

City of Seagoville, Texas
TA Needs Assessment and Workplan

Purpose

This Needs Assessment and Community Workplan documents lead service line replacement (LSLR) planning and capacity development activities for the City of Seagoville. These activities are intended to advance the community’s compliance with requirements of both Lead and Copper Rule Revisions (LCRR) and Lead and Copper Rule Improvements (LCRI) to submit and maintain service line inventories (notify customers who have or could have lead service lines, and ultimately work toward the goal of replacing 100 percent of lead service lines (LSLs) throughout the City of Seagoville’s service area.

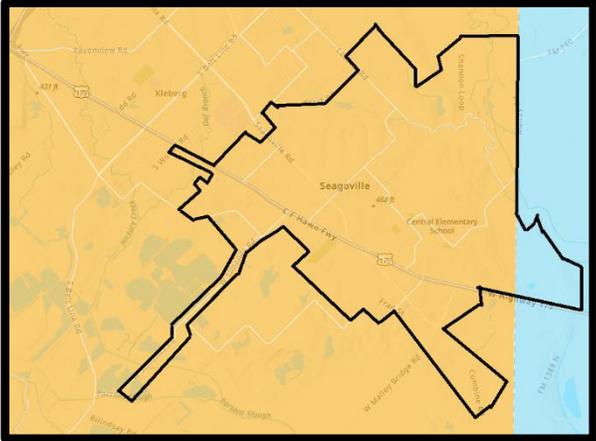
A summary of the LSLR-related infrastructure and capacity development needs is provided below, followed by a draft plan for addressing those needs. To gain the greatest benefits from this process, the City of Seagoville will support and encourage designated staff to work alongside EPA in this collaborative initiative. EPA and its technical assistance providers will regularly work with City of Seagoville designated staff via in-person, email, phone, and/or virtual meetings.

Community and System Summary

Community Characteristics

Community Name	City of Seagoville
Location	City of Seagoville, Dallas and Kaufman Counties, Texas
State Definition of Disadvantaged Community	<p>Disadvantaged Community is defined as: The annual median household income (AMHI) of the entity’s area must be less than or equal to 75% of the State’s AMHI and the Household Cost Factor that considers income, unemployment rates, and population trends must be greater than or equal to 1 percent if only water or sewer service is provided.</p> <p>State of Texas Intended Use Plan</p>
Does community meet state definition of disadvantaged community?	<p>No, the annual median household income for Seagoville is not equal to or less than the state’s AMHI.</p> <p>Census Bureau Quick Facts:</p> <ul style="list-style-type: none"> • Population: 18,446 • Median Household Income (MHI): \$65,300 • Employment Rate: 50.9% • Poverty Rate: 14.1% • Supplemental Security Income: 781 • Total Households: 5,185 • Total Housing Units: 5,353 • English: 55.4% • Spanish: 42.9% • Other: 1.7% • Total Non-English: 44.6%

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	<ul style="list-style-type: none"> • Hispanic or Latino Population: 8,769 • Children under the age of 6: 1,617 • Houses built pre-1990: 2,522 • Households with Bachelor’s Degree or Higher: 12.2% • Households without Health Care Coverage: 27.9%
<p>Does the community meet other disadvantaged or under-resourced criteria?</p>	<p>Yes, the City of Seagoville meets other disadvantaged or under-resourced criteria because it contains census tracts which meet one burden threshold and the associated socioeconomic threshold (Climate and Economic Just Screen Tool [CEJST])</p>  <p><i>Note: The orange shading indicates ‘disadvantaged’ communities and the blue-green shading indicates ‘not disadvantaged’ communities. The black outline denotes the water service area boundary.</i></p> <p>Indicators of disadvantages status from CEJST:</p> <ul style="list-style-type: none"> • Climate change: expected agriculture loss rate and projected wildfire risk • Workforce development: high school education, low income
<p>How was the community selected?</p>	<p>The City of Seagoville was referred for participation in the GLO Initiative by a potholing contractor (Putt Bros), who previously worked with the City of Seagoville. The utility contacted the Project Manager expressing interest in participating. Upon further discussion with EPA, it was determined the utility was a good fit for the GLO Initiative as Seagoville serves disadvantaged communities.</p>

