RESOLUTION NO. 2026 – 84

TO ADOPT THE MUNICIPAL WATER POLLUTION PREVENTION RESOLUTION

WHEREAS, the Cullman City Council has determined that it would serve a public purpose to adopt the Municipal Water Pollution Prevention Resolution;

BE IT RESOLVED, that the City of Cullman, Alabama, informs the Department of Environmental Management that the following actions were taken by the Cullman City Council:

1. Reviewed the MWPP Annual Report which is attached to this resolution.

2. Set forth the following actions and schedule necessary to maintain effluent requirements contained in the NPDES Permit, and to prevent the bypass and overflow of raw sewage within the collection system or at the treatment plant:
   (a) Continue Five-Year Planning for Wastewater.
   (b) Continue currently Planned Projects.
   (c) Continue Smoke Testing.
   (d) Continue Video Inspection.

BE IT FURTHER RESOLVED, that upon the completion of the execution of this Agreement by all Parties, that a copy of such Agreement shall be kept on file by the City Clerk.

ADOPTED BY AN UNANIMOUS VOTE of the Cullman City Council on this the 6th day of April, 2026.

_____
President of the City Council

ATTEST:

_____
City Clerk

APPROVED BY THE MAYOR this the 6th day of April, 2026.

_____
Mayor

COUNCIL AGENDA REQUEST

Date: 03/30/2026

Department: Wastewater Treatment Plant **Name:** Chris Freeman

Phone: 256-256-736-4822 **Email:** cbrown@cullmanal.gov

Type of request (select all that apply):

___ Alcohol License ___ Annexation ___ Bid Award
___ Budget Amendment ___ Change Order ___ Codification Change
___ Contract Approval ___ Petition ___ Proclamations
___ Public Comment ___ Resolution ___ Rezoning
___ Special Event ___ Tax Abatement ___ Variance
_X_ Other MWPP

Reason for Request:

Wastewater Treatment Plant MWPP Approval

Supporting Documentation:

_X_ Attach supporting documentation.

Signature: Signed by: Chris Freeman A83AE96E07E44B5...

Approval Sequence:

1. **Administration – City Clerk's Office**
   Verifies form is completed and proper documentation is attached.
   _X_ Approved to Move Forward ___ Rejected ___ Return to Requestor
   Comments:
   Signature: Signed by: Pam Leslie 6F02210223EC457... **Date:** March 31, 2026 | 8:13 AM CDT

2. **Council Committee Chairperson** - Paul Schaffer
   Ensures necessity of the request.
   _X_ Approved to Move Forward ___ Rejected ___ Return to Admin
   Comments:
   Signature: Signed by: Paul Schaffer CF207C9F2261441... **Date:** March 31, 2026 | 8:22 AM CDT

3. **Council President**
   _X_ Approved for Council Agenda ___ Rejected ___ Return to Committee
   Comments:
   Signature: Signed by: Kim Hall 373F5C72C0C944B... **Date:** March 31, 2026 | 3:32 PM CDT

4. **Administration – City Clerk's Office**
   _X_ Added to Council Agenda Date of Meeting: 04/06/2026
   Comments:
   Signature: Signed by: Wes Moon 6F02210223EC457... **Date:** 03/31/2026

MUNICIPAL WATER POLLUTION PREVENTION (MWPP)

ANNUAL REPORT

SUBMITTED BY:

TREATMENT FACILITY: City of Cullman WWTP NPDES #: AL0050423

MUNICIPALITY: Cullman COUNTY: Cullman

CONTACT PERSON: Woody Jacobs
Responsible Official
Mayor
Title
Telephone #: 256-775-7102 Fax #: 256-736-1456
Email Address: wjacobs@cullmanal.gov

CHIEF OPERATOR: Chris Freeman
Name
Telephone #: 256-775-7211 Fax #:
Email Address: cfreeman@cullmanal.gov
Date: 03/16/2026

REVIEWED BY: Erica York, P.E. (AL PE 40366)
Consulting Engineer
Telephone #: 256-775-7112 Fax #: 256-775-7132
Date: 03/16/2026

MWPP Annual Report
Information Source List

The following information will be needed to complete the compliance maintenance report that covers the calendar year of 2025 (due **May 31,** 2026).

