

REPORT WRITING GUIDELINES

Structure

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

Content

Include **only facts and observations** in the inspection report.
Do Not include conclusions in the inspection report.
Reference and use actual language of statute, permit, or regulation to identify requirements.
Compare and contrast what you observed vs. what was required by statute, permit, or regulation.
Provide a detailed description of all potential violation(s).
Present all evidence used to support potential violation(s).
Provide sampling data and proof of calibration.
Document the start time and duration of potential violation.
Describe facility response to correct past violations.
Reference all supporting material in text of report.
Include 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

Complete 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.
Review previous facility inspection reports if available.
Check EPA/State files for facility compliance status.
Review facility permits.
Verify facilities are in business and addresses are current.
Prepare inspection trip list with facility names and addresses.
Plan 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 :

Observe from public right-of-way; note obvious concerns.

Observe facility layout and note which direction is North.

Site Entry

Present credentials to facility representative.

Provide notice of inspection form as required.

Do not relinquish credentials or allow photocopying of them.

Record name, responsibilities, and relevant qualifications of facility representatives you interact with during inspection.

Explain purpose of inspection and what will be inspected.

Provide facility 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

Obtain statements and document who said what.

Take legible notes that document the inspection findings.

Copy documents supporting potential violations and record documents copied; initial and date copies.

Photograph, diagram, and identify the location of each potential violation, regulatory concern, and sample collection point.

Collect Global Positioning System(GPS) data as required.

Calibrate sampling and measurement equipment.

Document start time and duration of potential violation.

Follow applicable chain of custody procedures.

Before You Leave

Review all findings, evidence, and data.

Ensure you have adequate information to prepare inspection report.

Answer Who? What? When? Where? Why? and How?

Communicate preliminary findings to facility representative and inform them the region will determine if violations exist.

Complete Inspection Conclusion Data Sheet (ICDS) forms and information.