SIGAR

Special Inspector General for Afghanistan Reconstruction

SIGAR Inspection 13-4

KUNDUZ AFGHAN NATIONAL POLICE PROVINCIAL HEADQUARTERS: AFTER CONSTRUCTION DELAYS AND COST INCREASES, CONCERNS REMAIN ABOUT THE FACILITY'S USABILITY AND SUSTAINABILITY

JANUARY
2013

SIGAR

Special Inspector General for Afghanistan Reconstruction

WHAT SIGAR REVIEWED

In August 2010, the U.S. Army Corps of Engineers - Afghanistan Engineer District - North (USACE-TAN) awarded a $12.4 million contract task order to ECCI-C METAG Joint Venture to design and build facilities at the Afghan National Police (ANP) Provincial Headquarters in Kunduz province. Subsequent modifications to the contract increased its total value to $17.7 million. On November 15, 2012, the Special Inspector General for Afghanistan Reconstruction (SIGAR) conducted a site inspection at the facility to determine whether construction was being completed in accordance with contract requirements and applicable construction standards.

In preparation for its site inspection, SIGAR reviewed contract documents, technical specifications, design documents, geotechnical reports, and quality control and quality assurance reports. SIGAR conducted its work in Kunduz province and in Kabul, Afghanistan, from September to December 2012, in accordance with *Quality Standards for Inspection and Evaluation* published by the Council of the Inspectors General on Integrity and Efficiency.

January 2013

KUNDUZ AFGHAN NATIONAL POLICE PROVINCIAL HEADQUARTERS: AFTER CONSTRUCTION DELAYS AND COST INCREASES, CONCERNS REMAIN ABOUT THE FACILITY'S USABILITY AND SUSTAINABILITY

SIGAR INSPECTION 13-4

WHAT SIGAR FOUND

Construction quality at the Kunduz ANP Provincial Headquarters generally meets contract specifications, although USACE-TAN's failure to address the potential for collapsible soils as part of the award of the contract caused a 10-month delay and a $5 million cost increase. A collection of 37 structures, the project was approximately 50 percent complete when SIGAR visited the site on November 15, 2012. Most of the buildings were structurally complete. No significant construction deficiencies were noted.

Nevertheless, SIGAR's inspection identified usability and sustainability issues with the facility. Specifically, a failure of the facility's only source of power—a single diesel generator with no back-up or connection to the local electrical grid—could lead to significant sewage overflows that threaten the health and safety of the facility and its occupants. Also, there are no plans for an operation and maintenance contract or to train Afghans to keep complex systems such as sewage treatment and electrical power in good working order. Therefore, in SIGAR's view, U.S. investment in this facility may be at risk.

WHAT SIGAR RECOMMENDS

SIGAR is making recommendations to the Commanding General, USACE, to install electrical back-up at the sewage treatment plant lift station. SIGAR also recommends that the Commanding General, USACE, in coordination with the Commanding General, NATO Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan, review the decision to not connect the site to the local electrical grid and, if this decision was warranted, install back-up site electrical power to help ensure a continuous supply of electricity; and to consider awarding an operation and maintenance contract to ensure the facility's long-term sustainability. USACE and NTM-A/CSTC-A concurred with the recommendations and noted actions they are taking to address them.

Sewage Treatment Plant (black) at Elevated Portion of Provincial Police Headquarters Compound

(SIGAR Photo 11/15/2012)

January 24, 2013

Lieutenant General Daniel P. Bolger
Commanding General, North Atlantic Treaty Organization Training Mission-Afghanistan/
Combined Security Transition Command-Afghanistan

Lieutenant General Thomas P. Bostick
Commanding General and Chief of Engineers
U.S. Army Corps of Engineers

This report discusses the results of the inspection of the U.S. Army Corps of Engineers' (USACE) Kunduz Afghan National Police (ANP) Provincial Headquarters construction project in Kunduz province, Afghanistan, by the Office of the Special Inspector General for Afghanistan Reconstruction (SIGAR). This report includes recommendations to the Commanding General, USACE, in coordination with the Commanding General, North Atlantic Treaty Organization Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan, to address these issues.

SIGAR conducted this inspection under the authority of Public Law No. 110-181, as amended; the Inspector General Act of 1978; and the Inspector General Reform Act of 2008.

John F. Sopko
Special Inspector General
for Afghanistan Reconstruction

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ABBREVIATIONS & ACRONYMS

ANP	Afghan National Police
CSTC-A	Combined Security Transition Command-Afghanistan
NATO	North Atlantic Treaty Organization
NTM-A	NATO Training Mission-Afghanistan
USACE	U.S. Army Corps of Engineers
USACE-TAN	U.S. Army Corps of Engineers, Afghanistan Engineer District-North

An objective of coalition efforts in Afghanistan is to build the country's capacity to provide for its own security by training and equipping the Afghanistan National Security Forces, which include the Afghan National Police (ANP) and the Afghan National Army. The U.S. Army Corps of Engineers (USACE) is constructing a Provincial Police Headquarters for the ANP in the city of Kunduz, which is located in the Kunduz Province of Northern Afghanistan.[1] The $17.7 million project is funded by the North Atlantic Treaty Organization (NATO) Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan (NTM-A/CSTC-A) using funds from the U.S.-appropriated Afghanistan Security Forces Fund.

