INTRADEPARTMENTAL CORRESPONDENCE

September 18, 2024
14.2

TO: The Honorable Board of Police Commissioners

FROM: Chief of Police

SUBJECT: BOMB SQUAD AUDIT (AD NO. 24-005)

RECOMMENDED ACTION

It is recommended that the Board of Police Commissioners REVIEW and APPROVE the attached Bomb Squad Audit.

DISCUSSION

Audit Division conducted the Bomb Squad Audit to evaluate compliance with Department policies and procedures.

If additional information regarding this audit is required, please contact Police Administrator Sharon Sargent, Commanding Officer, Audit Division, at (213) 486-8480.

Respectfully,

DOMINIC H. CHOI
Chief of Police

Attachment

BOMB SQUAD AUDIT
Conducted by
Audit Division
2024

OVERVIEW

In accordance with the Los Angeles Police Department (LAPD or Department) 2024 Annual Audit Plan, Audit Division (AD) conducted a Bomb Squad Audit to evaluate adherence with Department policies and procedures pertaining to selection, training, recertification, response, and disposal of hazardous material evidence.

BACKGROUND

The Emergency Services Division (ESD) is comprised of three sections: The Hazardous Devices Material Section (HDMS), the Bomb Detection Canine (K9) Section, and the Emergency Management Section. The HDMS is further made up of the Explosives Unit (Bomb Squad) and the Hazardous Materials Unit (Haz-Mat). This audit focused on the Bomb Squad.

The primary mission of the Bomb Squad is to ensure the safety and well-being of the community as well as the public safety personnel responding to explosive-related incidents. A total of 26 certified technicians respond to an average of over 400 service calls annually involving improvised explosive devices, military ordnance, explosive chemical compounds, pyrotechnics, incendiary devices, dignitary sweeps, special events as well as provides support to the Department's Special Weapons and Tactics team. In addition to the response mission, the Bomb Squad maintains a proactive stance in its attempt to prevent, detect, and deter terrorist incidents.

Trained and certified by the Federal Bureau of Investigation (FBI), newly assigned personnel complete a one-week online course and attend a six-week Hazardous Devices School (HDS). Once certified as a bomb technician, additional specialized training is completed which focuses on post-blast investigations, military ordnance, electronics, robotics, threat assessment, and render safe techniques.

The Bomb Squad currently operates under the LAPD Bomb Squad Standard Operating Guidelines Manual, June 29, 2023. The LAPD Bomb Squad Standard Operating Guidelines Manual provides operational and administrative procedures, which were comprehensively reviewed by AD. It was determined that the high-risk elements contained in the LAPD Bomb Squad Standard Operating Guidelines Manual would be considered as audit objectives.

UNDERSTANDING OF INTERNAL CONTROLS

Auditors obtained an understanding of the significant internal controls within the context of the objectives. Auditors assessed whether internal controls were properly designed and implemented to achieve compliance with the Department's Manual and the LAPD Bomb Squad Standard Operating Guidelines Manual.

PRIOR AUDITS

Audit Division conducted a prior Bomb Squad Audit during the fiscal year of 2016. There were no recommendations made.

SCOPE AND METHODOLOGY

This audit is comprised of four objectives with six sub-objectives. Auditors evaluated the period of January 14, 2024, through April 6, 2024, Deployment Periods (DP) 1-3. The objectives covered various timeframes depending on the scope determined for each objective.

Table No. 1 – Summary of Findings

Objective No.	Description of Objectives	2016		2024	
		Number Meeting Standards/ Evaluated	Percent Meeting Standards	Number Meeting Standards/ Evaluated	Percent Meeting Standards
1	**Personnel Selection**				
1(a)	Personnel Selection Criteria Followed	5/5	100%	3/3	100%
1(b)	Initial Training Requirements	25/26	96%	16/16	100%
1(c)	Recertification Requirements	26/26	100%	16/16	100%
2	**Disposal and Transportation**	N/A[1]	N/A	1/1	100%
3	**Total Containment Vessel**	N/A[2]	N/A	Not Deployed	N/A
4	**Magazine Procedures**				
4(a)	Office Day Magazine Inspections Conducted	55/55	100%	12/12	100%
4(b)	Office Evidence Storage Locker Inspections Conducted	25/25	100%	12/12	100%
4(c)	Vehicle Magazine Inspections Conducted	62/62	100%	12/12	100%

DETAILED FINDINGS

The selection process for an assignment to ESD is very competitive. Auditors reviewed the completeness of selection packages, federally required bomb technician training, and re-certification of all Bomb Squad personnel.

[1] Not tested in the 2016 audit.