Part 1
A. The average plant influent flow for each month (million gallons per day/MGD) during the year.
B. The average plant influent BOD (CBOD) for each month (mg/l and lb/day) in the year.
C. The plant's average design flow (MGD) and design BOD (CBOD) loading (lbs/day).

Part 2
A. The monthly average permit and DMR effluent concentration for BOD (CBOD), TSS, NH3-N, and/or TKN in mg/l for the year
B. The monthly average effluent limits and DMR loading for BOD (CBOD), TSS, NH3-N, and/or TKN in lbs/day for the year

Part 3 The age of the treatment plant defined as the number of years since the last major reconstruction to increase the organic or hydraulic capacity of the plant. The last calendar year minus the year the new construction was brought on-line.

Part 4 Bypass and overflow information. This is the number of bypass or overflow events of untreated wastewater due to heavy rain or equipment failure whether intentional or inadvertent from all collection systems tributary to the treatment facility.

Part 5
A. Describe the characteristics and quantity of sludge generated.
B. If sludge is landspread, how many months of sludge storage does the plant have? This should include on-site and off-site storage from the treatment plant. The digestor capacity may be used in the calculation.

Part 6
A. Sludge Disposal Method
B. The number of approved land disposal sites for sludge available, and how many months or years these disposal sites will these be available for use.

Part 7 The number of sewer extensions installed in the community last year, the design population, design flow, and design BOD (CBOD) for each sewer extension.

Part 8 Operator Certification

Part 9 Financial Status

Part 10 Subjective Evaluation

Part 11 Summary Sheet

State of Alabama
MWPP Annual Report
Department of Environmental Management

Instructions to the Operator-in-Charge

1. Complete all sections of the MWPP Report to the best of your ability.

2. Parts 1 through 8 contain questions for which points will be generated. These points are intended to communicate to the Department and the governing body or owner the actions necessary to prevent effluent violations. Enter the point totals from Parts 1 through 8 on Part 11: Summary Sheet.

3. Add the point totals on Part 11: Summary Sheet.

4. Submit the MWPP Report to the governing body and the consulting engineer and owner for review and approval.

5. The governing body should pass a resolution which contains the following points:

   a. The resolution should acknowledge the governing body or owner has reviewed the MWPP Report.

   b. The resolution should indicate what actions will be taken to prevent effluent violations.

   c. The resolution should provide any other information the governing body or owner deems appropriate.

6. **The MWPP Report and the resolution must be submitted by May 31st to Municipal Section, Water Division, ADEM, P.O. Box 301463, Montgomery, AL 36130-1463**.

Facility Name: City of Cullman WWTP

Part 1: Influent Loading/Flows

A. List the average monthly volumetric flows and BOD_5 ($CBOD_5$) loadings received at your facility during the last calendar year.

Month	Column 1 Average Monthly Flowrate (MGD)	Column 2 Average Monthly BOD_5 ($CBOD_5$) Concentration (mg/l)	Column 3 Average Loading BOD_5 ($CBOD_5$) (lbs/day**)
January	5.01	93	5729
February	7.10	99	4339
March	4.51	102	3650
April	6.01	86	3773
May	7.39	75	4619
June	5.37	139	6889
July	2.83	129	3108
August	2.84	137	3003
September	1.81	159	2372
October	2.12	167	2733
November	1.57	201	3228
December	2.40	182	3743
Annual Avg.	4.08	130.75	5075.33

** As reported on NPDES Discharge Monitoring Reports (DMRs) and as required by EPA's NPDES Self-Monitoring System, User Guide, March 1985.

B. List the average design flow and average design BOD_5 ($CBOD_5$) loading for the facility below. If you are not aware of these design quantities, contact your consulting engineer.

	Average Design Flow 7.0 MGD	Average Design BOD_5 ($CBOD_5$) Loading (lbs/day)
Design Criteria	7.0	11676
90% of the Design Criteria	6.3	10508

C. How many times did the monthly flow (Column 1) to the WWTP exceed 90% of design flow?

2 (Check the appropriate point total)

■ 0 - 4 = 0 points ☐ 5 or more = 5 points

D. How many times did the monthly flow (Column 1) to the WWTP exceed the design flow?

2 (Check the appropriate point total)

☐ 0 = 0 points ■ 1 – 2 = 5 points ☐ 3 – 4 =10 points ☐ 5 or more =15 points

E. How many times did the monthly BOD_5 ($CBOD_5$)* loading (lbs/day) (Column 3) to the WWTP exceed 90% of the design loading?