For this inspection, we assessed the quality and maintenance of construction and site improvements for facilities located at the headquarters. Specifically, we determined whether construction was being completed in accordance with contract requirements and applicable construction standards, and whether the facilities could be used as intended and maintained.

We conducted this inspection at Kabul, Afghanistan; the USACE Kunduz Resident Office; and the Kunduz Provincial Police Headquarters construction site from September to December 2012, 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 Professional Engineers in accordance with the National Society of Professional Engineers' *Code of Ethics for Engineers*. Appendix I contains more detail on our scope and methodology and Appendix II contains a map of the headquarters site and the locations inspected.

BACKGROUND

USACE Afghanistan Engineer District-North (USACE-TAN) [2] awarded task order 0003 to W5J9JE-10-D-0007 on August 8, 2010, for $12.4 million to ECCI-C METAG, JV.[3] Through a series of modifications, the contract was increased to $17.7 million. The task order was for facility design, site improvements, and construction to support the ANP Uniformed Civilian Police[4] with facilities for a provincial response command, quick response force, and a traffic directorate in Kunduz, Afghanistan. The task order provides for the management, material, labor, and equipment to design, construct and/or refurbish all utilities, roads, buildings, force protection measures, site security, and de-mining activities, among other things. The facility will provide capacity for a provincial headquarters of 37 structures and a total of 625 persons. See Appendix III for more details.

The construction project consists of barracks, classroom buildings, latrines, office buildings, dining facility, guard towers, entry-control points, and utility systems. Utility systems include a single diesel generator power plant, water wells/tanks, sewage treatment plant, and underground piping networks (see figure 1). The site is located in an urban area of Kunduz with existing infrastructure and buildings surrounding it. The site also has existing police buildings and personnel already working onsite.[5] The contractor has a large staff and housing camp onsite with several construction and quality control managers present to oversee the project. During our

[1] Kunduz Province is located north of the Afghan capital, Kabul. The Province borders Tajikistan. The city of Kunduz, the province capital, is 153 miles (246 kilometers) north, northeast of Kabul and about 60 miles (90 kilometers) from the Tajikistan border. The province covers an area of 7827 km^2. Three quarters of the area is made up of flat land while about 12 percent is mountainous or semi mountainous terrain.

[2] In 2009, the Afghanistan Engineer District was divided into two districts—North and South. The North District is referred to as USACE-TAN.

[3] ECCI-C METAG, JV is a joint venture between ECC International Constructors, LLC, headquartered in Burlingame, California, and METAG Construction Trade Company, Inc., headquartered in Ankara, Turkey.

[4] The ANP are organized into four broad categories, including the Afghan Uniformed Civilian Police; Afghan Border Police; Afghan National Civil Order Police; and Afghan Anti-Crime Police.

[5] The site included existing ANP facilities which were in use during our site visit. These facilities were not included in the contract. The contractor had adjusted its construction activities to accommodate the ANP personnel.

visit, approximately 400 sub-contractor construction workers were observed. The USACE Quality Assurance Representative was also onsite at the time of our visit.

Figure 1 - Aerial Photo, Kunduz ANP Provincial Police Headquarters

Source: USACE Photo. Aerial View 9/23/2012 (Courtesy USACE-TAN)

CONSTRUCTION QUALITY IS GENERALLY MEETING CONTRACT SPECIFICATIONS, ALTHOUGH SOIL INSTABILITY CAUSED DELAYS AND ADDITIONAL COSTS

According to contractor representatives, the ANP Provincial Headquarters project was approximately 50 percent complete when we visited the site on November 15, 2012.[6] Most of the buildings were structurally complete, although construction was ongoing and no buildings, to date, were occupied by the end user. No significant structural construction deficiencies were noted and site grading and drainage also appeared adequate at this point in the construction project. Site occupational safety practices were also adequate based on our observations. Personnel were observed to be wearing proper protective equipment. Barrier tape was applied to excavated areas (see figure 2). Some small excavations were observed as in figure 2. We also observed that most underground utility piping, conduit, and manholes had been installed. However, some building sewer connections had not been made to the nearest manhole (see figure 3), and no electrical cabling

[6] Key work remaining to be performed included roofing, water tanks, underground utilities, interior finish, windows and doors, roads, parking, and the sewage treatment plant.

had yet been delivered to the job site. Nevertheless, in our view, these are not significant issues since the project is only 50 percent complete. Construction was continuing on, among other things, the dining facility and barracks (see figures 4 and 5). The quality of the concrete and steel construction appeared to meet contract specifications (see figures 6 and7).

