

AMC-WSG LLC : 2EP7-S3XE-WQQ

Groundwater - Comprehensive Inspection

Inspector: Brent Benson

Start Date: 04/01/2025 Completed Date: 05/20/2025

Facility Information

1. Facility Designated Name:	AMC-WSG LLC
2. Facility Address:	4984 EARHART RD
3. Facility County:	Washtenaw
4. Type of Facility:	GW-Industrial

Opening Inspection Information

5. Last Inspection:

Type of Inspection	Name of Inspector	Date of Inspection
n/a	n/a	

There is no prior inspection or enforcement history for the facility.

6. Has the permittee responded to the last inspection, enforcement, or general letter (if requested), and addressed any deficiencies as necessary?

Yes No NA

There is no prior inspection or enforcement history for the facility.

7. Current Inspection:

Type of Inspection	Name of Inspector	Date of Inspection
cei	B. Benson	03/31/2025

8. Inspection Participant Information:

Participant Name	Title	Affiliation	Phone Number	Email Address
Jeff McConnell	Site Manager	Vela Pit	1-810-300-3305	jmcconnell@midmichiganmaterials.com
Jonathan Vaughn	Technical Services Coordinator	Vela Pit	1-810-363-1322	jjvaughn@midmichiganmaterials.com
Robert Wilson	President	Vela Pit		rwilson@midmichiganmaterials.com

9. Approximate inspection start time:

11:03 AM

AMC-WSG LLC : 2EP7-S3XE-WQQ

Groundwater - Comprehensive Inspection

Inspector: Brent Benson

Start Date: 04/01/2025 Completed Date: 05/20/2025

Opening Inspection Information

10. Opening conference notes:

The facility harvests concrete, gravel, and class II fill sand that is road based. The aggregate materials are extracted from land that encompasses an area about 40 acres that is east of the front office. The extraction process uses a front end loader to transport buckets of aggregate out of the ground to the wash plant. Wash water for the aggregate is obtained from ground water onsite that is held at a pond designated as pond 2. Based on a map dated September 2024 from Haley Aldrich and from information provided by the site manager, as well as from the Technical Services Coordinator the process for the washing of the mined materials and waste water production involves the following steps: a. Clean water is pumped from Pond 2 to the wash plant. See picture img_3935. The wash plant is approximately 100 feet from where the sand and gravel are extracted. b. At the wash plant, the clean water is used to wash the excavated material. c. A belt drive is started and transports the material to a slurifier. The slurifier is designed to ensure the material is converted to a slurry. d. From the slurifier, the aggregate is transferred to a classification tank where the material is separated into different grades of sand and gravel based on particle size. See videos img_3940 and img_3942. From the classifying tank, the finished product is stockpiled on the ground in accordance to the grade. The wash water from the wash plant is transferred to a trench that leads to pond 4 which is a settling basin. See videos img_3949. Some settling of solids takes place at the trench. A culvert pipe leading from the \$\$ north east \$\$ side of the trench transfers the wash water to the settling pond, which is pond 4. See videos img_3949 and img_3950. The settling pond is designed to treat the wash water by allowing solids to settle out of the water and to the bottom of the pond. See video img_3950. When asked, what steps are taken to ensure the discharge is not or not likely to become injurious, the manager reported that the settling pond is used to remove solids from the wash water discharge. There is no set amount of time that the wash water must spend at the settling pond, as the determination of whether enough sediment has been removed from the wash water is not based on the time the water spends at the pond.

After pond 4, the water is discharged to pond 3. Based on the map dated September 2024, a pump is present at pond 3 to transfer the water to pond 2. On the map, pond two is listed as a settling pond. Pond 2 has an overflow connection to pond 1. Once at pond 1 or 2, the wash water is considered treated with respect to the removal of sediment or solids and it is pumped back from pond 2 to the wash plant to restart the process.

Per the manager, everything at the mining area is higher than the water table.

Permit Review

11a. Permit Number	GW1540096
11b. Permit Version	1
11c. Permit Effective Date	02/01/2022
11d. Permit Expiration Date	04/01/2025

AMC-WSG LLC : 2EP7-S3XE-WQQ

Groundwater - Comprehensive Inspection

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Start Date: 04/01/2025 Completed Date: 05/20/2025

Permit Review

<i>12a. Current Permit Status:</i>	In Effect
<i>12b. If Permit is expired, was reapplication made? If Yes, include date of re-application in comments:</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
<i>13a. Permit Rule Authorization (Permit Category):</i>	Rule 2215 Authorization
<i>13b. Permit Subcategory (if applicable):</i>	2215-05-4, Gravel, Sand, Limestone, or Mining
<i>14a. List the specific industrial/commercial or municipal processes that produce the raw wastewater flows:</i> See the answer to question 10.	
<i>14b. Does the current permit (or permit application) accurately identify these wastewater sources? (Cross check following on-site visit to determine if a permit modification is necessary)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
<i>15. Wastewater Treatment Method:</i> See the answer to question 10.	
<i>16. Wastewater Disposal Method:</i> See the answer to question 10.	
<i>17. Authorized discharge flow/volume:</i>	
Daily (include units) Certificate of coverage gw1540096 under general permit gw1540000 prescribes no limits for the \$ daily discharge rate.	Annually (include units) 3,048,480,000 gallons per day
<i>18. Are there additional (unauthorized) discharges? If Yes, describe in comments.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
<i>19. Are the permittee name, site location, and mailing address the same as in the permit? If No, provide current Permittee Name, Permittee Site Location and/or Permittee Mailing Address in the comments.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
Permittee address: 4984 Earhart Road, Ann Arbor, Michigan 48105	
<i>20. Is a permit modification in order due to a change in name, ownership, or operations? If Yes, explain in comments.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA

AMC-WSG LLC : 2EP7-S3XE-WQQ

Groundwater - Comprehensive Inspection

Inspector: Brent Benson

Start Date: 04/01/2025 Completed Date: 05/20/2025

Permit Review

21. If applicable, is the facility in compliance with Special Conditions within the Permit? If No, please explain in comments.

Yes No NA

No Special Conditions are prescribed in permit gw1540000. Part I Section 1, A. 4. prescribes specific conditions. Regarding these conditions, the site manager reported that no wash water additives are added to the water. The wash water just consists of the existing pond water onsite. Regarding the water source, when asked the site manager reported that of the approved sources listed, the source water from the plant would likely meet the requirements of source 4.b. iv. On the initial groundwater application, hps - ek8r - 25rmx received on September 30, 2020, the applicant reported that their water source meets state or federal criteria for potable water. The same information regarding the water source was also provided on reissuance application, hp6 - pcva - n73fx received on 4.1.2025.

Areas Evaluated:

22. Permit Review Compliance Rating:

Satisfactory

Operator Certification and Facility Classification

23. Has a classification letter been sent to the facility? If yes, list the classification(s) and date of classification in comments.

Yes No NA

A basis of decision was drafted on 4.11.2025. April 22, 2025: A classification has not yet been sent to the facility. On 4.15.2025 npdes language was added to the basis of decision. On 4.15.2025, it was determined by wrd staff, M. Myers. R. Burns, and B. Benson that the npdes classification will be sufficient to meet the requirements of the ground water special classification a - 1a. In addition, it was determined that the certificate for the certified operator, Jeffrey W. Wilson will be sufficient for the requirements for the ground water certified operator.

24. Is the site properly classified?

Yes No NA

See the answer to question 23.

AMC-WSG LLC : 2EP7-S3XE-WQQ

Groundwater - Comprehensive Inspection

Inspector: Brent Benson

Start Date: 04/01/2025 Completed Date: 05/20/2025

Operator Certification and Facility Classification

25. Is the facility classification correct within MiWaters?

Yes No NA

See the answer to question 23. April 22, 2025: updated: Yes.

26a. Current certified operator:

Name	Phone Number	Email Address
Jeffrey W. Wilson	n/a	n/a

At the time of evaluation, documentation of a certified operator was not available. The facility stated that a certified operator was present and they identified an additional staff person that may become a certified operator. April 25, 2025: Update: See the answer to question 23.

26b. Certification(s) of current certified operator:

Certification Category	Certification Number (if applicable)	Certification Expiration Date
a - 1d	w 5662	July 1, 2029

See the answer to question 26 a.

26c. Is the operator properly certified?

Yes No NA

See the answer to question 26 a.

Based on washing operations described from the basis of decision form and based on the waste water process described by the answer to question 10, the classification * 4.22.2025 that is * more applicable is deemed as a - 1d. 4.22.2025: Update: See the answer to question 23.

AMC-WSG LLC : 2EP7-S3XE-WQQ

Groundwater - Comprehensive Inspection

Inspector: Brent Benson

Start Date: 04/01/2025 Completed Date: 05/20/2025

Operator Certification and Facility Classification

27. Has there been a change in certified operator since the permit was issued? If Yes, please note in the comments if the permittee properly notified Water Resource Division of the change?

Yes No NA

On April 11, 2025 an email correspondence was sent to the facility to determine an answer to this question. On April 21, 2025 a response was received from the tech services coordinator reporting that there had been no change in certified operators since the permit was issued.

Areas Evaluated:

28. Operator Certification and Facility Classification Compliance Rating: Satisfactory

Records, Submittals and Reporting

29. Does the permit include SOCs for any of the following:

30. Are any permit SOC submittals overdue?

Yes No NA

There are no schedules of compliance required by the permit.

31. Does the file contain information on any water treatment additives that have been approved? If Yes, list product name(s) and approved concentration(s) in the comments.

Yes No NA

No. Also, see the answer to question 21.

AMC-WSG LLC : 2EP7-S3XE-WQQ

Groundwater - Comprehensive Inspection

Inspector: Brent Benson

Start Date: 04/01/2025 Completed Date: 05/20/2025

Records, Submittals and Reporting

32. Has EGLE received any citizen complaints, spills, SSO, or PEAS reports relating to the facility since the last inspection? If Yes, include the nature, date, and location of the complaint(s) or incident(s) in the comments.

Yes No NA

The inspection conducted on March 31, 2025 was the first groundwater inspection conducted for the facilities ground water discharge permit. There have been no prior ground water inspections. There were however a series of complaints received on 4.6.2023, 8.14.2023, 8.20.2023, 8.21.2023, 8.22.2023, 8.23.2023, 10.18.2023, and 12.17.2023 regarding a drop in static water levels of wells in the area of the pit, poor water quality via sedimentation at area lakes, water withdrawals without impact studies, water withdrawals, contamination of groundwater & depletion of water wells, increases in water withdrawals & its impact on the sustainability on well water, and mining & water usage.

33. Is the facility under an ACO/Directors Order/Consent Judgment? Yes No NA

34. Is the facility utilizing MiWaters for reporting? Yes No NA

Discharge monitoring reports are not a requirement of groundwater discharge permit gw1540000.

35a. Since the last inspection, are DMRs or annual reports complete? If No, Yes No NA list any missing annual report or DMR data in the comments; include a description of what data is missing and the timeframe it is missing for.

See the answers to questions 32 and 34. However, general permit gw1540000 Part I A. 1., a. requires a log to be kept that documents the daily and annual discharge rate to eq 1 which is pond 4. See picture img_3938.

35b. Have annual reports or DMRs generally been submitted on time? Yes No NA

See the answers to questions 32 and 34.

AMC-WSG LLC : 2EP7-S3XE-WQQ

Groundwater - Comprehensive Inspection

Inspector: Brent Benson

Start Date: 04/01/2025 Completed Date: 05/20/2025

Records, Submittals and Reporting

35c. Do DMR report forms (within MiWaters) match permit limits/requirements?

Yes No NA

See the answers to questions 32 and 34.

36a. Since the last inspection, have there been any effluent violations (including flow volume) or groundwater violations?

Yes No NA

See the answer to question 17.

36b. If Yes, list the monitoring point, parameter, date, reported value and permit limit associated with the violation(s). Violation data may be entered in the table below, attached to this question as an image, or uploaded as a separate inspection document within MiWaters.

Monitoring Point	Parameter	Date	Reported Value	Permit Limit

See the answer to question 17.

37. For facilities submitting annual flow reports, have there been any flow violations since the last inspection? If yes, explain in comments.

Yes No NA

See the answer to question 17. \$ A log of daily discharge volumes was sent via email on April 11, 2025. The discharges sent were from dates ranging from April 22, 2024 to October 31, 2024. The totals for each month where discharges took place were provided. The totals of those months was 45,807,878 gallons from April 22, 2024 to October 31, 2024.

AMC-WSG LLC : 2EP7-S3XE-WQQ

Groundwater - Comprehensive Inspection

Inspector: Brent Benson

Start Date: 04/01/2025 Completed Date: 05/20/2025

Records, Submittals and Reporting

38. Has the permittee provided Water Resources Division with the proper notification for violations? Yes No NA

See the answer to question 17.

39. Is an adequate log or other record of visual inspections maintained at the facility? Yes No NA

Groundwater discharge permit gw1540000 does not require visual inspections of the treatment system. When asked, the site manager reported that visual inspections are conducted for risk factors such as turbidity, oil sheens, sediment, foul odors, chemical odors, foam, black colors, and brown colors every day at ponds 1 to 4.

A log of daily discharge volumes was sent via email on April 11, 2025. The discharges sent were from dates ranging from April 22, 2024 to October 31, 2024. The totals for each month where discharges took place were provided. The totals of those months was 45,807,878 gallons from April 22, 2024 to October 31, 2024.

Areas Evaluated:

40. Records, Submittals and Reporting Compliance Rating: Satisfactory

Self-Monitoring Program

41a. For facilities submitting DMRs, use the table below to spot check at least three sets of data points.

Date or Monitoring Period	Effluent or MW#	Parameter	Reported Results (from DMR)	Site Record (from bench sheet or lab rep)	Accurate (yes or no)
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See the answers to questions 32 and 34.

AMC-WSG LLC : 2EP7-S3XE-WQQ

Groundwater - Comprehensive Inspection

Inspector: Brent Benson

Start Date: 04/01/2025 Completed Date: 05/20/2025

Self-Monitoring Program

41b. Are analytical results/bench sheets/contract laboratory reports consistent with the data reported on the DMRs? If the data is not consistent, include comments about if the permittee can explain the discrepancies.

Yes No NA

See the answers to questions 32 and 34.

42. For facilities with spray irrigation fields or rapid infiltration beds, has the permittee maintained records of land application of wastewater?

Yes No NA

43. Are all records and information resulting from the monitoring activities required by this permit (eg DMRs, lab data, maintenance records etc.) maintained for at least three years?

Yes No NA

When asked, the site manager reported that the facility plans to keep records regarding the daily and annual discharge logs indefinitely, though for this facility the plant records are only as old as the plant.

44. Does the inspection contact/operator have copies of the current Permit, Discharge Management Plan, and/or Sampling and Analysis Plan?

Yes No NA

Via an email correspondence received on April 11, 2025, the facility stated that a copy of the permit is maintained onsite and is available for review at any time.

Areas Evaluated:

45. Self-Monitoring Program Compliance Rating: Satisfactory

Facility Site Review

46. Population served by treatment plant (public system only):

AMC-WSG LLC : 2EP7-S3XE-WQQ

Groundwater - Comprehensive Inspection

Inspector: Brent Benson

Start Date: 04/01/2025 Completed Date: 05/20/2025

Facility Site Review

47. Has the service area of the wastewater treatment plant changed since the last application submittal (public system only): Yes No NA

When asked if the amount of sand and or gravel washed had changed since the permit was first issued, the site manager reported that no, that there were no major changes. In addition, when asked whether the earhart facility mines sand or gravel for satellite locations the plant manager reported no.

48. List all treatment unit processes:

See the answer to question 10.

49. Are all treatment units in service? If No, note in the comments which units are not in service and explain why, how long, and when they are expected to be back in service. Yes No NA

Via an email correspondence received on April 11, 2025, the facility stated that all components of the waste water treatment system were in full operation during the evaluation on March 31, 2025.

50. Is a Flow Diagram of Treatment System Attached? A flow diagram may be attached to this question as an image or uploaded as a separate inspection document within MiWaters. Flow Diagrams should include influent, effluent and groundwater sampling locations. Yes No NA

Areas Evaluated:

51. Facility Site Review Compliance Rating: Satisfactory

Analytical and Sampling Methodology

52. Is the facility required to do any sampling? If No, mark the final question on this page as Not Applicable and continue on to next page. Yes No

53. How are staff trained to collect samples?

54. Does the facility have an approved Sampling and Analysis Plan? Yes No NA

55. Does the facility conduct effluent sampling in accordance with the requirements in the Sampling and Analysis Plan (i.e. are samples collected in an appropriate location, collected with the proper sampling equipment, preserved in the appropriate way, handled appropriately after being collected, and delivered in a timely manner to the laboratory)? If No, explain in comments. Yes No NA

56a. Is the facility required to collect groundwater samples? Yes No NA

AMC-WSG LLC : 2EP7-S3XE-WQQ

Groundwater - Comprehensive Inspection

Inspector: Brent Benson

Start Date: 04/01/2025 Completed Date: 05/20/2025

Analytical and Sampling Methodology

56b. Does the facility conduct groundwater sampling in accordance with the requirements in the Sampling and Analysis Plan (i.e. are samples collected in an appropriate location, collected with the proper sampling equipment, collected after the appropriate volume of water is purged, preserved in the appropriate way, handled appropriately after being collected, and delivered in a timely manner to the laboratory)? If No, explain in comments. Yes No NA

56c. For facilities that indicate they utilize low-flow groundwater sampling in their Sampling and Analysis Plan, are low flow procedures being followed? Yes No NA

57a. Is a contract lab used for any sample analysis? If Yes, Provide the name of the lab and which parameters are analyzed in the comments. Yes No NA

57b. Does the permittee have access to a copy of the QA/QC procedures for the contract lab? Yes No NA

57c. Has the contract lab provided written analytical reports and chain of custody records to the permittee? Yes No NA

57d. Do analytical methods used at the contract lab and/or at the facility match analytical methods listed in the Sampling and Analysis Plan? Please explain any inconsistencies (alternative methods, hand-held probes, etc.) Yes No NA

Areas Evaluated:

58. Analytical and Sampling Methodology Compliance Rating: Not Applicable

Laboratory

59. Does the facility have a laboratory? If No, mark the final question on this page as Not Applicable and continue on to next page. Yes No

On April 11, 2025, an email correspondence was sent the facility to determine if they have a laboratory for ground water sampling purposes. April 22.2025: update: On April 21, 2025, a response was received from the facility reported that they do not have a laboratory for ground water sampling purposes.

60. Is clean and proper volumetric glassware is used? Yes No NA

61. Is Equipment operated at the proper temperatures, and logs kept to demonstrate required temperatures? Yes No NA

62. Are laboratory instruments and equipment in good condition and calibrated regularly? Yes No NA

AMC-WSG LLC : 2EP7-S3XE-WQQ

Groundwater - Comprehensive Inspection

Inspector: Brent Benson

Start Date: 04/01/2025 Completed Date: 05/20/2025

Laboratory

63. Are records kept with dates of equipment replacement, repair, and maintenance? Yes No NA

64. Does laboratory staff training and staffing levels appear adequate? Yes No NA

65. Are appropriate QA/QC procedures written and followed? Yes No NA

66a. Are laboratory bench sheets/monitoring records available? Yes No NA

66b. If Yes, do laboratory bench sheets/monitoring records include all of the following information? If any required information is not included in the bench sheets/monitoring records, provide explanation or description of missing information in comments.

Bench Sheets/Monitoring Records Include:	Yes
Dates, times, frequency and location of sample collection	
Name of individual(s) performing sampling	
Results of analyses	
Dates of analyses	
Name of person(s) performing analyses	
Analytical technique or method used	

Areas Evaluated:

67. Laboratory Compliance Rating: Not Applicable

Operation and Maintenance

68. Number of wastewater personnel recommended in the O&M Manual (Public System Only):

69. For privately owned systems that serve the public (e.g. condo associations), has the facility established Financial Assurance/Escrow Accounts as required under part 41? Yes No NA

70. How many wastewater treatment system personnel does the facility have? 4

The plant manager reported consistently 4 personnel and as many as 7 are available.

71. Does the number of wastewater treatment personnel appear to be adequate? Yes No NA

AMC-WSG LLC : 2EP7-S3XE-WQQ

Groundwater - Comprehensive Inspection

Inspector: Brent Benson

Start Date: 04/01/2025 Completed Date: 05/20/2025

Operation and Maintenance

72. Are operating schedules established? If Yes, describe the operating schedule (including weekend operation) in the comments. Yes No NA

The facility stated that a designated staff is present on weekends to check ponds and pumps for problems.

73. How are alarms/upsets monitored and responded to during off hours and on weekends?

The facility reported that a pump console is present at the control office that monitors the operations of the pumps. If there was a pump failure it would show at the control room.

74. Are hydraulic and/or organic overloads experienced? If Yes, include reasons in the comments. Yes No NA

75a. Does the facility have an effluent or land application flow metering device? If Yes, describe type of flow metering device in the comments. Yes No NA

Per the facility, the plant uses the time that the pump from pond 2 runs per day when providing water to the wash plant times the flow rate of the pump to determine the discharge rate.

75b. When was the flow metering device last calibrated and how?

See the answer to question 75 a.

76. Any unusual conditions noted in the treatment system effluent, irrigation fields, infiltration basins or tile fields? If Yes, describe in the comments. Yes No NA

77. Any evidence of bypasses, chemical spills, surcharges and/or overflow in the wastewater collection or treatment system? If Yes, describe in the comments. Yes No NA

78. Any accumulation of solids, grease, foam or floating material in wetwells, sumps, clarifiers, land application areas, or other treatment units? If Yes, describe in the comments. Yes No NA

AMC-WSG LLC : 2EP7-S3XE-WQQ

Groundwater - Comprehensive Inspection

Inspector: Brent Benson

Start Date: 04/01/2025 Completed Date: 05/20/2025

Operation and Maintenance

79. Any problems with the wastewater treatment chemical feed system? If Yes, describe in comments.

Yes No NA

The plant manager stated that they do not add any additives to the wash water such as coagulants.

80. Do chemical storage areas have adequate curbing and secondary containment to capture leaks or spills? If No, explain in the comments.

Yes No NA

No chemicals storage areas were observed at the time of evaluation.

81. Any jury rigged or temporary systems to correct operational problems? If Yes, explain in the comments.

Yes No NA

82. Any obnoxious odors noted? If Yes, describe the source of the odors in the comments.

Yes No NA

83. Does general housekeeping appear to be adequate?

Yes No NA

84. Does the treatment system security/fencing appear to be adequate?

Yes No NA

85. Is the facility in compliance with the general discharge standards under Rule 2204 (listed below)? If any standard is not being met, describe in comments.

Rule 2204 Requirement	In Compliance	Not in Compliance
Not currently nor likely to become injurious		
Does not cause runoff to, ponding on, or flooding of adjacent properties		
Does not cause erosion		
Does not cause nuisance conditions (such as odors, vectors, noise, pathogens, or changes in aesthetic properties of gw)		
Meets adequate property boundary setbacks*		
Meets water supply well setbacks under the safe drinking water act**		
No evidence that the discharge could create a facility as defined by part 201		
No evidence that the discharge is reaching or negatively impacting surface waters of the state		

AMC-WSG LLC : 2EP7-S3XE-WQQ

Groundwater - Comprehensive Inspection

Inspector: Brent Benson

Start Date: 04/01/2025 Completed Date: 05/20/2025

Operation and Maintenance

86. Is the facility in compliance with the general discharge prohibitions under Rule 2205? If either of the two standards is not being met, describe in comments

Rule 2205 Requirement	In Compliance	Not in Compliance
The facility does not discharge through a general purpose floor drain (unless authorized under 2210(v), 2215, or 2218)		
The discharge does not originate from a structure within 200 feet of an available public sanitary sewer system		

Areas Evaluated:

87. Operation and Maintenance Compliance Rating: Satisfactory

Other

Areas Evaluated:

88. Compliance Rating for groundwater discharge permit-related requirements not addressed in other sections of this form. Please provide a description of items reviewed in the comments section: Satisfactory

Closing Inspection Information

89. Approximate inspection end time: 01:45 PM

90. Weather conditions during inspection: Overcast with some rain.

91. Closing conference notes:

92. Were photographs taken? Yes No NA

93. Were samples taken? Yes No NA