

Submitted via e-mail: Jonathan.Peng1@dnr.ga.gov

May 8, 2026

Jonathan Peng  
Environmental Compliance Specialist 3  
Emergency Response Team  
Environmental Protection Division  
Georgia Department of Natural Resources

**Re:** ATL Airport Petroleum Release – Request to Discontinue Surface Water Monitoring

Dear Mr. Peng:

On behalf of VGS2MATL, Joint Venture (VGS2MATL), ECM is submitting this request to discontinue the surface water monitoring in the Flint River that was implemented subsequent to the January 30, 2026 release at the A34 Vault.

The attached table documents the surface water sampling data through the last sampling event on April 30, 2026. The data show that impacts associated with release event are no longer present. In the most recent sampling rounds, most analytical results are non-detect, with sporadic, low-level detections (estimated concentrations) of some poly aromatic hydrocarbons (PAHs).

Based on the results, VGS2MATL is requesting permission to discontinue surface water monitoring along the Flint River. The next bi-weekly sampling event, if required, is scheduled for Wednesday, May 13, 2026, so we would appreciate a response as soon as possible.

We are in the process of finalizing the surface water sampling report reflecting the above recommendation, which will include the supporting analytical data. If you have any questions or comments, please do not hesitate to contact me at (347) 408-4553.

Respectfully,  
**ECM CONSULTANTS**



Herbert W. Ernst, P.G.  
*Program Manager*

Attach: Table 1 – Surface Water Sample Analytical Results

cc (via email): Jerald Mitchell, VGS2MATL  
Ronald Menges, VGS2MATL  
Wesley Bowen, Atlanta Department of Aviation

Table 1 - Surface Water Sample Analytical Results  
A34 Release  
VGS2MATL, JV  
Atlanta International Airport, Atlanta, Georgia

|                               |                        |             | TPH<br>(8015C)         | BTEX<br>(8260D) |         |               |            |           | PAHs<br>(8270E) |                |            |                    |                |                      |                    |                      |          |                       |              |          |                        |             |              |         |                     |                     |         |
|-------------------------------|------------------------|-------------|------------------------|-----------------|---------|---------------|------------|-----------|-----------------|----------------|------------|--------------------|----------------|----------------------|--------------------|----------------------|----------|-----------------------|--------------|----------|------------------------|-------------|--------------|---------|---------------------|---------------------|---------|
| Sample Location               | Sample Date            | Sample Time | TPH - DRO<br>(C10-C28) | Benzene         | Toluene | Ethyl Benzene | m,p-Xylene | o-Xylene  | Acenaphthene    | Acenaphthylene | Anthracene | Benzo(a)anthracene | Benzo(a)pyrene | Benzo(b)fluoranthene | Benzo(ghi)perylene | Benzo(k)fluoranthene | Chrysene | Dibenz(a,h)anthracene | Fluoranthene | Fluorene | Indeno(1,2,3-cd)pyrene | Naphthalene | Phenanthrene | Pyrene  | 1-Methylnaphthalene | 2-Methylnaphthalene |         |
| Sample Results                |                        |             |                        |                 |         |               |            |           |                 |                |            |                    |                |                      |                    |                      |          |                       |              |          |                        |             |              |         |                     |                     |         |
| Units                         |                        |             | (mg/L)                 | (ug/L)          |         |               |            |           |                 |                |            |                    |                |                      |                    | (ug/L)               |          |                       |              |          |                        |             |              |         |                     |                     |         |
| Flint River - Upstream #1     | 2/2/2026               | 18:30       | ND                     | ND              | ND      | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | ND          | ND           | ND      | ND                  | ND                  |         |
|                               | 2/26/2026              | 11:39       | ND                     | ND              | ND      | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | 0.083 J      | ND       | ND                     | ND          | ND           | 0.051 J | 0.047 J             | ND                  | ND      |
|                               | 3/4/2026               | --          | 0.1 J                  | ND              | ND      | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | 0.044 J            | ND                   | ND       | 0.028 J               | ND           | 0.062 J  | 0.032 J                | ND          | ND           | 0.037 J | 0.056               | 0.04 J              | 0.057 J |
|                               | 3/11/2026              | 15:07       | ND                     | ND              | ND      | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | 0.047 J      | ND       | ND                     | ND          | ND           | 0.12    | ND                  | ND                  | ND      |
|                               | 3/18/2026 <sup>2</sup> | 12:02       | ND                     | ND              | 3.6     | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | 0.058 J     | ND           | ND      | ND                  | ND                  | ND      |
|                               | 3/26/2026              | 14:25       | ND                     | ND              | ND      | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | ND          | ND           | 0.043 J | ND                  | ND                  | ND      |
|                               | 4/1/2026               | 10:33       | 0.18 J                 | ND              | 1.1     | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | ND          | ND           | ND      | ND                  | ND                  | ND      |
|                               | 4/15/2026              | 11:26       | ND                     | ND              | 0.83 J  | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | 0.099 J            | ND                   | 0.037 J  | 0.12                  | ND           | 0.25     | ND                     | ND          | ND           | 0.13    | 0.13                | ND                  | ND      |
| 4/30/2026                     | 9:25                   | ND          | ND                     | ND              | ND      | ND            | ND         | 0.055 J * | ND              | 0.042 J *      | ND         | 0.024 J            | 0.055 J        | ND                   | 0.022 J            | 0.050 J *1           | ND       | 0.16 *1               | 0.061 J *    | ND       | 0.047 J *              | 0.18        | 0.094 *1     | ND      | ND                  |                     |         |
| Quarry Outfall #1             | 2/2/2026               | 15:00       | 0.50                   | ND              | ND      | ND            | ND         | 1.9       | 1.1             | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | 0.75     | ND                     | 9.2         | 0.24         | ND      | 8.6                 | 12                  |         |
|                               | 2/9/2026               | 5:30        | 0.091 J                | ND              | ND      | ND            | ND         | ND        | 0.06 J          | 0.023 J        | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | 0.11     | ND                     | 0.14 J      | 0.042 J      | ND      | 0.28 J              | 0.29 J              |         |
|                               | 2/18/2026              | 9:31        | ND                     | ND              | ND      | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | 0.081 J      | ND       | 0.11 J                 | 0.032 J     | ND           | 0.2 J   | 0.14 J              |                     |         |
|                               | 2/26/2026              | 12:12       | 0.21                   | ND              | ND      | ND            | ND         | ND        | 0.064 J         | ND             | ND         | ND                 | ND             | 0.059 J              | ND                 | 0.019 J              | 0.043 J  | ND                    | 0.11         | 0.053 J  | ND                     | 0.099 J     | 0.078        | 0.07    | 0.13 J              | 0.12 J              |         |
|                               | 3/4/2026               | --          | ND                     | ND              | ND      | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | 0.047 J      | ND       | 0.2 J                  | ND          | ND           | 0.34 J  | 0.36 J              |                     |         |
|                               | 3/11/2026              | 12:12       | ND                     | ND              | ND      | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | ND          | ND           | ND      | ND                  | ND                  |         |
|                               | 3/18/2026              | 12:20       | ND                     | ND              | ND      | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | 0.13 J      | 0.031 J      | ND      | ND                  | ND                  |         |
|                               | 4/1/2026               | 9:57        | 0.16 J                 | ND              | 0.65 J  | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | ND          | ND           | ND      | ND                  | ND                  |         |
|                               | 4/15/2026              | 11:05       | ND                     | ND              | 1.2     | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | ND          | ND           | ND      | ND                  | ND                  |         |
| 4/30/2026                     | 11:11                  | ND          | ND                     | ND              | ND      | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | 0.036 J        | ND                   | 0.017 J            | 0.022 J *1           | ND       | 0.034 J *1            | ND           | ND       | ND                     | ND          | 0.055 *1     | ND      | ND                  |                     |         |
| Outfall FR-1 #1<br>(AATC Lot) | 2/2/2026               | 6:00        | 830                    | ND              | ND      | 1.4           | 8.1        | 7         | 430             | 39             | 4.4        | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | 1.4          | 230      | ND                     | 2200        | 52           | 1.3     | 3700                | 5300                |         |
|                               | 2/9/2026               | 5:05        | 1.8                    | ND              | 0.62 J  | 0.69 J        | 3          | 2.1       | 2.3             | 0.26 J         | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | 0.035 J      | 1.5      | ND                     | 40          | 0.36         | ND      | 41                  | 57                  |         |
|                               | 2/18/2026              | 10:11       | 9.7                    | ND              | 0.57 J  | 0.46 J        | 2.1        | 1.3       | 4.5             | 0.44 J         | 0.076      | ND                 | 0.044 J        | 0.22                 | 0.059 J            | 0.051 J              | 0.18     | ND                    | 0.34         | 3.2      | 0.068                  | 5.2         | 0.72         | 0.22    | 19                  | 28                  |         |
|                               | 2/26/2026              | 16:50       | 0.45                   | ND              | ND      | ND            | ND         | ND        | ND              | ND             | ND         | 0.1                | 0.2            | 0.46                 | 0.28               | 0.16                 | 0.35     | 0.043 J               | 0.77         | 0.095 J  | 0.22                   | 0.24 J      | 0.46         | 0.49    | 0.41 J              | 0.45 J              |         |
|                               | 3/4/2026               | --          | ND                     | ND              | 0.48 J  | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | 0.11 J      | ND           | ND      | 0.16 J              | 0.14 J              |         |
|                               | 3/11/2026              | 16:16       | 0.089 J                | ND              | 1.1     | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | ND          | ND           | ND      | ND                  | ND                  |         |
|                               | 3/18/2026              | 15:20       | ND                     | ND              | 2.5     | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | 0.097 J     | ND           | ND      | ND                  | ND                  |         |
|                               | 4/1/2026               | 13:29       | 0.15 J                 | ND              | 1.7     | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | ND          | ND           | ND      | ND                  | ND                  |         |
|                               | 4/15/2026              | 14:40       | ND                     | ND              | ND      | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | 0.062 J     | 0.062        | ND      | ND                  | ND                  |         |
| 4/30/2026                     | 11:40                  | 0.14 J *1   | ND                     | ND              | ND      | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | ND          | ND           | ND      | ND                  |                     |         |
| Duplicate Sample<br>(AATC)    | 2/26/2026              | 16:50       | 0.37                   | ND              | ND      | ND            | ND         | ND        | ND              | ND             | ND         | 0.069              | 0.13           | 0.3                  | 0.15               | 0.1                  | 0.26     | ND                    | 0.56         | 0.069 J  | 0.11                   | 0.18 J      | 0.34         | 0.35    | 0.28 J              | 0.32 J              |         |
|                               | 4/30/2026              | 11:50       | 0.14 J *1              | ND              | ND      | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | ND          | ND           | ND      | ND                  | ND                  |         |
| Forest Parkway #1             | 2/2/2026               | 5:35        | 6.3                    | ND              | ND      | 1.9           | 9          | 7.3       | 5.8             | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | 4        | ND                     | 100         | 0.67         | ND      | 110                 | 150                 |         |
|                               | 2/9/2026               | 4:45        | 3.7                    | ND              | 0.32 J  | 0.5 J         | 2.3        | 1.7       | 4.9             | 0.47 J         | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | 0.062 J      | 3.4      | ND                     | 22          | 0.82         | 0.044 J | 39                  | 55                  |         |
|                               | 2/18/2026              | 11:16       | 0.11 J                 | ND              | ND      | ND            | ND         | ND        | 0.24 J          | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | 0.2      | ND                     | 1.8         | 0.068        | ND      | 3.4                 | 4.3                 |         |
|                               | 2/26/2026              | 16:31       | 0.50                   | ND              | ND      | ND            | ND         | ND        | 0.13 J          | 0.025 J        | 0.042 J    | 0.14               | 0.3            | 0.63                 | 0.37               | 0.24                 | 0.53     | 0.061 J               | 1.1          | 0.14     | 0.3                    | 0.43 J      | 0.7          | 0.75    | 0.72                | 0.86                |         |
|                               | 3/4/2026               | --          | ND                     | ND              | ND      | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | 0.13 J      | 0.044 J      | ND      | 0.1 J               | ND                  |         |
|                               | 3/11/2026              | 16:55       | ND                     | ND              | 1.3     | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | ND          | ND           | ND      | ND                  | ND                  |         |
|                               | 3/18/2026              | 15:06       | ND                     | ND              | 7.1     | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | 0.11 J      | ND           | ND      | 0.12 J              | 0.13 J              |         |
|                               | 4/1/2026               | 13:04       | 0.12 J                 | ND              | 1.1     | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | ND          | ND           | ND      | ND                  | ND                  |         |
|                               | 4/15/2026              | 14:21       | 0.081 J                | ND              | 1.1     | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | 0.054 J     | 0.035 J      | ND      | ND                  | ND                  |         |
| 4/30/2026                     | 12:30                  | 0.097 J *1  | ND                     | ND              | ND      | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | ND          | ND           | ND      | ND                  |                     |         |
| Lee's Bridge                  | 2/2/2026               | 5:10        | 31                     | ND              | ND      | 2.4           | 12         | 10        | 11              | 1.1            | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | 7        | ND                     | 86          | 1.4          | ND      | 140                 | 170                 |         |
|                               | 2/9/2026               | 4:35        | 4.8                    | ND              | ND      | ND            | 1.5 J      | 1.1       | 2.8             | 0.28 J         | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | 0.034 J      | 2.1      | ND                     | 14          | 0.52         | ND      | 27                  | 33                  |         |
|                               | 2/18/2026              | 11:43       | 0.087 J                | ND              | ND      | ND            | ND         | ND        | 0.38 J          | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | 0.032 J      | 0.29     | ND                     | 2.1         | 0.095        | ND      | 4.7                 | 5.6                 |         |
|                               | 2/26/2026              | 16:17       | 0.12 J                 | ND              | ND      | ND            | ND         | ND        | 0.14 J          | ND             | ND         | ND                 | 0.051          | 0.14                 | 0.075 J            | 0.04 J               | 0.098    | ND                    | 0.22         | 0.15     | 0.064                  | 0.49 J      | 0.14         | 0.15    | 0.99                | 1.1                 |         |
|                               | 3/4/2026               | --          | ND                     | ND              | ND      | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | 0.17 J      | 0.028 J      | ND      | 0.41 J              | 0.38 J              |         |
|                               | 3/11/2026              | 10:38       | ND                     | ND              | 1.6     | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | ND          | ND           | ND      | ND                  | ND                  |         |
|                               | 3/18/2026              | 14:55       | ND                     | ND              | ND      | ND            | ND         | ND        | ND              | ND             | ND         | ND                 | ND             | ND                   | ND                 | ND                   | ND       | ND                    | ND           | ND       | ND                     | 0.11 J      | ND           | ND      | 0.16 J              | 0.18 J              |         |
|                               | 4/1/2026               | 12:50       | 0.20                   | ND              | 1.5     | ND            | ND         | ND        | ND              |                |            |                    |                |                      |                    |                      |          |                       |              |          |                        |             |              |         |                     |                     |         |

**Table 1 - Surface Water Sample Analytical Results**  
**A34 Release**  
**VGS2MATL, JV**  
**Atlanta International Airport, Atlanta, Georgia**

[illegible]

Table 1 - Surface Water Sample Analytical Results  
A34 Release  
VGS2MATL, JV  
Atlanta International Airport, Atlanta, Georgia

|                 |             |             | TPH<br>(8015C)         | BTEX<br>(8260D) |         |               |            |          | PAHs<br>(8270E) |                |            |                    |                |                      |                    |                      |          |                       |              |          |                        |             |              |        |                     |                     |
|-----------------|-------------|-------------|------------------------|-----------------|---------|---------------|------------|----------|-----------------|----------------|------------|--------------------|----------------|----------------------|--------------------|----------------------|----------|-----------------------|--------------|----------|------------------------|-------------|--------------|--------|---------------------|---------------------|
| Sample Location | Sample Date | Sample Time | TPH - DRO<br>(C10-C28) | Benzene         | Toluene | Ethyl Benzene | m,p-Xylene | o-Xylene | Acenaphthene    | Acenaphthylene | Anthracene | Benzo(a)anthracene | Benzo(a)pyrene | Benzo(b)fluoranthene | Benzo(ghi)perylene | Benzo(k)fluoranthene | Chrysene | Dibenz(a,h)anthracene | Fluoranthene | Fluorene | Indeno(1,2,3-cd)pyrene | Naphthalene | Phenanthrene | Pyrene | 1-Methylnaphthalene | 2-Methylnaphthalene |

**Notes:**

1 - Upper Riverdale Road and Valley Hill Road were added to the sampling schedule at the request of GA EPD after the February 2, 2026 sampling event; therefore, no samples were collected at these locations on that date.

2 - During the 3/18/2026 sampling event, sample bottles for Flint River Upstream #1 and Upper Riverdale Road had labels switched. The table has been adjust to reflect the correct analytical results for each sample.

3 - GA Instream Criteria from 391-3-6-.03. Waste Treatment and Permit Requirements. 391-3-6-.03(5)(e)(iv) – Instream concentrations of chemical constituents listed as toxic priority pollutants pursuant to Section 307(a)(1) of the Federal Clean Water Act shall not exceed criteria under annual average or higher stream flow conditions.

\*\* - For the analytes indicated, numerical instream standards are not provided. The Waste Treatment and Permit Requirements under 391-3-6-.06 (4)(d)(iii) indicate that site-specific may be developed for these analytes for incorporation into permits.

\*+ = LCS and or LCSD is outside acceptance limits, high biased.  
\*1 = LCS/LCSD RPD exceeds control limits.  
BTX = Benzene, Toluene, and Xylene  
DRO = Diesel Range Organics  
**Bold** = Analyte is equal to or greater than laboratory method detection limit  
**Highlighted** = Analyte is equal to or greater than GA Instream Criteria, but is less than the laboratory method detection limit (J - estimated value)  
**Highlighted and Bold** = Analyte is equal to or greater than laboratory method detection limit and detected at or greater than GA Instream Criteria  
I = Value is EMPC (estimated maximum possible concentration)  
J = Result is less than the reporting limit but greater than or equal to MDL, and the concentration is an approximate value  
LCS = Lab control sample.  
LCSD = Lab control sample duplicate.  
ND = Not Detected at the reporting limit or method detection limit  
NE = Not established  
PAHs = Polynuclear Aromatic Hydrocarbons  
RPD = Relative percent difference, a measure of the relative difference between two points.  
TPH = Total Petroleum Hydrocarbons