FORERUNNER

A Guide to Managing SWPPP Compliance Across Multiple Project Sites

How multi-site construction and energy operators keep track of inspections across every active site

PRACTICAL GUIDE

USE THIS GUIDE TO

01 **Find missing inspections, late entries and open items**
Run four tests this week, then compare two or three sites to see which one needs attention first.

02 **Close the gaps with rules your team can set now**
Each fix starts with a change you can make in the systems you already run.

03 **Ask vendors what holds up in the field**
The 12 questions include what happens to your records when a subcontractor rolls off or the contract ends.



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WHY THIS MATTERS

One standard for every site's record

Across dozens or hundreds of sites, it gets hard to say what was found at each one and whether it has been fixed. A record that never made it into the system, or cannot be found when someone asks for it, often turns into a compliance finding for the agency. It can also leave the owner asking whether the contract was performed.

In the field, inspectors need to see and update the site map and the open items from the last visit, often with no signal. When that means switching between systems, or typing the inspection up at the office hours or days later, it is very likely that the record gets split up. The photos stay on someone's phone and the notes land somewhere else.

The person running the program needs to know which sites have inspections due, which corrective actions are overdue, and where the same deficiency keeps coming back, so they know where to step in. If the only way to find out is to ask each project team, it can take days to hear back from everyone, and by then a storm, a new deficiency or a fix on site may have changed the picture.

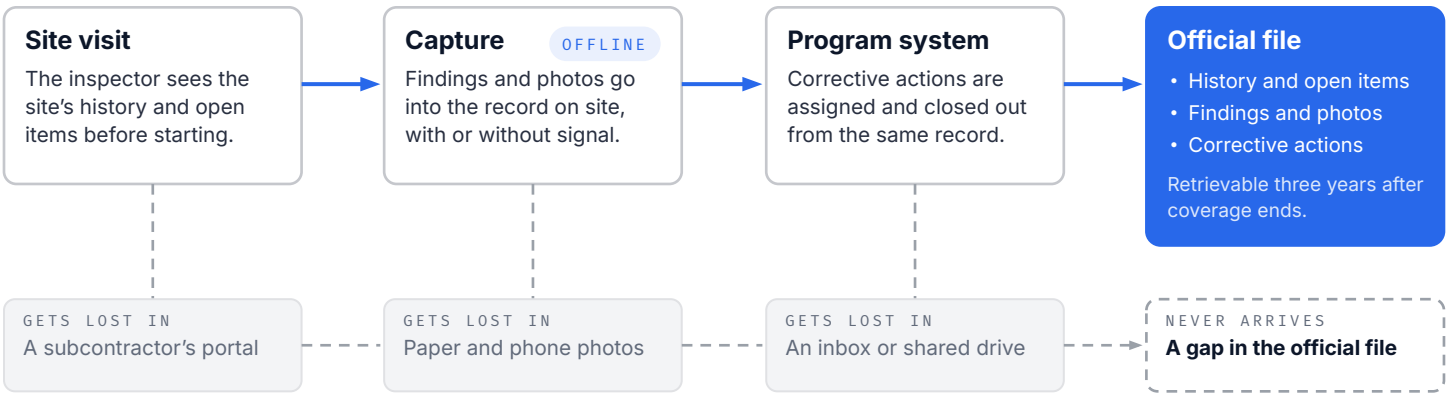
Running many sites makes this harder in three ways:

- **Different people inspect each site.** It is usually a project engineer, a superintendent or a subcontractor. Each person records the same inspection differently, so the records do not line up from site to site.
- **Each site can have different rules.** Different permits and owner contracts mean different rain triggers and correction deadlines, and applying the wrong ones leads to missed inspections or late corrections.
- **The records have to outlast the project.** Records must be kept for at least three years after coverage ends, long after the people who created those records have moved on.

Managing compliance across many sites means holding every site's record to the same standard, no matter which permit or contract the site is under.

This guide gives you a way to check how well you are tracking inspections across every active site with **four tests you can run yourself**. It also explains where multi-site programs usually fall short, describes what a complete record looks like, and gives you the questions to ask if you are evaluating a new inspection system.

THE PATH OF ONE INSPECTION RECORD



When the record holds, each step adds to the same official file. Anything that gets lost along the way never reaches it, and the gap shows up when someone asks for the record.

STEP 1 · RUN THE TESTS

The four tests, and where multi-site programs fail

These are four tests you can run this week to find out where your inspection records may be falling short. Run them on one site first, then on two or three more, and compare the results. The site with the highest number of record gaps is the one you should prioritize improving.

1. The record exists for every required inspection
2. It is tied to a verifiable place and time
3. It shows the condition, the corrective action and the closeout
4. It can be produced on demand

1 The record exists for every required inspection

WHAT PASSES

A record exists for every inspection the permit or the owner requires.

HOW TO CHECK IT THIS WEEK

1. Pick one site and one month.
2. Use the permit to figure out how many inspections the site should have had. Under the federal permit, a site is inspected either once every 7 days, or once every 14 days plus within 24 hours of any storm that drops a quarter inch of rain or more. (States that issue their own permit set their own schedule.)
3. Count the records in the system for that site and month.
4. Calculate the difference. That is the number of missed inspections.

YOUR NUMBER

Missed inspections, that site and month _____

WHERE IT USUALLY BREAKS

It breaks in the field, for one of two reasons.

1. The site had no internet service, and the inspection was not recorded or re-keyed in back at the office.
2. The inspection was done by someone else, a subcontractor or a consultant, and the record lives in a third-party system. Under Part 4.1 of EPA's Construction General Permit, the work can be delegated, but the certification and the responsibility cannot.

2 The record is tied to a verifiable place and time

WHAT PASSES

Each record shows the location on the site map, the time of the visit, and the photos from that visit.

HOW TO CHECK IT THIS WEEK

1. Pull last month's inspection forms for one region. For each one, compare the inspection date written on the form with the date it was entered into the system. Count how many forms were entered more than a day after the inspection.
2. Open five records at random and look at the photos. Count how many you cannot match to a site and a specific stormwater control, such as a silt fence or inlet protection, without asking the person who took them.

YOUR NUMBERS

Late entries _____

Photos nobody can place _____

WHERE IT USUALLY BREAKS

The first place it breaks is the delay between the visit and the data entry. If an inspection is done on Tuesday but entered on Friday, the record says Friday. The storm it was supposed to follow was three days earlier, so on paper the inspection looks late or looks like it never happened.

The second place it breaks is the photos. Photos were taken during the visit, but they are sitting in someone's phone instead of attached to the record, and a month later nobody can say which site or which control they show.

STEP 1 · RUN THE TESTS

The four tests, continued

3 The record shows the condition observed, if a corrective action is necessary, and the steps to close out

WHAT PASSES

For every deficiency, the record shows what was found, whether it needed a corrective action, who was responsible for it, and when it was closed. The record also shows that the closeout was logged on site at the time, not updated later from the office. When a finding means the SWPPP or site map has to change, the record shows who updated it and when.

HOW TO CHECK IT THIS WEEK

1. Export the open corrective actions for one large site.
2. Count how many open items name the same location and the same control as another open item, just logged on a different date. Those are **duplicates**. The deficiency was logged once, and then logged again by someone who could not see the earlier entry.
3. Set the duplicates aside and ask the site team which of the remaining open items have already been fixed. That number is your closeout lag.

YOUR NUMBERS

Duplicate open items	
Open items already fixed	

WHERE IT USUALLY BREAKS

The first place it breaks is duplicates. A silt fence fails, gets logged, fails again a week later, and gets logged again by someone who could not see the earlier entry. The record now shows two problems instead of one control that keeps failing. The second place it breaks is closeout. A crew fixes a deficiency on site, nobody marks it closed, and it stays open in the system for weeks. Both start the same way: the person in the field can see the site but not the record.

A third place it breaks is the plan itself. When an inspection finds that a control has been moved, added or removed, the site map in the SWPPP has to be updated to show it.

4 The record can be produced on demand

WHAT PASSES

One person can pull a site's complete record from one system the same day it is requested, whether the request comes from an auditor, an owner, or an agency.

HOW TO CHECK IT THIS WEEK

1. Imagine you are asked to create a report of every inspection and corrective action for the last quarter, including photos. How many places would you have to get the information from to compile that report?
   - If everything comes from one system, the site passes. If you had to pull from multiple places (for example, the system, a shared drive, and someone's phone), that count is your number for this test.

YOUR NUMBER

Places the record had to be pulled from	

WHERE IT USUALLY BREAKS

It breaks when a request comes years after the project ended. Under the 2022 Construction General Permit, the SWPPP and every record it requires must be kept for at least three years after coverage ends, and the clock starts when coverage ends, not when the crew leaves. By then the superintendent may have moved to another project, the subcontractor's portal access may have expired, or the shared drive may have been archived.

TEST 3, WHEN SITES SHARE COVERAGE

This gets harder when more than one company holds permit coverage on the same site, which is common on large projects. Each one keeps its own inspection log, but the areas they cover overlap. The same silt fence can be closed in one company's log and still open in another's, and the first time anyone notices is when an auditor compares the two.