Figure 2 - Over-Excavation of Sewage Filter Beds

Source: SIGAR Photo 11/15/2012 (taken from the top of the sewage treatment plant)

Figure 3 - Sewer Manhole Construction

Source: SIGAR Photo 11/15/2012

Figure 4 - Dining Facility under Construction

Source: SIGAR Photo 11/15/2012

Figure 5 - Open-Bay Barracks under Construction

Source: SIGAR Photo 11/15/2012

Figure 6 - Roof Rebar Placement for Concrete Pour for Open Bay Barracks

Source: SIGAR Photo 11/15/2012

Figure 7 - Roof Slab Pour Underway for Administration Building

Source: SIGAR Photo 11/15/2012

Originally scheduled to be completed in September 2012, the project was over 1 year behind schedule at the time of our site visit. Soon after award of the contract, the contractor began to have problems with collapsible soil conditions and sink holes on the project site. Construction work was placed on hold until a $5 million contract modification was put in place[7] to remediate the collapsible soil risk by requiring the contractor to over-excavate the building pads by three meters and then bring in certified backfill material as replacement soil.[8] This process delayed construction progress for approximately 10 months. It is unclear why USACE-TAN did not address the potential for collapsible soils as part of the award of the contract since the soil condition is endemic to the area. We noted a similar problem in an April 2010 audit report and October 2012 inspection report where a USACE-TAN contractor at an Afghan National Army garrison in the same general area of Kunduz Province had failed to identify serious collapsible soil problems in its geotechnical report.[9]

Furthermore, construction of the Kunduz ANP Provincial Headquarters has been further delayed by weather. USACE-TAN now estimates that the project will be completed and the facility ready for turnover to NTM-A/CSTC-A by September 2013.

[7] The contractor was given a notice to proceed on September 9, 2010. On September 29, the contractor advised USACE of the potential for collapsible soil at the site. Omran Geotechnical Co. submitted a geotechnical report to the contractor on November 15. The contractor submitted a letter to USACE on January 1, 2011, outlining soil issues at the site, along with three proposed solutions. USACE approved a contract modification on June 19, 2011, adding $5 million to the contract and increasing the performance time by 281 days.

[8] At the time of our site visit, most of this work to remediate the collapsible soil risk had been completed.

[9] See SIGAR Audit 10-09, *ANA Garrison at Kunduz Does Not Meet All Quality and Oversight Requirements; Serious Soil Issues Need to be Addressed*, April 30, 2010, and SIGAR Inspection 13-1, *Kunduz ANA Garrison: Army Corps of Engineers Released DynCorp of All Contractual Obligations despite Poor Performance and Structural Failures*, October 25, 2012.

PROBLEMS WITH SEWAGE TREATMENT, LACK OF BACK-UP ELECTRICITY, AND ABSENCE OF AN OPERATION AND MAINTENANCE CONTRACT COULD HARM LONG-TERM USABILITY AND SUSTAINABILITY

Our inspection identified a number of problems that could negatively affect the long-term usability and sustainability of the facility. For example, we have concerns about the facility's ability to treat sewage generated by the facility's occupants as well as the availability of adequate back-up power. In addition, the facility currently lacks an operation and maintenance contract that will help ensure its long-term sustainability.

To address site waste water, a sewage treatment plant[10] (see figures 8 and 9) has been installed near the main entry control point on the northwest corner of the project site—one of highest elevation points for the site. Based on discussions with site personnel and USACE-TAN, installation of the sewage treatment plant at this higher elevation is based on the need to discharge the treated sewage effluent into a municipal storm and sewage drain system located outside the site along the northwest corner.

Figure 8 - Distant View of the Sewage Treatment Plant

Source: SIGAR Photo 11/15/2012

The sewage treatment plant is designed to drain untreated sewage by gravity to a single pumping station, called a "lift station,"[11] located within a few feet of the sewage treatment plant itself (see figure 10). The lift station will pump the untreated sewage into the sewage treatment plant for processing. However, we have concerns about the adequacy and sustainability of the lift station. The site is designed to be occupied by 625 persons, which will generate approximately 90,000 liters of untreated sewage per day.[12] The sewage treatment plant and lift station require full-time electrical power. In the event of a power failure, the large amount of untreated sewage generated per day will quickly fill the 200-liter lift station and overflow through the manhole, possibly destroying the electrical motor mounted on top of the lift station.[13]. Sewage would then flow downhill along the ground toward the main entry control point, resulting in health and safety hazards. A review of the design criteria could identify the best option for providing back-up power for the lift station, such as an auxiliary electrical generator capable of operating independently from the site power plant.

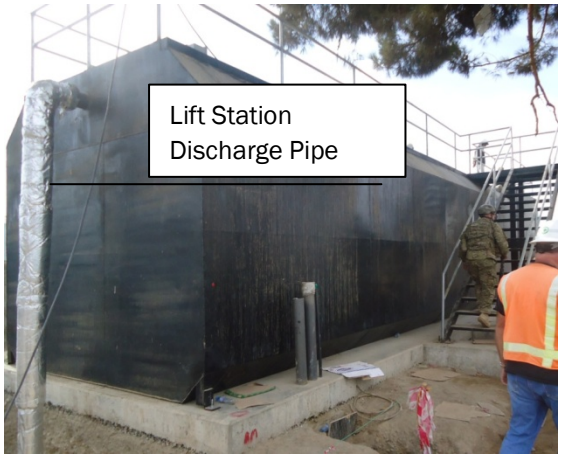
[10] The sewage treatment plant was constructed off-site, shipped to the location, and installed.

[11] The lift station, which was being constructed during our site visit, is a small barrel-shaped device placed in the ground and is approximately 200 liters in volume. Sewage is fed into it by gravity. The electrical motor, seen with a protective cover in figure 10, will pump the sewage up the adjacent pipe (seen in figures 9 and 10) and into the sewage treatment plant.