0 (Check the appropriate point total)

■ 0 -1 = 0 points ☐ 2 – 4 =5 points ☐ 5 or more =10 points

F. How many times did the monthly BOD_5 ($CBOD_5$)* loading (lbs/day) (Column 3) to the WWTP exceed the design loading?

0 (Check the appropriate point total)

■ 0 = 0 points ☐ 1 = 10 points ☐ 2 =20 points ☐ 3 =30 points ☐ 4 =40 points ☐ 5 or more =50 points

G. Enter each point value marked for C through F and enter the sum in the appropriate blank below.

C points = 0

D points = 5

E points = 0

F points = 0

TOTAL POINTS VALUE FOR PART 1 5

Enter this value on Part 11: Summary Sheet.

*To obtain equivalent BOD_5 loading for comparison with design loading for those permittees using influent $CBOD_5$, divide annual average $CBOD_5$, loading in lbs/day from Part 1, A by 0.7.

Facility Name: City of Cullman WWTP

Part 2: Effluent Quality/Plant Performance

A. List the monthly average permit limits for the facility in the blanks below and the average monthly effluent DMR BOD_5, ($CBOD_5$) TSS, NH_3-N and/or TKN concentration produced by the facility during the last calendar year.

(1) NPDES Permit Concentration

	Months	BOD_5 ($CBOD_5$) (mg/l)	TSS (mg/l)	NH_3-N (mg/l)	TKN (mg/l)
Permit Limit	Dec- Apr	16.0	30	2.5	Report Only
	May- Nov	11.0	30	1	Report Only

(2) DMR Concentration

Qtr	Month	BOD_5 ($CBOD_5$) (mg/l)	TSS (mg/l)	NH_3-N (mg/l)	TKN (mg/l)
1	January	6.5	10	0.5	3.64
	February	8.8	11	0.8	2.43
	March	8.1	14	1.1	5.04
2	April	7	11	0.7	7.11
	May	5.8	10	0.1	1.73
	June	4.7	12	0	2.23
3	July	6.5	15	0.1	1.46
	August	5.9	11	0.2	0
	September	6.6	10	0.6	0
4	October	10.5	11	1.4	5.1
	November	10.6	16	1.4	13.9
	December	12.4	16	2.1	12.9
	Annual Avg.	7.78	12.25	0.75	4.63

B. List the monthly average permit limit and DMR loadings below.

(1) NPDES Permit Loading

	Months	BOD_5 ($CBOD_5$) (lbs/day)	TSS (lbs/day)	NH_3-N (lbs/day)	TKN (lbs/day)
Permit Limit	Dec- Apr	934	1751	145	Report Only
	May- Nov	642	1751	58.3	Report Only

(2) DMR Loading

Qtr	Month	BOD_5 ($CBOD_5$) (lbs/day)	TSS (lbs/day)	NH_3-N (lbs/day)	TKN (lbs/day)
1	January	373	591	13.6	397
	February	417	548	38.9	117.9
	March	317	536	40.5	73.1
2	April	341	480	27.1	294.1
	May	380	672	4.6	105.9
	June	235	565	0	120
3	July	160	354	2.3	84.3
	August	127	258	3.3	0
	September	96	138	8.8	0
4	October	191	196	25.7	52.3
	November	159	230	25.5	215
	December	308	325	56	374.4
	Annual Avg.	258.7	407.75	20.53	152.8

C. During the past year did the BOD_5 ($CBOD_5$) concentration (mg/l) and/or loading (lbs/day) exceed the product of 1.4 times the monthly average permit limit during two months of any consecutive quarters? (Check the appropriate point total.)

☒ No = 0 points ☐ Yes = 121 points

D. During the past year did the BOD_5 ($CBOD_5$) concentration (mg/l) and/or loading (lbs/day), exceed the monthly average permit limit during four months of any two consecutive quarters? (Check the appropriate point total.)

