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January 2017

Management Assistance Report: Health and Safety Concerns Identified Related to Armored Vehicle Disposals

MANAGEMENT ASSISTANCE REPORT

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Summary of Review

During an audit of the armored vehicle program, the Office of Inspector General (OIG) observed health and safety concerns during the disposal of armored vehicles at three overseas posts. For example, OIG observed contractors using blow torches to dismantle sections of an armored vehicle at Embassy Nairobi's warehouse facility without appropriate eye protection. OIG also observed armored vehicle disposals at contractor facilities in Abuja, Nigeria, and Port-au-Prince, Haiti, and noted that neither the contractors performing the disposal nor Department witnesses were wearing required personal protective equipment.

The Department of State (Department) has general guidance relating to the health and safety of Department employees and contractors while performing post-related activities. The Department also has specific occupational safety and health standards, such as the mandatory use of personal protective equipment. However, the Bureau of Diplomatic Security (DS), which is responsible for developing standards for armored vehicle disposal, has not incorporated health and safety standards into guidance that would help ensure armored vehicle disposals are performed safely. In addition, OIG found that the audited posts that used contractors to dispose of armored vehicles did not incorporate required contract clauses relating to health and safety into the vehicle disposal contracts. As a result, Department employees and contractors who carry out or observe armored vehicle disposals are at increased risk of injury or death.

OIG made two recommendations to DS to improve armored vehicle disposal guidance and ensure that required clauses relating to health and safety standards are incorporated into contracts involving the disposal of armored vehicles. Based on the response from DS to a draft of this report (see Appendix B), OIG considers both recommendations resolved, pending further action. A synopsis of the DS response and OIG's reply follow each recommendation in the Results section of this report. In addition to the response from DS, Embassy Port-au-Prince and Embassy Nairobi also provided comments (see Appendices C and D, respectively).

BACKGROUND

This Management Assistance Report communicates deficiencies OIG identified during its audit of the DS administration of the armored vehicle program. The primary objective of the audit is to determine whether DS effectively administered the armored vehicle program in accordance with Department policies and guidelines; allocated armored vehicles to meet posts' needs; maintained accountability over armored vehicles stored domestically; and whether posts used armored vehicles that met required standards, sufficiently maintained armored vehicles, and disposed of or transferred armored vehicles in accordance with Department policies. OIG is reporting these deficiencies in accordance with generally accepted government auditing standards.

DS Armored Vehicle Program and Armored Vehicle Disposal

The DS armored vehicle program is intended to provide armored vehicles abroad to ensure that posts have a reasonable number of armored vehicles “for enhanced levels of protection for employees and dependents during periods of increased threat, instability, or evacuation” and “to enhance security for U.S. dignitaries visiting countries that require higher protection levels.”¹

According to the Foreign Affairs Manual (FAM), “DS is responsible for coordinating the armored vehicle program and developing standards.”² In addition, the Foreign Affairs Handbook (FAH) names the DS Office of Physical Security Programs, Defensive Equipment and Armored Vehicle Division as the program manager for armoring vehicles.³ Department personnel at overseas posts play a significant role in the armored vehicle program and are jointly responsible with DS for the disposal of armored vehicles.⁴ Further, the FAM, the FAH, and the Armored Vehicle Program Guide Book, which was developed by DS, provide guidance relating to armored vehicle disposal. According to 12 FAM 388, “All armored vehicles must be destroyed at the end of their useful life; they may NOT be sold, donated, or transferred to persons, governments, or organizations outside of the U.S. Government.”⁵ The FAM also states that the “disposal must be witnessed by a cleared U.S. citizen.”⁶

Safety, Health, and Environmental Management Abroad

The Department provides guidance in the FAM regarding the health and safety of Department employees, their family members, locally employed staff members, contractors, visitors, and others performing official duties on Department controlled or leased diplomatic or consular facilities abroad. Specifically, the FAM states that the “Safety, Health, and Environmental Management (SHEM) Program, in the Directorate for Operations, Bureau of Overseas Buildings Operations, Office of Safety, Health, and Environmental Management (OBO/OPS/SHEM) seeks to

¹ 12 FAH-6 H-522, “Armored Vehicles.”

