

July 29, 2026

SENT BY CERTIFIED AND REGISTERED MAIL

Andre Dickens, Mayor
City of Atlanta
55 Trinity Ave SW, Suite 2900
Atlanta, GA 30303

Ricky Smith, Airport General Mgr.
City of Atlanta
Department of Aviation
P.O. Box 20509
Atlanta, GA 30320

Re: Notice of intent to file citizen suit pursuant to the federal Clean Water Act and Resource Conservation and Recovery Act

Ladies and Gentlemen:

The purpose of this letter is to notify the City of Atlanta, owner and operator of the Hartsfield-Jackson Atlanta International Airport (Airport), that Flint Riverkeeper, Inc. intends to file suit in sixty (60) days under Section 505(a)(1) of the Clean Water Act (CWA), 33 U.S.C. § 1365(a)(1), in United States District Court against the City of Atlanta for longstanding and ongoing violations of the CWA. These violations arise out of illegal and unpermitted discharges of fuel, sewage, solid waste, and per- and polyfluoroalkyl substances (PFAS) from the Airport into the Flint River and two of its tributaries, Sullivan Creek and Mud Creek.

This letter also serves to notify the City of Atlanta of Flint Riverkeeper, Inc.'s notice of intent to sue in ninety (90) days under Section 7002(a)(1)(B) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6972(a)(1)(B), for abatement of an imminent and substantial endangerment to health and the environment in connection with the disposal of solid or hazardous waste containing PFAS on Airport property. The ongoing release of these chemicals into the Flint River and its tributaries from the Airport poses a threat to drinking water supplies downstream and to aquatic life.

Persons Responsible for Violations

The City of Atlanta owns and operates the Airport. Pursuant to 40 C.F.R. § 135.3 and 40 C.F.R. § 254.3, the City of Atlanta is identified as the person¹ responsible for all CWA and RCRA violations described in this letter.

¹ Under both the Clean Water Act and the Resource Conservation and Recovery Act, the term "person" includes municipalities such as the City of Atlanta. 33 U.S.C. § 1362(5); 42 U.S.C. § 6903(14).

Persons Giving Notice

As required by 40 C.F.R. § 135.3 and 40 C.F.R. § 254.3, Flint Riverkeeper provides the names, addresses and telephone numbers of the persons giving notice of intent to sue as follows:

Flint Riverkeeper, Inc.
102 Pine Avenue
Albany, GA 31701
(229) 435-2241

Flint Riverkeeper is a non-profit corporation organized under the laws of the State of Georgia, with a principal office in Albany, Georgia. The organization seeks to restore and preserve the habitat, water quality, and flow of the Flint River for the benefit of current and future generations and dependent wildlife. Flint Riverkeeper achieves these purposes and objectives through education, advocacy, monitoring, social events, water sampling and testing, pollution prevention measures, and seeking redress in the courts when necessary.

Flint Riverkeeper is a member organization with roughly 1,300 active members, including individuals, families, farms, and businesses—some of whom own real property and/or reside along the Flint River and its tributaries, draw water for growing food, consume drinking water from the Flint River, and engage in social, aesthetic, educational, scientific, and recreational activities including fishing, swimming, and boating in and on the Flint River and its tributaries. Flint Riverkeeper has members who have been harmed by and will continue to suffer harm from the city's illegal discharges and releases of pollutants to the Flint River and its tributaries.

The Southern Environmental Law Center is legal counsel for Flint Riverkeeper in this matter. Any responses or correspondence related to this letter should be directed only to the legal counsel identified below, in accordance with 40 C.F.R. § 135.3 and 40 C.F.R. § 254.3:

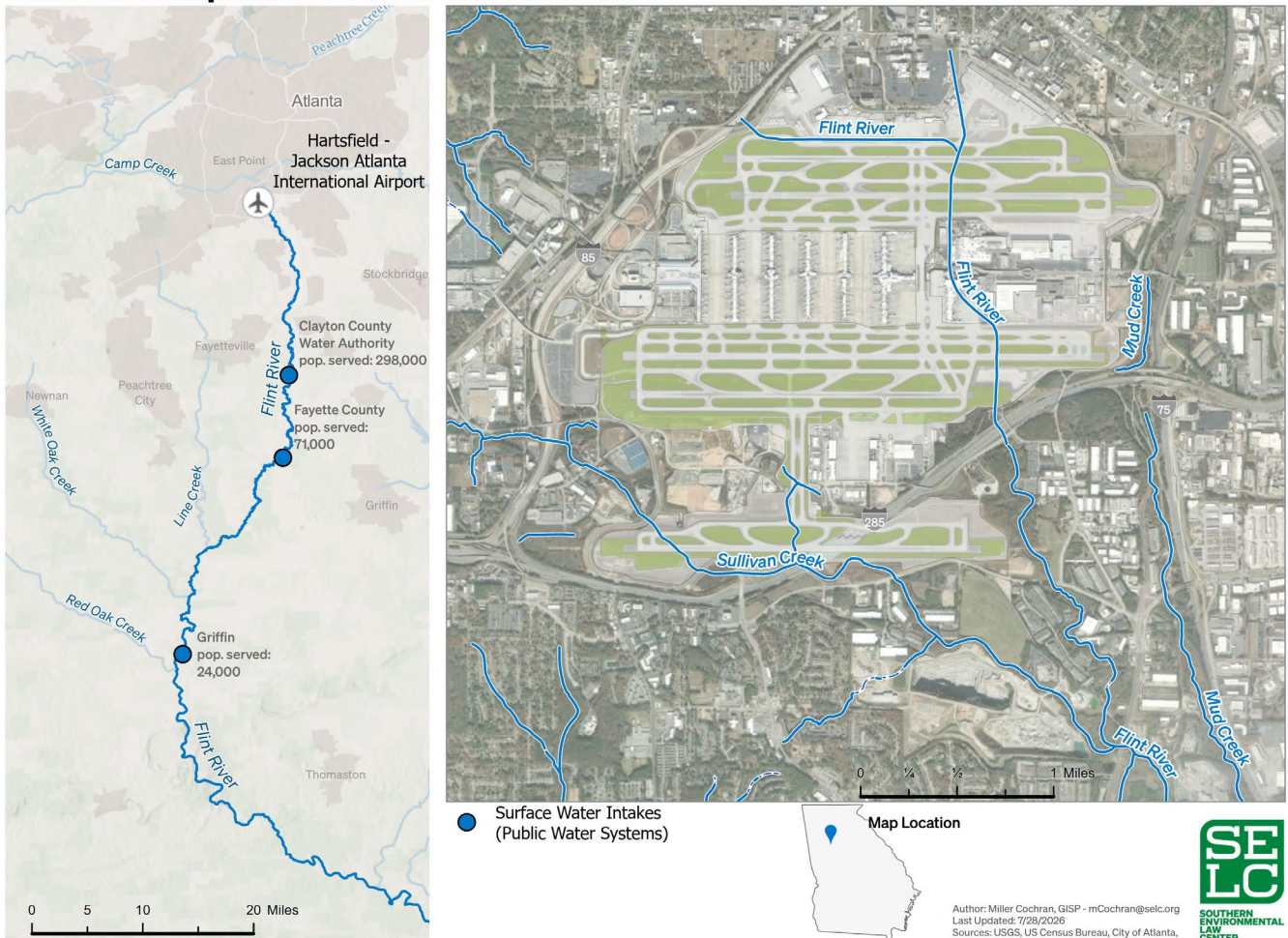
April Lipscomb
Peter Slag
William Snow
Southern Environmental Law Center
Ten 10th Street NW
Suite 1050
Atlanta, GA 30309
(404) 521-9900
alipscomb@selc.org
pslag@selc.org
wsnow@selc.org

BACKGROUND

The Flint River, Sullivan Creek, and Mud Creek

The Flint River flows 344 miles from south of Atlanta to the southwestern corner of the state. The Flint River's headwaters trickle up from springs in East Point, Hapeville, and College Park just north of the Airport. The river begins flowing in earnest from the mouth of a concrete culvert on the south side of Virginia Avenue in Hapeville and runs directly underneath the Airport's runways through a large concrete tunnel. It flows out of the Airport property through a rock quarry and shortly downstream begins to look like the scenic, tree-lined Flint River that many Georgians recognize. Sullivan Creek and Mud Creek are direct tributaries of the Flint River that converge with the Flint downstream of the Airport, between Forest Parkway and Upper Riverdale Road. Sullivan Creek flows along and beneath southwestern portions of Airport property, while Mud Creek flows along the eastern boundary of the Airport.

The Atlanta Airport and the Flint River watershed



The Flint River provides drinking water to more than 400,000 people downstream of the Airport, including the predominantly Black communities of Clayton County and the City of Griffin.² The Flint is also a valued resource for its fishing and other recreational activities. The Flint River basin provides water for drinking, swimming, fishing, commercial, agricultural, and industrial pursuits for more than one million people. Despite its importance, it has been identified as one of the most endangered rivers in the country because of demand for its limited supply.³ Because the Flint essentially begins near and under the Airport, pollution emanating from the Airport negatively affects the health and quality of the entire River.

Hartsfield-Jackson Atlanta International Airport

The Airport is one of the busiest in the world. The Airport is located near College Park, Georgia, in Fulton and Clayton Counties, and is almost entirely within the Flint River watershed. According to its website, “the terminal complex measures approximately 7.7 million square feet, or 176 acres. The complex includes the terminal building and concourses T, A, B, C, and D; and the international terminal building and concourses E and F. Within these concourses, there are 155 domestic and 43 international gates.”⁴

Roughly 60 percent of the Airport’s footprint, as well as much of the surrounding area, is covered by impervious surfaces. With all that concrete and asphalt comes prolific stormwater runoff during precipitation events. To manage this runoff, the Airport includes infrastructure designed to funnel stormwater into the Flint River, Sullivan Creek, and Mud Creek, including stormwater piping, culverts, holding tanks, and drainage basins. A map of the Airport’s stormwater infrastructure is attached to this letter as Exhibit A. There are over 30 outfalls where stormwater exits the Airport’s piping, and the vast majority of stormwater and the pollutants it carries converge to enter the Flint River as it emerges in the rock quarry on the south side of the Airport property (seen as “Flint River-1” in Exhibit A). Smaller amounts of stormwater from the Airport are discharged to Sullivan Creek to the southwest of the Airport and Mud Creek to the east via the Airport’s stormwater infrastructure.

According to Airport records, the Airport can contain stormwater that falls on portions of its property from any rain event that includes 0.03 inches of rain per hour using a “first flush” system.⁵ Upon information and belief, this system mostly routes initial stormwater runoff to the South River Water Reclamation Center for treatment.⁶ But rainfall exceeding 0.03 inches per

² Alyssa Johnson, *15,000 Gallons of Jet Fuel Spill Into Atlanta River, Raising Drinking Water Concerns*, Capital B, (Feb. 11, 2026), <https://atlanta.capitalbnews.org/atlanta-jet-fuel-spill-flint-river/>.

³ American Rivers, *America’s Most Endangered Rivers 2016*, at 3 (2016), <https://www.americanrivers.org/threats-solutions/about-mer/> (last visited July 2, 2026).

⁴ Hartsfield-Jackson Atlanta International Airport, *ATL Fact Sheet*, www.atl.com/about-atl/atl-factsheet/ (last visited July 2, 2026).

⁵ See AECOM, *Stormwater Pollution Prevention Plan 2026, Hartsfield-Jackson Atlanta International Airport (H-JAIA)* 16 (Feb. 2026).

⁶ *Id.*

hour produces direct discharges into the Flint River without treatment, as well as direct discharges to Mud Creek and Sullivan Creek.

The City of Atlanta manages, operates, or is otherwise responsible for various facilities at the Airport that generate pollutants that discharge to the Flint River and its tributaries, including but not limited to fueling infrastructure, fire stations, deicing chemicals storage and application facilities, sanitary sewer systems, and the Hartsfield-Jackson Internal Airport Fire Training Center (ATLFTC). The ATLFTC is located on the south side of the Airport on the western bank of the Flint River. As the operator and owner of the Airport, as well as being the permittee of the relevant CWA permits, the City of Atlanta is legally responsible for any and all violations of the CWA and RCRA.

The City's discharges of stormwater associated with industrial activities at the Airport are governed by the terms and conditions of Permit No. GAR05000, which is an Industrial General Permit (IGP) issued by the Georgia Environmental Protection Division (EPD) pursuant to its authority to implement the CWA's National Pollutant Discharge Elimination System (NPDES) program.⁷ The IGP authorizes stormwater discharges from only those portions of the Airport involved in vehicle maintenance (including vehicle rehabilitation, mechanical repairs, painting, fueling, and lubrication), equipment cleaning operations, or airport deicing operations.⁸ Deicing operations include both deicing (removing frost, snow, or ice) and anti-icing (preventing accumulation of frost, snow, or ice).⁹

The IGP does not authorize non-stormwater discharges from the Airport, nor does it authorize the Airport to discharge stormwater unrelated to the industrial activities listed above. The only other NPDES permit that authorizes the discharge of pollutants into the Flint River, Sullivan Creek, or Mud Creek from the Airport is a general permit allowing discharges of stormwater associated with specific construction activities.¹⁰ But that permit similarly does not authorize the discharge of the pollutants at issue in this notice letter.¹¹

⁷ EPD, Permit No. GAR05000, Authorization to Discharge Under the National Pollutant Discharge Elimination System Stormwater Discharges Associated with Industrial Activity (June 1, 2022) [hereinafter "IGP"].

⁸ IGP § 8.S.2.1.

⁹ *Id.*

¹⁰ *See, e.g.*, Permit No. GAR100001, Authorization to Discharge Under the National Pollutant Discharge Elimination System Stormwater Discharges Associated with Construction Activity for Stand Alone Construction Projects (Aug. 1, 2023). Flint Riverkeeper is not alleging violations of this permit in this notice letter but reserves the right to send future notice letters regarding any such violations.

¹¹ For instance, the Stand Alone Construction General Permit expressly states that "[s]olid materials, including building materials, shall not be discharged to waters of the State, except as authorized by a Section 404 permit." Permit No. GAR100001, Part IV.D.3.c(1).

VIOLATIONS OF THE CLEAN WATER ACT

I. The City of Atlanta is in violation of the Clean Water Act by discharging pollutants to waters of the United States from the Airport without an NPDES permit.

Section 301 of the Clean Water Act¹² prohibits the discharge of pollutants from a point source to waters of the United States except in compliance with, among other conditions, an NPDES permit issued pursuant to Section 402 of the CWA.¹³ Each discharge that is not authorized by an NPDES permit constitutes a separate violation of the CWA.¹⁴ Persons in violation are subject to a civil penalty not to exceed \$68,445 per day for each violation.¹⁵

The term “discharge” refers to the addition of any pollutant to navigable waters from any point source.¹⁶ The term “pollutant” is broadly defined and includes solid waste, chemical waste, biological materials, rock, sand, and industrial, municipal, and agricultural waste.¹⁷ The term “point source” includes any “discernible, confined and discrete conveyance” from which pollutants may be discharged, including pipes, ditches, channels, tunnels, conduits, wells, and discrete fissures.¹⁸ The point source need not be the original source of the pollution; all that is required is that it conveys the pollution to a “navigable water,” defined as the waters of the United States.¹⁹

The City of Atlanta has a decades-long history of CWA violations at the Airport.²⁰ The City of Atlanta and the Airport have repeatedly discharged jet fuel, sewage, deicing chemicals, and other pollutants from its stormwater and sewage infrastructure at the Airport into the Flint River, Sullivan Creek, and Mud Creek, which are waters of the United States. While EPD has taken various enforcement actions against the City for its illegal discharges at the Airport, discharges to surface waters have continued to occur and are likely to recur.

For purposes of this notice letter, the City of Atlanta has and is continuing to violate the CWA by discharging fuel, sewage, deicing chemicals, solid waste, and PFAS into the Flint River, Sullivan Creek, and Mud Creek from its various outfalls, pipes, conveyances, and culverts in and around the Airport without an NPDES permit authorizing those discharges since July 2021. Importantly, these pollutants are discharged entirely within the boundaries of the Airport,

¹² 33 U.S.C. § 1311(a).

¹³ *Id.* § 1342.

¹⁴ *Id.* § 1319(d).

¹⁵ *Id.* §§ 1319(d), 1365(a); 40 C.F.R. §§ 19.1–19.4 (updating statutory penalties to adjust for inflation).

¹⁶ 33 U.S.C. § 1362(12)(A).

¹⁷ *Id.* § 1362(6).

¹⁸ *Id.* § 1362(14).

¹⁹ *Id.* § 1362(7).

²⁰ For instance, Georgia EPD documented some of those earlier discharges in an expedited enforcement compliance order signed in May 2021. *See* Letter from Brian Badger, Airport, to Lewis Hayes, EPD, Re: Expedited Enforcement Compliance Order, Hartsfield-Jackson Atlanta International Airport (May 17, 2021).

which for obvious reasons is surrounded by substantial security fencing and barriers, and Riverkeeper staff are unable to access those areas. As such, the Airport controls much of what evidence and information is available to inform and describe the problem. This letter relies on publicly available data to describe the various pollutant discharges. To the extent that information relating to the discharges identified herein is in the Airport's possession, the Airport is best able to identify such information, including but not limited to exact discharge sources and locations.²¹

A. Ongoing Discharges of Pollutants During Rain Events

The City of Atlanta discharges fuel, sewage, deicing chemicals, solid waste, and PFAS from the Airport to the Flint River, Mud Creek, and Sullivan Creek in violation of the CWA any time rainfall is sufficient to generate pollutant-laden stormwater discharges that are not captured by the first-flush system. Based on publicly available data about the Airport's impervious surfaces, the first-flush system, and its stormwater infrastructure, stormwater is discharged into surface waters anytime it rains at the Airport more than 0.03 inches an hour. During these stormwater discharge events, stormwater picks up fuel, sewage, deicing chemicals, solid waste, and PFAS and carries these pollutants via the City's outfalls, pipes, conveyances, and culverts to the Flint River and its tributaries. In addition, infiltration and inflow of stormwater into the sanitary sewage system at the airport also results in discharges of sewage to these surface waters during these stormwater discharge events.

Over the past five years, there have been well over 400 of these stormwater discharge events at the Airport. A table listing the individual dates on which these events occurred is attached as Exhibit B. This number is conservative, as the attached table does not identify instances in which there were multiple stormwater discharge events on the same day, nor does it identify dates when less intense rain events resulted in direct discharges to the Flint River, Mud Creek, and/or Sullivan Creek from areas where stormwater is not captured by the first-flush system or when stormwater infiltrated sewer pipes and resulted in discharges to these surface waters.

More information about the individual pollutants discharged during these stormwater discharge events is provided below, along with additional instances in which the City of Atlanta discharged pollutants into surface waters from the Airport via spills.

B. Ongoing Discharges of Fuel

As discussed above, the City of Atlanta discharges fuel²² from the Airport into the Flint River, Sullivan Creek, and Mud Creek during rain events that exceed 0.03 inches per hour, in

²¹ Where the defendant "possesses 'maps, plans, and investigative tools to trace the source of the pollution,' [it] should be able to identify the source based on the location of the overflow [the plaintiff] identified." *Cebollero-Bertran v. Puerto Rico Aqueduct & Sewer Auth.*, 4 F.4th 63, 77 (1st Cir. 2021) (holding plaintiff alleged the CWA violations with "reasonable specificity").

²² The term "fuel" includes jet fuel, Jet A, gasoline, diesel fuel, and similar petroleum-based products.

which stormwater picks up residual or spilled fuel on the ground or in the storm drains and carries it to surface waters. In addition to these unpermitted discharges, the City also has ongoing and unpermitted discharges associated with both minor and major fuel spills.

According to the Airport’s own records, the Airport has had *over 400 fuel spills*, both large and small, since July 2021. While most of the spills are cleaned up immediately and appear not to enter storm drains, many others reach the storm drains and ultimately enter the Flint River. At least nine of those fuel spills have resulted in discharges to surface waters, though that number is likely higher. In 2026 alone there have been at least three different major fuel spills. The first spill, which lasted from late January to early February, went undetected for eight days as approximately 28,000 gallons of fuel flowed through the Airport’s stormwater piping directly to the Flint River. The spill was so severe that it triggered “Do Not Drink” advisories in downstream communities like the City of Griffin, where residents reported smelling fuel in their tap water.²³ Other downstream utilities avoided drawing from the Flint until the cleanup effort was complete.²⁴ The second spill occurred on or around April 22, when an unknown quantity of a petroleum-based product exited the Airport property via the rock quarry where the Flint River daylighted out from underneath the Airport’s runways. The third spill is still under investigation, but early reports estimate that 26,500 gallons of fuel were discharged from an underground fuel line and into the Flint River via the Airport’s stormwater piping infrastructure over the course of Memorial Day weekend in May.

The known dates and locations of these additional fuel discharges are identified below:

Date	Gallons Spilled	Spill Location	Receiving Waterbody
9/26/21	1,674	33.6394, -84.433	Flint River
3/17/22	400-500	Concourses C and D	Flint River
7/6/24	3	Gate B27	Flint River*
6/11/25	20	Gate F9	Flint River*
1/30/26	28,000	33.644, -84.4397	Flint River
3/15/26	3	Delta Fuel Farm	Flint River*
3/16/26	2	Gate C40	Flint River*
4/22/26	Unknown	Unknown**	Flint River
5/25/26	26,500	Unknown**	Flint River

*Airport records indicate the pollutant entered storm drains but does not provide the receiving waterbody. Regardless, upon information and belief, the pollutant entered the Flint River, Sullivan Creek, or Mud Creek, which are all waters of the United States.

** The precise spill location is unknown but upon information and belief the pollutant was discharged to waters of the United States via the City of Atlanta’s pipes, conveyances, and culverts beneath the Airport.

²³ See, e.g., Pamela Kirkland, *Georgia EPD: 20,000-gallon jet fuel leak into Flint River went undetected for eight days*, Georgia Public Broadcasting (Apr. 14, 2026), <https://www.gpb.org/news/2026/04/14/georgia-epd-20000-gallon-jet-fuel-leak-flint-river-went-undetected-for-eight-days>. Interestingly, City of Griffin officials stated that it was propylene glycol, a deicing chemical, and chlorine which together created the smell of fuel in residents’ tap water.

²⁴ Johnson, *supra* note 2.

C. Ongoing Discharges of Sewage

As discussed above, the City of Atlanta discharges sewage into the Flint River and its tributaries because of infiltration and inflow of stormwater into the sanitary sewer system at the airport, as well as from the stormwater system during rain events exceeding 0.03 inches per hour, as identified in Exhibit B. For instance, on June 19, 2026, during one of these stormwater discharge events, instream sampling data show *E. coli* levels in the Flint River just upstream of the Airport were approximately 1,500 counts/100mL, while levels of *E. coli* just downstream of the Airport at Forest Parkway were higher than 24,196 counts/100mL. For reference, the Georgia water quality criteria for *E. coli* in waters designated for fishing is 120 counts/100mL in warm weather months.²⁵ Such a drastic jump in *E. coli* levels in the Flint as it flows beneath the Airport indicates an alarming problem with the Airport's sewer infrastructure.

In addition to these unpermitted discharges, the City has had three major sewage spills at the Airport since July 2021. According to records obtained from the City via an Open Records Act request, the first spill occurred on November 30, 2021, when 7,500 gallons of sewage entered Mud Creek from a sanitary sewer pipe at Cargo Service Road and Nlvr SE as a result of debris. The second spill occurred on January 20, 2022, when 2,100 gallons of sewage discharged into Mud Creek. On January 30, 2023, 22,000 gallons of sewage discharged from a lift station south of the fifth runway when a bypass lane shifted and released sewage that flowed into Sullivan Creek. More details about those spills are provided below:

Date	Gallons Spilled	Spill Location	Receiving Waterbody
11/30/21	7,500	33.63833, -.84.40833	Mud Creek
1/20/22	2,100	Unknown*	Mud Creek
1/30/23	22,000	33.6181642, -84.4417254	Sullivan Creek

* The precise spill location appears to be the same location as the November 30, 2021, spill. Regardless, sewage entered waters of the United States via the City of Atlanta's pipes, conveyances, and culverts beneath the Airport.

D. Ongoing Discharges of Deicing Chemicals

Again, the City of Atlanta discharges a variety of pollutants, including deicing chemicals, into the Flint River and its tributaries from the Airport during stormwater discharge events where rainfall exceeds 0.03 inches per hour. *See* Ex. B. Even if those discharges are covered by the IGP, the City has also had at least two unpermitted spills of deicing chemicals over the past five years that resulted in discharges to the Flint River, as detailed in the table below. While the Airport did not report a deicing chemicals spill on January 30, 2026, the City of Griffin reported the presence of propylene glycol in its drinking water system in sufficient quantities to create an obvious fuel smell after it mixed with chlorine.²⁶ The Airport is the obvious source of that propylene glycol, and neither state nor local officials have identified any other source of the propylene glycol in Griffin's water system that day.

²⁵ Ga. Comp. R. & Regs. 391-3-6-.03(6)(c)(i)(2). This standard is a geometric mean based on 4 samples collected from a given sampling site at least 24 hours apart within a 30-day period.

²⁶ Kirkland, *supra* note 233.

Date	Gallons Spilled	Spill Location	Receiving Waterbody
5/19/23	75	33.6406, -84.4386	Flint River*
1/30/26	Unknown	Unknown	Flint River**

*Airport records indicate the pollutant entered storm drains but does not provide the receiving waterbody.

Regardless, upon information and belief, the pollutant entered the Flint River, Sullivan Creek, or Mud Creek, which are all waters of the United States.

** According to the City of Griffin, propylene glycol was found in the city's water system, which pulls water from the Flint River.²⁷

E. Ongoing Discharges of Solid Waste

The City discharges solid waste, including but not limited to luggage tags and ear plugs, whenever rainfall is sufficient to generate untreated stormwater discharges to surface waters through the Airport's stormwater pipes and outfalls.²⁸ These discharges to the Flint River and its tributaries have occurred on the dates in Exhibit B and are likely to recur.

This is corroborated by observations of Flint Riverkeeper members and staff who have seen evidence of Airport-generated trash in and along the banks of the Flint River. For instance, Riverkeeper staff and members observed luggage tags and the types of ear plugs worn by Airport personnel in the Flint on Airport property, at the approximate coordinates 33.62441 N, 84.41417 W, during river clean-up events on November 11, 2021; April 22, 2022; November 5, 2022; October 28, 2023; April 19, 2024; October 18, 2024; April 18, 2025; and October 31, 2025.

In addition, Riverkeeper staff observed Airport-generated trash in the Flint River at Forest Parkway on the following dates: May 20, 2022; November 11, 2023; May 30, 2024; November 10, 2025; February 10, 2026; March 4, 2026; March 6, 2026; March 31, 2026; April 21, 2026; May 25, 2026; May 28, 2026; and June 19, 2026.

F. Ongoing Discharges of PFAS

As discussed in subsection A above, when it rains in sufficient amounts to generate discharges to surface waters, stormwater picks up PFAS and carries these toxic chemicals to the Flint River, Sullivan Creek, and Mud Creek via the Airport's stormwater infrastructure. PFAS are a group of man-made chemicals manufactured and used broadly by industry since the 1940s.²⁹ An ever-growing body of evidence demonstrates that PFAS pose a significant threat to human health and the environment, even at extremely low concentrations.³⁰

²⁷ *Id.*

²⁸ These discharges are also a violation of the IGP, described in more detail below.

²⁹ Lifetime Drinking Water Health Advisories for Four Perfluoroalkyl Substances, 87 Fed. Reg. 36,848, 36,849 (June 21, 2022); *Our Current Understanding of the Human Health and Environmental Risks of PFAS*, U.S. Env'tl. Prot. Agency, <https://perma.cc/V6PX-2PNK> (page saved Mar. 8, 2023).

³⁰ More details about the threats PFAS pose to human health and environment are provided in the discussion of RCRA violations below.

Specifically, sampling data show the increased presence of the following PFAS chemical compounds in the Flint River and its tributaries just downstream of the Airport, each of which is a pollutant unlawfully discharged without a permit under the Clean Water Act: PFOA, PFOS, PFHxS, PFNA, PFBS, PFHpA, PFHxA, PFBA, PFPeA, PFPeS, PFHpS, PFUnA, and 6:2 FTS. These PFAS are also discharged to surface waters via hydrologically connected soils and surficial groundwater, which constitute the functional equivalent of a direct discharge, during these stormwater discharge events.³¹ Again, the dates on which these unpermitted discharges occurred are listed in Exhibit B.

In addition, water quality sampling shows that the Airport discharged these PFAS to the Flint River and its tributaries on at least the following dates, based on a comparison of upstream versus downstream surface water samples: March 29, 2023; June 27, 2023; September 25, 2023; December 29, 2023; April 3, 2024; June 20, 2024; September 20, 2024; December 11, 2024; March 25, 2025; June 16, 2025; September 24, 2025; December 17, 2025; and March 17, 2026. These discharges are likely to recur.

Because Flint Riverkeeper is unable to access Airport property to collect samples and because the Airport has not documented any specific use of PFAS, the Riverkeeper is unable to identify the precise source of the PFAS discharges or precise discharge locations on Airport property. Nevertheless, the location of the ATLFTC on the banks of the Flint River,³² along with the presence of PFAS chemicals in the surface water samples, demonstrates that the City has used and/or stored substances containing these PFAS on Airport property drained by Airport stormwater infrastructure, including pervious and impervious surfaces and areas in close proximity to the banks of the Flint River. The City is in the best position to know the precise source of those PFAS and the specific discharge points to surface waters. Regardless, the City discharges those PFAS to surface waters via the Airport's stormwater pipes, conveyances, and outfalls in violation of the CWA.

II. The City of Atlanta is in violation of NPDES Permit No. GAR05000, the Industrial General Permit.

The City of Atlanta is also violating NPDES Permit No. GAR05000, and each violation constitutes a separate, continuing violation of the Clean Water Act.³³ Each condition described below has been violated on all dates when rain fell in quantities sufficient to cause the discharge of polluted stormwater into the Flint River, Sullivan Creek, and Mud Creek, including at least the dates listed in Exhibit B.

³¹ See *Cnty. Of Maui, Hawaii v. Hawaii Wildlife Fund*, 590 U.S. 165 (2020).

³² Upon information and belief, the ATLFTC and the Airport itself uses and has used firefighting foam, such as aqueous film-forming foam (AFFF), which contains various PFAS.

³³ 33 U.S.C. § 1319(d); see also IGP § 1.2 (“Noncompliance with any of the requirements of this permit constitutes a violation of the Clean Water Act (CWA) and the Georgia Water Quality Control Act (WQCA).”).

A. Condition 2.1.2.2 – Good Housekeeping Control Measure

This condition requires the Airport to “keep clean all exposed areas that are potential sources of pollutants” and to “minimize the potential for waste, garbage, and floatable debris to be discharged by keeping exposed areas free of such materials, or by intercepting them before they are discharged.”

The City is violating this condition by failing to engage in good housekeeping measures to ensure that waste, garbage, and floatable debris are not discharged to surface waters. As discussed above, the Airport routinely discharges debris such as luggage tags and ear plugs into surface waters from its stormwater infrastructure. The types of debris discharged from the Airport are easily traceable to airport property, as the Airport is the only possible source of items such as luggage tags and ear plugs, commonly worn by employees on the tarmac. The City has not taken adequate steps to prevent, intercept, or remove these wastes before they are discharged.

B. Condition 2.1.2.10 – Waste, Garbage, and Floatable Debris Control Measure

Under this condition, the Airport “must ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged.” See discussion of Condition 2.1.2.2 above.

C. Condition 2.3.1 – Water Quality Standards

Under this section of the IGP, discharges “must be controlled as necessary to ensure that the receiving waterbody does not exceed the applicable Water Quality Standards as stated in the Georgia Rules and Regulations for Water Quality Control 391-3-6-.03.”³⁴ In addition, if “the permittee’s discharge causes or contributes to an exceedance of applicable Water Quality Standards in the receiving waterbody, permittees shall take corrective action as required” by other parts of the IGP.³⁵

Georgia’s Water Quality Standards provide that “[a]ll waters shall be free from oil, scum and floating debris associated with municipal or domestic sewage, industrial waste or other discharges in amounts sufficient to be unsightly or to interfere with the designated use of the water body.”³⁶ In addition, all waters “shall be free from material related to municipal, industrial or other discharges which produce turbidity, color, odor or other objectionable conditions which interfere with the designated use of the water body.”³⁷

Atlanta is violating this condition by failing to control discharges of fuel, sewage, deicing chemicals, solid waste (garbage), and PFAS into the Flint River, Sullivan Creek, and Mud Creek. These recurring discharges produce color, odor, and other objectional conditions which interfere

³⁴ IGP § 2.3.1.1.

