REMEDIAL ACTION PLAN

SHEBOYGAN RIVER AND HARBOR SUPERFUND SITE
TECUMSEH DEWATERING SITE, SHEBOYGAN FALLS, WI AND
MARYLAND AVENUE DEWATERING SITE, SHEBOYGAN, WI

SME Project Number: 069638.00.025.001

August 10, 2017

SME

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1. INTRODUCTION

We prepared this Remedial Action Plan (RAP) to address previously undiscovered, historical polychlorinated biphenyl (PCB) impact in soils at the Tecumseh Falls dewatering facility of the Sheboygan River and Harbor Superfund Site (Site). The PCB impact was discovered during the post remedial sampling of the facility to evaluate the potential that release of sediment during dewatering may have affected the soil. The RAP is also intended to address the Maryland Avenue dewatering facility where lead and polynuclear aromatic hydrocarbons (PAHs) were encountered in shallow soils at concentrations exceeding commercial/industrial preliminary remedial goals (PRGs).

The objective of this RAP is to evaluate the need for remediation at the two dewatering sites and the remedial options to protect human health and the environment. Descriptions of the Site history and known current environmental conditions; data evaluation, proposed remedial methods, reporting; and the estimated project schedule are presented in the following sections.

2. SITE HISTORY AND CURRENT CONDITIONS

The following subsections summarizes the Site history, current Site conditions, and environmental conditions identified during previous investigations of the Property.

2.1 SITE HISTORY

Tecumseh, a manufacturer of refrigeration and air conditioning compressors and gasoline engines, was located adjacent to the Sheboygan River in Sheboygan Falls, Wisconsin. Polychlorinated biphenyls (PCBs) were found in sewer lines that lead to the River from Tecumseh and in hydraulic fluids used in Tecumseh Products Company's Diecast Division manufacturing processes. Prior to remediation, the contamination level was high in the sediments immediately surrounding the Tecumseh Falls Site, but decreased in concentration downstream.

The Record of Decision (ROD) listed the risks at the Sheboygan River and Harbor Superfund site to be from the chemicals of concern, metals and PCBs. Metals, PCBs, and polynuclear aromatic hydrocarbons (PAHs) were the as potential chemicals of concern (PCOC). The metals listed as the target of concern for the Remedial Investigations were cadmium, chromium, copper, lead, mercury, nickel, and zinc. Pesticides, dioxins, and dibenzofurans were not present in the sediment and as such, were no longer PCOC.

Between 2005 and 2013, Pollution Risk Services (PRS) and others remediated the river sediments. PRS dewatered the dredged sediment at the Tecumseh Falls and Maryland Avenue sites (Figure 1).

2.2 CURRENT CONDITIONS

Following the sediment remediation activities, the two dewatering sites have remained vacant. In accordance with the approved Sampling and Analysis Plans, SME sampled the areas where one of the geo-tubes broke releasing water outside of the dewatering pads, the wastewater treatment facilities, and the Confined Treatment Facility (CTF) or Sediment Management Facility (SMF) in 2016.

The results of this Phase II ESA demonstrated that soil at the Tecumseh Falls facility is impacted with concentrations of PCBs and PAHs; however, the impact was not the result of dewatering releases or activities by PRS. The impacted soil represents an undiscovered historical release from historical operations that occurred prior the remediation performed by PRS.

The concentrations of PAHs and PCBs at several locations at the Tecumseh Falls facility exceed the 2016 cleanup criteria or screening levels for commercial/industrial receptors. As such, impacted soil in these areas must be addressed through remediation or an engineering control before the Tecumseh facility meets the risk goals. The total cumulative direct contact risk is acceptable for commercial/industrial receptors as long as the soil impacted with PAH and PCB at concentrations above the PCSLs are addressed via remediation or engineering controls. There is no residual impact from at the former CTF and SMF from sediment management activities completed by Tecumseh prior the remediation performed by PRS. Figure 2 shows the location of the impacted soils.

