### Note Taking and Report Writing

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#### DISCLAIMER

- •Presenter's degree is in Biology
- •Writing styles are different
- •Understand your target audience
- •Can't control yawning, snoring, or sleeping



•Who: Should take notes? > Everyone

•Where: Should notes be taken? >More complex CESQGs, SQGs, LQGs, definitely permitted facilities

•When: Should notes be taken?

>Anytime, if it helps

>Especially if you suspect a criminal case

- •Why: Should notes be taken?
  - Give the next inspector a better understanding of the facility
  - >Reminders to self
  - >Document, document, document
- •What: Do you take notes about?.....

- What to take notes about:
  - Names of participants



- Specific storage locations, release locations, types of releases, quantities of wastes in storage/generated monthly, types of wastes
- The process
- -Questions to ask at the end of inspection
- Strange goings on



Be brief and concise



- Could be part of public records
- Don't editorialize or doodle
  - This guy is a stupid @#!\$?.
  - The facility was a pig sty.
- Get everyone's name who is participating in the inspection (you might need to chat with them later)

- Try to ask certain inspection questions in the same order every time
- Come up with symbols that you understand



- "\*" = violation
- MSDS = request MSDS

Manager, HW, non-HW

– "?" = something did not make sense –(15) 55-gallon drums or use slash marks – Write in shorthand  $H_2O$ , NaOH, EHS

### **Report Writing**

#### Why are inspection reports important?

- Inspection reports inform owners and operators of potential Areas of Concern or violations and how to correct them.
- They remind you and new inspectors of what to look for
- Aid in calculation of penalty
- Aid in preparation of legal documents such as COs, NOVs, Case Reports, etc.
- Serve to refresh your memory for a hearing or trial
- For use as evidence at a hearing or trial
  - o It is the Department's burden to prove a violation occurred

#### **Inspection Reports**

#### Who will read or use the inspection report?

- Owner/operator/responsible party
- Other Department staff (other sections, districts, successor inspectors)
- Office of General Counsel (OGC)
- Attorneys representing the owner/operator, responsible party, or interested parties (neighbors, competitors)
- Hearing Officer, Judge, Jury
- The public

### **Inspection Report-SWIFT**

- Attachments
  - Pictures
  - Description: Figure 1: bla, bla bla
- Introduction:
  - Inspection date
  - Participants names, titles
  - Drinking water supply: private well, city system?
  - Domestic waste system: sewer or septic?
  - Number of employees
  - Operating times
  - Inspection History

### Inspection Report-SWIFT

- Process Description:
  - Type of business
  - Follow the process beginning to end
  - Describe each step in the process
- Narrative (under Process Description)
  - Include wastes generated
  - Include violations observed and cite them [40 CFR 262.11]
  - Odd ball stuff, releases, locations of stuff Bldg A, other program issues

NOTE: Mr. Bean sent an email with corrective action on June 1, 2013.

### **Inspection Report**

- Narrative Dos:
  - Plagiarize good previous inspection reports
  - Define acronyms prior to using Florida
     Department of Environmental Protection (FDEP)
  - Organize report to flow
  - Use Plain language
  - Document specific information,
    - Who stated?
    - Number of drums
    - Dates

#### **Inspection Report**

- Narrative Don'ts:
  - Fib or stretch the truth, Just the facts Jack
  - Be bias
  - Editorialize
  - Document specific information,
    - Who stated?
    - Number of drums not a "few"
    - Dates
    - Labeling?
    - Secondary containment?

### **Inspection Report-SWIFT**

- Records Review (under Process Description)
  - Review manifests, weekly inspections, contingency plan, notification of local authorities, etc.
  - ✓ Include transporter and TSDF information and EPA Id #
  - ✓ Include violations observed and cite them [40 CFR 262.20]

#### Conclusion

- ✓ Contacts made since inspection
- ✓ Inspection status at time of inspection
- ✓ Verbal exit interview
- ✓ Compliance status at the time of the issuance of report

### **Inspection Report-SWIFT**

- Potential Violations
  - State the rule
  - Specifically describe the facility's violation as it relates to the rule
  - Request a corrective action in a specific number of days with documentation

### **Reporting Technical Information**

•<u>*Reporting:*</u> providing an account or description of what we learn by experience, observation, or investigation.

•*Technical*: peculiar to or characteristic of a particular art, science, discipline, or profession.

•*Information*: a body of knowledge gained from experience, observation, or investigation.



### Our Objectives as Technical Writers

- Clear & meaningful presentation to intended audience
- Get the point across with less words
- Honest, objective, brief, clear, & consistent
- Never editorialize!
  - Overall the facility seemed in good shape.
- Be specific when possible
- Try not to use first person
  - I spoke to the manager. vs. The inspector spoke to Mr. Smith.
  - We are requesting the sample results. vs. The Department is requesting the results of the soil sampling conducted on March 5, 2008.

#### 

- •Use where two complete thoughts are separated by *but*, *or, yet, so, for, and, nor* 
  - -The pumps and piping were in good repair, *and* chemical feeders were operating properly.
- •Use to set off introductory clause
  - -Before the inspector made her first visit, she thoroughly reviewed the files.
- Use where three or more items are listed in series

  The outfall structure for the wet detention pond was equipped with a rectangular weir, bleeder orifice, and skimmer.

  Use to set off dates

  Sunday, December 7, 1941

THE COMMA

#### **Punctuation:** Semicolons;;;;;;

•Use when a conjunction *(but, or, yet, for, and, nor)* is omitted between two complete thoughts

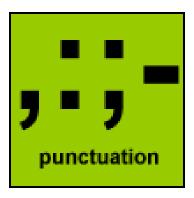
- •The permit will expire within 61 days; you must submit the renewal application tomorrow.
- •When two complete thoughts are linked by *however*, *therefore, accordingly, consequently, moreover* 
  - •The Department did not receive the application within 60 days of permit expiration; therefore, operations must cease on December 31, 2005.