³⁵ IGP § 2.3.1.2.

³⁶ Ga. Comp. R. & Regs. 391-3-6-.03(5)(b).

³⁷ Ga. Comp. R. & Regs. 391-3-6-.03(5)(c).

with the designated use of these waterbodies.³⁸ Fuel, sewage, deicing chemicals, and garbage are unsightly at best, may also produce noxious odors, and at worst indicate dangerous contamination and poor water quality in such a way that interferes with uses of these surface waters such as fishing, boating, swimming, and drinking. The City has not taken sufficient corrective action to redress the exceedances of the Water Quality Standards.

D. Condition 3.1 – Conditions Requiring Review and Revision to Eliminate a Problem

If “an unauthorized release or discharge (e.g., spill, leak, or discharge of non-stormwater not authorized by this or another NPDES permit) occurs at” the Airport, then the City “must review and revise the selection, design, installation, and implementation of control measures to eliminate the condition and ensure that it will not be repeated in the future.”³⁹

The City has failed to implement control measures to ensure that spills, leaks, and discharges of jet fuel, sewage, deicing chemicals, garbage, and PFAS are not repeated in the future. In other words, the frequency of these spills and discharges at the Airport—combined with a lack of evidence showing meaningful infrastructure repairs and upgrades or process changes over the past several years—demonstrates that the City has not done nearly enough to prevent these types of discharges from recurring.

VIOLATIONS OF THE RESOURCE CONSERVATION AND RECOVERY ACT

The City of Atlanta is violating RCRA by contributing to the past and present disposal of waste containing PFAS on or near Airport property that may present an imminent and substantial endangerment to health or the environment. After giving notice, citizens are entitled to bring suit under RCRA against “any person . . . who has contributed to or who is contributing to the past or present handling, storage, treatment, transportation, or disposal of any solid or hazardous waste which may present an imminent and substantial endangerment to health or the environment.”⁴⁰

The term “solid waste” is broad and includes garbage, refuse, sludge from a waste treatment plant, “and other discarded material.”⁴¹ RCRA defines disposal as “the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste or any constituent

³⁸ The Flint River from the Airport to Swamp Creek (two separate segments totaling 12.8 miles) carries the designated use of fishing; the Flint from Swamp Creek to North Bridge Road (a further 5.9 miles) carries the designated uses of fishing and drinking water supply. Drinking water supplies are waters approved as a source for public drinking water systems permitted by EPD. Ga. Comp. R. & Regs. 391-3-6-.03(6)(a). Waters designated for fishing include waters for the propagation of fish, shellfish, game and aquatic species and for which there is primary contact recreation in and on the water from May through October and secondary contact recreation from November through April. Ga. Comp. R. & Regs. 391-3-6-0.3(6)(c).

³⁹ IGP § 3.1.a.

⁴⁰ 42 U.S.C. § 6972(a)(1)(B).

⁴¹ *Id.* § 6903(27).

thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.”⁴²

The City of Atlanta is in violation of RCRA because it has contributed and is contributing to the disposal of PFAS at the Airport in a manner that allows PFAS to enter the Flint River, Sullivan Creek, and Mud Creek, and therefore may present an imminent and substantial endangerment to health or the environment. Upon information and belief, PFAS are present at the Airport on and in soils and pervious and impervious surfaces as a result of spraying firefighting foam containing PFAS during firefighting and fire training activities. By failing to remove that foam after such activities, the City of Atlanta disposed of that foam and its PFAS constituents on land next to storm drains and on land next to the Flint River, such that PFAS may enter surface waters via stormwater piping and/or hydrologically connected soils and surficial groundwater during rain events that are sufficient to generate discharges to surface waters. The City has released PFAS into surface waters in violation of RCRA on at least the dates identified in Exhibit B and on the dates identified in Section I.F above.⁴³

Furthermore, the City’s disposal of PFAS may present an imminent and substantial endangerment to health and the environment. As previously mentioned, an ever-growing body of evidence demonstrates that PFAS pose a significant threat to human health, even at extremely low concentrations. Two of the most studied PFAS—PFOA and PFOS—are bioaccumulative and highly persistent in humans.⁴⁴ These chemicals build up in the human body, and have been shown to cause developmental effects to fetuses and infants, kidney and testicular cancer, liver malfunction, hypothyroidism, high cholesterol, ulcerative colitis, obesity, decreased immune response to vaccines, reduced hormone levels, delayed puberty, and lower birth weight and size.⁴⁵ Recent literature also suggests PFAS exposure can result in decreased fertility in women.⁴⁶

⁴² 42 U.S.C. § 6903(3).

⁴³ These dates are conservative, as they do not account for releases of PFAS into surface waters from the Airport on dry weather days immediately following rain events or during less intense rain events that nevertheless result in releases of PFAS to the river.

⁴⁴ See, e.g., 87 Fed. Reg. at 36,849; U.S. Env’tl. Prot. Agency, Interim Drinking Water Health Advisory: Perfluorooctanoic Acid (PFOA) CASRN 335-67-1 (June 2022), at 3–4, <https://perma.cc/F89R-PJUV>.

⁴⁵ U.S. Env’tl. Prot. Agency, *Drinking Water Health Advisories for PFAS: Fact Sheet for Communities* at 1–2 (June 2022), <https://perma.cc/T7FQ-EKD6>; Agency for Toxic Substances and Disease Registry, *Toxicological Profile for Perfluoroalkyls* (May 2021) [hereinafter “ATSDR, Toxicological Profile for PFAS”]; PFAS National Primary Drinking Water Regulation Rulemaking, 88 Fed. Reg. 18,638, 18,642 (Mar. 29, 2023) (discussing developmental effects).

⁴⁶ Nathan J. Cohen, *Exposure to Perfluoroalkyl Substances and Women’s Fertility Outcomes in a Singaporean Population-Based Preconception Cohort*, 873 Sci. Total Env’t 162267 (May 15, 2023).

Exposure to other types of PFAS like perfluorobutyric acid (PFBA),⁴⁷ perfluorohexanoic acid (PFHxA),⁴⁸ perfluorononanoic acid (PFNA),⁴⁹ perfluorodecanoic acid (PFDA),⁵⁰ perfluoropentanoic acid (PFPeA),⁵¹ and perfluoroheptanoic acid (PFHpA),⁵² is associated with many of the same health outcomes as exposure to PFOA and PFOS.

Given the recognized harms posed by PFAS compounds, on April 10, 2024, EPA made the historic announcement that it finalized enforceable national drinking water standards for six PFAS compounds.⁵³ EPA limited concentrations of PFOA and PFOS to 4.0 parts per trillion (ppt), with a maximum contaminant level goal of 0 ppt.⁵⁴ This maximum contaminant level goal recognizes that *no* level of PFOA or PFOS in drinking water is considered safe. Additionally, PFHxS, PFNA, and HFPO-DA (commonly known as GenX chemicals) have a maximum contaminant level (MCL) of 10 ppt each.⁵⁵ EPA also finalized a Hazard Index MCL to account for dose-additive health effects for mixtures that could include two or more of PFHxS, HFPO-DA, PFNA, and PFBS, recognizing that mixtures of PFAS can be harmful.⁵⁶

⁴⁷ U.S. Env'tl. Prot. Agency, IRIS Toxicological Review of Perfluorobutanoic Acid (PFBA, CASRN 375-22-4) and Related Salts at xii (Dec. 2022), <https://perma.cc/7N53-6K2M> (explaining that “available evidence indicates that developmental, thyroid, and liver effects in humans are likely caused by PFBA exposure in utero or during adulthood”).

⁴⁸ U.S. Env'tl. Prot. Agency, IRIS Toxicological Review of Perfluorohexanoic Acid [PFHxA, CASRN 307-24-4] and Related Salts at xiv, 14 (Apr. 2023), <https://perma.cc/6562-8JA5> (concluding exposure to PFHxA “likely causes” liver, fetal development, and immune system complications, as well as decreased red blood cell counts).