[2] Not tested in the 2016 audit.

Objective No. 1 – Personnel Selection

Objective No. 1(a) – Personnel Selection Criteria Followed

Criteria

The LAPD Bomb Squad Standard Operating Guidelines Manual, June 29, 2023, Chapter 5, *Personnel Selection*, states:

> *"Bomb Squad Officers shall be selected by the following criteria: ...*
>
> - *Have a minimum of five years experience as a Los Angeles Police Officer.*
> - *Must be the rank of Police Officer III, or higher, or be on the Police Officer III eligibility list at the time of selection.*
> - *Must not be subject to any administrative or duty restriction/conditions...*
>
> *A personnel selection process shall be administered in accordance with existing Los Angeles Police Department Policies and established procedures. The process shall include, but not limited to the following: ...*
>
> - *Oral interview*
> - *Bomb suit practical exam*
> - *Bomb Squad physical medical exam*
> - *FBI Background investigation"*

Audit Procedures

Auditors determined that the Bomb Squad did not have any newly selected personnel during the audit period. Therefore, auditors expanded the review period to include August 27, 2023, through January 13, 2024 (DPs 9-13), to determine if there were any newly selected personnel.

There were three newly selected bomb technicians during DPs 9-13. Each selection package was reviewed to determine if the above criteria was met. The Department met the standard if all selection packages were complete.

Findings

Each (100 percent) of the three selection packages met the standard for this objective.

Objective No. 1(b) – Initial Training Requirements

Criteria

The LAPD Bomb Squad Standard Operating Guidelines Manual, June 29, 2023, Chapter 6, *Training Requirements*, states:

"It is the responsibility of the Bomb Squad Commander and the Department to ensure all new technicians selected for assignment to the Bomb Squad and the currently assigned technicians receive appropriate training in the field of explosives handling and disposal to ensure maximum safety for the technician, other public safety personnel, and the public in general...

- *FEMA* [Federal Emergency Management Agency] *Emergency Responder Hazardous Material Technician - (40 hours, HDS Prerequisite)...*
- *Incident Command System (ICS) and National Incident Management (NIMS) courses ICS-100, ICS-200, IS-700 [Incident System] and IS-800.*
- *Federal Bureau of Investigations (HDS)/ United States (US) Public Safety Bomb Technician Certification (240 Hours)...*
- *Complete a minimum of 288-hours per year of practical exercise/training at the unit level for sustainment of basic skills. NBSCAB [National Bomb Squad Commanders Advisory Board] recommends this be performed 24-hours per month...*
- *Complete a minimum of 40-hours of additional external explosive related training, seminar, exercise, symposium, or conference annually.*
- *Comply with Hazmat Technician training requirements set forth in 29 CFR [Code of Federal Regulation] 1910.120(q)(6)(iii). Training meets NFPA [National Fire Protection Association] 472 standards will satisfy the 29 CFR 1910.120(q)(6)(iii) requirement (i.e., 8-hour annual Refresher Training)."*

Audit Procedures

The Bomb Squad provided auditors with a list of active bomb technicians' graduations and proof of re-certification from the FBI HDS Basic Course.[3]

Auditors determined there were a total of 26 bomb technicians. Of the 26 technicians, 10 were excluded, resulting in 16 technicians for review.[4] The Department met the standard if each technician met the initial training requirements.

Findings

Each (100 percent) of the 16 bomb technicians met the standard for this objective.

---

[3] The Bomb Squad provides the FBI HDS with a list of active technicians, so a background investigation can be conducted, prior to them being hired. Once approved by the FBI HDS, technicians are expected to complete all training and obtain a certification.

[4] During the audit period, one technician was Injured on Duty (IOD) status and nine were new to the unit and had not completed the training requirements.

Objective No. 1(c) – Recertification Requirements

Criteria

The LAPD Bomb Squad Standard Operating Guidelines Manual, June 29, 2023, Chapter 5, *Recertification*, states:

- *"Each bomb technician (officers and supervisors) must comply with the minimum physical and operational requirements to maintain their position as a bomb technician. Failure to comply with the minimum requirements may result in the technician being deselected from the Bomb Squad.*
- *All Hazardous Device and Materials Section (HDMS) personnel are required to utilize City of Los Angeles, Personnel Department, Medical Services Division for medical examinations to be eligible for the FBI Hazardous Device School Basic Course or re-certification and meet height/weight or body fat percentage standards.*
- *No waivers will be granted for bomb technicians not meeting height/weight or body fat percentage standards identified in FBI Bomb Data Center Special Technicians Bulletin* 87-4, *National Guidelines for Bomb Technicians*."