² 12 FAM 383a, “Responsibilities.”

³ 12 FAH-6 H-522.3e, “Responsibilities.”

⁴ 12 FAH-6 H-522.3c, “Responsibilities”, 12 FAH-6 H-522.5e, “Standards”, and 12 FAH-6 H-522.5g, “Standards.”

⁵ 12 FAM 388, “Disposal” states that the post Regional Security Officer, the Office of Logistics Operations, Motor Vehicles Branch, Secure Logistics Division (A/LM/OPS/SL/MV), DS’s Defensive Equipment and Armored Vehicles Division (DS/PSP/DEAV) and General Services Officer must coordinate disposal of armored vehicles. Posts must dispose of armored vehicles on the basis of local conditions and restrictions and via one of five approved methods: explosive demolition, burning, crushing, disassembly with sections no larger than 2 square feet, or burial on U.S. Government-controlled land.

⁶ The “Definitions of Diplomatic Security Terms” in 12 FAM 091 describes a “Cleared U.S. Citizen” as a citizen of the United States who has undergone a background investigation by an authorized U.S. Government Agency and been issued a Confidential, Secret, or Top Secret security clearance in accordance with Executive Orders 12968 and 10450 and implementing guidelines and standards published in 32 CFR 147. When abroad, cleared U.S. citizens are required to have, at minimum, Secret-level clearances.

protect and conserve Department of State resources abroad and to protect operational continuity. This is accomplished through the avoidance or proper control of hazardous conditions that can result in physical harm, illness, death, property loss, or environmental damage.”⁷ The FAM also states that Department officials are responsible for ensuring that contractors conduct operations and activities in a safe manner. Specifically, the FAM states that “Other entities conducting projects or programs abroad that are funded or supported by the Department of State must provide their employees with safe conditions of employment.... In all cases, contractor operations and activities, whether sponsored by the post or another Department of State organization, should be closely coordinated with the [post occupational safety and health officer] during both planning and implementation phases to ensure that required safety and health standards are included as part of the project.”⁸ Further, the FAM requires safety and health planning analysis that “reduces the possibility that new or additional hazards to personnel and/or property will be introduced.”⁹

In 2014, OBO/OPS/SHEM issued specific guidance in a cable entitled “Oversight of Post Contractor Safety and Health Activities,” which requires action by post management to improve safety and health oversight of contractors working on post-managed activities.¹⁰ The cable stated that between 2012 and 2014, six fatalities and six serious mishaps of post-managed contractors occurred because of the lack of effective oversight of the contractor’s safety and health program.¹¹ The cable lists the following standards that are applicable to all contracts (including armored vehicle disposal contracts):

- The Statement of Work must incorporate the hazards and safety requirements that are specific to the job and not addressed by the Department of State Acquisition Regulation.
- Occupational Safety and Health Administration standards apply to contractor service projects.¹²
- Activity Hazard Analyses must be developed during the pre-award phase as necessary to address hazards and included in the contractor’s safety plan submitted for

⁷ 15 FAM 912, “Scope.”

⁸ 15 FAM 935, “Contractors, Grantees, and Other Entities.”

⁹ 15 FAM 967, “System Safety and Health Planning Analysis.”

¹⁰ 14 STATE 46762, dated April 22, 2014.

¹¹ In addition to the fatalities and serious mishaps reported by OBO/OPS/SHEM, a fatality occurred during the course of an armored vehicle disposal. Specifically, in 2010, the General Services Officer at Consulate General Lagos, Nigeria, contracted with a Nigerian marine vessel to dispose of an armored vehicle at sea. The vessel suffered an accident during which five Nigerian contractor personnel fell into the water, resulting in the death of one person, apparently by drowning. The vessel lacked sufficient life jackets and not all personnel could swim. Appendix A includes a copy of a Department cable discussing this accident.

¹² Contractor-performed construction projects and service projects are differentiated in 14 STATE 46762. An armored vehicle disposal would be classified as a contractor service project.

approval.¹³ Safety control measures must be verified by post personnel and the work stopped if the hazards are not properly controlled.