[12] For sewage treatment, the contract factors a daily water use standard per person in Afghanistan of 190 liters per day, and requires design for 80 percent, or 155 liters per person per day, to be processed by the sewage treatment plant.

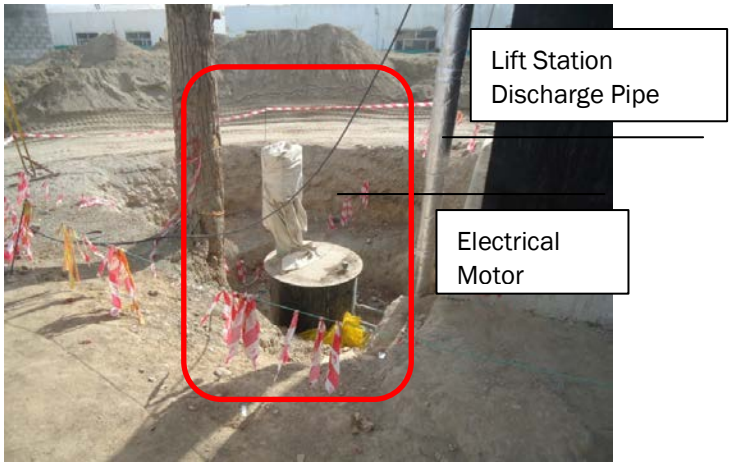
[13] As can be seen in Figure 10, the site was excavated for the lift station, which will be below ground level upon completion.

Figure 9 - Close View of the Sewage Treatment Plant



Source: SIGAR Photo 11/15/2012

Figure 10 - Sewage Lift Station



Source: SIGAR Photo 11/15/2012

The possibility of power failure is exacerbated by the lack of back-up power for the single diesel generator that we observed being installed on the southwest corner of the project site. This single generator is designed to provide 100 percent of the site's electrical power needs. The generator will consume over 180 liters per hour of diesel fuel at 75 percent load. As a result, based on our analysis using current fuel costs, operation of this generator will require approximately $243,000 per month or over $2.9 million per year.

A potentially cheaper option that would not require fuel to be delivered on a regular basis to the generator would be to connect the site to the local electrical grid. Distribution power lines for the area's electrical grid exist along the western perimeter of the site and we observed a local home being connected to that grid (see figures 1 and 11). In discussion with USACE-TAN representatives, they informed us that a decision had been made at the beginning of the project to not connect to the local grid, because it would not support the requirements of the site facilities, and the variability in voltage and frequency of electricity from the local grid could damage the site electrical equipment. However, fuel requirements for the diesel generator will be extremely costly, raising questions about USACE-TAN's decision to forgo connecting the site to the local electrical grid, or determining other economical means to provide back-up electrical power.

Based on the $17.7 million project cost and discussions with USACE-TAN and construction officials, it is not clear why a facility of this size is being built at this location without adequate plans for a back-up electrical power supply. Addressing this issue will require further costs to be expended, above the $5 million already incurred by the failure to address the collapsible soil issue at the time of the contract award. Providing another back-up diesel generator is an option, but will further exacerbate the fuel costs, and the site will still be dependent on regular fuel deliveries. However, without a viable electrical back-up, there will be no power available to the site in the event that the primary generator is shut down for maintenance or repair, or in unintended circumstances.

Figure 11 - Evidence of Local Electrical Grid Adjacent to Site

Source: SIGAR Photo 11/15/2012

Technically complex systems such as the sewage treatment plant and the power plant require operation and maintenance skills. Normally, an operation and maintenance contract would be put in place subsequent to the completion of the project, which is currently envisioned to occur in September 2013. The contract would typically include training for local personnel to properly operate and maintain facility systems. However, while USACE-TAN contract provisions provide limited training upon turnover for technical equipment, there are currently no plans to award an operation and maintenance contract. The officials told us the reason for this is that the construction would be covered under warranty by the contractor for 1 year and, after that period had passed, most coalition forces will have left Afghanistan. However, the lack of an operation and maintenance contract or plans to provide comprehensive training to local Afghans to operate and maintain U.S.-funded construction raises questions about the long-term sustainability of the facility. Failure of the site's electrical supply or sewage treatment systems would result in increased costs to repair or replace any damage that occurs and negatively affect use of the facility, jeopardizing the $17.7 million investment, and could result in significant health and safety concerns for the facility and its occupants.

CONCLUSION

Although construction at the Kunduz ANP Provincial headquarters is generally meeting contract specifications, USACE-TAN's failure to address the potential for collapsible soils as part of the award of the contract resulted in significant construction delays. The cost of the contract had to be increased by $5 million to address the collapsible soil issues at the construction site. In addition, the facility's design has problems that raise concerns about the facility's usability and sustainability. In particular, a failure of the facility's only source of electrical power—a single diesel generator with no back-up or alternate connection to the local electrical grid or other back-up electrical power supply—could lead to site power outages and significant sewage overflows that threaten the health and safety of the facility and its occupants.

Furthermore, while USACE-TAN has planned to provide limited site maintenance training to local Afghans at the end of the project, it has not adequately planned for the long-term sustainability of the facility through an operation and maintenance contract that would keep site facilities, including technically complex systems such as sewage treatment and electrical power, in good working order. Failure of these systems will result in increased costs to repair or replace any damage that occurs. In our view, therefore, the $17.7 million U.S. investment in this facility may be at risk.

