If time allows, there is a short exercise at the end of this session where students will evaluate sample inspection reports. It should be done after talking about inspection reports, and takes approximately thirty minutes to complete and discuss. The report evaluation checklist can be used to facilitate the review. If time does not allow for the report evaluation, they should be given to the students to do on their own time as a guide for their own work.

This session is designed to expose you to different models for presenting the results of your inspection in an inspection report. We will also spend a few minutes on note taking, which is a crucial antecedent for the report. A good report is built upon good field documentation. In your notebook, you’ll see an example of an inspection report format that is commonly used in the United States. While the findings of non-compliance will be different and the layout may vary, it does present a model that you may find useful in your program.

Proper documentation of an inspection is a key aspect of an inspector's job. It is the vehicle through which the inspector communicates his or her findings from the inspection. If your report does not communicate your findings well—clearly, accurately, and convincingly—you have wasted your time, and the environment will suffer. If you discover evidence that indicates serious violations, but your report fails to include the information that allows that case to be made, the facility probably will be able to continue its violation. If, on the other hand, you prepare a highly effective report, your agency probably will be able to take strong action and obtain a favorable settlement or court decree.

In other words, nothing else you do is more important than writing your inspection report. Government officials and attorneys who review the report must have all the facts to make appropriate and effective decisions.
Unless you have a photographic memory, note taking is a critical component of the inspection. Your notes are written to remind you of the details of your visit, and make it possible to reconstruct your observations later when you write your report or are called to testify about your findings. We do not tend to remember details in the past, so your notes, along with any pictures or other evidence, will help bring back those events.

When taking notes, try to be as descriptive and specific as possible. For example, be specific with names and titles so that person can be identified later. Your key witness may have changed jobs by the time of a trial, so you must note enough about him to identify them later.

Also, be specific with your terms and your language. Avoid judgmental statements in your notes. This example of the plastic drums assumes two things – WHAT ARE THEY?

1. That the particular drums are appropriate,
2. That the facility uses those drums to avoid corrosion (they may be using them because these are the only drums available.)
Note Taking
Be specific (continued)

- Use dates and times
  - Instead of: "On Monday morning, a spill was observed. The foreman said it had happened the day before. . . ."
  - Use: "At 09:34 a.m. on January 3, 2001, a spill was observed. Tom Jones said the spill occurred on January 2, 2001. . . ."

Be specific with time and dates. It is much easier to correctly note these details than to try to reconstruct them later. In some cases, it this information may be critical for later stages of the enforcement action when we base penalties on length of time in violation or amount of material that was spilled.
There are different approaches to keeping track of the information. In some situations, a checklist of requirements and verification methods may be most appropriate. These checklists may be based on the requirements in a regulation, law, or permit, and guides the user through the applicable requirements. Checklists may be developed for an individual facility, a regulatory program, or a type of industry. *If any applicable checklists are available, they should be distributed to the audience. EPA checklists are not likely to be useful since they are so specific to US Regulations.* The other method is a narrative report or narrative notes. These are freely written notes that detail your findings and activities. Who can tell me some advantages and disadvantages with the two methods?

**Checklists:**
- *Serves as outline or guide for inspector*
- *Ensures all areas are covered*
- *Helps inspector remember important areas*
- *Format allows for quick recording with minimal writing.*
- *May focus inspector too much, and cause them to miss areas of importance not on list.*
- *May not provide enough details to substantiate findings*
- *Does not describe how the findings were made*
- *May provide an incomplete record if the inspector is no longer available*

**Narrative**
- *Requires more writing*
- *Requires better recall of each requirement*
- *Forces inspector to recollect details improving memory of event*
- *Allows inspector better control of flow of inspector*
- *Unlimited in scope so inspector can stray to other areas if needed*
- *Takes longer to fill out and to review.*
- *Provides institutional knowledge even if inspector is no longer available*
The purpose of the inspection report is to present a factual record of an inspection, from the time when the need for the inspection is perceived through the time when analysis of samples and other data collected during the inspection has been completed. An inspection report must be complete and accurate, because it will provide the basis for potential enforcement actions and might become an important piece of evidence in litigation. It should also be the organized collection of all records and evidence so the reviewer knows what exists.

The technical report supports the inspector's experiences, so it should be written as the inspector sees fit.
A report must be complete and provide a basis for action.

- If the report is not complete and factual, time will be wasted in attempting to remedy the situation by making a supplemental inspection or report, or the opportunity to verify violation may be lost altogether because of the inability to reconstruct the evidentiary foundation for an enforcement action.

- A report is a written record of the results of the inspection and provides the permanent record that may be used later as evidence or to refresh the inspector's recollection.

- The report serves as a starting point for the next inspection. It should identify processes, problems, and areas of particular concern. It also must inform fully other inspectors who may become responsible for subsequent inspections.