- Specialized safety and health training is required for post personnel to be considered qualified to verify contractor compliance for service work involving high-hazard activities.¹⁴

RESULTS

From February through April 2016, OIG observed armored vehicle disposals at Embassies Nairobi (Kenya), Abuja (Nigeria), Port-au-Prince (Haiti), and Bogota (Colombia). At three of the four locations (Port-au-Prince, Nairobi, and Abuja), OIG observed deviations from Occupational Safety and Health Administration standards that put Department and contractor personnel at risk of injury or death. Specifically, OIG observed contractors using blow torches to dismantle sections of an armored vehicle in close proximity to a "No Smoking" sign and without appropriate eye protection at Embassy Nairobi. In addition, OIG observed unsafe disposal practices at contractor facilities in Abuja and Port-au-Prince.

The inadequate safety practices occurred, in part, because the DS Armored Vehicle Program Guide Book, which provides guidance for armored vehicle disposal, does not include occupational health or safety standards. Specifically, the Guide does not provide details on how to perform the required Activity Hazard Analyses or explain that this analyses must be done during the pre-award phase of the contracting process. Further, the Armored Vehicle Program Guide Book does not provide details on specialized safety and health training that is required for post personnel to be considered qualified to verify contractor compliance with safety issues for service work involving high-hazard activities. Finally, the Armored Vehicle Program Guide Book does not provide guidance on where destruction should take place, for example, at an embassy facility or at a contractor facility even though, according to OBO/OPS/SHEM officials, performing a high-hazard activity on embassy property increases the potential for losses for the Department and should be avoided if possible.

In addition, Department guidance stipulates that Statements of Work for Department activities that will be carried out by contractors must incorporate safety and health requirements. OIG found that this requirement was not being followed and identified no specific provisions related

¹³ The United States Army Corp of Engineers states in its Safety and Health Requirements (EMA 385-1-1) that an activity hazard analysis "shall be used to document the evaluation of the hazards and the controls present. The hazard evaluation shall identify all substances, agents, and environments that present a health, explosive or fire hazard to workers or visitors, the risk of the hazard, and recommend hazard control measures."

¹⁴ Examples of high-hazard activities in 14 STATE 46762 include work in confined spaces or using compressed gases. Language in 15 FAM 962, "Workplace Hazard Identification and Assessment" defines a 'high-risk activity' as a workplace or environment with a high potential for mishaps or occupational illness. According to Bureau of Overseas Buildings Operations, Office of Safety, Health and Environmental Management officials, armored vehicle disposal is considered a high-hazard activity.

to the health or safety of Department or contractor personnel. For example, Embassy Port-au-Prince was unable to provide any contract with the vendor that performed the armored vehicle disposal and could only provide a document titled "Cash Receipt Sub Voucher" that had no contract clauses or provisions.¹⁵ If DS developed a standard template to be used by posts for armored vehicle disposal contracts, it would assist posts in consistently implementing safety requirements for the disposals.

Embassy Nairobi

Embassy Nairobi did not physically dispose of any armored vehicles between January 2013 and April 2016 because it could not identify a vendor willing or able to perform an armored vehicle disposal. Embassy Nairobi successfully identified a contractor to perform armored vehicle disposals on March 31, 2016; however, the vendor had never performed an armored vehicle disposal and did not have a facility in which to conduct the disposal. Therefore, the contractors performed the armored vehicle disposal at the embassy warehouse location.

OIG observed the first armored vehicle disposal with the selected vendor, which occurred on April 20, 2016. The contractor arrived at the embassy warehouse with equipment to perform the disposal, including blow torches and unmarked cans of compressed gases. As the contractor began dismantling and cutting up the armored vehicle, OIG observed several apparent deviations from Occupational Safety and Health Administration standards. For example, OIG observed contractors cutting portions of an armored vehicle with blow torches in an area marked "No Smoking,"¹⁶ as shown in Figure 1. OIG also noted that some of the contractor personnel participating in the process, as well as Department personnel witnessing the process, did not have the required personal protective equipment, as shown in Figure 2. Occupational Safety and Health Administration standards state that appropriate eye and face protection must be used when exposed to eye or face hazards;¹⁷ the use of blow torches appears to constitute just such eye and face hazards, and therefore all persons within the vicinity of the disposal should have been equipped with eye and face protection.¹⁸

¹⁵ OIG understood from discussions with embassy officials that an embassy official had a verbal agreement with the vendor to perform the armored vehicle disposal, and the transaction was paid in cash.

¹⁶ In response to a draft of this report (see Appendix D), Embassy Nairobi commented that the "area in question had once been a working auto shop/garage that included the mission fuel station. The auto shop was closed and the fuel tanks drained (emptied) many years ago. There is no flammable material in the area and the "No Smoking" sign has now been removed."

¹⁷ Occupational Safety and Health Administration 1910.133, "Personal Protective Equipment Eye and Face Protection."

¹⁸ Embassy Nairobi also stated its written response that "the Mission has equipped the contractor with gloves and goggles and will ensure that all personnel in the area at the time destruction occurs are using them. Additional face protection as required has been ordered and will be distributed upon receipt."



Figure 1. Workers disposing of an armored vehicle at Embassy Nairobi's warehouse using a blow torch in close proximity to a "No Smoking" sign.

Source: OIG photo taken April 20, 2016, at Embassy Nairobi warehouse.



Figure 2. Contracted workers using a blow torch in an enclosed area; two contractors supervising the disposal lack the required personal protective equipment.

Source: OIG photo taken April 20, 2016, at Embassy Nairobi's warehouse.

Embassy Abuja

Embassy Abuja had not physically disposed of any armored vehicles between September 2013 and April 2016 because it could not identify a vendor willing or able to perform an armored vehicle disposal. In April 2016, Embassy Abuja successfully identified a contractor to perform armored vehicle disposals who subsequently performed two armored vehicle disposals at the contractor's facility, one of which OIG witnessed.

As the contractor began dismantling and crushing the armored vehicle, OIG observed several apparent deviations from Occupational Safety and Health Administration Standards. For example, OIG observed that several contractor employees participating in the disposal process, as well as Department employees supervising and witnessing the process, lacked adequate personal protective equipment. Some contractors were wearing flip flops, and one contractor employee, who was attempting to smash ballistic glass with a hammer, was wearing sneakers that only partially covered the sole of his foot, as shown in Figures 3 and 4. Occupational Safety and Health Administration standards state that protective footwear must be worn when working in areas where foot injuries are possible due to objects piercing the sole, such as broken glass.¹⁹

OIG also observed several contractors working underneath an armored vehicle, while other contractors were inside the vehicle, which was being suspended by a metal chain from a tow truck. As shown in Figure 4, these workers did not have personal protective equipment—such as face, head, or eye protection—while performing the disposal process.



Figure 3. A contractor without proper protective footwear smashing ballistic glass.

Source: OIG photo taken on April 27, 2016, during armored vehicle disposal at in Abuja, Nigeria.

¹⁹ Occupational Safety and Health Administration 1910.136, "Personal Protective Equipment Foot Protection."



Figure 4. Contractors working in flip flops, without personal protective equipment, and under the vehicle while other men are in the vehicle, which is being suspended by a metal chain from a tow truck.

Source: OIG photo taken on April 27, 2016, during armored vehicle disposal at in Abuja, Nigeria.

Embassy Port-au-Prince

Embassy Port-au-Prince contracted with a local junkyard to conduct its armored vehicle disposals. On February 24, 2016, OIG observed an armored vehicle disposal at the junkyard, during which the contractor attempted to destroy an armored vehicle by hitting it repeatedly with a front-end loader. As shown in Figures 5, 6, and 7, OIG observed the process with a crowd of onlookers (including Department personnel) standing nearby, within 5 to 10 feet, and most onlookers had no personal protective equipment.²⁰

²⁰ In response to a draft of this report (see Appendix C), Embassy Port-au-Prince commented that “for all future in-country disposals of armored vehicles via destruction, Post will ensure that contractor and Mission personnel performing or observing the destruction use personal protective equipment; that the destruction is performed in a controlled area with potential onlookers kept at a safe distance; that a purchase order or contract between the Mission and the contractor is established which includes Department of State Acquisition Regulation (DOSAR) clause 652-236-70 covering accident prevention; and that the contractor adheres to the provisions of that clause.”



