in accordance with contract requirements and applicable construction standards, and (2) the facilities are being used and maintained. Specifically, we:

- reviewed contract documents, design and engineering documents, quality assurance and quality control reports, and other relevant documentation;
- interviewed officials with the U.S. Army Corps of Engineers, the Afghan government, and Alpine; and
- made eight site visits to Camp Commando on June 28, 2016; October 18, 19, 23, and 24, 2016; November 13 and 16, 2016; and March 10, 2018.

We did not rely on computer-processed data in conducting this inspection. However, we considered compliance with laws and indicators of fraud risk, other illegal acts, and abuse, and their potential impact.

In December 2014, SIGAR entered into a cooperative agreement with Afghan civil society partners. Under this agreement, our Afghan partners conduct specific inspections, evaluations, and other analyses. In this regard, Afghan engineers inspected the Camp Commando phase III facilities in October and November 2016, and March 2018.¹⁴ We developed a standardized engineering evaluation checklist covering items required by the contract and design/specification documents. Our checklist required our partners to analyze the contract documents, scope of work, technical specifications, and design drawings.

We compared the information our Afghan civil society partners provided to accepted engineering practices, relevant standards, regulations, laws, and codes for quality and accuracy. In addition, as part of our monitoring and quality control process, we:

- met with the Afghan engineers to ensure that the approach and planning for the inspection were consistent with the objectives of our inspection and the terms of our cooperative agreement;
- attended periodic meetings with our partners, and conducted our normal entrance and exit conferences with agency officials;
- discussed significant inspection issues with them;
- monitored our partners' progress in meeting milestones and revised contract delivery dates as needed; and
- conducted oversight of them in accordance with SIGAR's policies and procedures to ensure that their work resulted in impartial, credible, and reliable information.

We conducted our inspection work in Kabul, Afghanistan, from August 2015 through December 2018. This work was conducted in accordance with the *Quality Standards for Inspection and Evaluation*, published by the Council of the Inspectors General on Integrity and Efficiency. The engineering assessment was conducted by our professional engineers in accordance with the National Society of Professional Engineers' *Code of Ethics for Engineers*. We conducted this inspection under the authority of Public Law No. 110-181, as amended, and the Inspector General Act of 1978, as amended.

¹⁴ We conducted the first site visit on June 28, 2016, without our Afghan partners.

APPENDIX II - COMMENTS FROM THE COMBINED SECURITY TRANSITION COMMAND–AFGHANISTAN



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DEPUTY CHIEF OF STAFF SECURITY ASSISTANCE
COMBINED SECURITY TRANSITION COMMAND–AFGHANISTAN
KABUL, AFGHANISTAN
APO AE 09320

DCOS SA/CSTC-A

3 November 2018

MEMORANDUM THRU

United States Forces – Afghanistan DCDR-S, APO AE 09356
United States Central Command (CCIG), MacDill Air Force Base, FL 33621

FOR Special Inspector General for Afghanistan Reconstruction, 2530 Crystal Drive, Arlington,
VA 22202-3940

SUBJECT: Special Inspector General Afghan Reconstruction (SIGAR) I-033A Draft Report
"Inspection of Afghan National Army Camp Commando Phases III and IV"

1. The purpose of this memorandum is to provide a response to the SIGAR-I-033A Draft Report
"Inspection of Afghan National Army Camp Commando Phases III and IV."

2. SIGAR Recommendation –

a. *To reduce the safety risks to ANA personnel using the Camp Commando phase III facilities, we recommend that the CSTC-A Commander:*

b. *Notify the ANA of the potential safety hazards resulting from the noncertified doors in the renovated buildings and noncertified rolling counter doors in the DFAC; the counterfeit fire extinguishers installed throughout the phase III facilities; the blocked exits in the DFAC and one of the new barracks; and the obstructed exit corridors in the two training classrooms converted into barracks.*

3. CSTC-A Management Response –

a. CSTC-A has informed the MOD, Director of Construction and Property Management Department (CPMD), of potential life, health and safety issues, due to safety hazards resulting from noncertified doors and counterfeit fire extinguishers, as well as, potential building egress hazards caused by building modifications subsequent to CSTC-A facilities transfer to GIRoA.

b. CSTC-A has recommended that MOD CMPD–

(1) Appoint a primary and alternative fire wardens at each MOD facility to identify and resolve fire safety issues.