System Information

<p>System Name</p>	<p>City of Seagoville</p>
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PWSID	TX0570016
System Type	Community Water System (CWS)
Utility Representative	Chris Ryan Water Utilities Director City of Seagoville cryan@seagoville.us 682-888-2440
Population Served by The Utility	17,800 (SDWIS) 19,643 (US Census Bureau – 2023)
Current Governance Type	Public Ownership
Primacy Agency Contact	TCEQ Lead and Copper Rule Office Lcrr@tceq.texas.gov
EPA Regional Coordinators	Eric Anderson EPA Region 6 Coordinator anderson.eric@epa.gov 214-665-3177
Technical Assistance Project Manager	Emily Dougan Project Manager GDIT emily.dougan@gdit.com 318-833-5820
Number of Service Connections	7,148
For CWS only, do multi-family residences comprise at least 20% of the structures you serve?	No.
Treatment System	Seagoville purchases water from the City of Dallas, which is treated at the Central and Southside Water Treatment plants.
LCR Compliance Status	No LCR compliance violations or action level exceedances for lead in the last 5 years.

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Link to State-Specific Inventory Requirements or Template	GEC Portal
Service line inventory started or completed?	<input checked="" type="checkbox"/> Not Started <input type="checkbox"/> Started <input type="checkbox"/> Completed
Summary of Service Line Material by Count (as of October 2024)	<p>At the time of the kick-off meeting on October 24th, the City of Seagoville had not begun their service line inventory or submitted an inventory draft to TCEQ.</p> <p>Public/utility side, number of service lines that are:</p> <ul style="list-style-type: none"> • Lead: unknown • Galvanized Requiring Replacement (GRR): unknown • Non-Lead: unknown • Unknown: 7,148 <p>Private/customer side, number of service lines that are:</p> <ul style="list-style-type: none"> • Lead: unknown • GRR: unknown • Non-Lead: unknown • Unknown: 7,148

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Task 1. Service Line Inventory

Provide technical assistance to help the City of Seagoville develop its service line inventory.

Short description of past inventory efforts:

As of the kick-off meeting date (October 24th, 2024), the City of Seagoville, Texas had not begun work on populating their service line inventory. The GLO Initiative team recommended that Seagoville submit the inventory as soon as possible, listing all lines as unknown, to ensure regulatory compliance. The GLO Initiative would then provide assistance with identifying the service line material.

Several years ago, Seagoville completed a meter replacement program in which photos were taken of the service lines. The city stated that these photos could be used for visually identifying service lines. They also have a work order system where service line material is documented when utility staff perform routine maintenance tasks. The work order system also has records of material types used when installing new service lines. Seagoville expressed interest in reviewing county tax appraisal data to determine the age of homes and to rule out homes built after the 1989 Texas Lead Ban date as having lead on the private side. Seagoville has not previously used water sampling as a means of identifying service line material as their compliance testing has not returned action level exceedances.

Visual inspection by the customer or a water utility staff member is not possible as water lines do not feed into basements or crawl spaces. Thus, the primary method of visual inspection in Seagoville is excavation and potholing. Potholing is not paused in the winter months due to the low probability of frost conditions that would make excavation work difficult. Seagoville owns a hydrovac truck that can be used for potholing and visual inspection of lines where the material type cannot be determined via historical records review. The city would like to prioritize the verification of childcare centers, elementary schools, senior living centers, and parts of town that were developed before 1989 with potholing and visual inspection.

The city would also like assistance with drafting customer notification letters to be sent out to customers after the inventory is submitted.

TA Needs:

Seagoville needs assistance with submitting their initial inventory (all service lines unknown) and with completing a historical records review and potholing prioritization plan. Technical assistance (TA) tasks include:

- *Training Seagoville staff on how to access, upload, and maintain data in the Texas Commission of Environmental Quality (TCEQ) SWIFT Inventory system.*
- *Assisting with historical records review (e.g., meter replacement photos, county appraisal data, and development plans) and digitizing relevant records.*

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- *Developing a prioritization plan for using the Seagoville hydrovac truck to pothole areas where materials cannot be determined through historical records review. The GLO TA team will provide onsite field coordination support during potholing, including visual identification and data collection, as needed.*

Note: On October 24th, EPA authorized the GLO TA team to provide immediate assistance with the service line inventory development.