The results of this Phase II ESA demonstrated that soil at Maryland Avenue facility was impacted with concentrations of PAHs and lead; however, the impact is not the result of dewatering releases or activities by PRS. The impacted soil represents an undiscovered historical release from historical operations that occurred prior the remediation performed by PRS.

The concentrations of PAHs and/or lead at several locations exceeded the 2016 cleanup criteria or screening levels for commercial/industrial receptors (Figure 3). As such, SME evaluated if the impacted soil in these areas need to be addressed to protect human health and the environment.

3. REMEDIAL EVALUATION

3.1 TECUMSEH FALLS

The two remedial options are either removal of impacted soil and off-site disposal or capping of the impacted soil to prevent direct contact with soils. The former building slab already acts as an engineering control for the soil located beneath it. The draft *Institutional Control, Implementation, and Assurance Plan* addresses this engineering control in Sections 2.3, 2.8, 3.1, 3.3, and 6.3. To be consistent, SME and PRS propose to expand the engineering control to cover the adjoining impacted soils. This option is the most economical by approximately an order of magnitude.

SME will install temporary surface water run-off controls to prevent migration of the impacted soils until we perform remedial activities. Please reference SME Serial Letter #39 (August 10, 2017) for a discussion of the proposed controls.

3.2 MARYLAND AVENUE

The impacted soil is limited to four locations and exposure to only those soils would not be a representative site exposure to future receptors. The USEPA guidance *Calculating Upper Confidence Limit for Exposure Point Concentration at Hazardous Waste Sites* (OSWER 9285 6-10), is an update to the *Risk Assessment Guidance Document for Superfund* (RAGs). This guidance states: “Unless there is site-specific evidence to the contrary, an individual receptor is assumed to be equally exposed to media within all portions of the exposure unit over time frame of the risk assessment.” RAGs stated the USEPA recommends using the average concentrations to represent “a reasonable estimate of the concentration over time.” However, the OSWER update recommended using a 95% UCL as a reasonable exposure point concentration.

The concentrations of the chemicals of concern (COCs) that exceeded the 2016 screening levels at the Maryland Avenue facility are summarized below. The average COC concentrations in the soil intervals within the POC are provided demonstrating that within the POC, only the concentrations of benzo[a]pyrene are close to the screening level. However, all of the COCs will be evaluated by comparing the 95% UCL to the screening levels.

CHEMICALS OF CONCERN			SAMPLE DEPTH INTERVAL			AVERAGE	2017 RSL OR CLEANUP CRITERIA[1]
			0-0.5	0.5-1.5	1.5-3.5		
Samples	B1	Benzo[a]pyrene	6.92	0.414	0.0406	2.5	21
	B1-1W		4.28	0.102	<0.0032	1.46	
	H4	Benzo[a]pyrene	27.7	2.02	1.97	10.6	21
		Benzo[b]fluoranthene	32.5	2.61	2.31	12.5	210
		Lead	1,530	219	174	641	800
	H4-2NW	Benzo[a]anthracene	29.2	4.00	0.387	11.2	210
		Benzo[a]pyrene	23.2	3.73	0.455	9.1	21
		Benzo[b]fluoranthene	38.2	5.68	0.569	14.8	210

Results in mg/kg.

[1] Using 10^{-5} carcinogenic risk and THQ of 1.0

SME calculated the 95% UCL using the UEPA program, ProUCL. The results are summarized below and are provided in Appendix A.

CHEMICAL OF CONCERN	EXPOSURE POINT CONCENTRATION	RSL OR CLEANUP CRITERIA
Benzo[a]pyrene	5.21	21
Benzo[a]anthracene	3.48	210
Benzo[b]fluoranthene	8.04	210
Lead	175	800