STEP 2 · FIX THE RECORD

What a complete record looks like

In a complete record, the inspection is written down on site, while it is happening, and every other system reads from that one record. That is the job of a **field intelligence layer**. It sits between the field and the GIS, EHS and project systems you already run, so nothing has to be replaced and nobody keeps a separate copy.

For the person running the program, that changes the day-to-day. Open items, overdue corrective actions and upcoming inspections across every site come from one place, without calling each team. When an auditor or an owner asks for a project's record, it comes out of one system the same day. When a subcontractor rolls off, their inspections are already in yours.

The four elements below are what it takes to get there.

1 The record is written in the field

Completing the inspection creates the record. Whoever is inspecting enters the findings and attaches the photos to the same site record, on their device, during the visit. That has to hold whether or not the site has cell service, and once the connection comes back, the record has to sync to the system automatically.

> **WHERE TO START**
>
> Set one rule: an inspection only counts once it is in the system, entered by the person who walked the site, on the day they walked it. Where that rule is not being met, ask the person why the entry waited, and find a solution. If there was no cell service, the tool has to work offline.

2 Location and time come from the device, not the person

The time and location on the record come from the inspector's device.

> **WHERE TO START**
>
> Require a photo taken during the visit for every deficiency and every closeout, and use the photo's timestamp as the record's timestamp. That dates the record to the visit instead of to whenever the paperwork got done.

Where the federal permit stands, as of September 2026.

EPA's proposed 2027 Construction General Permit would, under Part 1.4.1, have an operator filing a Notice of Intent provide the complete SWPPP, a URL where it can be viewed, or the site map plus a signed certification. Forerunner filed a public comment (docket EPA-HQ-OW-2025-0760). A SWPPP changes throughout a project, so we asked EPA to require that submitted material show its last-revised date, that a submitted URL resolve to the current plan and stay live for the retention period, and that operators under a group SWPPP be able to reference one shared submission. The direction is the one this guide describes: documentation that can be produced on demand and is current when it is.

3 The form carries the requirement, and every open item has an owner and a deadline

The person inspecting has to be a qualified person under the permit, but should not have to rely on memory to cover every requirement. The form should walk them through what that site's permit requires. It can be set up with the rain total that triggers an inspection in that state, the deadline for correcting a deficiency, and what each control looks like when it is working. It also shows what the last visit found and which items are still open, so nothing gets logged twice.

When your system is set up this way, it can also tell people what is due before it is late. When a storm meets the rain trigger, the team responsible for that site gets notice that an inspection is due.

> **WHERE TO START**
>
> Set up your inspection form so it reflects each site's permit, including its rain trigger, its correction deadline and anything the owner's contract adds. Put one person in charge of keeping it current, and give every corrective action an owner and a due date when it is logged.

4 The full record is in the company's system before the project ends

A project's inspection record has to be complete, and in a system the company owns, before the project ends. If part of it lives somewhere else, such as a subcontractor's portal or a folder on the project's shared drive, that part can be lost when the subcontractor rolls off or the project changes hands.

> **WHERE TO START**
>
> Pick one system as the company's record for every inspection on every project, and make it the only place an inspection counts.

STEP 3 · EVALUATE A SYSTEM

What to look for if you are looking at adopting a new system

Most inspection systems fall into one of three types:

A forms product that works alongside your GIS, with the map in one app and the inspection in another

An enterprise EHS suite that tracks obligations and due dates, and records an inspection after someone enters it

A field intelligence layer that captures the inspection on the device and writes it to the GIS, EHS, and project systems you already have

Whichever type you are looking at, these are the questions to ask in the demo.

01 Does it work for every role that touches the record?

The project engineer or superintendent doing the inspection, the specialist reviewing it, the program lead who needs to see every site at once, and the subcontractor or owner who should only see their own scope all need to work in the same system, each seeing what their role needs. Ask to see one record from each role's view in the demo.

02 Can it be set up for each project's permit, and where does the rain data come from?

Ask how the rain trigger, the correction deadline, and the questions that differ by state or by owner get into the form, who maintains them when a permit changes, and how long that takes. Then ask which weather station feeds the rain trigger, and whether it can be the one your contract names.

03 When an inspection shows the site has changed, how does the SWPPP keep up?

Ask how a finding that means the site map or SWPPP has to change gets flagged, who it is assigned to, and how you would see which projects have updates outstanding. Then ask how the crew knows they are working from the current version.

04 How can I tell the inspection actually happened?

A signature only tells you someone signed. Proof is a record that captured the device's own location and time, with photos attached. Ask how the record gets created in the field: can the inspector finish it on site with no signal, and does it reach the system without anyone retyping it?