Complete	Needed/In Progress	Not Applicable to GLO TA	Task Number	Task Name	Task Description
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1-1	Develop format for service line inventory	<ul style="list-style-type: none"> • Assist the City of Seagoville in setting up their initial inventory spreadsheet in accordance with the template provided by TCEQ and train staff on how to maintain this spreadsheet and consistently upload it to the TCEQ SWIFT Inventory system with new information.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1-2	Collect service line inventory information from historical records review	<ul style="list-style-type: none"> • Compile (digitize if necessary) all available water system records that contain service line material information and incorporate into inventory (i.e., maintenance records, development plans). • Create a database (Excel spreadsheet) for service line installation date information, relevant assessor information, construction year, and other information from the property assessor's electronic records (confirm that the paper records found at the water system have been digitized). • Identify properties with no known construction year. For those properties, identify other records that could help identify construction year (e.g., subdivision maps, photos from the meter replacement program). • Use the "building year" database to determine buildings constructed prior to Texas' lead ban (1989) and having the potential for LSLs. • Search for additional (e.g., off-site) water system records that may be owned by or stored with other entities (County Zoning Department plumbing records, previous contractors, plumbers, and water system employees, including former employees). Prioritize the search for those buildings constructed before the 1989 lead ban and how likely the record may be to improve the quality of the service line inventory.

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					Incorporate the review of any documents located into the database based upon anticipated level of confidence in the records.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1-3	Coordinate with water system staff to plan inventory process	<ul style="list-style-type: none"> • Communicate with utility staff to identify resources needed to complete the inventory. Identify where the contractor team can expand inventory and record keeping success in the short term and provide training for future needs. • Develop a timeline for initial service line inventory completion (e.g., Gantt Chart, electronic calendar). • Conduct initial individualized training, as needed, with the water system staff responsible for service line inventory development to ensure they are trained to complete the tasks they are responsible for.
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1-4	Collect service line inventory information during routine distribution system work	<ul style="list-style-type: none"> • Support is not needed for this subtask. The City of Seagoville already has service line material identification as a part of their regular maintenance work.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1-5	Develop a field verification plan	<ul style="list-style-type: none"> • Determine a potholing prioritization plan, after historical records review, prioritizing sensitive populations and areas where there are many remaining unknowns. • Provide on-site support during potholing for data collection and conducting service line material identifications. • Provide additional potholing support through a local contractor, as needed, to supplement work that can be done in-house by Seagoville. • Coordinate with a Community Engagement Plan to recommend water flushing in homes.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1-6	Implement the field	<ul style="list-style-type: none"> • Implement the potholing prioritization plan.

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				verification plan	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1-7	Submit the inventory to the water system	<ul style="list-style-type: none"> • Complete and submit the inventory spreadsheet to the water system based on the information gathered from the historical records review, routine system maintenance, field verification. The water system is responsible for submitting the inventory to TCEQ as soon as possible.

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Task 2. LSL Replacement Planning

Provide technical assistance to help the City of Seagoville develop an LSLR Plan.

Short description of past LSL replacement planning efforts:

The City of Seagoville has not identified any LSLs, and thus has not yet developed an LSLR plan. They would like assistance in developing a plan based on the outcome of the service line inventory process.

TA Needs:

Seagoville would like assistance developing an LSLR plan pending the number of LSLs or galvanized requiring replacement (GRR) lines identified during the inventory development process.

Complete	Needed/In Progress	Not Applicable to GLO TA	Task Number	Task Name	Task Description
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2-1	Establish an LSLR Policy with the water system	<ul style="list-style-type: none"> • Develop an LSLR Policy, defining procedures for what to do when encountering an LSL or GRR line during routine work or capital projects. This will be done in concert with a broader LSLR Plan. • Incorporate water system feedback prior to completion.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2-2	Develop the LSLR Plan	<ul style="list-style-type: none"> • Develop the LSLR Plan outline in concert with an LSLR policy. • Incorporate water system feedback prior to completion of the outline. • Develop an LSLR Plan that the system can use to efficiently identify and remove service lines that require replacement. Among other elements, the LSLR Plan will consider prioritization of replacements, coordination with property owners (see Task 3), coordination with state and municipal authorities, and disposal of lead pipes. The plan will be developed to include all required elements as specified in state and federal regulations (see 40 CFR § 141.84), as applicable. <ol style="list-style-type: none"> 1. Discuss details of the LSLR Plan outline. 2. Conduct discussion and/or interviews with water system staff and other stakeholders on anticipated LSL replacement planning approaches for incorporation into the plan.