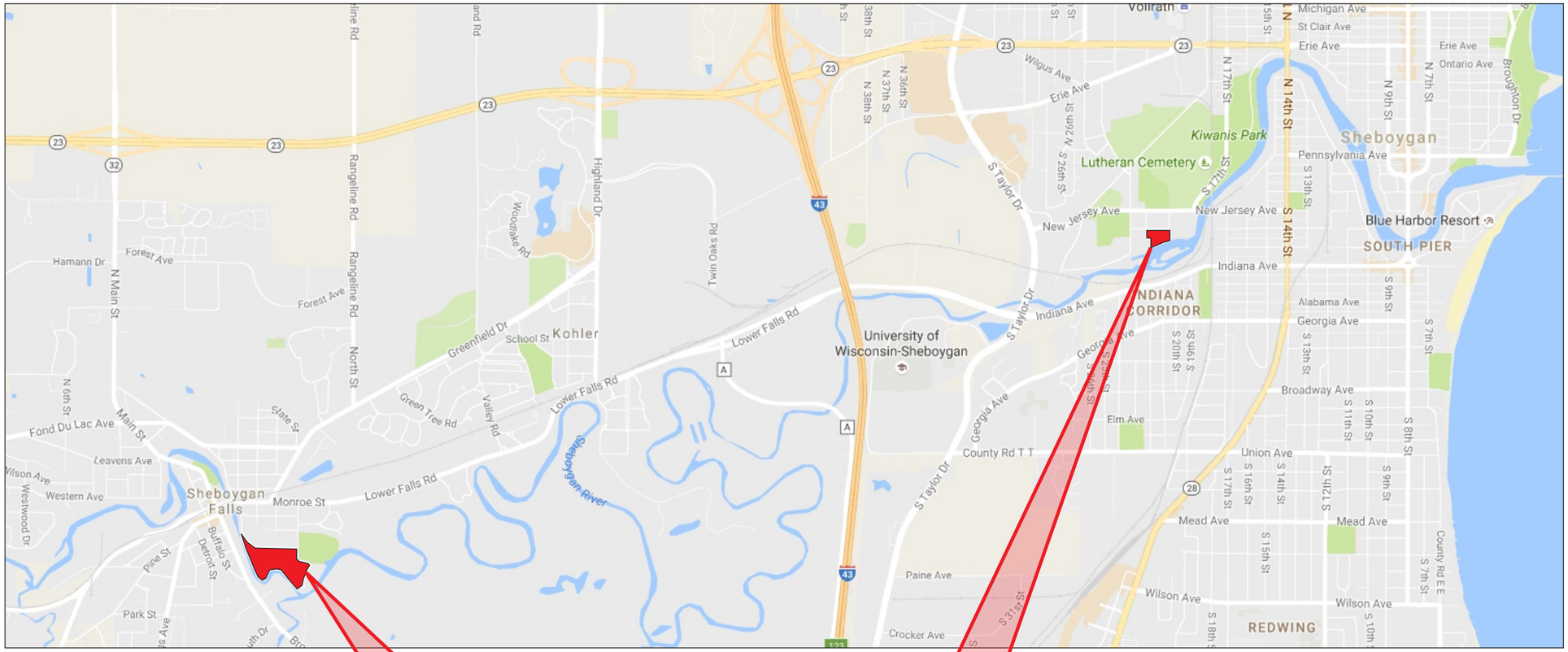
Results in mg/kg.

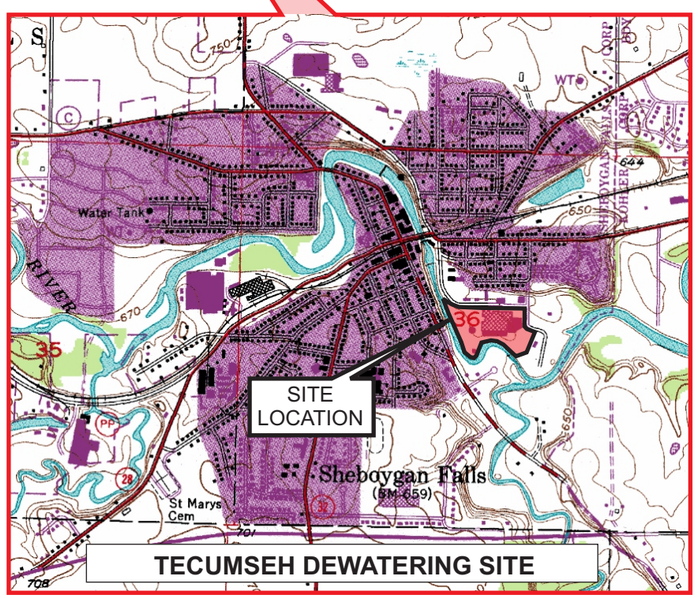
The exposure point concentrations are less than the screening level and exposure to site soils does not pose and unacceptable risk at a carcinogenic risk of 10^{-5} and THQ of 1.0. As such, SME and PRS recommended that no further action is required at the Maryland Avenue facility.