RECOMMENDATIONS

To ensure that the ANP will be able to adequately use and sustain the Kunduz Provincial Police Headquarters for its intended purpose, we recommend that the Commanding General, USACE, direct USACE-TAN to:

1. **Provide electrical back-up at the lift station, such as an auxiliary electrical generator, to provide back-up power to continue pumping untreated sewage into the sewage treatment plant and help mitigate the potential for sewage overflow when the main generator is out of service for repair or maintenance or from unintended power outages.**

In addition, to aid long-term sustainability, we recommend that the Commanding General, USACE, in coordination with the Commanding General, NTM-A/CSTC-A:

2. **Review the decision made at the start of the project to not connect the site to the local electrical grid and, as part of the review, conduct a cost-benefit and technical analysis. The review should factor the high costs to purchase and deliver fuel to the site for the electrical generator, the capability of the local grid to provide adequate power for the site facilities and equipment, and the need for a back-up site electrical system. Based on the results of this review, if connection to the local power grid is not feasible, install a back-up site generator or otherwise provide an appropriate back-up electrical power system to prevent loss of electricity across the site when the primary generator is not working.**
3. **Award an operation and maintenance contract at project completion to ensure that the facility is appropriately maintained once occupied.**

AGENCY COMMENTS

We provided a draft of this report to USACE and NTM-A/CSTC-A for comment. USACE concurred with SIGAR's three recommendations, stating that it is prepared to address these issues, pending NTM-A/CSTC-A direction and funding. For SIGAR's first recommendation, USACE is prepared to install a back-up at the lift station. For SIGAR's second recommendation, USACE is prepared to conduct a cost-benefit and technical analysis associated with connecting the site to the local electrical grid. And for SIGAR's third recommendation, USACE is prepared to issue a task order against the existing operations and maintenance contract. USACE's comments are reproduced in appendix IV.

NTM-A/CSTC-A's responded to recommendations 2 and 3. Concerning recommendation 2, NTM-A/CSTC-A noted that a Power Summit was held in October 2012 to review current coalition and ANSF power requirements as well as the current status and capacity of the Afghan national grid. While the summit participants found that major investment is still required to connect major military bases to the national grid, they also highlighted the need to conduct a feasibility and cost-benefit analysis of connecting ANSF facilities to the national grid as a primary power source. NTM-A/CSTC-A will conduct this analysis to develop a feasible timeline for transition of ANSF facilities to the Afghan grid. Concerning recommendation 3, NTM-A/CSTC-A noted that, as the Ministries of Defense and Interior build up their ability to sustain new facilities, facilities and infrastructure that are deemed critical can be placed on an operations and maintenance contract exclusively for their maintenance to ensure their continued viability into 2014 and later. NTM-A Engineer Advisors will also encourage the Ministry of Interior Facilities Department to award an operations and maintenance contract for the sustainment needs of the Kunduz Provincial Police Headquarters. NTM-A/CSTC-A comments are reproduced in appendix V.

APPENDIX I - SCOPE AND METHODOLOGY

This report provides the results of an inspection of the Provincial Police Headquarters for Kunduz Province. The Provincial Police Headquarters is being constructed in an urban portion of the City of Kunduz. This inspection report is one of a series of nine inspections of construction projects contracted by the U.S. Army Corps of Engineers (USACE) in the Northern Provinces of Afghanistan.

To determine whether the construction was completed in accordance with contract requirements and applicable construction standards and whether the facilities will be used as intended and maintained, we:

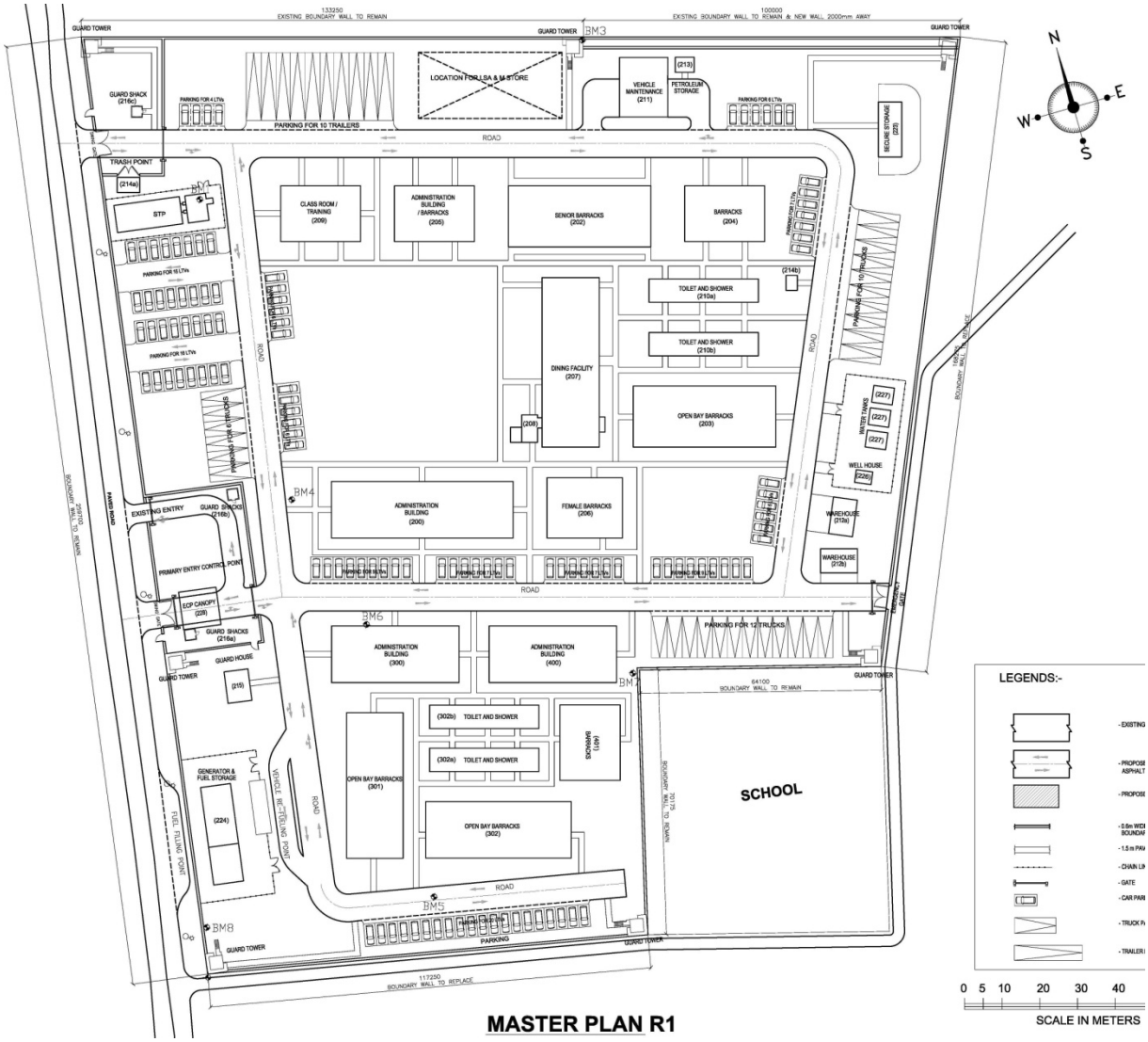
- reviewed contract documents, design submittals, and geotechnical reports, to understand project requirements and contract administration;
- interviewed cognizant U.S. and Afghan government officials responsible for the construction project; and
- conducted a physical inspection and photographed the project site to observe the current status and the quality of construction.

We conducted work at Kabul, Afghanistan; the Kunduz Provincial Reconstruction Team, USACE Kunduz Resident Office; and the Kunduz Provincial Police Headquarters construction site from September to December 2012, in accordance with the *Quality Standards for Inspection and Evaluation*, published by the Council of the Inspectors General on Integrity and Efficiency. These standards were established to guide inspection work performed by all the Offices of Inspector General. The engineering assessment was conducted by Professional Engineers in accordance with the National Society of Professional Engineers' *Code of Ethics for Engineers*. We did not rely on computer-processed data in conducting this inspection. We considered the impact of compliance with laws and fraud risk.

We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our inspection objectives. This inspection was conducted by the Office of the Special Inspector General for Afghanistan Reconstruction under the authority of Public Law 110-181, as amended, the Inspector General Act of 1978, and the Inspector General Reform Act of 2008.

APPENDIX II - KUNDUZ ANP PROVINCIAL POLICE HEADQUARTERS SITE PLAN

Figure I - Site Plan, Kunduz ANP Provincial Police Headquarters



Source: Courtesy of USACE-TAN

APPENDIX III - SUMMARY OF KUNDUZ POLICE HEADQUARTERS CONTRACT

The Kunduz ANP Provincial Police Headquarters is being constructed under a multiple award task order contract (W5J9JE-10-D-0007), awarded on March 8, 2010. The contract is a firm fixed-price, indefinite delivery indefinite quantity, multiple award task order contract that provides for the management, material, labor, and equipment to design, construct and/or refurbish utilities, roads, buildings, force protection measures, site security, and de-mining activities, among other things, throughout North Afghanistan. The multiple award task order contract's total capacity is $240 million over its life. Construction of the Kunduz ANP Provincial Police Headquarters facility is being performed under Task Order #3 (W5J9JE-10-D-0007-0003) of the multiple award task order contract, awarded to ECCI-C METAG, JV[14] on August 8, 2010, for $12.43 million. Through a series of modifications, the contract value was increased to $17.7 million.

Table I provides a summary of the standard buildings being constructed.

Table I - Summary of Facilities in Task Order 0003

Name/Designation	Number of Units
Administration building (#200)	1
Barracks-private/semi-private (#202)	1
Women's barracks-open bay (#206, 401)	2
Dining facility (#207)	1
Toilet/shower/ablution/laundry (#210a, 210b, 302a, and 302b)	4
Secure storage (#223)	1
Gate house (#215)	1
Training building (two used as barracks) (#204, 205, and 209)	3
Guard shack (#216a-c)	3
Guard tower (#217a-g)	7
Vehicle maintenance building (#211)	1
Petroleum, oil, and lubricants (#213)	1
Warehouse (#212a-b)	2
Trash collection point (#214a-b)	2
Well house (#226)	1
Fuel storage & vehicle refuel (#224)	1
Barracks open bay (#203, 301, and 302)	2 w/1-Option
Administration building (#300, 400)	2

[14] ECCI-C METAG, JV is a joint venture between ECC International Constructors, LLC, headquartered in Burlingame, California, and METAG Construction Trade Company, Inc., headquartered in Ankara, Turkey.