Figure 5. On-lookers without complete personal protective equipment, such as protective eyewear, viewing the disposal in close vicinity to the area where the front-end loader was hitting the vehicle.

Source: OIG photo taken February 24, 2016, at contractor facility in in Port-au-Prince, Haiti.



Figure 6. A front-end loader attempting to smash the vehicle while a Department employee who is providing instruction to the contractor stands nearby without personal protective equipment.

Source: OIG photo taken February 24, 2016, at contractor facility in in Port-au-Prince, Haiti.



Figure 7. Contractor personnel, with no personal protective equipment, holding an armored door while the front-end loader attempts to smash it.

Source: OIG photo taken February 24, 2016, at contractor facility in in Port-au-Prince, Haiti.

CONCLUSION

Armored vehicle disposal is considered by OBO/OPS/SHEM to be a high-hazard activity. This activity warrants clear guidance that incorporates occupational health and safety standards for Department and contractor personnel carrying out armored vehicle disposals. It is therefore important that DS update its armored vehicle disposal guidance with safety standards, and incorporate related contract provisions into overseas armored vehicle disposal contracts to help prevent injury or death of those performing disposals. The 2010 incident that resulted in the death of a Department contractor performing armored vehicle disposal (see Appendix A), in addition to the deaths and accidents that have occurred with post-managed contractors in other circumstances from 2012 through 2014, demonstrates the need for prompt action to be taken to address these deficiencies. OIG is offering the following recommendations:

Recommendation 1: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Directorate for Operations, Bureau of Overseas Buildings Operations, Office of Safety, Health, and Environmental Management, develop and implement specific safety guidance for the disposal of armored vehicles overseas. The guidance should reference obligatory occupational health and safety standards, instruct how to conduct an Activity Hazard Analyses in accordance with Overseas Buildings Operations requirements, specify that Activity Hazard Analyses must be performed during the pre-award contract

phase, and mandate specialized health and safety training for post personnel involved in armored vehicle disposals in order that they may verify contractor compliance with required occupational health and safety standards.

Management Response: DS concurred with the recommendation when it was presented at the audit exit conference. In addition, DS and OBO stated in their written response that they "continue their collaboration in identifying successful mitigation of the risks associated with the disposal of armored vehicles." They further stated that the "information will be used to provide guidance and template contract language for posts, in order to alleviate many of these risks and facilitate safe armored vehicle disposal."

OIG Reply: Based on the DS response, OIG considers this recommendation resolved, pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that DS and OBO have developed and implemented specific safety guidance for the disposal of armored vehicles overseas. The guidance should reference obligatory occupational health and safety standards, instruct how to conduct an Activity Hazard Analyses in accordance with OBO requirements, specify that Activity Hazard Analyses must be performed during the pre-award contract phase, and mandate specialized health and safety training for post personnel involved in armored vehicle disposals in order that they may verify contractor compliance with required occupational health and safety standards.

Recommendation 2: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Directorate for Operations, Bureau of Overseas Buildings Operations, Office of Safety, Health, and Environmental Management, develop a contract template for overseas posts to use for armored vehicle disposal contracts. The template should include specific contract clauses relating to occupational health and safety standards for contractors performing vehicle disposals.

Management Response: DS concurred with the recommendation when it was presented at the audit exit conference. In addition, DS and OBO stated in their written response that they "continue their collaboration in identifying successful mitigation of the risks associated with the disposal of armored vehicles." They further stated that the "information will be used to provide guidance and template contract language for posts, in order to alleviate many of these risks and facilitate safe armored vehicle disposal."

OIG Reply: Based on the DS response, OIG considers this recommendation resolved, pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that DS and OBO have developed and implemented a contract template for overseas posts to use for armored vehicle disposal contracts. The template should include specific contract clauses relating to occupational health and safety standards for contractors performing vehicle disposals.