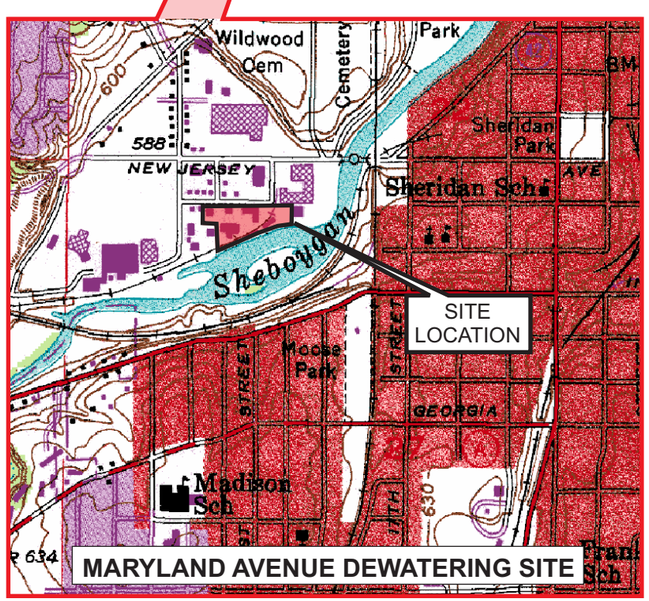
4. CONCLUSIONS

The soil at the Tecumseh Falls facility should be capped to protect the public and groundwater. The soil at the Maryland Avenue facility does not pose a risk to the public.

FIGURES







NOTE: DRAWING INFORMATION TAKEN FROM GOOGLE MAPS AND USGS 7.5-MINUTE TOPOGRAPHIC MAPS OF THE SHEBOYGAN SOUTH AND SHEBOYGAN FALLS QUADRANGLES, WISCONSIN, 1994.