The LAPD Bomb Squad Standard Operating Guidelines Manual, June 29, 2023, Chapter 6, *Training Requirements*, states:

"*FBI HDS Public Safety Bomb Technician Recertification – (40 Hours, EVERY 3 YEARS)*

- *The Bomb Technician Recertification Course is designed to test proficiency on basic technician skills and knowledge, provide information and training on new technology and threats, and award an official certification based on standards set by the National Bomb Squad Commanders Advisory Board (NBSCAB)."*

"MINIMUM FORMAL TRAINING TO MAINTAIN PROFICIENCY AND CERTIFICATION:

- *Complete a minimum of 288-hours per year of practical exercise/training at the unit level for sustainment of basic skills. NBSCAB recommends this be performed 24-hours per month...*
- *Complete a minimum of 40-hours of additional external explosive related training, seminar, exercise, symposium, or conference annually.*
- *Comply with Hazmat Technician training requirements set forth in 29 CFR 1910.120(q)(6)(iii). Training meets NFPA 472 standards will satisfy the 29 CFR 1910.120(q)(6)(iii) requirement (i.e., 8-hour annual Refresher Training)."*

Audit Procedures

Auditors reviewed the same list of 26 technicians provided by the Bomb Squad for Objective No. 1(b). The 10 technicians were also excluded for this objective, resulting in a review of 16 technicians. The Department met the standard if all the technicians were certified.

Findings

Each (100 percent) of the 16 bomb technicians were certified and met the standard for this objective.

Objective No. 2 – Disposal and Transportation

Criteria

The LAPD Bomb Squad Standard Operating Guidelines Manual, June 29, 2023, Chapter 9, *Disposal*, states:

- *"Explosives shall be evaluated for destruction at or near the incident site...*
- *The method for disposal shall be at the recommendation of the primary response team based on their training and experience, though they are encouraged to seek additional input as necessary to ensure safe disposal operation, and approval via chain of command. ...*
- ***All Disposals REQUIRE a DISPOSAL OPERATION PLAN (ATF-AEDT [Alcohol, Tobacco, Firearms-Advances Explosives Disposal Techniques])***
    - ***All calculations will be verified by at scene Bomb Squad personnel***
        - ***Verify and log all calculations in the ICS 208 HDM (Safety Plan) ...***"

The LAPD Bomb Squad Standard Operating Guidelines Manual, June 29, 2023, Chapter 10, *Transportation*, states:

> *"To provide for the legal, proper and safe transportation and storage of actual or suspected improvised explosive device(s), incendiary device(s), military or civilian explosives, military ordnance, large quantities of fireworks, pyrotechnics, ammunition, shock sensitive hazardous chemical(s), suspicious package(s)/item(s) or any other material or combination of materials likely to pose a threat to Bomb Squad Technicians, other public safety personnel, other persons or property, the following procedure will be adhered to.*
>
> - *The decision to transport these items will be weighed carefully to ensure that the act of loading, transporting and unloading for disposal or storage does not unduly increase the hazards to Bomb Squad Technicians, other public safety personnel, other persons or property...*
> - *Documentation on 208 HDM..."*

Audit Procedures

Auditors utilized LAPDs Bomb Squad internal database (Automated Field Data Reports/Incident Tracking-Crime Analysis Data System) during the audit period to determine if any calls for service required disposal and transportation of hazardous material to assess this objective.

The Bomb Squad did not have any calls for service that required disposal or transportation during the audit period. Therefore, auditors expanded the scope of the audit from July 2023 to April 2024, to capture a call that required disposal and transportation. It resulted in one call for service. The Department met the standard if the call met the criteria above.

Findings

The one call (100 percent) met the standard for this objective.

Objective No. 3 – Total Containment Vessel

Criteria

The LAPD Bomb Squad Standard Operating Guidelines Manual, June 29, 2023, Chapter 11, *Total Containment Vessel (TCV)*, states:

> *"Current LAPD Bomb Squad TCV deployment protocols DO NOT allow for at scene TCV disposal. Current LAPD Bomb Squad TCV Deployment Protocols allow for TCV transport to and Disposal (if recommended RSP [Render Safe Procedure] at "Safe-Site" ONLY.*
>
> *Safe Site is defined as:*
>
> - *Established Disposal range*
> - *Expedient range with Chain of Command approval…*
> - *NABCO[5] TCV Manufacturer's Capacity Limits…"*

Audit Procedures

Auditors used the same internal database as used in Objective No. 2(a) to determine calls for service that required the response of the TCV for disposal or transportation during the audit period to assess this objective.

