

# SIGAR

**Special Inspector General for  
Afghanistan Reconstruction**

**SIGAR Inspection 13-6**

Afghan National Police Main Road Security Company,  
Kunduz Province, Is behind Schedule and May Not  
Be Sustainable



**APRIL  
2013**

# SIGAR

## Special Inspector General for Afghanistan Reconstruction

### WHAT SIGAR REVIEWED

In February 2012, the U.S. Army Corps of Engineers-Afghanistan Engineer District-North (USACE-TAN) awarded a \$1.7 million firm fixed-price contract to Bamic Global Construction Company to design and build facilities at the Afghan National Police (ANP) Main Road Security Company compound in Kunduz province. SIGAR's inspection assessed whether construction was being completed in accordance with contract requirements and applicable construction standards, and whether any construction or design issues placed the facility's long-term sustainability at risk.

In preparation for the site inspection, we reviewed contract and design documents, technical specifications, geotechnical reports, and quality control reports. SIGAR conducted the inspection on November 15, 2012. Due to construction being behind schedule, our inspection was limited to observing grading and excavation activities. SIGAR conducted its work in Kunduz province and in Kabul, Afghanistan from September 2012 through March 2013, in accordance with *Quality Standards for Inspection and Evaluation* published by the Council of the Inspectors General on Integrity and Efficiency.

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April 2013

**Afghan National Police Main Road Security Company, Kunduz Province, Is behind Schedule and May Not Be Sustainable**

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SIGAR Inspection 13-6

### WHAT SIGAR FOUND

We observed a soil compaction process that put the ANP Main Road Security Company compound at risk of future soil settlement and structural failure. Specifically, the contractor used a smooth steel-wheeled roller, rather than a properly-loaded dump truck or pneumatic-tired roller for soil compaction. USACE officials stated that the contractor's excavation work to address collapsible soil issues at the site met contract specifications. However, the process used by the contractor does not follow U.S. Army guidance and is a major concern due to collapsible soil conditions at the site and surrounding Kunduz area.

The project is behind schedule and probably will not meet the May 18, 2013, completion date. Although 54 percent of the performance period had passed at the time of SIGAR's visit, only 15 percent of the work had been completed. The contractor vowed to take steps, such as doubling the work shifts, to improve on the construction schedule. USACE officials noted that the contractor is operating for the first time as a prime contractor and that it has been somewhat overwhelmed by government procedures. The officials believe that the contractor's performance has improved.

SIGAR found that the facilities will be powered by one generator and that there is no provision for a back-up generator or connecting to the local power grid. Further, at the time of the inspection, no plans existed on who would be responsible for operation and maintenance of the facilities when the site is transferred to the Afghan government. Failure to address the soil compaction, back-up power source, and operation and maintenance issues could place the \$1.7 million U.S. investment in this facility at risk.

### WHAT SIGAR RECOMMENDS

SIGAR is making two recommendations to the USACE Commanding General and the NATO Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan Commanding General that address the need for a backup power source at the compound, and operation and maintenance costs.

We received formal comments from USACE and NATO Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan. As a result of their comments to a draft of this report, we revised the recommendations and made other revisions to the report as appropriate.



Use of a smooth roller in the over-excavation process is an improper soil compaction technique, raising the risk of future structural failures.

Source: SIGAR,  
November 15, 2012



**SIGAR** | Office of the Special Inspector General  
for Afghanistan Reconstruction

April 17, 2013

Lieutenant General Kenneth E. Tovo  
Commanding General, NATO 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 SIGAR's inspection results of the U.S. Army Corps of Engineers' (USACE) Afghan National Police Main Road Security Company compound construction project in Kunduz province, Afghanistan. SIGAR is making two recommendations to the USACE Commanding General and the NATO Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan Commanding General that call for a backup power source at the compound, and consideration of future operation and maintenance costs.

We received formal comments from USACE and the NATO Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan. Those formal comments are presented, in their entirety, in Appendix III and IV. SIGAR conducted this performance audit under the authority of Public Law No. 110-181, as amended, and the Inspector General Act of 1978, as amended.