☒ No = 0 points ☐ Yes = 121 points

E. During the past year did the effluent TSS concentration (mg/l) or loading (lbs/day) exceed the product of 1.4 times the monthly average permit limit during two months of any two consecutive quarters? (Check the appropriate point total.)

☒ No = 0 points ☐ Yes = 121 points

F. During the past year did the TSS concentration (mg/l) and/or loading (lbs/day) exceed the monthly average permit limit during four months of any two consecutive quarters? (Check the appropriate point total.)

☒ No = 0 points ☐ Yes = 121 points

G. During the past year did the NH_3-N or TKN concentration (mg/l) and/or loading (lbs/day) exceed the product of 1.4 times the monthly average permit limit during two months of any two consecutive quarters? (Check the appropriate point total.)

☒ No = 0 points ☐ Yes = 121 points

H. During the past year did either the NH_3-N or TKN concentration (mg/l) and/or loading (lbs/day), exceed the monthly average permit limit during four months of any two consecutive quarters? (Check the appropriate point total.)

☒ No = 0 points ☐ Yes = 121 points

I. Enter each point value checked for C through H in the blanks below.

C Points = 0

D Points = 0

E Points = 0

F Points = 0

G Points = 0

H Points = 0

HIGHEST INDIVIDUAL POINT VALUE FOR PART 2 (C-H) 0 (HIGHEST POINT = 121)
Enter this value on Part 11: Summary Sheet.

Facility Name: City of Cullman WWTP

Part 3: Age of the Wastewater Treatment Facility

A. What year was the wastewater treatment plant constructed or last reconstructed? 2001

Subtract the above answer from the report year to determine age:

Age = (Last Calendar year) - (Answer to A)

Age 24 = (2025) - (2001)

Enter Age in Part C below.

B. Check the type of treatment facility employed.

		Factor
X	Mechanical Treatment Plant	2.0
	Aerated Lagoon	1.5
	Stabilization Pond	1.0
	Other (Specify:)	1.0

C. Multiply the factor listed next to the type of the facility your community employs by the age of your facility to determine the total point value for Part 3:

2.0 (Factor) x 24 (Age) = 48 TOTAL POINT VALUE FOR PART 3

Enter the above value on Part 11: Summary Sheet. If the total point value exceeds 40, enter 40 on Part 11: Summary Sheet.

Facility Name: City of Cullman WWTP

Part 4: Bypassing and Overflows

A. How many bypass or overflow events of untreated wastewater occurred in the last year at the WWTP due to heavy rain? 1

B. How many bypass or overflow events of untreated wastewater occurred in the last year prior to the headworks of the WWTP due to heavy rain? 0

C. How many of the bypass or overflow events listed in Parts A and B have been corrected such that future bypass or overflow events at the same location due to heavy rain are not anticipated? 1

D. Add together Answers A and B and subtract Answer C from that total.

A + B – C = 0 (Check the appropriate point total.)

- ☒ 0 = 0 points
- ☐ 1 = 5 points
- ☐ 2 =10 points
- ☐ 3 =15 points
- ☐ 4 =20 points
- ☐ 5 =25 points
- ☐ 6 = 30 points
- ☐ 7 = 35 points
- ☐ 8 =40 points
- ☐ 9 =45 points
- ☐ 10 =50 points
- ☐ 11 or more =100 points

E. How many bypass or overflow events of untreated wastewater occurred in the last year at the WWTP due to equipment failure? (This includes clogged/broken lines or manholes.) 0

F. How many bypass or overflow events of untreated wastewater occurred in the last year due to equipment failure prior to the headworks of the WWTP? (This includes clogged/broken lines or manholes.) 0

G. How many of the bypass or overflow events listed in Parts E and F have been corrected such that future bypass or overflow events at the same location due to the same equipment failure are not anticipated? 0

H. Add together Answers E and F and subtract Answer G from that total.

E + F – G = 0 (Check the appropriate point total.)

- ☒ 0 = 0 points
- ☐ 1 = 5 points
- ☐ 2 =10 points
- ☐ 3 =15 points
- ☐ 4 =20 points
- ☐ 5 =25 points
- ☐ 6 = 30 points
- ☐ 7 = 35 points
- ☐ 8 =40 points
- ☐ 9 =45 points
- ☐ 10 =50 points
- ☐ 11 or more =100 points

I. Add point values checked in D and H and enter the total in the blank below.

TOTAL POINT VALUE FOR PART 4 0
Enter this value on Part 11: Summary Sheet.