Auditors determined the TCV was last deployed on June 30, 2021. Therefore, auditors were unable to expand the audit scope due to the lack of the TCV use. Additionally, the Bomb Squad Standard Operating Guidelines Manual was revised on June 29, 2023.

---

[5] NABCO is the manufacturing company for security solutions for public safety, security, and defense organizations in the United States and worldwide.

Findings

There were no calls for service resulting in the TCV being deployed, nor any explosive materials disposed of by the TCV during the audit period.

Objective No. 4 – Magazine Procedures

Objective No. 4(a) – Office Day Magazine Inspections Conducted

Criteria

The LAPD Bomb Squad Standard Operating Guidelines Manual, June 29, 2023, Chapter 15, *Magazine Procedures*, states:

> *"Improvised Explosive Devices shall never be stored in explosive magazines. The HDMS OIC [Officer in Charge] shall be responsible for the maintenance of the explosive magazines. The Bomb Squad OIC will appoint a primary and secondary Magazine Control Officer to oversee each magazine…*
>
> - *Only small quantities of stable explosives including fireworks are to be stored in these magazines for a short period, with supervisor approval. …*
> - *The combined weight of the items booked into the day magazine shall be listed on the sign in log. …*
> - *The Duty Supervisor, or his designee, shall inspect the Valley Bomb Squad and Metro Bomb Squad day magazines every seven days for accuracy of the sign-in-sheets, and to ensure nothing has been stored over ten days. These inspections shall be documented on the magazine sign-in-sheets and in a Supervisor's Daily Report…"*

Audit Procedures

Auditors determined that the Bomb Squad completed Office Day Magazine inspections every seven days on two Office Day Magazines for three consecutive months, resulting in a total of 12 inspections to review. Auditors determined that the Bomb Squad no longer uses sign-in sheets to document inspection results, and currently completes badge notes instead, which are emailed directly to Counter Terrorism and Special Operation Bureau (CTSOB). The Department met the standard for this objective if each badge note was complete.[6]

Findings

Each of the 12 (100 percent) badge notes reviewed met the standard for this objective.

---

[6] A badge note is a Department document used for internal communication.

Objective No. 4(b) – Office Evidence Storage Locker Inspections Conducted

Criteria

The LAPD Bomb Squad Standard Operating Guidelines Manual, June 29, 2023, Chapter 15, *Office Evidence Storage Lockers*, states:

- *"All evidence must be logged in and out on the sign-in sheet upon placement or removal from the evidence storage lockers.*
- *No IED's[7] or high explosives shall be stored in the evidence lockers.*
- *A running inventory of the evidence lockers shall be maintained at their respective evidence locker.*
- *The Duty Supervisor, or his designee, shall inspect the Valley Bomb Squad and Metro Bomb Squad evidence lockers and control sheets every seven days for accuracy of the sign-in-sheets, and to ensure nothing has been stored over ten days. These inspections shall be documented on the Evidence Locker Control Sheets and in a Supervisor's Daily Report."*

Audit Procedures

Auditors determined that the Bomb Squad completed Office Evidence Storage Locker inspections on six Office Evidence Storage Lockers every seven days for three consecutive months, resulting in a total of 12 inspections for review.

Auditors noted during the audit period, there were three pieces of evidence stored in evidence lockers. All evidence was properly processed, removed, and documented prior to the 10-day requirement. Auditors verified there was proper documentation on each badge note. The Department met the standard if badge notes were complete.

Findings

Each of the 12 (100 percent) badge notes met the standard for this objective.

Objective No. 4(c) – Vehicle Magazine Inspections Conducted

Criteria

The LAPD Bomb Squad Standard Operating Guidelines Manual, June 29, 2023, Chapter 15, *Vehicle Magazines*, states:

- *"A running inventory of all explosives in a Bomb Squad vehicle magazine shall be maintained by the responsible Bomb Squad supervisor and Magazine Control Officer.*
- *All magazines shall be kept locked when the magazine is not being accessed, and the*

[7] The LAPD Bomb Squad Standard Operating Guidelines Manual indicates an IED is an Improvised Explosive Device.

vehicle be alarmed properly secured.

- *All logistics vehicle magazines shall be inspected every seven days to determine if there is any evidence of tampering with the respective magazine. This inspection shall be documented in a Supervisor's Daily Report."*

Audit Procedures

Auditors determined that the Bomb Squad has three Vehicle Magazine Lockers that are located on vehicle shop 21150. Auditors determined that the Bomb Squad completed Vehicle Magazine inspections every seven days for three consecutive months, resulting in a total of 12 inspections to review. Auditors reviewed each badge note emailed to CTSOB. The Department met the standard for this objective if badge notes were complete.