John F. Sopko  
Special Inspector General  
for Afghanistan Reconstruction

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## ABBREVIATIONS

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

The NATO Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan (NTM-A/CSTC-A) provided the U.S. Army Corps of Engineers (USACE) \$1.7 million in Afghanistan Security Forces Funds to award a contract for constructing the Afghan National Police (ANP)<sup>1</sup> Main Road Security Company compound in Kunduz province. SIGAR's inspection assessed whether construction activities were being done in accordance with contract requirements and applicable construction standards, and whether any construction or design issues placed the facility's long-term sustainability at risk.

We conducted this inspection at Kabul, Afghanistan; USACE's Kunduz Resident Office; and the Main Road Security Company construction site located in Kunduz province. We made our inspection visit to the construction site on November 15, 2012. Work was performed from September 2012 through March 2013, 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 a more detailed discussion of our scope and methodology.

## BACKGROUND

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USACE Afghanistan Engineer District-North (USACE-TAN)<sup>2</sup> awarded a firm fixed-price contract (W5J9JE-12-C-0054), on February 29, 2012, for \$1.7 million to Bamic Global Construction Company.<sup>3</sup> The contract, with a 400-day period of performance, included site improvements and the design and construction of an ANP Main Road Security Company compound. The facility is being built on barren land about 10 kilometers north of Kunduz City and 370 kilometers northeast of Kabul. The 143x140 meter site is designed for 103 people and is situated 400 meters east of the Kunduz-Shir Khan Bander asphalt road. Photo 1 provides an aerial site view of the ANP Main Road Security Company compound.<sup>4</sup>

This is a "site adapt" contract, in which USACE-TAN provides all standard architectural designs to the contractor. Table 1 provides a listing of the buildings and other facilities required under the base contract. The scope of work includes the management services, material, labor, and equipment to design and construct or refurbish all utilities, roads, buildings, force protection measures, site security, as well as waste,

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**Photo 1 - ANP Main Road Security Company Compound**



Source: USACE-TAN, September 23, 2012

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<sup>1</sup> The ANP includes, among others, the Afghan Uniformed Police, Afghan Border Police, Afghan National Civil Order Police, and Afghan Counter-Narcotics Police.

<sup>2</sup> In 2009, the Afghanistan Engineer District was divided into two districts—North and South. The North District is referred to as USACE-TAN. Afghanistan Engineer District, North and South report to USACE Transatlantic Division.

<sup>3</sup> Bamic Global Construction Company is an Afghan-owned and -operated company based in Kabul, specializing in construction and construction services, operation and maintenance, life support, and commodities supply and services.

<sup>4</sup> Appendix II provides a site plan.

**Table 1 - Base Contract Buildings and Other Facilities**

Description	Quantity
Headquarters Building	1
Wood Storage	1
Wood Stove Kitchen	1
Family Response Unit Facility	1
Criminal Investigations Division Facility	1
Women's Barracks	1
Open Bay Barracks	1
20 Meter Water Tower	1
Well House	1
Guard Tower	4
Gate House	1
Grease Interceptor	1
Generator/Fuel Storage	1
Guard Shack	2
Trash Collection Point	2
Entrance Control Point Canopy	1
Septic Tank	1
Septic Drainage Area	1

Source: SIGAR analysis of contract W5J9JE-12-C-0054.

sanitary sewer, storm drain, and electrical distribution systems. The contract requires that each building pad be over-excavated by at least 1.2 meters, due to the potential risk of collapsible soil in the area.<sup>5</sup>

During our site visit, we observed over-excavation of several building pads and the perimeter wall, construction of a worker camp and temporary guard towers, installation of a chain-link fence, and drilling of a potable water well. The contractor had an on-site quality control manager and safety manager but no on-site project manager. Approximately 25 construction workers were at the site and it appeared that the quality control manager was managing the work. The USACE quality assurance representative was not present.