RECOMMENDATIONS

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APPENDIX A: CABLE ON THE ACCIDENTAL DROWNING OF A NIGERIAN CONTRACTOR EMPLOYEE DISPOSING OF U.S. ARMORED VEHICLES

Figure A.1: Cable 10 LAGOS 404

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From: Armand, Fred M
Sent: 9/21/2010 8:58:58 AM
To: svcSMARTBTSP01
Subject: Accidental Drowning of Nigerian Contractor Employee Disposing of U.S. Armored Vehicles
Attachments: Metadata.dat

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MRN: 10 LAGOS 404
Date/DTG: Sep 21, 2010 / 211300Z SEP 10
From: AMCONSUL LAGOS
Action: WASHDC, SECSTATE ROUTINE
E.O.: 13526
TAGS: AMGT, NI, KSAF
Reference: A) E-MAIL MESSAGES TO OPERATIONS CENTER, AF/W/AF/EX ON 9/18
Pass Line: DEPARTMENT FOR AF/EX
AF/W
AF/PD
DS
WATCH CENTER
Subject: Accidental Drowning of Nigerian Contractor Employee Disposing of U.S. Armored Vehicles

SUMMARY

1. On September 18 at 1010 hours local time, a Nigerian marine vessel contracted by the General Services Office (GSO) of the U.S. Consulate General (ConGen) in Lagos suffered an accident during which five Nigerian contractor personnel fell into the water, resulting in the apparent death of one person by drowning. The GSO had contracted a local Nigerian company, Tarzan Boats and two Nigerian Navy personnel (as facilitators), to transport ten decommissioned, armored U.S. Government vehicles for disposal at an approved Nigerian Government (GON) location in the waters off the coast of Lagos. ConGen personnel on a separate boat following the flat-bed, ferry-like vessel responded to the scene of the accident and rendered assistance to personnel thrown into the water. The U.S. Government suffered no property damage, injuries, or loss of life in this accident. END SUMMARY.

DETAILS

2. On September 18, at about 1010 hours, a flat-bed, ferry-like vessel

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owned and operated by Nigerian car-ferry contractor Tarzan Boats suffered an accident while transporting ten decommissioned, armored U.S. Government vehicles to a GON-approved disposal site off the coast of Lagos. ConGen Lagos GSO had contracted Tarzan Boats for this disposal at sea to prevent the illegal salvage and reuse of such vehicles. In the past, this contractor had accomplished similar work without incident. At the time of the accident, ConGen personnel from GSO and the Regional Security Office (RSO) followed the ferry in a Consulate-owned and operated boat to observe and verify the disposal in accordance with U.S. guidelines.

3. On the way to the disposal location, one of the vehicles broke loose, and five of the contractor's employees on the vessel positioned themselves between the armored vehicle and the front of the flat-decked vessel to push the vehicle back into place. The vehicle then lurched forward, struck the men, broke the loading ramp off the vessel (causing the support arms of the ramp to buckle and fail), and threw the ramp, support arms, and four contractor employees into the water while a fifth hung onto the front bumper of the vehicle. Personnel in the Consulate boat, following about 100 yards to the rear of the ferry, saw the incident, and immediately responded to render aid. As the Consulate boat arrived at the scene and scanned the area for survivors, ConGen personnel assessed that the man holding onto the vehicle aboard the vessel was in relative safety, a second man was floating in the water with a life vest, and another two men were struggling in the water without life vests, with one who could not swim clinging frantically to the other who could. The Consulate boat arrived alongside the two men in distress who appeared about to go under the water, while ConGen personnel signaled a nearby, small private vessel to rescue the person in the water wearing the life vest and assist them with the two men in distress. Together, personnel on both boats pulled the three men from the water, while the fourth individual clung to the front of the armored vehicle on board the ferry.