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					<ol style="list-style-type: none">3. Develop the LSLR Plan for review by the water system.4. Incorporate feedback on the LSLR Plan and finalize.
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Task 3. Community Engagement

Provide technical assistance to help the City of Seagoville develop and implement a Community Engagement Plan.

Short description of relevant past community engagement efforts:

The City of Seagoville water utility has a strong relationship with the city council, who meet regularly with the public to disseminate and receive information. They hold quarterly meetings in which Seagoville staff are invited to provide updates to the community and respond to questions. City council meetings have a good turnout, and the utility has presented at these meetings in the past. The local Homeowners Associations have also shared information with residents regarding upcoming water projects.

The Seagoville Library Board is actively involved in the community and has previously collaborated with the Water Department. Seagoville communicates with residents through their water bills, Facebook, email blasts, monthly newsletters, and the City Manager's weekly report. Seagoville also has large LED sign located at Bruce Central Park which is used to share important community information.

Generally, Seagoville residents only communicate with the utility when there is a problem such as a water leak or outage. Customer feedback is logged in CivicPlus and is forwarded to the Department Director for review and response.

The utility does not currently have a Community Engagement Plan but is interested in developing one as residents may have concerns and questions given the number of unknowns in the initial service line material inventory.

TA Needs:

Seagoville would like assistance developing a Community Engagement Plan and conducting outreach to allay fears regarding the unknown status of their service lines. Possible TA tasks include:

- *Identifying events (up to 10) where the GLO Initiative can provide booth support or host presentations discussing the service line inventory process.*
- *Developing educational materials on how to reduce exposure to lead and on the service line inventory process.*
- *Creating partnerships with local leaders and organizations (e.g. HOAs, Victory Baptist Church) to disseminate information and receive feedback.*
- *Translating materials into Spanish and providing translation support at events.*
- *Developing a Community Engagement Plan.*

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Complete	Needed/In Progress	Not Applicable to GLO TA	Task Number	Task Name	Task Description
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3-1	Develop Community Engagement Plan to identify and replace service line materials	<ul style="list-style-type: none"> • Work with the water system to identify the communication methods that can be used to engage customers in service line inventory data collection on the private side. • Together with the water system, identify and confirm any language translation needs (e.g., Spanish) for community. • Together with the water system, develop a Community Engagement Plan using the system's preferred communication methods that: <ol style="list-style-type: none"> 1. Communicates the existing service line inventory status and the steps that are being taken to address public health concerns. 2. Specifies the customer outreach process to identify and report to water system the service line materials within their residence or business (e.g., door hangers, water bills, etc.). For customers that are unsure of their service line materials, include information on how to contact the water system to request an employee or contractor to come to the residence and verify the service line material. 3. Communicates the water system's LSLR Plan (existing or as completed in Task 2), including locations and timing for planned replacements, if applicable based on the outcome of the service line inventory. 4. Communicates what individual customers can expect if their service line is replaced, i.e., duration of water outage, use of filters, follow-up sampling, etc., if applicable based on the outcome of the service line inventory. • Together with the water system, prepare a schedule to implement the Community Engagement Plan.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3-2	Implement Community Engagement Plan to	<ul style="list-style-type: none"> • Support the water system's implementation of the Community Engagement Plan with prepared statements, flyers, draft letters and notices, newspaper publicity, consumer confidence reports (CCRs), and other supporting tasks as needed.

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				identify and replace service line materials	<ul style="list-style-type: none"> Support the water system's implementation of the Community Engagement Plan with event support as needed, such as with community events (e.g., May Fest and Keep Seagoville Beautiful event), quarterly City Council community meetings, HOA meetings, schools, churches, and other in-person outreach, as needed and appropriate.
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3-3	Support the PWS in accessing private property	<ul style="list-style-type: none"> Support is not needed on this subtask. Seagoville has an easement in place.

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Task 4. LSLR Funding Support

Provide technical assistance to help the City of Seagoville identify and apply for LSLR funding.

Short description of past funding efforts:

The City of Seagoville has not previously applied for Drinking Water State Revolving Funds (DWSRF) or any other LSLR funding, as they have not identified LSLs in their system. For other capital development projects such as water main and line replacements, Seagoville has used CDBG funds, though they will not be eligible in FY2026.

TA Needs:

Seagoville is interested in receiving assistance with developing an application to the DWSRF pending the outcome of their service line inventory. Dependent on the number of LSLs identified in the inventory process, they may also be interested in pursuing additional grants such as WIFIA.

Complete	Needed/In Progress	Not Applicable to GLO TA	Task Number	Task Name	Task Description
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4-1	Identify potential funding sources	<ul style="list-style-type: none"> Identify potential sources of funding for elements not covered under the GLO Initiative (e.g., LSL replacement, particularly customer side). Research applicable deadlines and requirements. Discuss the funding options with the water system. Document the desired funding approach.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4-2	Develop SRF LSLR funding application	<ul style="list-style-type: none"> Develop funding application related to service line inventory and/or LSLR. This will likely include helping the utility prepare supporting documents such as preliminary engineering reports (PERs), financial audits, etc. as required by Texas Water Development Board's State Revolving Fund (SRF) application.
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	4-3	Assist with implementation of existing LSLR funding	<ul style="list-style-type: none"> Support is not need on this subtask.

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Task 5. LSLR Construction Support

Provide technical assistance to help City of Seagoville manage construction activities related to LSLR.

Short description of past construction efforts:

The City of Seagoville has not previously conducted any LSLR work but has a strong existing relationship with Putt Brothers who do their general service line replacements and hydrant maintenance work. The city has a dedicated staff member who oversees bidding and proposal evaluation, though Seagoville has not previously done this for customer-side service line replacement projects.

TA Needs:

Seagoville would like assistance in developing templates to prepare and evaluate RFPs for customer-side service line replacements, pending the outcome of the service line inventory.

Complete	Needed/In Progress	Not Applicable to GLO TA	Task Number	Task Name	Task Description
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5-1	Prepare a request for proposal (RFP) or model contract	<ul style="list-style-type: none"> • Evaluate existing contract language and provide RFP/ Model Contract language to include high road labor practices. • Incorporate contract language and approaches that could benefit the community financially. Facilitate communication with the community attorneys. • Identify contract compliance language requirements which need to be included to receive maximum principal forgiveness from Texas Water Development Board's SRF program.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5-2	Identify and prepare construction support templates and tools	<ul style="list-style-type: none"> • Working within the limits of the GLO Initiative scope and timeline, identify construction support services to the water system that may include contractor evaluations (budget, work quality, percent complete, etc.). Scope and timing of support to be determined on initiation of construction contract. • Working closely with water system prepare any templates or tools to be used by water system to support LSLR-related construction.

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Tentative Workplan Schedule

Task Number	Task	Nov 2024	Dec 2024	Jan 2025	Feb 2025	Mar 2025	Apr 2025	May 2025	Jun 2025	Jul 2025
1-1	Develop format for service line inventory									
1-2	Collect service line inventory information from historical records review									
1-3	Coordinate with water system staff to plan inventory process									
1-5	Develop a field verification plan									
1-6	Implement the field verification plan									
1-7	Submit the inventory to the water system*									
2-1	Establish an LSLR Policy with the water system									
2-2	Develop the LSLR Plan									
3-1	Develop Community Engagement Plan to identify and replace service line materials									
3-2	Implement Community Engagement Plan to identify replace service line materials									
4-1	Identify potential funding sources									
4-2	Develop SRF LSLR funding application									
5-1	Prepare a request for proposal (RFP) or model contract									

*Initial inventory will be submitted in November 2024 (with unknowns) and later, an updated inventory will be submitted in March 2025.