## SOIL COMPACTION METHODS COULD LEAD TO FUTURE STRUCTURAL FAILURES

The majority of work during our site visit related to over-excavation of the building pads. During our inspection, we observed the contractor using a smooth steel-wheeled roller rather than a dump truck loaded with 6 cubic meters of soil or a 13.6 metric ton pneumatic-tired roller (see photo 2) to compact backfill material for the building pads.<sup>6</sup> U.S. Army guidance states that soil compaction is one of the most critical components in the construction of foundations and affects the durability and stability of a structure.<sup>7</sup> Structural failure or damage caused by foundation settlement can often be traced back to improper soil compaction. The guidance also states that the use of smooth-steel wheeled rollers is more effective in conducting the final surface finish rather than the initial compaction of the backfill material. In its response to a draft of this report, USACE officials stated that the soil density met the contract technical requirements. However, because the contractor was using neither recommended equipment nor recommended process, we maintain that the backfill material may not be properly compacted.

<sup>5</sup> Over-excavation involves removing soil in a construction area to a specified depth. For the ANP Main Road Security Company compound, the contract calls for excavation to at least 1.2 meters.

<sup>6</sup> We also observed two water trucks, which also help with compaction, providing moisture content to the backfill areas as required by the Department of the Army Technical Manual 3-34.64, *Military Soils Engineering*, September 2012. The guidance notes that water often must be added to soil being incorporated in embankments, subgrades, and bases to obtain the desired degree of compaction and achieve uniformity.

<sup>7</sup> Department of the Army, *Military Soils Engineering*.

The Kunduz area has a history of collapsible soil problems, as we reported in April 2010 and October 2012.<sup>8</sup> This condition is directly related to the contract requirement on this project for over-excavation of the building pads by at least 1.2 meters. However, due to the soil conditions in certain areas of the compound, the contractor had to excavate some building pads up to 2.5 meters—more than double the minimum requirement. We observed that excavated material was being disposed of outside the project site.

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**Photo 2 - Machinery Used to Compact Soil in an Over-Excavated Area**



Source: SIGAR, November 15, 2012

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The USACE-TAN construction representative told us that trucks were hauling approved backfill material from a certified borrow-pit about 7 kilometers from the ANP Main Road Security Company construction site. Due to security concerns and time constraints, we did not inspect any off-site borrow-pit excavations. However, during

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**Photo 3 - Hand Placement of Backfill**



Source: SIGAR, November 15, 2012

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our site visit, we observed four truck deliveries of backfill material at the construction site. Backfill material was being screened for size, with larger rocks being removed for disposal. Backfill was being spread by hand, using wheelbarrows and shovels (see photo 3). The on-site quality control manager stated that workers were spreading approximately 700 to 800 cubic meters of backfill material per day.

We also observed that the potable water well had recently been drilled. We observed the truck mounted drill on-site, with the well casing and equipment delivered but not installed.

Site safety practices appeared to be adequate. For example, we observed personnel wearing proper protective equipment such as “hard hats” and reflective vests. In addition, barrier tape and warning signs were applied to excavated areas.

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## PROJECT IS UNLIKELY TO BE COMPLETED ON TIME

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The contractor will most likely not finish construction of the facilities by May 18, 2013, the required completion date. At the time of our site visit, the project was 54 percent (216 of 400 days) into the time period of performance, but the project was only 15 percent complete. USACE-TAN officials sent Bamic Global Construction Company a Letter of Concern on October 5, 2012, noting the poor quality of design plans and the

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<sup>8</sup> SIGAR Audit Report 10-09, *ANA Garrison at Kunduz Does Not Meet All Quality and Oversight Requirements; Serious Soil Issues Need to Be Addressed*, April 2010; SIGAR Inspections Report 13-1, *Kunduz ANA Garrison: Army Corps of Engineers Released DynCorp of All Contractual Obligations despite Poor Performance and Structural Failures*, October 2012.

slow construction progress to date and urging the company to adopt an aggressive schedule to complete the contract within the required completion date. The contractor responded on October 12, 2012, stating that it would begin doubling work shifts to improve on the construction schedule. Then, in December 2012, construction activities were slowed due to weather conditions. USACE-TAN officials noted that the contractor is operating for the first time as a prime contractor and that it has been overwhelmed by government procedures. However, the officials believe that the contractor's performance has improved.

## LONG-TERM SUSTAINABILITY IS AT RISK

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We also found sustainability issues during our inspection. For example, one generator will provide all electricity for the compound's facilities (lights, heating and air conditioning, well pump for water), but the contract scope of work has no provision for a back-up generator or connection to the municipal power grid located near the site. As a result, electrical power will not be available when the on-site generator is undergoing maintenance or repair, when fuel is unavailable, and during periods of unintended inoperability. NTM-A/CSTC-A officials told us that a Power Summit was held in October 2012 to review current Afghanistan National Security Forces power requirements as well as the current status and capacity of the Afghan national grid. The Summit revealed that the Afghan power grid was inadequate for current demand and that significant investment was still required to connect major bases to the national grid.

The officials further noted that the Summit highlighted the need to conduct a feasibility and cost-benefit analysis for connecting Afghanistan National Security Forces facilities to the national grid as a primary power source in the future, and that NTM-A/CSTC-A would conduct the analysis and develop a feasible timeline for transitioning these facilities to the national grid. NTM-A/CSTC-A officials stated they planned to address the ANP Main Road Security Company site by prioritizing systems that they deemed mission critical, such as power for the water system, and addressing options for a back-up power system that could at least support these systems when the primary power source is inoperable. In its response to a draft of this report, NTM-A/CSTC-A stated that the feasibility study (completed on March 10, 2013) showed that the capital costs to connect the compound to the nearest grid connection point would be in excess of \$2.2 million dollars, suggesting that this is not a viable option.

In addition, sustaining site support facilities—including the electrical generator, water treatment system, and heating, ventilating, and air conditioning systems—will require complex technical operation and maintenance skills. NTM-A/CSTC-A officials told us that they have developed a training program that will provide Afghan engineers the skills necessary to sustain these new facilities. They also indicated that facilities and infrastructure deemed critical could be placed on an operation and maintenance contract to ensure continued viability of the facilities into 2014 and beyond. However, a decision has still not been made to determine who will assume operation and maintenance responsibility for the facilities upon transfer to the Afghan government.

## CONCLUSION

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Although this project will likely not be completed on time, the facility's long-term sustainability is of greater concern than the project delays. The project's design does not provide for back-up electrical power through a generator or connection to the local power grid in order to ensure a continuous supply of site electricity. In addition, no decision has been made about who will be responsible for operation and maintenance when the site is transferred to the Afghan government. Failure to use recommended soil compaction processes, secure a back-up power source, and assign operation and maintenance responsibility could place the \$1.7 million U.S. investment in this facility at risk of waste.

## RECOMMENDATIONS

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To promote the ANP Main Road Security Company compound's long-term sustainability, we recommend that the Commanding General, USACE, in coordination with the Commanding General, NTM-A/CSTC-A:

1. **Review the ANP Main Road Security Company site design and install a back-up power system, at least for mission critical systems, to prevent loss of site electricity when the primary generator is out-of-service for repair or maintenance or from unintended power outages, including the lack of fuel.**
2. **Determine an appropriate means for ensuring operation and maintenance of the compound at project completion, and that the site is appropriately maintained as part of the turnover to the Afghan government.**

## COMMENTS

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We received formal comments on a draft of this report from NTM-A/CSTC-A and USACE and made revisions to the report, as appropriate. The full text of NTM-A/CSTC-A and USACE's comments—and our response to them—are reproduced in appendices III and IV, respectively.

- NTM-A/CSTC-A did not concur with our recommendation to review the ANP Main Road Security Company site design and install a back-up power system to prevent loss of electricity when the primary generator is out-of-service for repairs or maintenance, or when power outages occur. NTM-A/CSTC-A stated the recently completed feasibility study showed that the costs of connecting the compound's facilities to the national grid for electricity would exceed \$2.2 million and this may not be a viable option. Because NTM-A/CSTC-A has completed the feasibility study, we deleted one recommendation from the draft report that had called on NTM-A/CSTC-A to consider including this site in the feasibility study for connecting its electrical system to the local power grid. NTM-A/CSTC-A also stated that purchasing a backup generator would increase maintenance and personnel costs and the use of the backup generator would still be dependent on fuel availability. However, NTM-A/CSTC-A noted that the Afghans "can easily buy a small generator to run those systems that they deem mission critical," noting that "this should be an Afghan provided solution." This response indicates that, while connecting the facility to the national power grid may be cost prohibitive, purchasing a small generator may not be. Further, our recommendation does not prohibit NTM-A/CSTC-A from requiring the Afghan government to pay for a small generator. We encourage NTM-A/CSTC-A to work with the Afghan government to develop viable options for acquiring a backup power source, per our recommendation. Until those options materialize, we continue to believe our recommendation is warranted.