05 Does the crew see what is already open at that site?

Before they start, the crew should see the last visit's findings and the open action items, marked on the site map.

06 Can I see every open action item across every project, by priority and days overdue?

The answer should be yes, without calling each site to ask. Ask who gets notified when an action item passes its deadline, and whether that happens automatically or in a report.

07 Where does the record live, and does everything else read from it?

Ask where an inspection is stored once it is captured, and whether the GIS and the project system read from that record or keep their own copies.

08 When a subcontractor or an owner's inspector does the inspection, where does their work end up?

If they work in their own system, ask how their inspections, closeouts, and sign-offs get into your record, and how you would know when they do not. If they work in yours, ask how their access is limited to their project and role, and what happens to what they created when that access ends. Either way, it has to end up in your record.

09 When an auditor asks, what do I hand over, and will they trust it?

Ask what reports come standard: one project's full record for a date range, photos included, signed by the person who did the inspection, and the same record cut for the agency, the owner, and the project manager. Then ask what the record keeps about its own history: who created it, who changed what and when, and whether an earlier version can be produced. A record that can be edited without a trace is one an auditor will not rely on.

10 Is the AI safe to use on a compliance record, and what does it do with our data?

Ask which model it runs on, whether it trains on your records, where the data goes, and whether it can be turned off. Then ask how it behaves on the record itself: does it show where a suggestion came from, and does a person confirm it before it becomes part of the record. Your IT and legal teams will ask these questions, so ask them first.

11 How do we roll it out without replacing what we have?

Nobody switches a live site mid-permit. Ask whether it runs on top of the GIS, EHS, and project systems you already have, and which of those integrations exist today versus which would be built for you. Then ask whether new projects can start on it while running projects finish where they are, how long a project takes to set up, and who on the vendor's side does that work.

12 Whose data is it, how long is it kept, and what comes back when the contract ends?

The permit's retention period outlasts most software contracts. Ask this of every vendor, including us: does the contract say the record is yours, how long is it kept and can that match your permit, how do you export a closed project in full, how long after the contract ends can you still get it, and can you read it without the tool.

NEXT STEP

Run the four tests on one site this week

Most programs are in better shape than they look. Run the four tests on one site this week. They will show you what to work on first, and whether the tools you already have can fix it. If they cannot, bring the questions on page 5 to the vendors you are evaluating.

WORKSHEET

Find the site to fix first

MONTH

Doing the inspection is usually the easy part. The cost shows up later: an inspection that has to be redone because the first record did not hold up, rework on a corrective action that was never closed, or staff pulling documentation together by hand. The six numbers you just wrote down are a good place to start sizing that cost at your own sites. Fill in the table for two or three sites and compare them.

THE NUMBER, BY TEST	SITE A	SITE B	SITE C
1 Missed inspections			
2 Late entries			
2 Photos nobody can place			
3 Duplicate open items			
3 Open items already fixed			
4 Places the record had to be pulled from			
Total record gaps			

SITE TO PRIORITIZE FIRST

NOTES

FORERUNNER

ABOUT FORERUNNER

Forerunner is a field intelligence layer for multi-site operators.

It works with the GIS, EHS, and project systems you already have, and maintains one complete record for every site.

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01 Each inspection is connected to its site on the mobile app, with location, time and photos, with or without cell service.

02 The inspector sees previous inspections and open items before the visit begins.

03 The permits, plans and standards that govern your sites are loaded as documents the AI Assistant treats as the authoritative source. When it helps fill a record, it quotes the passage it relied on, and nothing it suggests takes effect until a person accepts it.

04 The record is written back to the GIS, EHS and project systems, so nobody enters it twice.

05 Automations can turn a deficiency into a task with an owner and a due date, and the owner gets an email when it is assigned.

More than 200 government agencies run their programs on Forerunner.

Book a demo at

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SOURCES

EPA, 2022 Construction General Permit, Appendix A (definition of “operator”), Part 4.1 (persons responsible for inspections; qualified person), Part 4.2 (inspection frequency and the 0.25-inch storm trigger), Part 4.6.4 (updating the SWPPP site map after an inspection), Appendix I, Part I.11 (signatory requirements), and Appendix G, Part G.15 (records retention). · EPA, Construction General Permit Frequent Questions (third-party inspections; multiple operators). · EPA, proposed 2027 Construction General Permit, Part 1.4.1, Federal Register, August 3, 2026; docket EPA-HQ-OW-2025-0760. · Forerunner, public comment EPA-HQ-OW-2025-0760-0025. · Airports Council International – North America, comment letter to EPA on the proposed Multi-Sector General Permit, docket EPA-HQ-OW-2024-0481-0260, May 19, 2025.