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Project

SHEBOYGAN RIVER AND HARBOR SUPERFUND SITES

ProjectLocation

SHEBOYGAN AND SHEBOYGAN FALLS, WISCONSIN

Sheet Name

DEWATERING SITES LOCATION MAP

No.	Revision Date

Date 9-12-2016

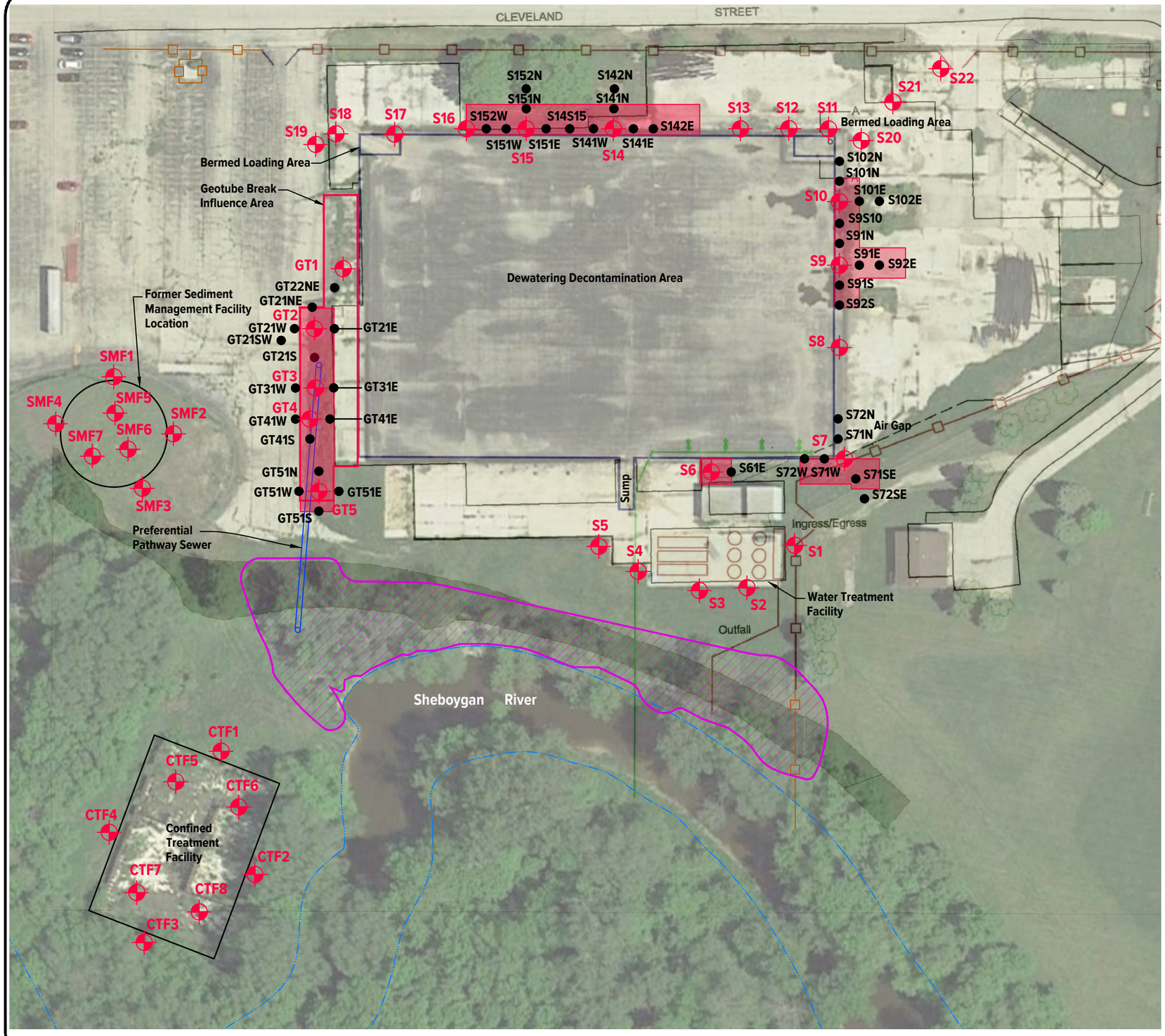
CADD JWH

Designer JWH

Scale NOT TO SCALE

Project 069638.00.024.001

Figure No. 1



NORTH

0' 80' 160'

GRAPHIC SCALE: 1" = 80'

LEGEND

- EXISTING TREE AND/OR BRUSH
- EXISTING ROAD
- EXISTING CONCRETE
- EXISTING FENCE
- FORMER DREDGE SLURRY PIPE
- FLOOD CONTROL BERM
- ORIGINAL SOIL SAMPLE LOCATION
- STEP-OUT SAMPLE LOCATION
- SOIL PREVIOUSLY REMEDIATED BY EXCAVATION
- IMPACTED SOIL

NOTE:
DRAWING INFORMATION TAKEN FROM PRS 2006 CONSTRUCTION DOCUMENTATION REPORT AND GOOGLE EARTH PRO WITH IMAGE DATE 6-1-2015.