NTM-A/CSTC-A concurred with our recommendation to determine an appropriate means for ensuring operation and maintenance of the compound at project completion and that that the compound is appropriately maintained as part of the turnover to the Afghan government. NTM-A/CSTC-A describes it plans for facilities turned over to the Afghan government in its comments to the draft report.

- In its comments to a draft of this report, USACE stated that it is prepared to install a backup power system and provide contract support for operation and maintenance pending NTM-A/CSTC-A's direction and funding. However, USACE disagreed with SIGAR's analysis of the contractor's soil compaction methods. USACE stated that the soil density met contract technical requirements and that no deficiencies have been found. USACE further stated that the contractor's performance work statement allowed the contractor "flexibility in determining the best, most economical method required for soil compaction." Based on these comments, we deleted two related recommendations made in an early draft of this report, which called for USACE to determine whether the soil density of the building pads meets project technical requirements and, if that is not possible, to provide a written explanation of how USACE plans to mitigate the possibility of structural failure resulting from the use of improper compaction methods.

## APPENDIX I - SCOPE AND METHODOLOGY

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This report provides the results of an inspection of the Afghan National Police (ANP) Main Road Security Company compound in Kunduz province. This is one of a series of nine inspections of USACE construction projects in the northern provinces of Afghanistan.

To determine whether the construction was being completed in accordance with contract requirements and applicable construction standards, and whether any construction or design issues placed the facility's long-term sustainability at risk, we

- reviewed contract documents, design submittals, and geotechnical reports to understand project requirements and contract administration;
- interviewed U.S. government officials regarding concerns with operation and maintenance of the facility upon project completion; and
- conducted a physical inspection and photographed the project site to observe the current status and the quality of construction.

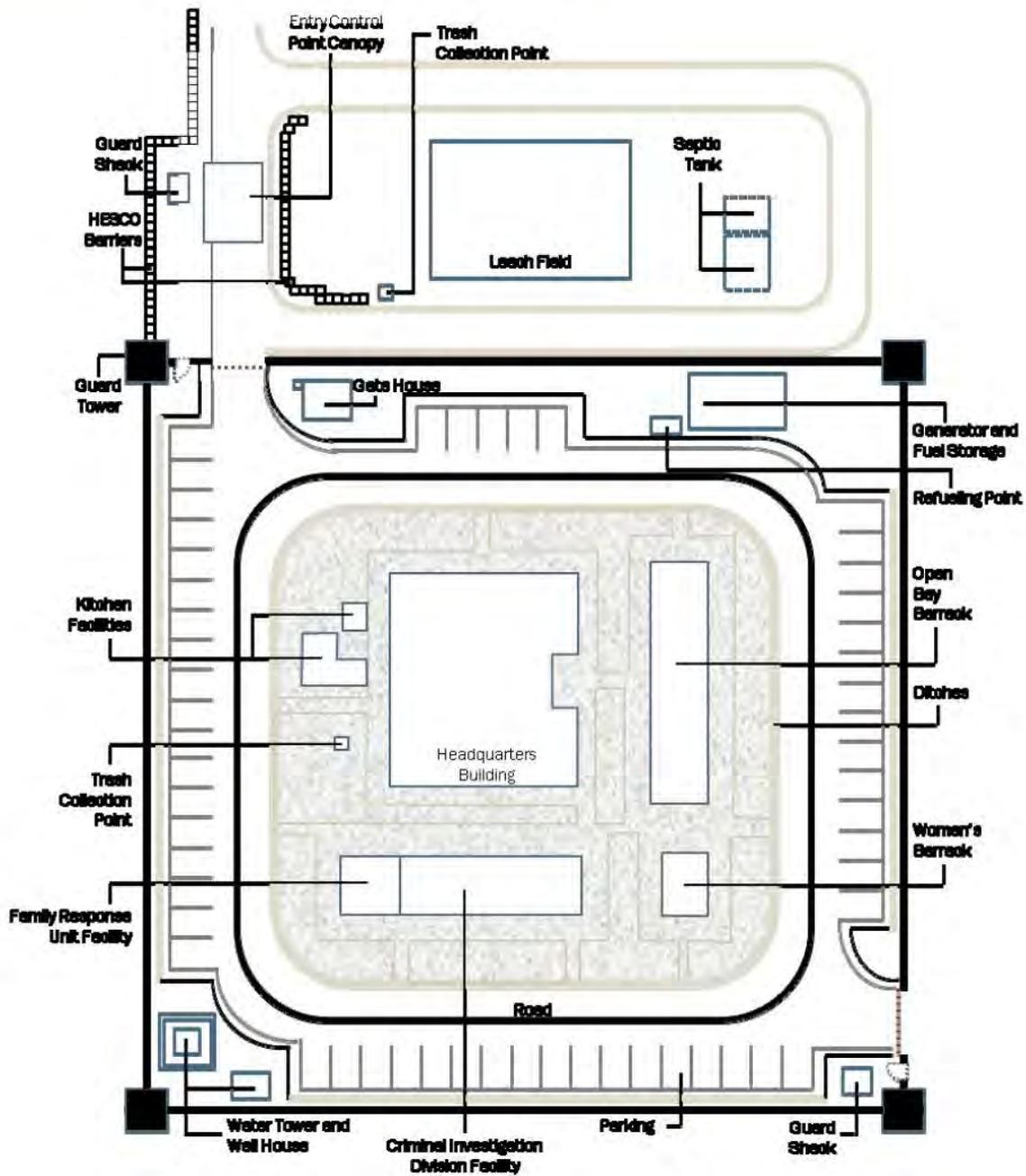
Due to construction progress being significantly behind schedule, our physical inspection during the site visit was limited to the observation of grading and over-excavation activities.

