Note Taking and Report Writing

Janine Kraemer, CHMM

Central District

Florida Department of Environmental Protection



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?
 - Five 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
 - "?" = something did not make sense
 - -(15) 55-gallon drums or use slash marks
 - Write in shorthand H₂O, NaOH, EHS
 Manager, HW, non-HW

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
 - 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.
- <u>Technical</u>: 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.

Punctuation: Commas,,,,,,,,,,

- •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

Punctuation: Semicolons;;;;;

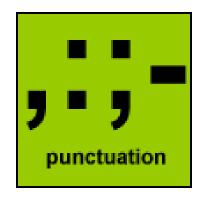
- •Use when a conjunction (but, or, yet, for, and, nor) is omitted between two complete thoughts
 - •The permit will expire within 61 days; you must submit the renewal application tomorrow.
- •When two complete thoughts are linked by *however*, *therefore*, *accordingly*, *consequently*, *moreover*
 - •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 Marks, 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!



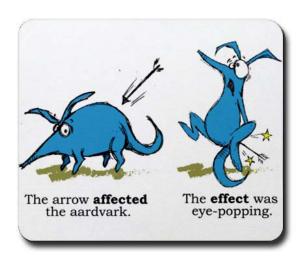
Affect/Effect

- 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

"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

- Incorrect: "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



Other Examples of Misuse:

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."



Helpful Tips

- The state of the s
- 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



References:

The Elements of Style-Strunk and White
The New Well-Tempered SentenceKaren Elizabeth Gordon
The Deluxe Transitive VampireKaren Elizabeth Gordon

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

Questions?

Janine Kraemer, CHMM

<u>Janine.Kraemer@dep.state.fl.us</u>

407-897-4303