⁴⁹ ATSDR, Toxicological Profile for PFAS at 7–21 (noting decreased pup survival in rodents as well as developmental delays, decreases in birth weight, decreased sperm motility, and altered immune responses).

⁵⁰ U.S. Env'tl. Prot. Agency, Draft IRIS Toxicological Review of Perfluorodecanoic Acid (PFDA) and Related Salts (Public Comment and External Review Draft) (Apr. 2023), <https://perma.cc/D75M-AWHN>.

⁵¹ Xin Liu et al., *Structure-Based Investigation on the Association Between Perfluoroalkyl Acids Exposure and Both Gestational Diabetes Mellitus and Glucose Homeostasis in Pregnant Women*, 127 *Env't Int'l* 85 (2019), <https://perma.cc/V86G-BP4R>; Surabhi Shah-Kulkarni et al., *Prenatal Exposure to Perfluorinated Compounds Affects Thyroid Hormone Levels in Newborn Girls*, 94 *Env't Int'l* 607 (2016), <https://perma.cc/VDR2-XAL6>; Xiaofei Song et al., *Biomonitoring PFAAs in Blood and Semen Samples: Investigation of a Potential Link Between PFAAs Exposure and Semen Mobility in China*, 113 *Env't Int'l* 50 (2018).

⁵² European Chemicals Agency, Committee for Risk Assessment RAC Opinion: Proposing Harmonised Classification and Labelling at EU Level of Perfluoroheptanoic Acid; Tridecafluoroheptanoic Acid (Dec. 10, 2020), <https://perma.cc/3N4G-S4Q9> (finding PFHpA may cause liver and thyroid damage as well as fertility and fetal development concerns).

⁵³ PFAS National Drinking Water Regulation, 89 Fed. Reg. 32,532, 32,532 (April 26, 2024).

⁵⁴ *Id.*

⁵⁵ *Id.*

⁵⁶ *Id.*

While the harms to human health are extreme, PFAS are also detrimental to wildlife and the environment. The chemicals have been shown to cause damaging effects in fish,⁵⁷ amphibians,⁵⁸ reptiles,⁵⁹ mollusks,⁶⁰ and other aquatic invertebrates⁶¹—resulting in developmental and reproductive impacts, behavioral changes, adverse effects to livers, disruption to endocrine systems, and weakened immune systems.

Water quality sampling data show levels of PFAS in the Flint River just downstream of the Airport that exceed the MCLs and MCLGs for PFOA and PFOS. Quarterly readings just downstream of the Airport routinely yield results ten times greater than the MCLs of 4.0 ppt, and sometimes even more. The same sampling data also show levels of PFHxS and PFNA that regularly exceed the MCLs of 10.0 ppt, with PFHxS levels often registering at or above 150 ppt. Other PFAS compounds are present in the samples as well, some of them at levels well over 100 ppt. Notably, the City of Griffin and Clayton County both pull their drinking water supply from the Flint River downstream of the Airport, and both drinking water systems are contaminated with PFOA and PFOS at concentrations that exceed the federal MCLs.⁶²

Neither jurisdiction's drinking water systems are currently capable of treating and removing PFAS. Accordingly, the Airport's ongoing and past disposal of PFAS may present an imminent and substantial endangerment to the residents of those communities who are exposed to PFAS in the water they use to drink, cook, bathe, and water lawns and gardens. Moreover, the releases of PFAS from the Airport also present an imminent and substantial endangerment to the

⁵⁷ See, e.g., Chen et al., *Perfluorobutanesulfonate Exposure Causes Durable and Transgenerational Dysbiosis of Gut Microbiota in Marine Medaka*, 5 Env't Sci. & Tech Letters 731 (2018); Chen et al., *Accumulation of Perfluorobutane Sulfonate (PFBS) and Impairment of Visual Function in the Eyes of Marine Medaka After a LifeCycle Exposure*, 201 Aquatic Toxicology 1 (2018).

⁵⁸ Cheng et al., *Thyroid Disruption Effects of Environmental Level Perfluorooctane Sulfonates (PFOS) in Xenopus Laevis*, 20 Ecotoxicology 2069 (2011); Lou et al., *Effects of Perfluorooctanesulfonate and Perfluorobutanesulfonate on the Growth and Sexual Development of Xenopus Laevis*, 22 Ecotoxicology 1133 (2013).

⁵⁹ Guillette et al., *Blood Concentrations of Per- and Polyfluoroalkyl Substances are Associated with Autoimmune-like Effects in American Alligators from Wilmington, North Carolina*, *Frontier Toxicology* 4:1010185 (Oct. 20, 2022).

⁶⁰ Liu et al., *Oxidative Toxicity of Perfluorinated Chemicals in Green Mussel and Bioaccumulation Factor Dependent Quantitative Structure-Activity Relationship*, 33 Env't Toxicology & Chem. 2323 (2014); Liu et al., *Immunotoxicity in Green Mussels under Perfluoroalkyl Substance (PFAS) Exposure: Reversible Response and Response Model Development*, 37 Env't Toxicology & Chem. 1138 (2018).

⁶¹ Houde et al., *Endocrine-Disruption Potential of Perfluoroethylcyclohexane Sulfonate (PFECHS) in Chronically Exposed Daphnia Magna*, 218 Env't Pollution 950 (2016); Liang et al., *Effects of Perfluorooctane Sulfonate on Immobilization, Heartbeat, Reproductive and Biochemical Performance of Daphnia Magna*, 168 Chemosphere 1613 (2017).

⁶² U.S. Env'tl. Prot. Agency, UCMR 5 Occurrence Data, <https://www.epa.gov/dwucmr/occurrence-data-unregulated-contaminant-monitoring-rule#5> (last accessed July 27, 2026).

fish, amphibians, and other aquatic animals that live in the Flint and its tributaries downstream of the Airport.

CONCLUSION

As set forth in this letter, the Airport has been, and continues to be, in violation of the CWA by discharging the pollutants identified herein into the Flint River, Mud Creek, and Sullivan Creek without a permit and by violating the Industrial General Permit. Furthermore, the actions described above may present an imminent and substantial endangerment to health or the environment, in violation of RCRA. A civil action under section 505 of the CWA and section 6972 of RCRA will be initiated against the City of Atlanta once applicable notice periods have expired or soon thereafter unless the violations described above are fully redressed.

If litigation is necessary, Flint Riverkeeper will seek redress for the violations described in this letter, including injunctive relief, litigation costs, and expert fees and attorneys' fees and expenses. Flint Riverkeeper will also seek civil penalties to the maximum extent allowable by law not to exceed \$68,445 per day per violation of the CWA under 33 U.S.C. § 1319(d) and 40 C.F.R. § 122, and civil penalties not to exceed \$93,058 per day per violation of RCRA under 42 U.S.C. § 6928(g) and 40 C.F.R. § 19.4 (updated to adjust for inflation).

Flint Riverkeeper reserves the right to add additional claims to the specific CWA and RCRA violations set forth above based on the same or similar patterns of conduct. Since these violations are ongoing, any violations occurring after the date of this letter are incorporated by reference herein.

During the relevant notice periods, Flint Riverkeeper is willing to discuss effective remedies for the violations detailed in this letter. If you wish to pursue negotiations in the absence of litigation, you should initiate such negotiations with counsel within the applicable notice period soon enough so that they can be completed, and the violations ceased, prior to the date that the notice periods elapse.

Thank you for your attention to this matter.