We conducted work at Kabul, Afghanistan; USACE's Kunduz Resident Office; and the ANP Main Road Security Company compound construction site from September 2012 through March 2013, 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 of the Offices of Inspectors 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 and the Inspector General Act of 1978, as amended.

# APPENDIX II - AFGHAN NATIONAL POLICE MAIN ROAD SECURITY COMPANY COMPOUND SITE PLAN

Figure I - ANP Main Road Security Company Site Plan



Note: Not to scale.

Source: SIGAR Analysis

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

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REPLY TO  
ATTENTION OF  
NTM-A/CSTC-A

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

25 Mar 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 "Afghan National Police Main Road Security  
Company, Kunduz Province: Project Does Not Meet Construction Requirements, is Behind  
Schedule, and May Not Be Sustainable" (Report No. SIGAR-Inspection-13-6)

REFERENCE: Draft Report, dated Mar 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 [REDACTED], or via e-mail at [REDACTED].

SHAWN STITH  
SES  
Deputy Commander, DCOM-P

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

**NTM-A/CSTC-A RESPONSE TO DRAFT REPORT**

**“Afghan National Police Main Road Security Company, Kunduz Province: Project Does Not Meet Construction Requirements, is Behind Schedule, and May Not Be Sustainable”  
Report No. SIGAR-Inspection-13-6 (SIGAR Code: SIGAR-I-006C)**

1. The purpose of this memorandum is to provide responses to SIGAR’s draft report.
2. Recommendation 3, Page 5, states:  
**Review the ANP Main Road Security Company site design and install a back-up power system, at least for mission critical systems, to prevent loss of site electricity when the primary generator is out-of-service for repair or maintenance or from unintended power outages, including lack of fuel.**

- a. NTM-A/CSTC-A reviewed the draft report and has the following comments:
- b. NTM-A/CSTC-A non-concurs with SIGAR’s recommendation. A feasibility study to connect this facility to the grid showed that the capital costs to connect to the nearest grid connection point would be in excess of \$2.2 million dollars – more than the entire cost to build the facility – and would take over 600 years to recoup the capital costs. SIGAR has been provided this study. A second backup generator adds increased maintenance and personnel costs and would still be subject to conditions based on lack of fuel. This should be an Afghan provided solution. If they want mission critical systems covered during periods of maintenance they can easily buy a small generator to run those systems that they deem mission critical.