All bypass or overflow events that have occurred in the last year (for any reason) must be individually reported with this MWPP report.

Facility Name: City of Cullman WWTP

Part 5: Sludge Quantity and Storage

A. Please provide information concerning sludge quantity, characteristics, and storage practices based on available data as requested on the *MWPP Sewage Sludge Survey,* ADEM Form 419.

B. How many months of sludge storage capacity does the wastewater treatment facility have available, either on-site or off-site? (i.e., How many months can the facility operate without land spreading or disposing of sludge?) 4

(Check the appropriate point total.)

Greater than or equal to 4 months	[x]	= 0 points
Less than 4 months, but greater than or equal to 3 months	[ ]	= 10 points
Less than 3 months, but greater than or equal to 2 months	[ ]	= 20 points
Less than 2 months, but greater than or equal to 1 month	[ ]	= 30 points
Less than one month	[ ]	= 50 points

TOTAL POINT VALUE FOR PART 5 0
Enter this value on Part 11: Summary Sheet.

Part 6: Sludge Disposal Practices and Sites

A. Please provide the sludge disposal practices and site information based on available data as requested on the *MWPP Sewage Sludge Survey,* ADEM Form 419.

B. How many months or years does the facility have access to and approval for sufficient land disposal sites to provide proper land disposal? (Check the appropriate point total.)

36 or more months	[■]	= 0 points
24 - 35 months	[ ]	= 10 points
12 - 23 months	[ ]	= 20 points
6 - 11 months	[ ]	= 30 points
Less than 6 months	[ ]	= 50 points

TOTAL POINT VALUE FOR PART 6 0
Enter this value on Part 11: Summary Sheet.

Facility Name: City of Cullman WWTP

Part 7: New Development

Are there any major new developments (industrial, commercial, or residential) in the last calendar year or anticipated in the next 2-3 years such that either flow or BOD_5 ($CBOD_5$) loadings to the sewage system could significantly increase? Estimate additional loadings below.

Design Population Equivalent (PE): 625 Design Flow: .05 MGD Design BOD_5 ($CBOD_5$): 50 lbs/day

List industrial and/or residential developments.

NOBLE RIDGE SUBDIVISION

FRANKWEILER SUBDIVISION

BOLTE CROSSING SUBDIVISION

WARNKE SUBDIVISION

Will the additional loading overload the plant?
(Check the appropriate point total.)

☒ No = 0 points ☐ Yes = 121 points

Enter the point total in the blank below.

TOTAL POINT VALUE FOR PART 7 0 (highest point total = 121)
Enter this value on Part 11: Summary Sheet.

Part 8: Operator Certification

Complete the *Plant and Collection System Personnel Inventory,* ADEM Form 441.

Do both the plant operator and collection system staffing comply with ADEM Administrative Code; Division 10, Operator Certification Program?
(Check the appropriate point total.)

☒ Yes = 0 points ☐ No = 121 points

TOTAL POINT VALUE FOR PART 8 0 (highest point total = 121)
Enter this value on Part 11: Summary Sheet.

Facility Name: City of Cullman WWTP

Part 9: Financial Status

A. Are User-Charge Revenues sufficient to cover operation and maintenance expenses? If no, how are O&M costs being financed? ***Include user charge rates***.

Yes

Residential Minimum $10.00 Plus rate $15.53 /1,000 gal.

Industrial Minimum $50.00 Plus rate $17.94 /1,000 gal.

Monthly residential rate based on 6,000 gallons usage $ 103.18

B. What financial resources are available to pay for the wastewater improvements and/or reconstruction needs?

Cash on hand & SRF loan program

C. Please attach a rate sheet and the most recent audit, if available.

No change

Part 10: Subjective Evaluation

A. Describe briefly the physical and structural conditions of the wastewater treatment facility.

The structural conditions at the the plant are well maintained and function well for the age of the facility.

B. Describe the general condition of the sewer system (sewer lines, manholes, lift stations).

The sewer system is in good condition with continuing upgrades through out the whole system.