(2) Conduct monthly inspection fire and safety inspections of MOD facilities, using the CSTC-A provided checklist, and resolve noted fire/safety issues to ensure facilities and personnel are not placed at undue risk.

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SUBJECT: Special Inspector General Afghan Reconstruction (SIGAR) I-033A Draft Report
"Inspection of Afghan National Army Camp Commando Phases III and IV"

4. CSTC-A appreciates SIGAR's inspection program of ANDSF facilities and will continue to TAA MOD CPMD on fire/safety and building utilization.
5. Point of contact is Jeff Zielinski, jeffrey.m.zielinski2.civ@mail.mil, DSN 318-449-9939.

Encl
CSTC-A Memo 21 Jun 18

Digitally signed by SHIRLEY.ERIC.PAUL.1156529822
DN: c=US, o=U.S. Government, ou=NSA, ou=DoD, ou=USA,
cn=SHIRLEY.ERIC.PAUL.1156529822
Date: 2018.11.05 13:13:27 +04'30'

ERIC P. SHIRLEY
COL (OF-5), U.S. Army
Chief of Staff, DCOS SA/CSTC-A

UNCLASSIFIED

APPENDIX III - COMMENTS FROM THE U.S. ARMY CORPS OF ENGINEERS



DEPARTMENT OF THE ARMY
UNITED STATES ARMY CORPS OF ENGINEERS
TRANSATLANTIC DIVISION
201 PRINCE FREDERICK DRIVE
WINCHESTER, VIRGINIA 22602-4373

November 8, 2018

SUBJECT: Response to Special Inspector General for Afghanistan Reconstruction (SIGAR) Draft Report (Project Code SIGAR-I-033a), Afghan National Army Camp Commando Phase III: Facility Construction Generally Met Contract Requirements, but Three Construction Deficiencies Increased Safety Risks

Mr. John F. Sopko
Special Inspector General for Afghanistan Reconstruction
1550 Crystal Drive, Suite 900
Arlington, VA 22202

Dear Mr. Sopko:

The U.S. Army Corps of Engineers (USACE) concurs with the draft report's finding that the Phase III construction and renovation work generally met contract requirements. However, USACE provides the following comments for clarification.

The fire door and fire extinguisher findings associated with contractor noncompliance addressed on pages 2, 3, and 4 of the draft report have been identified by SIGAR in previous inspections of older projects such as this one. As a result of SIGAR reporting these issues, USACE implemented a training program for project engineers, quality assurance representatives, and local national quality assurance personnel entailing a comprehensive review of fire door assemblies and identification of counterfeit hand-held fire extinguisher. We have seen improvement in this area and believe improvements will continue with current and future projects.

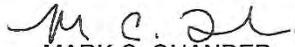
USACE disagrees with SIGAR's comments on page 4 of the draft report that indicate USACE overpaid about \$49,000 for fire extinguishers. This is incorrect. This project was awarded as a firm-fixed-price contract and the price is agreed and fixed before construction starts. If the actual cost of the work exceeds the agreed price, then the contractor must bear the additional expense. If, on the other hand, the cost of the work is less than the agreed price, the contractor will benefit from the savings. While costs may change based upon the expense incurred, the price remains the same for carrying out the construction. As a result, there was no overpayment for fire extinguishers.

USACE defers to the Combined Security Transition Command-Afghanistan for response to the one recommendation in the draft report.

-2-

My point of contact for this response is Mr. George Sullivan, Transatlantic Division Internal Review Auditor. He may be reached by e-mail at George.a.sullivan@usace.army.mil or by telephone at 202-761-4573.

Sincerely,


MARK C. QUANDER
Colonel(P), U.S. Army
Commanding

APPENDIX IV - ACKNOWLEDGMENTS

Steven Haughton, Senior Inspection Manager

Arthur Granger, Inspector-in-Charge

Javed Khairandish, Engineer

Wilhelmina Pierce, Professional Engineer

Abdul Rahim Rashidi, Program Analyst

This inspection was conducted
under project code SIGAR-I-033.

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The mission of the Special Inspector General for Afghanistan Reconstruction (SIGAR) is to enhance oversight of programs for the reconstruction of Afghanistan by conducting independent and objective audits, inspections, and investigations on the use of taxpayer dollars and related funds. SIGAR works to provide accurate and balanced information, evaluations, analysis, and recommendations to help the U.S. Congress, U.S. agencies, and other decision-makers to make informed oversight, policy, and funding decisions to:

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- advance U.S. interests in reconstructing Afghanistan.

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