#### **Punctuation:** Colons:::::::

# Use after an independent clause preceding a list or quotation

"The site was in violation of Rule 62~701.300(1)(a) F.A.C., which states: 'No person shall store, process, or dispose of solid waste except at a permitted solid waste management facility...'"



#### **Punctuation:** Apostrophes''''''''

- •Use to show possession •The inspector's report
- •For words not ending in *s*, use *'s*



- •A woman's blouse could be made of the same material.
- •For any word ending in *s*, use *s*'
  - •New Orleans' Jazz
- •Exceptions
  - •Singular word ending in *s* that, when plural, forms an extra
    - syllable for pronunciation
      - •This is my boss's day off.
  - •Form contractions, show omission of letters/numbers
    - •Can't, won't, shouldn't, couldn't wouldn't, haven't
    - •The big freeze of '89

#### **Punctuation:** Quotation Marks."""""

- Use to indicate exact words of a text or speaker
   The Secretary said, "All employees must attend People First training."
- •Use when words are introduced by *labeled, marked, signed, entitled* 
  - -All drums of hazardous waste must be labeled "Hazardous Waste."
- •Periods, exclamation points and question marks go inside quotes (Some rare exceptions)
  - -"What did he just say?"
- •Colons and semicolons go outside quotes
  - -"Do good work!": Gus Grissom



#### **Punctuation:** Hyphens-----

•Use in specifying container sizes

- •The 55-gallon drum.....
- •The 2000-gallon above ground storage tank
- •Combine two words to form compound adjective
  - •Large-tired vehicle
- •Do not use when better written as one word
  - •Freshwater fish
  - •Groundwater hydrology



**Punctuation:** Periods, Question Mark<u>s</u>, Exclamation Points

- Period (.) Closes declarative sentence; used in abbreviations (
  - Ms., Dr., Ph.D., etc.
- Question Mark (?) Closes a direct question
- Exclamation Points(!) Indicate loud noises, apology, endearment, astonishment...
   Do not use them in technical writing!



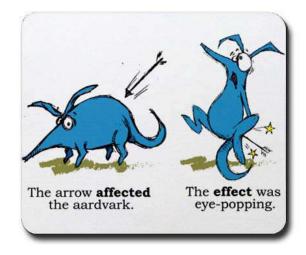
#### Affect/Effect

- Affect (verb) = Influence or change *Hiring an experienced inspector will positively affect our efficiency.*
- Effect (noun) = impression, results

*Hiring an experienced inspector had a positive effect on our efficiency.* 

• Effect (verb) = to cause

*The reorganization effected a change in our efficiency.* 



#### Because/Since

• Because: Refers to a reason

- Provide the second seco
- *"We had to delay reviewing permit application because Hurricane Charley disrupted our office routine."*
- Since: Refers to time
- *"We have had to delay reviewing permit applications since Hurricane Charley passed over Orlando,FL."*



#### It's/Its

- It's: contraction of it is *"It's a small world."* IT'S = IT IS
- Its: possessive pronoun *"Return your vehicle to its assigned spot."*

#### Nor

Often misused for or after negative expressions

- <u>Incorrect</u>: "The manager could not locate the drums *nor* the manifests."
- "The manager could not locate the drums or the manifests."
- "The manager could locate *neither* the drums *nor* the manifests."
- "The manager could not locate the drums, *nor* could he locate the manifests."



#### Contaminate/Contaminant

• Contaminate: *(verb);* to pollute



• Contaminant: (noun); polluting substance





#### Redundancy

- "PIN number" = Personal Identification Number *Number*
- "ATM machine" = Automated Teller Machine *Machine*
- "MSDS sheets" = Material Safety Data Sheets *Sheets*
- RPM per minute" = Revolutions per minute *per minute*



#### **Other Examples of Misuse:**

- Avoid repeating same word in same sentence
  - A *separate* penalty for each of the 21 *separate* violations could have been assessed.
- Avoid flowery language
  - The perfectly beautiful intact 250-gallon tote was transported by the recently properly trained young handsome driver.



#### Common Latin Abbreviations

• e.g.

- Exempli gratia; means for example

- etc.
  - Et cetera; "others of the same kind"
  - "and so forth"
- i.e.
  - Id est; "that is" or "that is to say"
  - Often misused for e.g.



#### Numbers: Figures or Words?

#### Basic rule

- One through ten: expressed as words
- 11 or more: expressed as figures
- Use figures for exact amounts, e.g., 3.2 mg/L

Special considerations (express as words)

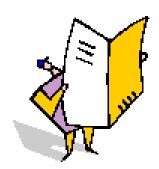
-Exact amount begins sentence

-"Thirty companies..."

- -"Inspectors found twelve 55-gallon drums."
- -Approximations
  - -"About a thousand attended."
- -Dates/times
- -"We started at 9:30 a.m. on June 1."
- -Dimensions and weights
- -"The room is 15 x 20 feet."







- Draft thoughts quickly; fix later
- Read text aloud or have someone read to you
- Peer review
- Don't rely on spell check (nothing in SWIFT)
- Don't fear editing & constructive criticism



<u>References :</u>

*The Elements of Style-*Strunk and White *The New Well-Tempered Sentence-*Karen Elizabeth Gordon *The Deluxe Transitive Vampire-*Karen Elizabeth Gordon

Special Thanks to: Christine Kirkpatrick, James Bradner Northeast District-FDEP







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