C. What sewage system improvements does the community have planned for construction in the next 5 years?

A phased project to replace multiple sewer lines is underway with approximately 75% of phase 2 completed. This includes upgrades to the city's pump stations. The city has a $5.5 million with St John and Associates overseeing the project.

D. What is the theoretical design life of the plant, and what is the estimated remaining useful life of the wastewater treatment facility?

The plant design is 20 years.

E. What problems, if any, over the last year have threatened treatment or conveyance within the system?

Infiltration is the biggest issue. However, the ongoing sewer project is helping the plant with this.

F. Is the community presently involved in formal planning for treatment facility upgrading?

Yes

G. How many days in the last year were there residential backups at any point in the collection system for any reason other than clogging of the lateral connection? 0

H. Does the plant have a written plan for preventive maintenance on major equipment items? If yes, describe.

Yes, between monitoring our SCADA system and our written SOP's for maintenance, our team is able to continually maintain the system.

I. Does this preventive maintenance program depict frequency of intervals, types of lubrication, and other preventive maintenance tasks necessary for each piece of equipment?

(Check the appropriate response.) ☒ Yes ☐ No

J. Are these preventive maintenance tasks, as well as equipment problems, being recorded and filed so future maintenance problems can be assessed properly?

(Check the appropriate response.) ☒ Yes ☐ No

K. Describe any major repairs or mechanical equipment replacement made in the last year and include the approximate cost for those repairs. Do not include major treatment plant construction or upgrading programs.

Rebuilt UV system-$80k, Digester clean out (ongoing project) -$400K

Speed Rink Pump station pump rebuild- $40K, Heat exchangers replaced gas valves- $2K

North pump station, replaced controller-transducer, rebuild screens, and rewelded stress

fractures in frame- $5K

L. List any additional comments. (Attach additional sheets if necessary.)

Facility Name: City of Cullman WWTP

Part 11: Summary Sheet

1. Enter in the values from Parts 1 through 8 in the left column below. Add the numbers in the left column to determine the MWPP Report point total the wastewater system generated for the previous calendar year.

Actual Values	Maximum Possible
Part 1 5 points	80 points
Part 2 0 points	121 points
Part 3 48 points	40 points
Part 4 0 points	200 points
Part 5 0 points	50 points
Part 6 0 points	50 points
Part 7 0 points	121 points
Part 8 0 points	121 points
Total 45 points	783 points

2. Check the facility type that best describes the plant's treatment and disposal of wastewater.

- ☒ Mechanical plant with surface water discharge
- ☐ Aerated Lagoon or stabilization pond with surface water discharge
- ☐ Mechanical plant using land disposal of liquid wastes
- ☐ Aerated Lagoon or stabilization pond using land disposal of liquid wastes

3. Check the range that describes the action needed to address problems identified in the report.

- ☒ 0 - 70 points Actions as Appropriate*
- ☐ 71 - 120 points Departmental Recommendation Range*
- ☐ 121 – 783 points Municipality Action Range*

***Other actions may be required by NPDES outside the scope of this report.**

4. Complete the *Municipal Water Pollution Prevention Resolution Form*, ADEM Form 418.

5. In Question 1, do any of the actual point values in the left column equal the maximum possible points in the right column?

(Check the appropriate response.) ☒ Yes ☐ No

If yes, provide a written explanation for this situation in the space below.

The age of the plant is the reason for receiving 40 points in Part 3.

Municipal Water Pollution Prevention Resolution Form

MUNICIPAL WATER POLLUTION PREVENTION (MWPP) PROGRAM

RESOLVED that the (City), (Board) of Cullman

informs the Department of Environmental Management that the following

actions were taken by (governing body) Cullman City Council.

1. Reviewed the MWPP Annual Report which is attached to this resolution.

2. Set forth the following actions and schedule necessary to maintain effluent requirements contained in the NPDES Permit, and to prevent the bypass and overflow of raw sewage within the collection system or at the treatment plant:

   (a) Continue five-year planning for wastewater.

   (b) Continue currently planned projects.

   (c) Contious smoke testing.

   (d) Continous video inspection.

Passed by a (majority)(unanimous) vote of the _____ on (date).

_____

_____

Clerk