3. Recommendation 4, Page 5, states:  
**Consider including this site in the feasibility study for connecting its electrical system to the local power grid.**

- a. NTM-A/CSTC-A reviewed the draft report and has the following comments:
- b. NTM-A/CSTC-A concurs with SIGAR’s recommendation. The feasibility study has already been completed and showed that the capital costs to connect the site to the local grid would exceed the cost to construct the facility and would take over 600 years for payback. This study has been provided to SIGAR.

SIGAR  
Comment 1

4. Recommendation 5, Page 5, states:  
**Determine an appropriate means for ensuring operation and maintenance of the compound at project completion, to ensure the site is appropriately maintained as part of the turnover to Afghan government.**

- a. NTM-A/CSTC-A reviewed the draft report and has the following comments:
- b. NTM-A/CSTC-A concurs with SIGAR’s recommendation. NTM-A has plans for all facilities it turns over to the Afghans. 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 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.

**NTM-A/CSTC-A RESPONSE TO DRAFT REPORT**

**“Afghan National Police Main Road Security Company, Kunduz Province: Project Does Not Meet Construction Requirements, is Behind Schedule, and May Not Be Sustainable”**  
Report No. SIGAR-Inspection-13-6 (SIGAR Code: SIGAR-I-006C)

With respect to a Facility O&M contract at this specific facility, the Ministry of Interior Facilities Department will assume responsibility once the facility is turned over to them. Depending on the capabilities of their facility engineers in this region they will maintain the facility organically or will contract out an Afghan O&M solution with NTM-A's help. 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. Ultimately the ANSF will maintain their facilities they value to their standards and priorities.



APPROVED BY:  
Andrew W. Backus  
COL, NTM-A ENG  
Director



PREPARED BY:  
B. Patrick Michael  
LCDR, NTM-A ENG  
Operations & Integration Chief,  
DSN [REDACTED]

### SIGAR Response to NTM-A/CSTC-A Comments

1. Because NTMA-A/CSTC-A has completed this study, which included the ANP Main Road Security Company site, we deleted this recommendation.

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



REPLY TO  
ATTENTION OF

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

CETAD- IR

- 2 APR 2013

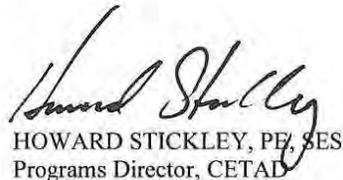
MEMORANDUM FOR Special Inspector General for Afghanistan Reconstruction (SIGAR)  
2530 Crystal Drive, Arlington, VA 22202-3940

SUBJECT: U.S. Army Corps of Engineers (USACE) Response to SIGAR Draft Report 13-6,  
Afghan National Police Main Road Security Company, Kunduz Province: Project Does Not  
Meet Construction Requirements, Is Behind Schedule, and May Not Be Sustainable

1. Enclosed is USACE Transatlantic Division response to the SIGAR Draft Report, SIGAR  
13-6, Afghan National Police Main Road Security Company, Kunduz Province: Project Does  
Not Meet Construction Requirements, Is Behind Schedule, and May Not Be Sustainable.

2. My point of contact for these comments is Mr. George Sullivan, Chief, Internal Review at  
[REDACTED].

Encl

  
HOWARD STICKLEY, PE, SES  
Programs Director, CETAD

USACE Comments to SIGAR 13-6 Draft Report, ANP Main Road Security Company, Kunduz Province: Project Does Not Meet Construction Requirements, Is Behind Schedule, and May Not Be Sustainable

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

**Page 2 of draft report, “Improper Soil Compaction Methods Could Lead to Future Structural Failures”**

USACE Comments: The soil density does meet the contract technical requirements. Contract requires compacting the backfill to a minimum dry density of 95% of the maximum dry density as determined by the Modified Proctor per ASTM D 1557 at moisture content between plus or minus 2% of optimum moisture content. The contractor overlaid nine (9) consecutive layers of fill soil and performed the field density tests for each layer per the specifications. The results were equal to or above 95% of the Modified Proctor maximum density as stated in the contract. The Field Density Test was performed as one of the quality control tests performed by the certified laboratory; the tests results were formally submitted by the contractor to the USACE Kunduz office and the results were verified by the Project Engineer.

