

## INSPECTION PHOTOGRAPHS

Photographs may be taken to document a noncompliant item(s) and/or facility conditions.

Digital photos are the photographs of choice.

Film photographs should only be taken when it is impossible to take digital photos, such as:

- the digital camera is broken, or
- batteries are dead

Photographs should be taken of:

- direct noncompliant items (NCIs)
- repeat NCIs
- NCIs which may result in an enforcement action or case
- NCIs which are additional information for an ongoing investigation or case
- transportation violations

**NOTE:** In all of the above situations, take photos of **all** noncompliant items identified on that inspection.

You may choose to take photographs of:

- indirect NCIs if:
  - ▶ there are a number of NCIs
  - ▶ the NCIs may become repeats
- NCIs to help you write the inspection report narrative
- NCIs to support your inspection report narrative
- items requiring further interpretation
- an NCI for clarification for the registrant. For example, to show the registrant at the exit interview, if he/she was not the person accompanying you on the facility inspection.
- items in compliance for future reference

You (the inspector) should use your discretion and professional judgment in deciding when to take photographs and take photographs whenever you feel it is necessary.

If the registrant or representative refuses to allow you to take photos of noncompliances, cite under 2.38(b)(v).

For records violations, where applicable make photocopies of the records rather than photographs.

Submit photographs to the Regional Office:

- with every applicable REPEAT violation
- with the request for an enforcement action or investigation
- as additional information for ongoing investigations or cases
- for further interpretation

NOTE: Photographs taken for clarification for the registrant or reference purposes do not have to be sent to the Regional Office. You should hold these photographs for as long as necessary.

When submitting photos:

- use a separate CD for each registrant/licensee's photos
  - submit two sets of photos, one labeled and one unlabeled
- Note: These may be submitted on the same CD.

When submitting photos for an enforcement action or investigation:

- submit digital photos on a CD (do not print pictures)  
Note: Use a separate disk for each registrant/licensee's photos.
- submit film photographs on paper
- photos should be 4"x 6" in size
- submit 2 sets of photos: one set labeled and one set unlabeled
- each labeled photo should contain: (see pages 6.5.7 & 6.5.8):
  - ▶ inspector's name
  - ▶ date and time photo was taken
  - ▶ licensee or research facility name
  - ▶ license/registration number, if applicable
  - ▶ CFR section violated
  - ▶ very brief description of the violation including location within the facility
  - ▶ include the waybill number on transportation violations
- all photos related to the inspection and/or investigation should be submitted, even if some of the photos are of poor quality or are irrelevant. NOTE: IES will determine which pictures will be used as supporting evidence.

**Processing  
photographs**

*Digital Photographs*

Digital photographs should be handled as follows:

- transfer all digital photos to your laptop computer (Do NOT delete any photos)  
NOTE: The memory card with the original photographs should be kept by you as it may be needed for an investigation or case.
- size the photographs to approximately 4" x 6". Note: The picture itself should be approximately 4" x 6". Increase the canvas size to add labeling (see page 6.5.5) - do not decrease the picture size.
- label the photographs  
NOTE: There are many ways to do this. A sample procedure is on pages 6.5.5 - 6.5.6.
- include the waybill number on transportation-related pictures, if applicable
- save the photographs on a CD  
Note: Use a separate CD for each registrant/licensee.
- when applicable, send the disk or CD to the Regional Office  
Note: Digital photographs should be sent to the Regional Office by e-mail only when:
  - ▶ requested by the SACS or Regional Office
  - ▶ for informational purposes

*Photographs from Film*

Photographs from film should be handled as follows:

- prints should be 4" x 6"
- label the back of the photographs using:
  - ▶ pre-printed label (see page 6.5.8), or
  - ▶ computer template label
- include the waybill number on transportation-related pictures, if applicable
- attach the label upside down in relation to the picture

Remember to submit two sets of photograph: one set labeled and one set unlabeled.

Retain negatives, as they may be requested by for an investigation

or case.

Hold photographs, negatives and copies of the photographs which were not sent to the Regional Office, until requested or needed, or files are purged.

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## INSTRUCTIONS FOR LABELING AND PROCESSING DIGITAL PHOTOGRAPHS USING ADOBE PHOTODELUXE

RETRIEVE THE PHOTOGRAPH FROM THE CAMERA OR THE COMPUTER FILE  
WHERE IT IS STORED.

### SIZE

The picture should be sized to approximately 4 x 6 inches

1. Click on **Advanced** on the left side tool bar
2. Click on **Size** tab
3. Click on **Photo Size**
4. Change the size of the picture to approximately 4 x 6 inches, if necessary
5. Click on **Canvas Size**
6. Increase the height by 1 inch
7. Click on **OK** - There should now be white space around the photo
8. Place your cursor in the middle of the photo
9. Single left click, hold, and drag the photo to the top of the frame
10. A box will appear around your photograph - place your cursor outside of the photo and single left click to remove the box and complete the sizing process

### TEXT

1. Click on the "T" on the toolbar at the top of the picture - a Text Tool window will open
2. Change the font size to 12
3. Type your text in the text box, including:
  - ▶ licensee, registrant or facility name
  - ▶ license/registration number, if applicable
  - ▶ CFR section violated, if applicable
  - ▶ a very brief description of the non-compliant item, photo subject, or item you want to point out
  - ▶ photographer's name
  - ▶ date and time photo was taken

NOTE: Proof read the text carefully for content and spelling.

4. Click on **OK**. The text should appear in a box in the middle of the picture.
5. Move the cursor into the box
6. When the cursor changes to a **single-headed** black arrow - single left click, hold, and drag the text box into the white area below the picture
7. Click and drag the text box lines to fit under the picture
8. Place your cursor outside of the photo and single left click to remove the box and complete the labeling process

NOTE: If you notice an error in your text after placing it in the picture:

- single left click in the text area - a box should appear around the text
- single right click in the box
- select "Cut" from the drop-down menu
- start at Step #1

#### SAVING YOUR PICTURE

Photographs should be saved in the JPEG format

1. Click on File
2. Click on Save As
3. Click on JPEG File
4. In the "Save in:" window, using the drop down menu, select where you want to save the picture (disk or CD)
5. In the "File name" window, type in the name you want to give the photo
6. Click on Save
7. A prompt will appear asking if you want to continue converting to JPEG format or want JPEG conversion to begin - click on OK
8. After the conversion has been completed, close the photo by clicking on the "X" at the top right hand corner of the photo

NOTE: You may be prompted to save the photo multiple times, you should click on NO. This is very important - only save the photo once.

#### SENDING PICTURES BY E-MAIL

1. Go to LotusNotes
2. Send the picture(s) as you would any other attachment to an E-mail letter or memo

#### PRINTING YOUR PICTURE

1. Click on **Send & Save** on the left side tool bar
2. Click on **To Printer**
3. Click on **Print**
4. Click on **OK**

### PHOTOGRAPH LABEL - Computer Generated

<b>SUBJECT NAME:</b>	
<b>LICENSE/REGISTRATION #:</b>	
<b>9 CFR SECTION #:</b>	
<b>DESCRIPTION:</b>	
<b>DATE:</b>	
<b>TIME:</b>	
<b>PHOTOGRAPHER:</b>	

## PHOTOGRAPH LABEL - Non-Computer Generated

SUBJECT NAME \_\_\_\_\_  
LIC/REG/CASE NO. \_\_\_\_\_  
SECTION NO. \_\_\_\_\_ TIME \_\_\_\_\_  
DESCRIPTION OF PHOTOGRAPH

PHOTOGRAPHER:      DATE: