

Phase 1: Conduct Lead Service Line Inventory per guidance and tools developed by USEPA. Pipe location and material type will be identified using several different tools/methodologies including review of historical data of the PWS, age of residential and commercial buildings, information from Public Works of known pipe materials at meter connections, local plumbing and construction companies with knowledge of pipe material types that have been installed as well as public outreach for self-reporting. All service lines are to be inventoried whether public or private. At this stage in the process, physical identification through excavation or pot holing will not be performed. Results of this inventory will provide identification of pipe material using the following categories:

1. POSITIVE

- a. Any portion contains Lead
- b. Contains Galvanized previously connected to Lead

2. UNKNOWN

- a. Likely contains Lead
- b. Likely does not contain Lead
- c. Material unknown

3. NEGATIVE

- a. Contains neither Lead nor Galvanized previously connected to Lead

Phase 2: Based on POSITIVE IDENTIFICATION, develop a budget for removal and replacement, identify and secure funding for completion of removal and replacement. As part of this phase, a public outreach plan will be developed and implemented to assist in the removal and replacement of positively identified lead or galvanized pipe previously connected to lead service lines on private property. Also, removal and replacement actions will be ranked by priority according to the following:

- 1. Schools
- 2. Child Care Facilities
- 3. Hospitals
- 4. Residential properties
- 5. Commercial Businesses

Phase 3: This phase will focus on refining the work performed in Phase 1 and Phase 2. After exhausting the process of reviewing historical data and performing more of a paper/cursory

review and implementing removal and replacement of the POSITIVE IDENTIFICATION list, more invasive measures will be implemented to investigate the UNKNOWN category through excavation, pot holing, active engagement of Public Works to report possible lead and/or galvanized previously connected to lead service lines as a matter of their daily operations and gathering of samples from businesses and residents. This phase will be iterative in nature and will follow the same location identification, budget development, funding, removal/replacement and public outreach process that was developed as part of Phase 2.

Phase 4: A Monitoring Plan will be developed to continue efforts to update the Lead Service Line Inventory. The plan will require continued outreach to work with the public and other agencies for those lines that remain to be determined. This plan could continue invasive efforts for identifying pipe materials. The plan will be updated per USEPA and TCEQ guidance which has not yet been published. The Monitoring Plan will include all necessary reporting and testing per published guidance.

The deadline for the first phase of this process is October 16, 2024. Currently, a framework and templates are being developed and will be disseminated for use by all PWS to aid in this inventory. The monitoring plan will be developed to include the City's drinking water system and to ensure it follows current TCEQ and EPA regulations. Since the City uses a groundwater supply for their drinking water, it is not required to be submitted to the TCEQ. The TCEQ can request reviewing of the monitoring plan for any system type. Due to updates to the current rule continuing to be published, approach and data required is subject to change.

KSA proposes the following scope and deliverables for this project:

- Compile information provided by Angleton
- On site meetings with City staff
- GIS – KSA will work with the City's existing GIS data as we develop an Action Plan and Monitoring Plan. Updating of major facilities information will be limited to by the City's existing GIS databases and models
- Deliverables:
 - o Lead Service Line Inventory
 - o Action Plan for Removal/Replacement
 - o Monitoring Plan