Contract specification “3.10.3 Compaction” of section 31 00 00 EARTHWORK states the following: “Finish compaction by sheepfoot rollers, pneumatic-tired rollers, steelwheeled rollers, vibratory compactors, or other approved equipment. Except for paved areas and railroads, compact each layer of the embankment to at least 95 percent of laboratory maximum dry density determined in accordance with ASTM D 1557.”

The paragraph above is a performance work statement which does not mandate the use of specific equipment, but instead indicates the final minimum compaction required, allowing the contractor flexibility in determining the best, most economical method of meeting the required compaction.

**Recommendations**

**To ensure that the ANP Main Road Security Company compound is adequately planned, designed, built, operated, and maintained to meet ANP needs and to protect the U.S. government investment, we recommend that the Commanding General, USACE direct the Commander, USACE Transatlantic Division to:**

**Recommendation 1. Determine whether the soil density of the building pads meets project technical requirements and, if necessary, require the contractor to remediate deficiencies.**

USACE Response. USACE acknowledges the recommendation. However, as discussed in comments above regarding soil compaction, the soil density meets project technical requirements and no deficiencies associated with soil density have been identified.

SIGAR  
Comment 1

**Recommendation 2. If it is not possible to determine whether the soil density of the building pads meets project technical requirements, provide a written explanation of how USACE plans to mitigate the possibility of structural failure resulting from the use of improper compaction methods.**

USACE Comments to SIGAR 13-6 Draft Report, ANP Main Road Security Company, Kunduz Province: Project Does Not Meet Construction Requirements, Is Behind Schedule, and May Not Be Sustainable

USACE Response. USACE acknowledges the recommendation. However, as discussed in comments above regarding soil compaction, the soil density meets project technical requirements and no deficiencies associated with soil density have been identified.

SIGAR  
Comment 2

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

**Recommendation 3. Review the ANP Main Road Security Company site design and install a back-up power system, at least for mission critical systems, to prevent loss of the electricity when the primary generator is out-of-service for repair or maintenance or from unintended power outages, including the lack of fuel.**

USACE Response. USACE acknowledges SIGAR's recommendation. As stated on page 4 of SIGAR's draft report "NTM-A officials stated they planned to address the ANP Main Road Security Company site by prioritizing systems that they deemed mission critical, such as power for the water system, and addressing options for a back-up power system that could at least support these systems, when the primary power source is inoperable." USACE is prepared to install a back-up power system pending NTM-A direction and funding.

**Recommendation 4. Consider including this site in the feasibility study for connecting its electrical system to the local power grid.**

USACE Response. USACE acknowledges SIGAR's recommendation. As discussed on page 4 of SIGAR's draft report a Power Summit held in October 2012 revealed that the Afghan power grid was inadequate for current demand and that NTM-A planned to conduct a feasibility study for connecting ANSF facilities to the power grid. As stated in SIGAR's report, "The feasibility study was completed on March 10, 2013, and NTM-A is currently developing several options." USACE is prepared to assist NTM-A pending NTM-A direction and funding.

SIGAR  
Comment 3

**Recommendation 5. Determine an appropriate means for ensuring operation and maintenance of the compound at project completion, to ensure the site is appropriately maintained as part of the turnover to the Afghan government.**

USACE Response: USACE acknowledges SIGAR's recommendation. As stated on page 4 of SIGAR's draft report a "NTMA/CSTC-A officials told us that they have developed a training program that will provide Afghan engineers the skills necessary to sustain these new facilities. They also indicated that facilities and infrastructure deemed critical could be placed on an operation and maintenance contract to ensure viability of the facilities into 2014 and beyond." USACE is prepared to issue a task order against the existing operations and maintenance contract pending NTM-A direction and funding.

### **SIGAR Response to USACE Comments**

1. Because USACE made a determination as to whether the soil density of the building pads meets project technical requirements, we deleted this recommendation.
2. We also deleted this recommendation, because it was no longer applicable, given USACE's determination regarding the soil density.
3. We deleted this recommendation, because NTM-A/CSTC-A has already completed the feasibility study, which included this facility.

## APPENDIX V - ACKNOWLEDGMENTS

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