- The report should identify the processes or areas of the facility that were not examined, if any. That information will provide assistance for future inspections; it also will make clear the extent of the evidentiary foundation for any enforcement action that might be based on the report.

- The report should discuss pertinent conditions. For example, the inspector should include facts about the background of a witness if those facts reflect on the credibility of the witness. Small details that the inspector ordinarily would not recall six months to a year after the inspection also should be included.

- Finally, as one long-time EPA manager said: "The quality of your inspection reports can make or break your career."
Executive Summary—Introduction

The primary audience of the executive summary is senior management and others who do not have the time or need to read the full report, but who wish to obtain an overview of the inspection and findings. They may not have direct knowledge of the issues being addressed in the report and will probably form their opinions of the team’s work from this alone.

- The executive summary presents the objectives of the inspection, background information, summarized inspection methods, and conclusions supported by pertinent findings.

- The executive summary is used to tie together the entire inspection report into a concise package, and should stand alone, summarizing compliance findings from the body of the report. It should contain no information that does not appear in the body of the report.

Technical Report

- The rest of the report presents all the factual information available and describes more comprehensively the facility and the inspection. It provides specific details about the compliance findings and discusses all the documentation necessary to prove a violation.

- The technical report provides all the technical information that supports the findings of the inspection. From an organizational standpoint, the rule is “to be logical and complete.” This portion of the report presents all documentation of violations and all documentation of current compliance status.

- The technical report should be concise, but brevity should not be sought at the price of failure to develop the subject completely. The inspector should be thorough and check facts.

Findings and Conclusions

- When the inspection report is written, it is essential that each of the apparent violations or concerns is identified clearly in the report, not buried in the narrative. Typically, a discussion of violations begins with a brief description of the applicable requirement or permit requirements (for example, conduct weekly monitoring). A detailed description may be necessary if no separate section on regulatory status is included in the report.

- In this section, details about the violations are presented. Findings are presented in an order that parallels the applicable requirements. The narrative should be detailed and specific; supporting documents, such as company records, sampling data, and photographs, usually are appended to the report.
Tips for Writing Inspection Reports

Environmental Compliance Inspection Course

- The eventual readers of your report may vary from an individual in the local general public and advocacy groups not directly involved in the case, to upper management and attorneys whom you may never meet. However, the main audience and target of your writing should be the agency case development team.

- Each of those target readers will have different motives, perspectives, and needs.

- Executive Summary must entail a boiled down list of facts, findings, and violations presented as a stand-alone discussion which gives any reader an overview, and assists managers in determining an overall course of action.

- Technical Report is used by all levels of enforcement. It contains the background information, methods used, evidence collected, and all relevant field notes from the logbook.

- Findings and Conclusions will be needed by developers who assess compliance with regulatory language to offer a preliminary evaluation.

- Appendices will be needed by scientific evaluators who test samples collected and verify use of QA/QC guides.

The document should be of professional quality, and conform with the writing style of your agency. If you have a standard format for reports, that should be used. It should be grammatically correct and not have misspelled words or other errors. Always proof read your reports carefully, and have someone else check it for clarity. Some inspection programs require that every inspection report go through a “peer review” process before the report is finalized to ensure the highest quality reports.
Keep it simple.

• Use short, direct sentences

• Avoid complicated terms, if possible. If you use acronyms, make sure they are defined the first time they are used, and are commonly used by the readers.

• Define any complicated terms used that your reader may not be familiar with.

• Be concise. Conciseness is not omission of necessary information; it is avoidance of all that is not essential. Include the relevant details, but avoid extraneous information.

• Avoid wordiness. Use short, simple sentences.
Only record your observations – what you saw, heard, smelled, etc. Try to avoid making conclusions, unless preface the statement by saying that this is your conclusion.

Be exact. For example: If you saw someone loading bags marked "toxic chemicals," do not write that you saw a person loading toxic chemicals. You saw someone loading bags marked "toxic chemicals." You don’t know what was actually in the bags without some additional evidence.

Avoid exaggerations and superlatives.

Inspection reports must be entirely objective, unbiased, and unemotional.
Be As Accurate As Possible

- Check every detail
- Conduct peer review of draft report
- Compare with notes or checklists

Some inspection programs require that every inspection report go through a “peer review” process before the report is finalized to ensure the highest quality reports.

And always, as you are writing report and later as you are proofing the report, compare it with your notes and checklists to ensure the two say the same thing. If there are discrepancies, what should you do? Note why the discrepancies exist “I noted that the substance was PCB contaminated oil, but subsequent analysis showed that the oil was not contaminated with PCB.”

*Be Complete*: Completeness implies that all the known facts and details are reported, either in the text of the report or in an exhibit (possibly appended), so that no further explanation is needed. The report should answer the questions who, what, how, when, where, and why about the compliance situation.

In your manual, there is a guide to good reports. It is presented as a checklist to use to rate your reports and ensure that the key elements are included. I hope you find it useful in evaluating your work and the work of your peers.