## **REPORT WRITING GUIDELINES**

#### Structure

<u>Use</u> short, clear, and direct sentences. Use active voice. <u>Identify</u> who said what by name and relationship to facility. <u>Write</u> report **promptly** upon return from the field.

#### Content

<u>Include</u> only facts and observations in the inspection report. <u>Do Not</u> include conclusions in the inspection report. <u>Reference and use</u> actual language of statute, permit,or regulation to identify requirements.

<u>Compare and contrast</u> what you observed vs. what was required by statute, permit, or regulation.

<u>Provide</u> a detailed description of all potential violation(s). <u>Present</u> all evidence used to support potential violation(s). <u>Provide</u> sampling data and proof of calibration. <u>Document</u> the start time and duration of potential violation. <u>Describe</u> facility response to correct past violations. <u>Reference</u> all supporting material in text of report. <u>Include</u> in the case file or inspection report all materials (photographs and documents) referenced in the report.

#### **Things to Avoid**

Do not use passive voice/inconsistent tense (was vs. is). Do not use negative inferences (the only ones were...). Do not use vague or absolute terms (some, always). Do not use unverified information from past reports.

#### **Data Entry**

<u>Complete</u> and submit data entry forms or enter inspection data directly into national program-specific databases.

### **PRE-INSPECTION GUIDELINES**

#### **Facility Research**

Use EPA systems, EPA Sector Notebooks, and the Internet to identify facility background information: facility official name, location, USGS Maps, and industrial processes. <u>Review</u> previous facility inspection reports if available. <u>Check EPA/State files</u> for facility compliance status. <u>Review</u> facility permits.

<u>Verify</u> facilities are in business and addresses are current. <u>Prepare</u> inspection trip list with facility names and addresses. <u>Plan</u> a route before starting inspections, and group facilities that are close to each other.

Environmental Justice Information is available at: http://www.epa.gov/environmentaljustice/assessment.html.

#### **Document/Material Preparation**

Take: inspection manual, forms, and statute/regulations. Pack notebooks, pens (water resistant), electronic equipment (e.g., lap top, tablet) with extra batteries. Refer to Role of the EPA Inspector in Providing Compliance Assistance During Inspections, June 25, 2003: http://www.epa.gov/compliance/resources/policies/monitoring/ inspection/inspectorrole.pdf. Identify applicable compliance assistance material.

#### **Inspection Equipment**

Pack appropriate Personal Protection Equipment (PPE). Pack camera, film/storage media, batteries. Pack appropriate sampling equipment/containers.

## **FIELD INSPECTION GUIDELINES**

### Prior to the Inspection, drive by facility. If there is public access :

<u>Observe</u> from public right-of-way; note obvious concerns. <u>Observe</u> facility layout and note which direction is North.

## Site Entry

<u>Present</u> credentials to facility representative. <u>Provide</u> notice of inspection form as required. <u>Do not</u> relinquish credentials or allow photocopying of them. <u>Record</u> name, responsibilities, and relevant qualifications of facility representatives you interact with during inspection. <u>Explain</u> purpose of inspection and what will be inspected. <u>Provide facility</u> a copy of the SBREFA form. Consult facility officials for any facility safety requirements.

## **Confidential Business Information (CBI)**

If cleared for CBI, follow all EPA procedures to collect, maintain, and use the CBI.

If not cleared to handle CBI, inspector can inspect non-CBI areas, documents, and collect non-CBI information. Do not ask to review CBI documents if you are not cleared. Present credentials to facility representative.

# FIELD INSPECTION GUIDELINES

### **Denial of Entry**

If entry is denied, contact supervisor or Regional Counsel, and explain situation.

Safety First: Do not confront facility officials if they deny entry. Leave premises if you feel threatened in any way. If a warrant is obtained, inspect facility with proper law

enforcement officer.

# **Evidence and Data Collection**

<u>Obtain</u> statements and document who said what. <u>Take</u> legible notes that document the inspection findings. <u>Copy</u> documents supporting potential violations and record documents copied; initial and date copies.

<u>Photograph, diagram, and identify</u> the location of each potential violation, regulatory concern, and sample collection point. <u>Collect</u> Global Positioning System(GPS) data as required.

Calibrate sampling and measurement equipment.

<u>Document</u> start time and duration of potential violation. <u>Follow</u> applicable chain of custody procedures.

# Before You Leave

Review all findings, evidence, and data.

Ensure you have adequate information to prepare inspection report.

<u>Answer</u> Who? What? When? Wher? Why? and How? <u>Communicate</u> preliminary findings to facility representative and inform them the region will determine if violations exist. <u>Complete</u> Inspection Conclusion Data Sheet (ICDS) forms and information.