Name/Designation	Number of Units
Criminal Investigation Division administration building [a]	1
Total Buildings	37 w/1-Option

Source: SIGAR summary of task order

Note: [a] This building was subsequently added to the project and no building number was assigned in the modification (1C).

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

DEPARTMENT OF THE ARMY
UNITED STATES ARMY CORPS OF ENGINEERS
TRANSATLANTIC DIVISION
255 FORT COLLIER ROAD
WINCHESTER, VIRGINIA 22603-5776

REPLY TO
ATTENTION OF

CETAD-IR

16 JAN 2013

MEMORANDUM FOR Special Inspector General for Afghanistan Reconstruction (SIGAR) ATTN: Benjamin J. Piccolo, Assistant Inspector General for Audit 2530 Crystal Drive, Arlington, VA 22202-3940

SUBJECT: U.S. Army Corps of Engineers (USACE) Response to SIGAR Draft Report 13-4, Kunduz Afghan National Police Provincial Headquarters: After Construction Delays and Cost Increases, Concerns Remain About The Facility's Usability and Sustainability

1. Enclosed is USACE Transatlantic Division's response to the SIGAR Draft Report, SIGAR 13-4, Kunduz Afghan National Police Provincial Headquarters, After Construction Delays and Cost Increases, Concerns Remain AboutThe Facility's Usability and Sustainability.

2. My point of contact for these comments is Mr. George Sullivan, Chief, Internal Review at 540-665-2117, George.a.Sullivan@usace.army.mil.

Encl

JOHN S HURLEY
Colonel, EN
Deputy Commander

USACE Comments to SIGAR 13-4 Draft Report, Kunduz Afghan National Police Provincial Headquarters: After Construction Delays And Cost Increases, Concerns Remain About The Facility's Usability and Sustainability

USACE comments are provided for the draft report and each recommendation as shown.

USACE Comment: USACE will coordinate with NTM-A/CSTC-A and stands ready to assist NTM-A/CSTC-A in implementing the recommendations pending direction and funding from NTM-A/CSTC-A.

1. Recommendation: To ensure that the ANP will be able to adequately use and sustain the Kunduz Provincial police Headquarters for its intended purpose, we recommend that the Commanding General, USACE direct USACE-TAN to:

> **Provide electrical back-up at the lift station, such as an auxiliary electrical generator, to provide back-up power to continue pumping untreated sewage into the sewage treatment plant and help mitigate the potential for sewage overflow when the main generator is out of service for repair or maintenance or from unintended power outages.**

Concur. USACE-TAN is prepared to install electrical back-up at the lift station, pending NTM-A/CSTC-A direction and funding.

2. In addition, to aid long-term sustainability, we recommend that the Commanding General, USACE, in coordination with Commanding General, NTM-A/CSTC-A:

> **Review the decision made at the start of the project to not connect the site to the local electrical grid and, as part of the review, conduct a cost-benefit and technical analysis. The review should factor the high costs to purchase and deliver fuel to the site for the electrical generator, the capability of the local grid to provide adequate power for the site facilities and equipment, and the need for a back-up site electrical system. Based on the results of this review, if connection to the local power grid is not feasible, install a back-up site generator or otherwise provide an appropriate back-up electrical power system to prevent loss of electricity across the site when the primary generator is not working.**

Concur. USACE-TAN is prepared to conduct a cost-benefit and technical analysis associated with connecting the site to the local electrical grid pending NTM-A/CSTC-A direction and funding.

3. Award an operation and maintenance contract at project completion to ensure that the facility is appropriately maintained once occupied.

Concur. USACE-TAN is prepared to issue a task order against the existing operations and maintenance contract pending NTM-A/CSTC-A direction and funding.

APPENDIX V - COMMENTS FROM THE NATO TRAINING MISSION-AFGHANISTAN/COMBINED SECURITY TRANSITION COMMAND-AFGHANISTAN

HEADQUARTERS
NATO TRAINING MISSION - AFGHANISTAN
COMBINED SECURITY TRANSITION COMMAND - AFGHANISTAN
KABUL, AFGHANISTAN
APO AE 09356

REPLY TO
ATTENTION OF
NTM-A/CSTC-A

14 JAN 2013

MEMORANDUM THRU United States Forces - Afghanistan (CJIG), APO AE 09356
United States Central Command (CCIG), MacDill AFB, FL 33621

FOR: Office of the Special Inspector General for Afghanistan Reconstruction
2530 Crystal Drive, Arlington, VA 22202

SUBJECT: NTM-A/CSTC-A Response to the Draft Report "Kunduz Afghan National Police Provincial Headquarters: After Construction Delays and Cost Increases, Concerns Remain About the Facility's Usability and Sustainability" (Report No. SIGAR-Inspection-13-4)

REFERENCE: Draft Report, dated Jan 2013, Office of the Special Inspector General for Afghanistan Reconstruction (SIGAR).

1. The purpose of this memorandum is to provide responses to SIGAR's draft report.

2. Point of contact for this action is LCDR B. Patrick Michael at DSN 318-449-0944, or via e-mail at Benjamin.P.Michael@afghan.swa.army.mil.

ANDREW W. BACKUS
COL, NTM-A ENG
Director

Enclosure:
NTM-A/CSTC-A Response to Draft Report

NTM-A/CSTC-A RESPONSE TO DRAFT REPORT

"Kunduz Afghan National Police Provincial Headquarters: After Construction Delays and Cost Increases, Concerns Remain About the Facility's Usability and Sustainability"
Report No. SIGAR-Inspection-13-4 (SIGAR Code: SIGAR-I-006A)

1. The purpose of this memorandum is to provide responses to SIGAR's draft report.

2. Recommendation 2, Page 8, states:
Commanding General, USACE, in coordination with Commanding General, North Atlantic Treaty Organization Training Mission–Afghanistan/ Combined Security Transition Command–Afghanistan, review the decision made at the start of the project to not connect the site to the local electrical grid and, as part of the review, conduct a cost-benefit and technical analysis. The review should factor the high costs to purchase and deliver fuel to the site for the electrical generator, the capability of the local grid to provide adequate power for the site facilities and equipment, and the need for a back-up site electrical system. Based on the results of this review, if connection to the local power grid is not feasible, install a back-up site generator or otherwise provide an appropriate back-up electrical power system to prevent loss of electricity across the site when the primary generator is not working.

a. NTM-A/CSTC-A reviewed the draft report and has the following comments:
NTM-A/CSTC-A acknowledges the SIGAR's recommendation. The current NTM-A Afghan National Security Forces (ANSF) Infrastructure program utilizes a design standard of non-grid sourced, independent primary power generation (generators) for all ANSF facilities. The power design selection made during the initial development of the program to not connect to grid power was based on several factors, the most significant of which was operational readiness and effectiveness of the facilities. Constructed facilities for the ANSF had to provide immediate reset, regeneration, and force projection capacity to the ANSF in order to allow the ANSF to conduct security operations in order to establish a safe and secure environment. Faced with the poor reliability and availability of the Afghan national grid during the early stages of the campaign, primary local power generation for ANSF facilities was the only option available to enable the ANSF to have consistent operational facilities. A Power Summit was held on 16 October 2012 by the Joint Engineer Directorate, USFOR-A, to review current theater power requirements of the Coalition and ANSF as well as the current status and capacity of the Afghan national grid. The Summit found that generally the Afghan grid capacity is still inadequate for current civilian demand and that major investment is required to connect major military bases to the national grid. The Summit highlighted the need to conduct a feasibility and cost benefit analysis of connecting ANSF facilities to the national grid as their primary power source in anticipation of increased developed Afghan grid capacity in the future. NTM-A will conduct this analysis in order to develop a feasible timeline for transition of ANSF facilities to the Afghan grid as their prime power source.

2. Recommendation 3, Page 8, states:
Commanding General, USACE, in coordination with Commanding General, North Atlantic Treaty Organization Training Mission–Afghanistan/ Combined Security Transition Command–Afghanistan – award an operation and maintenance contract at project completion to ensure that the facility is appropriately maintained once occupied.

a. NTM-A/CSTC-A reviewed the draft report and has the following comments:
NTM-A/CSTA-A acknowledges the SIGAR's recommendation. The general approach to building facility stewardship is along four lines of effort: 1) hiring facility engineers, 2) training facility engineers, 3) provision of tools and equipment, and 4) delegating appropriate authorities and developing routine processes so maintenance is consistently executed to high standards. As the Ministries of Defense and Interior build up their own organic ability to sustain their new facilities, NTM-A utilizes a bridging strategy of utilizing a U.S. Army Corp of Engineers (USACE) National Operations and Maintenance (O&M) contract to provide facility maintenance

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and training for a period of up to 6 months. This allows time to build the capabilities of the assigned facility engineers (FE). In addition, facilities/infrastructure that is deemed of a critical nature can be placed on an O&M contract exclusively for their maintainability to ensure the continued viability into 2014 and later.

With respect to a Facility O&M contract at this specific facility, NTM-A Engineer Advisors will encourage the Ministry of Interior Facilities Department to award an Operations and Maintenance contract for this facility's sustainment needs. This is consistent with our approach to push Afghans into the lead for operating and maintaining the facilities we are constructing and transitioning to them.

APPROVED BY:
Andrew P. Brickson
LTC, NTM-A ENG
Deputy Director

PREPARED BY:
B. Patrick Michael
LCDR, NTM-A ENG
Operations & Integration Chief,
DSN 318-449-0944

APPENDIX VI - ACKNOWLEDGEMENTS

Crawford “Les” Thompson, Senior Inspections Manager

Brian M. Flynn, Senior Audit Manager

Milton Naumann, Auditor-in-Charge

Warren Anthony, Senior Auditor

William “Lee” Dillingham, Professional Engineer

This inspection report was conducted under project code SIGAR-I-006.

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- Phone International: +1-866-329-8893
- Phone DSN International: 312-664-0378
- U.S. fax: +1-703-601-4065

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Public Affairs Officer

- Phone: 703-545-5974
- Email: sigar.pentagon.ccr.mbx.public-affairs@mail.mil
- Mail: SIGAR Public Affairs
  2530 Crystal Drive
  Arlington, VA 22202