Sincerely,



April S. Lipscomb
Senior Attorney

Peter Slag
Staff Attorney

William Snow
Associate Attorney

cc:

By Certified & Registered Mail

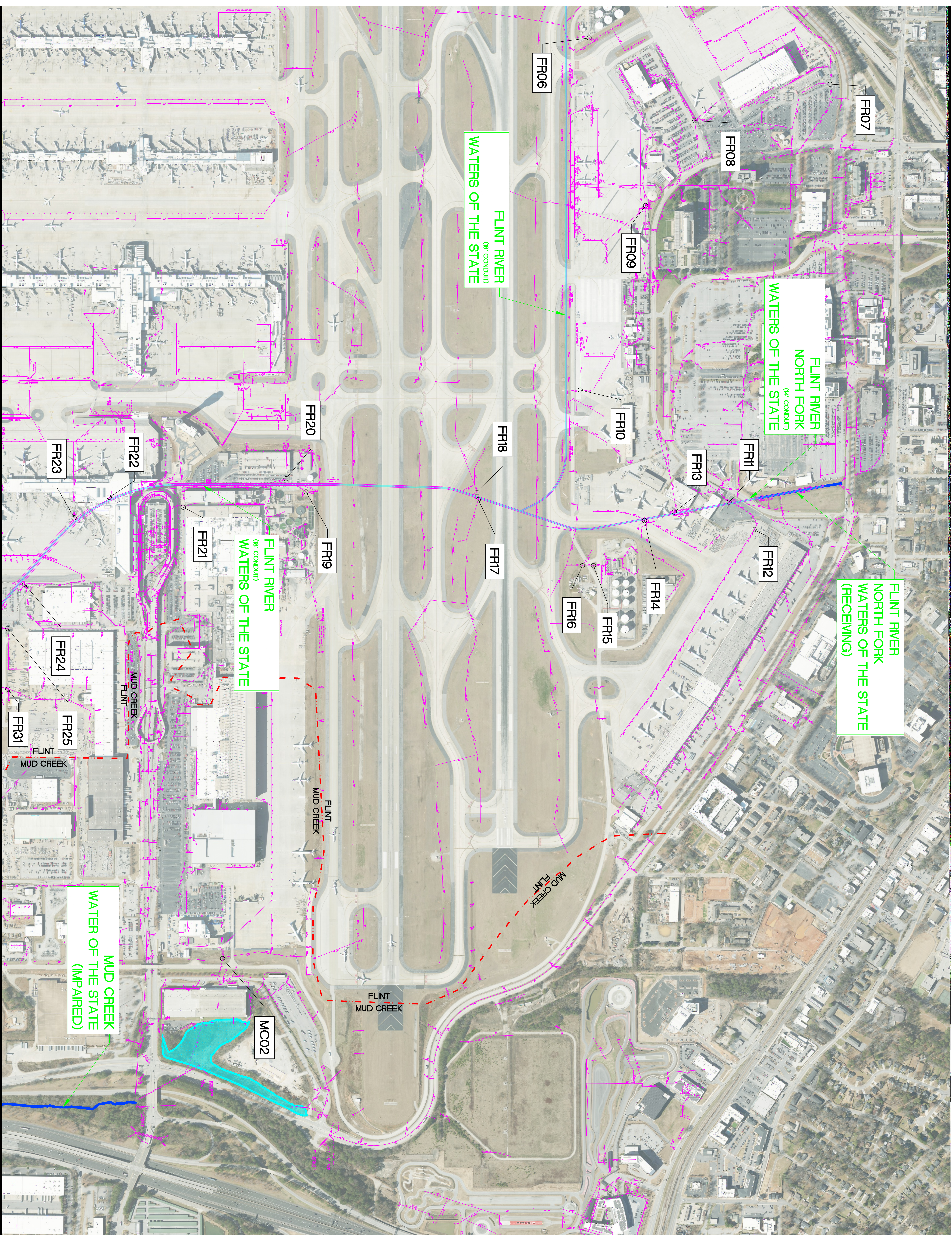
Jeff Cown, Director
Georgia Department of Natural Resources
Environmental Protection Division
2 Martin Luther King, Jr. Drive, SE
Suite 1456 – East Tower
Atlanta, GA 30334

Lee Zeldin, Administrator
Environmental Protection Agency
Office of the Administrator
Mail Code 1101A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

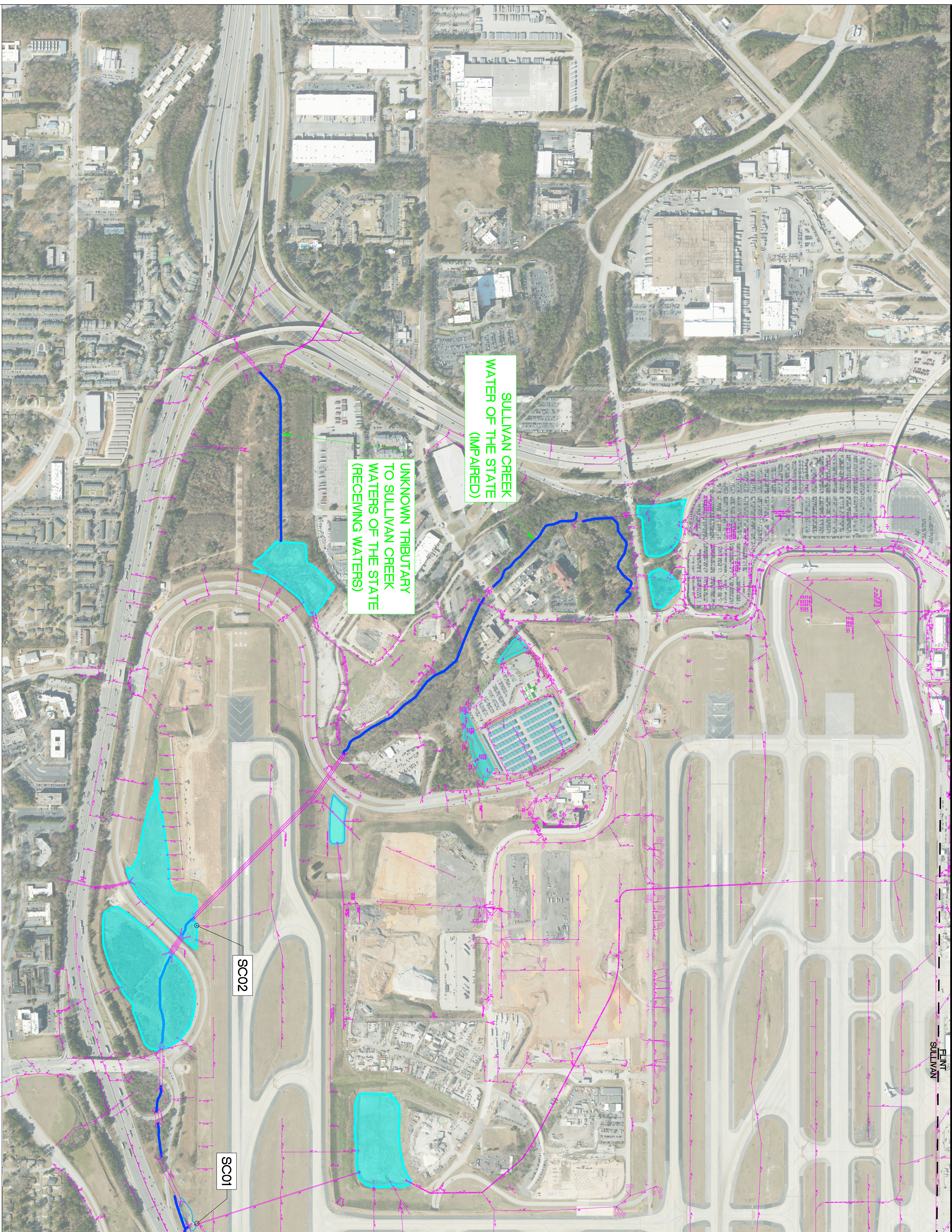
Kevin J. McOmber, Regional Administrator
U.S. Environmental Protection Agency –
Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-3104

Todd Blanche, Acting Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington DC 20530

Exhibit A



 CITY OF ATLANTA, GEORGIA Hartsfield-Jackson Atlanta International Airport		DEPARTMENT OF AVIATION PLANNING & DEVELOPMENT	
LEGEND — STORM SEWER --- 100 YEAR FLOOD LEVEL DRAINAGE BASINS --- CREEK OF RIVER WATERS OF THE STATE --- FLUENT MUD CREEK DRAINAGE DIVIDE LINE --- FLUENT SULLYMAN DRAINAGE DIVIDE LINE FFOI FLUENT RIVER OUTFALL 			
NO. DATE BY REVISION		DRAWN BY: LR DESIGNED BY: LR, WB CHECKED BY: LR, WB APPROVED BY: WB	
AIRPORT STORM WATER SYSTEM		STORM WATER PERMIT DRAWINGS	
T.C. NUMBER:		CONSULTANT PROJECT NUMBER:	
SHEET NO. 2		DATE: FEB. 25, 2026 SCALE: 1"=300'	



Hartsfield-Jackson
Atlanta International Airport

CITY OF ATLANTA, GEORGIA

The seal of the City of Atlanta, Georgia, is a circular emblem. It features an eagle with spread wings in the center. The words "CITY OF ATLANTA" are inscribed around the top inner edge, and "GEORGIA" is at the bottom. The years "1847" and "1996" are positioned on the left and right sides, respectively, separated by a vertical line.