Findings

Each of the 12 (100 percent) badge notes met the standard for this objective.

OTHER RELATED MATTERS

1. Although technicians met the minimum requirements for training, auditors found it difficult to determine the number of required hours for each training, certification, external training, and refresher hours. Auditors determined various training hours were completed in each technicians' Training Evaluation and Management System II. However, it was difficult to determine the type of training and actual hours for each course. [See Recommendation No. 1 for Objective No. 1(b)].

2. Auditors discovered that the Bomb Squad is now documenting the weekly magazine inspections on a badge note directly emailed to the commanding officer of CTSOB, creating ease of tracking, transparency, and efficiency [See Recommendation No. 2 for Objective No. 4(a)].

RECOMMENDATIONS

Audit Division recommends that:

1. The Bomb Squad create a tracking system to record training hours and reference them to specific training categories. This would assist management in reconciling training hours by indicating which hours correspond to the required trainings as indicated in Objective No. 1(b). (See Other Related Matters No. 1).

2. The Bomb Squad update their 2023 Manual to include their process of completing a badge note in place of sign-in sheets. A badge note is a more consistent method for documenting weekly inspections and it has proven to be effective and easily trackable. The badge note will continue to be emailed directly to the Commanding Officer, CTSOB, which expedites the process [See Other Related Matters No. 2 for Objective No. 4(a)].

APPENDIX I

Audit Division Contact: Sergeant II Manual Arzate, Serial No. 34753, (213) 486-8388

Manual Arzate
Project Manager, Audit Division
Sergeant II

Wendy Gamble
Officer-In-Charge, Section A, Audit Division
Police Performance Auditor IV

Sharon Sargent
Commanding Officer
Audit Division

INTRADEPARTMENTAL CORRESPONDENCE

September 10, 2024
15.2

TO: Commanding Officer, Audit Division

FROM: Commanding Officer, Emergency Services Division

SUBJECT: VALIDATION OF FINDINGS, BOMB SQUAD AUDIT

Emergency Services Division has reviewed the Bomb Squad audit recently completed by Audit Division and is in agreement with the findings of 100% compliance as well as with the recommendations provided by Audit Division. The attached document provides a summary of the actions taken to implement the recommendations from Audit Division.

If you have any questions regarding this matter, please have a member of your staff contact Lieutenant Robert Beckers, Emergency Services Division, at (323) 342-4200.

MARIO Q. MOTA, Captain
Commanding Officer
Emergency Services Division

Attachment

Response to Bomb Squad Audit
September 10, 2024

Beginning in the Third Quarter of Fiscal Year 2023/2024, Audit Division conducted an audit of the Bomb Squad to evaluate adherence with Department policies and procedures as well as the Bomb Squad Standard Operating Guidelines (SOG). Audit Division last conducted an audit of the Bomb Squad in the Third Quarter of Fiscal Year 2015/2016.

The audit report provides findings which review a total of eight separate items categorized under the following headings: Personnel Selection, Disposal and Transportation, Total Containment Vessel, and Magazine Procedures. The audit report revealed that the Bomb Squad was in 100% compliance in all categories. The Commanding Officer, Emergency Services Division, is in agreement with the audit findings.

This document provides a summary and explanation for the two recommendations provided by the audit report.

Audit Division recommends:

1. The Bomb Squad create a tracking system to record training hours and reference them to specific training categories. This would assist management in reconciling training hours by indicating which hours correspond to the required trainings as indicated in Objective No. 1(b).

2. The Bomb Squad update their 2023 Standard Operating Guidelines to include their process of completing a badge note in place of sign-in sheets. A badge note is a more consistent method for documenting weekly inspections and it has proven to be effective and easily trackable. The badge note will continue to be emailed directly to the Commanding Officer, CTSOB, which expedites the process, Objective No. 4(a).

Emergency Services Division response:

1. The Bomb Squad training tracking data base has been revised to record the training hours in the specific training categories as required by the Standard Operating Guidelines and the 2024 National Guidelines for Bomb Technicians. The revision will take effect for the 2025 training cycle for the Bomb Squad. The audit report revealed that Bomb Squad personnel were in compliance with the required training and hours, however, the revision to the training tracking data base will provide management with an easier method to monitor and oversee the progress throughout the year.

2. During this audit, the Bomb Squad's 2024, Standard Operating Guidelines dated April 26, 2024 was being reviewed and approved by the CTSOB/OSO chain of command. In Chapter 24, page 67, heading Inspections, sub-heading Magazine Security Inspection, line 3, provides direction to the Bomb Squad Duty Supervisor to document the weekly magazine inspections on a badge note.