4. When asked about any additional people who could be in the water, the survivors mentioned the name of a fifth individual. The ConGen personnel responding to the rescue had not noticed this fifth individual during their approach and subsequent search, leading to speculation that the individual may have drowned immediately after entering the water, perhaps after suffering injury during the accident. A Nigerian Navy frigate and crewmembers arrived at the scene moments after the incident. After Navy crewmembers spoke with the contractor, the frigate and crew departed the scene. The Navy frigate and crew did not render any noticeable assistance to the contractor before departing the scene. One of the two Nigerian Navy personnel on the barge jumped onto the Consulate boat and would not leave even after repeated requests. The other Nigerian Navy personnel stayed on the barge.

5. After a futile search by ConGen personnel for the fifth victim, the contractor decided to dispose of the armored vehicles on the damaged ferry and return to shore as soon as possible in the interest of safety. Contractor personnel pushed the armored vehicles overboard at the closest safe location in the GON-approved disposal zone, and all returned to Lagos without further incident.

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6. Location of the Accident: Off-Shore, Lagos, Nigeria in the Gulf of Guinea: Latitude: 6 degrees, 23.084 minutes North, Longitude: 3 degrees, 23.459 minutes East.

7. ConGen Lagos RSO notified the Maritime Police Superintendent upon returning to land -- the first to do so of any involved in or witnessing the accident -- and volunteered U.S. Government assistance (with guidance from State) as coincidental witnesses to the incident. RSO will maintain contact with Maritime Police until the investigation concludes.

8. GSO and RSO have suspended future maritime disposal of U.S. Government armored vehicles, pending a full review of this accident.

9. If this mode of disposing of U.S. Government armored vehicles is discontinued, GSO will work with RSO to determine other possible measures.

10. ConGen Lagos coordinated this telegram with Embassy Abuja.

Signature: STAFFORD

Drafted By: LAGOS:Armand, Fred M
Cleared By: MGT:Cable, Floyd S
POL:McAnulty, James P
Approved By: EXEC:Stafford, Joseph D
Released By: LAGOS:Armand, Fred M
Info:
Attachments: Metadata.dat

Action Post:
Dissemination Rule: Archive Copy

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APPENDIX B: BUREAU OF DIPLOMATIC SECURITY RESPONSE



United States Department of State

Assistant Secretary of State
for Diplomatic Security

Washington, D.C. 20520

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December 20, 2016

INFORMATION MEMO TO INSPECTOR GENERAL LINICK – OIG

FROM: DS – Gregory B. Starr  DEC 21 2016

SUBJECT: Response to Draft OIG Management Assistance Report: Health and Safety Concerns Identified Related to Armored Vehicle Disposals (AUD-SI-17-XX), October 2016

Thank you for the opportunity to respond to the Draft Management Assistance Report on Health and Safety Concerns Identified Related to Armored Vehicle Disposals (AUD-SI-14-XX), dated October 2016.

Below is Diplomatic Security's response to Recommendations 1 and 2.

Recommendation # 1: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Directorate for Operations, Bureau of Overseas Buildings Operations, Office of Safety, Health, and Environmental Management, develop and implement specific safety guidance for the disposal of armored vehicles overseas. This guidance should reference obligatory occupational health and safety standards, instruct how to conduct an Activity Hazard Analysis in accordance with Overseas Buildings Operations requirements, specify that Activity Hazard Analyses must be performed during the pre-award contract phase, and mandate specialized health and safety training for post personnel involved in armored vehicle disposals in order that they may verify contractor compliance with required occupational health and safety standards.

DS Response (no later than 12/20/2016): DS and OBO continue their collaboration in identifying successful mitigation of the risks associated with the disposal of armored vehicles. This information will be used to provide guidance and template contract language for posts, in order to alleviate many of these risks and facilitate safe armored vehicle disposal.

Recommendation # 2: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Directorate for Operations, Bureau of Overseas Buildings

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Operations, Office of Safety, Health, and Environmental Management, develop a contract template for overseas posts to use for armored vehicle disposal contracts. The template should include specific contract clauses relating to occupational health and safety standards for contractors performing vehicle disposals, including the Department of State Acquisition Regulation Accident Prevention clause.

DS Response (no later than 12/20/2016): DS and OBO continue their collaboration in identifying successful mitigation of the risks associated with the disposal of armored vehicles. This information will be used to provide guidance and template contract language for posts, in order to alleviate many of these risks and facilitate safe armored vehicle disposal.