LEGEND

- 18'
RCP
- STORM SEWER
- 100 YEAR FLOOD LEVEL
DRAINAGE BASINS
- CREEK OF RIVER
WATERS OF THE STATE
- PLANT
- MUD CREEK
- DRAINAGE DIVIDE LINE
- FLINT RIVER OUTFALL
- SULLMAN
- FR01

[illegible]

WBS NUMBER:	DRAWN BY: LR
FC NUMBER:	DESIGNED BY: LR WB
CONSULTANT PROJECT NUMBER:	CHECKED BY: LR WB

Exhibit B

Dates Where Rainfall Exceeded 0.03 in. per Hour					
7/30/2021	5/23/2022	2/2/2023	10/11/2023	7/28/2024	8/3/2025
8/1/2021	5/25/2022	2/10/2023	10/12/2023	7/29/2024	8/4/2025
8/3/2021	5/26/2022	2/11/2023	10/13/2023	7/30/2024	8/5/2025
8/12/2021	6/6/2022	2/12/2023	10/20/2023	8/3/2024	8/15/2025
8/16/2021	6/7/2022	2/17/2023	11/10/2023	8/16/2024	8/19/2025
8/17/2021	6/8/2022	2/23/2023	11/11/2023	9/12/2024	8/20/2025
8/22/2021	6/27/2022	2/24/2023	11/21/2023	9/25/2024	9/6/2025
8/25/2021	7/3/2022	3/2/2023	12/1/2023	9/26/2024	9/25/2025
8/27/2021	7/5/2022	3/3/2023	12/3/2023	9/27/2024	10/19/2025
8/30/2021	7/8/2022	3/9/2023	12/9/2023	11/14/2024	10/27/2025
8/31/2021	7/9/2022	3/10/2023	12/10/2023	11/19/2024	10/29/2025
9/15/2021	7/10/2022	3/12/2023	12/25/2023	11/20/2024	11/2/2025
9/16/2021	7/13/2022	3/17/2023	12/26/2023	11/26/2024	11/8/2025
9/18/2021	7/18/2022	3/25/2023	1/5/2024	12/9/2024	11/25/2025
9/19/2021	7/19/2022	3/26/2023	1/6/2024	12/10/2024	11/30/2025
9/20/2021	7/30/2022	3/27/2023	1/8/2024	12/11/2024	12/1/2025
9/22/2021	8/4/2022	4/1/2023	1/9/2024	12/27/2024	12/2/2025
10/3/2021	8/6/2022	4/3/2023	1/12/2024	12/28/2024	12/4/2025
10/4/2021	8/7/2022	4/8/2023	1/16/2024	12/29/2024	12/5/2025
10/5/2021	8/9/2022	4/13/2023	1/25/2024	1/5/2025	12/19/2025
10/6/2021	8/10/2022	4/14/2023	1/27/2024	1/6/2025	1/2/2026
10/7/2021	8/11/2022	4/16/2023	2/4/2024	1/18/2025	1/3/2026
10/28/2021	8/15/2022	4/27/2023	2/5/2024	1/27/2025	1/9/2026
11/4/2021	8/17/2022	4/29/2023	2/11/2024	1/31/2025	1/10/2026
11/11/2021	8/19/2022	4/30/2023	2/12/2024	2/7/2025	1/22/2026
11/22/2021	8/20/2022	5/12/2023	2/23/2024	2/9/2025	1/25/2026
11/25/2021	8/21/2022	5/15/2023	2/28/2024	2/11/2025	2/15/2026
11/26/2021	8/22/2022	5/16/2023	3/1/2024	2/12/2025	2/21/2026
12/6/2021	8/25/2022	5/20/2023	3/5/2024	2/13/2025	2/26/2026
12/8/2021	8/27/2022	5/21/2023	3/6/2024	2/16/2025	2/27/2026
12/10/2021	8/30/2022	5/22/2023	3/8/2024	2/19/2025	3/6/2026
12/11/2021	9/3/2022	6/4/2023	3/9/2024	3/5/2025	3/7/2026
12/18/2021	9/4/2022	6/6/2023	3/15/2024	3/9/2025	3/8/2026
12/29/2021	9/5/2022	6/11/2023	3/22/2024	3/10/2025	3/9/2026
12/30/2021	9/10/2022	6/12/2023	3/26/2024	3/16/2025	3/10/2026
1/1/2022	9/20/2022	6/14/2023	4/2/2024	3/20/2025	3/12/2026
1/2/2022	10/12/2022	6/19/2023	4/3/2024	3/24/2025	3/16/2026
1/3/2022	10/13/2022	6/21/2023	4/9/2024	3/31/2025	4/5/2026
1/6/2022	10/25/2022	6/22/2023	4/10/2024	4/6/2025	4/28/2026
1/9/2022	10/30/2022	6/25/2023	4/11/2024	4/7/2025	4/29/2026
1/20/2022	10/31/2022	6/30/2023	4/17/2024	4/10/2025	4/30/2026
2/2/2022	11/10/2022	7/2/2023	4/20/2024	4/25/2025	5/6/2026
2/3/2022	11/11/2022	7/3/2023	4/21/2024	5/2/2025	5/7/2026
2/4/2022	11/15/2022	7/4/2023	4/30/2024	5/17/2025	5/17/2026
2/17/2022	11/25/2022	7/7/2023	5/5/2024	5/18/2025	5/22/2026
2/18/2022	11/26/2022	7/9/2023	5/9/2024	5/21/2025	5/23/2026

2/21/2022	11/27/2022	7/10/2023	5/10/2024	5/25/2025	5/24/2026
2/22/2022	11/29/2022	7/20/2023	5/18/2024	5/26/2025	5/25/2026
2/23/2022	11/30/2022	7/21/2023	5/25/2024	5/27/2025	5/26/2026
2/25/2022	12/3/2022	7/22/2023	5/27/2024	5/28/2025	5/27/2026
2/27/2022	12/5/2022	7/28/2023	6/2/2024	5/29/2025	5/29/2026
3/7/2022	12/6/2022	8/3/2023	6/6/2024	5/30/2025	6/8/2026
3/8/2022	12/9/2022	8/6/2023	6/10/2024	6/4/2025	6/10/2026
3/9/2022	12/11/2022	8/7/2023	6/24/2024	6/10/2025	6/14/2026
3/12/2022	12/14/2022	8/10/2023	6/27/2024	6/12/2025	6/16/2026
3/15/2022	12/15/2022	8/11/2023	6/29/2024	6/14/2025	6/17/2026
3/16/2022	12/23/2022	8/12/2023	7/4/2024	6/17/2025	6/18/2026
3/18/2022	12/31/2022	8/14/2023	7/5/2024	6/25/2025	6/19/2026
3/23/2022	1/3/2023	8/15/2023	7/7/2024	6/26/2025	6/23/2026
3/31/2022	1/4/2023	8/28/2023	7/9/2024	6/27/2025	7/3/2026
4/5/2022	1/8/2023	8/29/2023	7/18/2024	6/28/2025	7/5/2026
4/14/2022	1/12/2023	8/30/2023	7/19/2024	7/1/2025	7/9/2026
4/16/2022	1/17/2023	9/9/2023	7/20/2024	7/9/2025	7/10/2026
4/26/2022	1/18/2023	9/13/2023	7/21/2024	7/10/2025	7/11/2026
5/4/2022	1/22/2023	9/14/2023	7/23/2024	7/11/2025	7/12/2026
5/6/2022	1/25/2023	9/15/2023	7/24/2024	7/18/2025	7/13/2026
5/13/2022	1/29/2023	9/16/2023	7/25/2024	7/21/2025	7/14/2026
5/15/2022	1/30/2023	9/17/2023	7/26/2024	7/23/2025	7/19/2026