



**SIGAR**

Office of the Special Inspector General  
for Afghanistan Reconstruction

October 5, 2016

The Honorable Ashton B. Carter  
Secretary of Defense

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

General John W. Nicholson, Jr.  
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

Major General Richard G. Kaiser  
Commander, Combined Security Transition Command–Afghanistan

I am writing to alert you to a serious safety issue involving noncertified fire doors installed in 25 buildings on the recently constructed Ministry of Interior (MOI) compound in Kabul, Afghanistan. The Combined Security Transition Command–Afghanistan funded the construction of the compound, and the U.S. Army Corps of Engineers (USACE) administered the contracts. The use of noncertified fire doors, despite contract requirements calling for certified fire doors for specific rooms, corridors, and stairwells, raises concerns about the safety of the buildings, whether the government overpaid for inferior products, and whether the contractors defrauded the government when they installed doors that did not meet contract requirements. Although this letter focuses on the MOI compound, our concerns extend to all completed and ongoing USACE construction projects in Afghanistan that required the installation of certified fire doors.

Fire doors protect the main paths occupants may use to exit a building when a fire occurs and are designed to limit the spread of smoke and flames. Lack of such protection in the event of a fire increases the occupants' risk of injury or death. Independent laboratories, such as the Underwriters Laboratory (UL), Factory Mutual Engineering and Research (FM), or Warnock Hersey-Intertek (WHI), use National Fire Protection Agency and UL standards to test and certify doors, frames, hardware, and other components of a fire door assembly to ensure that they are manufactured to fire resistant specifications. USACE's contracts for the MOI compound required the use of certified fire doors with a metal label permanently attached to the door and door frame at the factory. According to the contract, the label must bear the UL, FM, or WHI logo and relevant fire rating information.<sup>1,2</sup>

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<sup>1</sup> We use the term "certified fire rated doors" in this letter to refer to doors manufactured with approved UL, FM, or WHI logos.

<sup>2</sup> According to UL officials, to use a certifying agency's logo, manufacturers must agree to periodic unannounced factory inspections by the certifying agency's staff who verify that the manufactured and sold product is built consistently to the standard marked on the manufacturer's plate. Upon a manufacturer's request, certifying agencies also test individual fire doors to determine whether they perform to a certain standard and issue a verification report documenting the result. The verification tests, however, do not entitle a manufacturer to use the certifying agency's logo in any way.

The MOI compound was constructed in three phases, and each phase had a different prime contractor.<sup>3</sup> The compound includes a headquarters building, national police command center, communications building, police barracks, and supporting infrastructure. The MOI compound's contract drawings and technical specifications required that 25 buildings have certified fire doors installed in specified locations. Phase 1 required the installation of 1 fire door. Phase 2 required the installation of 153 certified fire doors in 3 buildings. Phase 3 required the installation of 780 certified fire doors in 21 buildings. The prime contractor for Phase 1 was Abdulhai Gardezi Construction, an Afghan company. The prime contractor for Phase 2 was Yuksel Insaat (Yuksel), a Turkish company. The prime contractor for Phase 3 was Macro Vantage Levant (MVL), a Dubai-based company.<sup>4</sup>

We reviewed the fire door submittals that Yuksel and MVL provided to USACE for review and approval.<sup>5</sup> We found that USACE reviewers approved the installation of fire doors manufactured by a Turkish company, Ankara Celik Kapi, for the Phase 2 fire doors, and three Afghan manufacturers—Omran Steel Tech (OST), Ayanda Sazan Productive & Industrial Company, and Akhtairzada Metallurgy & Engineering Company (AMC)—for the Phase 3 fire doors. Neither the Turkish nor Afghan companies are registered as certified fire door manufacturers by UL, FM, or WHI.

Table 1 summarizes the contractor and approved manufacturer for each phase of construction of the MOI compound, and the number of certified fire doors required.

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<sup>3</sup> The total value of the three contracts was initially \$90 million.

<sup>4</sup> USACE originally awarded the Phase 3 contract to Lakeshore Toltest Corporation (LTC), a U.S.-based construction firm. USACE subsequently removed LTC as the prime contractor due to a number of schedule and safety issues. Through an agreement with LTC's debt guarantor, MVL completed the contract on LTC's behalf.

<sup>5</sup> The contractors' submittals consisted of a USACE form—ENG Form 4025, "Transmittal of Shop Drawings, Equipment Data, Material Samples, or Manufacturer's Certificates of Compliance"—with product literature and other relevant attachments providing details about the door, including the manufacturer, the door's technical specifications, construction materials used, testing performed, and the door's fire rating. The fire rating specifies the amount of time the door can withstand a fire, such as 30, 60, or 120 minutes. USACE reviewers used a construction submittal review form to approve each submittal.

**Table 1 - Summary of Certified Fire Doors Required for the MOI Compound and the Responsible Contractors**

Construction Phase	Prime Contractor	USACE-Approved Fire Door Manufacturer	Number of Buildings Requiring Certified Fire Doors	Number of Certified Fire Doors Required
Phase 1	Abdulhai Gardezi Construction	Unknown <sup>a</sup>	1	1
Phase 2	Yuksel Insaat	Ankara Celik Kapi	3	153
Phase 3	Macro Vantage Levant	Omran Steel Tech Ayanda Sazan Productive & Industrial Company Akhtairzada Metallurgy & Engineering Company	21	780

Source: SIGAR analysis of USACE contract documents

<sup>a</sup> We asked USACE for relevant fire door submittal(s); however, they were not provided.

While reviewing submittals, we did not see any evidence that the contractors informed USACE that they were deviating from the contract’s requirement for certified doors. We also did not see any evidence that USACE reviewers made any effort to question the contractor’s submittal about this requirement.<sup>6</sup> The approval also raises concerns that the government may have overpaid for the doors installed given that noncertified doors presumably cost less than certified fire doors. To our knowledge, USACE did not pursue any type of price adjustment.

During our site visits to the MOI compound, we observed conditions that raise questions about who actually manufactured the fire doors, whether the doors are fire-resistant, and whether USACE conducted sufficient contract oversight. Specifically, we observed that:

- None of the 153 fire doors installed under Phase 2 had a manufacturer’s label.
- Under Phase 3, OST’s labels displayed a certifying agency logo—in each case, a UL logo. UL officials confirmed that they never certified OST’s doors and that the inclusion of the UL logo on the door labels was unauthorized. The officials also said they directed OST to remove the logo from the doors it installed.
- During our October 26, 2015, site visit, we saw MVL staff attaching metal AMC labels to doors after the doors arrived at the MOI compound. Presumably, if AMC had actually manufactured those doors, it would have installed the labels at the factory in accordance with standard practices.

<sup>6</sup> For the doors manufactured by Ankara Celik Kapi, Yuksel’s submittal included results of a verification test conducted by a local university. This test is not a valid form of certification since it only addresses the properties of the door tested. As previously noted, Ankara Celik Kapi is not registered as a certified manufacturer by UL, FM, or WHI. To be certified, a manufacturer must agree to periodic unannounced factory inspections by the certifying agency’s staff who verify that the manufactured and sold product is consistently built to the standard marked on the manufacturer’s plate.

- We found that 736 doors installed under Phase 3 had “field labeled” tags, which appeared to have been installed to make the doors look more official.<sup>7</sup> Our work confirmed that these labels provided misleading information. For example, the labels refer to the Hollow Metal Manufacturers Association, a division of the National Association of Architectural Metal Manufacturers. This trade organization provides advisory opinions and guidance on the use and installation of fire doors, but is not a certifying body like UL, FM, and WHI.

We are continuing to examine these issues as part of our ongoing inspection of the MOI compound.<sup>8</sup> However, due to the seriousness of this matter, we are bringing these issues to your attention now so USACE can conduct a review and begin taking corrective action, where necessary, to ensure the safety of building occupants at the MOI compound and safeguard the expenditure of U.S. funds. Such actions should include:

1. Taking immediate steps to identify all noncertified fire doors in the 25 MOI buildings that do not meet the fire-rating standards required in the contracts and replace them with certified fire doors that do meet those standards.
2. Identifying the USACE official(s) who approved the installation of noncertified fire doors instead of the required certified fire doors and take appropriate disciplinary action.
3. Taking steps to identify other completed and ongoing USACE construction projects in Afghanistan that required the installation of certified fire doors, and if noncertified doors were installed, take appropriate action to replace those doors.

We conducted this work under the authority of Public Law No. 110-181, as amended, and the Inspector General Act of 1978, as amended. Please contact Ms. Gabriele Tonsil, Assistant Inspector General for Audits & Inspections, at [REDACTED] or [REDACTED], if you have any questions or concerns regarding this work.

Thank you for your attention to these concerns. We will continue to monitor USACE’s actions as we complete our inspection of the MOI compound.

Sincerely,



John F. Sopko  
Special Inspector General  
for Afghanistan Reconstruction

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<sup>7</sup> “Field labeling” normally involves re-certifying a certified door when the existing metal label is damaged, or the door has been modified in some manner. UL, FM, or WHI have to perform the re-certification for the door to be approved for a new label bearing the certifier’s logo.

<sup>8</sup> SIGAR also has initiated an investigation to examine possible fraudulent activity.