Approved: DS – Gregory B. Starr ()

Analyst: DS/MGT/PPD – Matthew Porter, x52734

Cleared: DS/DSS – G.Hurst for PDAS (ok)
DS/EX – S. Dietz (ok)
DS/EX/MGT – W. Black, acting (ok)
DS/MGT/PPD – M. Scherger (ok)
DS/MGT/PPD – D. O'Neill (ok)
DS/C – W. Ashbery (ok)
DS/C/PSP – P. Gibbons (info)
DS/PSP/DEAV – B. Bishop (info)
OBO/OPS/SHEM – D. Needham (ok)
OBO/RM/P – A. Gertsch (ok)
M – D. Winters (ok)
A – DLReid (ok)

APPENDIX C: EMBASSY PORT-AU-PRINCE RESPONSE



Embassy of the United States of America

Port-au-Prince, Haïti

November 7, 2016

Mr. Norman P. Brown
Assistant Inspector General
for Audits
Office of Inspector General
Department of State
Washington DC 20520

Dear Mr. Brown:

I am in receipt of the Office of Inspector General (OIG) draft *Management Assistance Report: Health and Safety Concerns Identified Related to Armored Vehicle Disposals*. I am grateful to OIG for bringing to my attention the unsafe disposal practices observed at contractor facilities in Port-au-Prince during the destruction of a vehicle in February 2016.

For all future in-country disposals of armored vehicles via destruction, Post will ensure that contractor and Mission personnel performing or observing the destruction use personal protective equipment; that the destruction is performed in a controlled area with potential onlookers kept at a safe distance; that a purchase order or contract between the Mission and the contractor is established which includes Department of State Acquisition Regulation (DOSAR) clause 652-236-70 covering accident prevention; and that the contractor adheres to the provisions of that clause.

Sincerely,

A handwritten signature in blue ink, appearing to read "Peter F. Mulrean".

Peter F. Mulrean
Ambassador

APPENDIX D: EMBASSY NAIROBI RESPONSE



Ambassador
Embassy of the United States of America
Nairobi, Kenya

November 14, 2016

Norman P. Brown
Assistant Inspector General for Audits
Office of Inspector General

Dear Mr. Brown,

Thank you for your October 28 letter concerning the *Management Assistance Report: Health and Safety Concerns Identified Related to Armored Vehicle Disposals*. The following is a response to issues specifically identified in Nairobi.

In response to the above mentioned report, I would offer the following:

- a) Issue: "OIG observed contractors cutting portions of an armored vehicle with blow torches in an area of the warehouse adjacent to fuel storage and marked "No Smoking".

Response: The area in question had once been a working auto shop/garage that included the mission fuel station. The auto shop was closed and the fuel tanks drained (emptied) many years ago. There is no flammable material in the area and the "No Smoking" sign has now been removed.

- b) Issue: "OIG also noted that some of the contractor personnel participating in the process, as well as Department personnel witnessing the process, did not have the required personal protective equipment. Occupational Safety and Health Administration standards state that appropriate eye and face protection must be used when exposed to eye or face hazards; the use of blow torches in a semi-confined area in the vicinity of flammable materials appears to constitute such eye and face hazards, and therefore all persons within the vicinity of the disposal should have been equipped with eye and face protection".

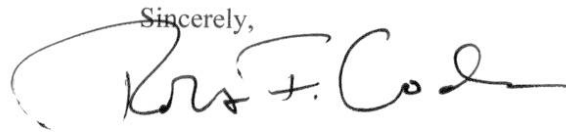
Mr. Norman Brown
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Response: The Mission has equipped the contractor with gloves and goggles and will ensure that all personnel in the area at the time destruction occurs are using them. Additional face protection as required has been ordered and will be distributed upon receipt.

Please let us know if the above has not adequately addressed the concerns within the report.

With best wishes,

Sincerely,

A handwritten signature in black ink, appearing to read "R. F. Godec", with a large, sweeping initial "R" that loops around the first part of the name.

Robert F. Godec

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