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Project
SHEBOYGAN RIVER SUPERFUND SITE

Project Location
SHEBOYGAN FALLS, WISCONSIN

Sheet Name
PHASE II SAMPLE LOCATIONS AND EXTENT OF IMPACTED SOIL-TECUMSEH SITE

No.	Revision Date

Date: 7-13-17
CADD: GBK/JAB
Designer: KE
Scale: 1" = 80'
Project: 069638.00.025.001
Figure No.: 2

PLOT DATE: Jul 13, 2017 - 3:22pm - jblake
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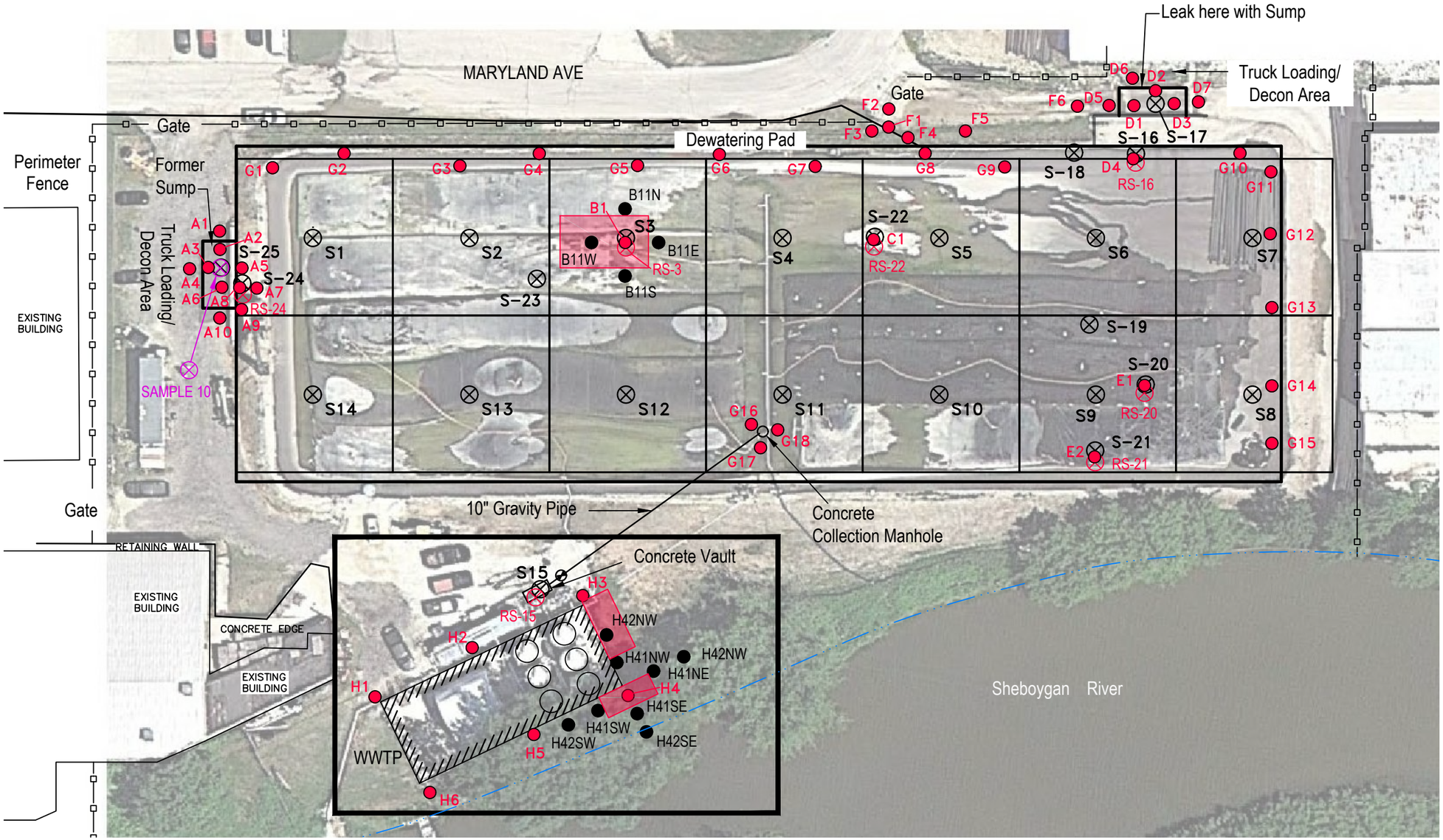

LEGEND

- SAMPLING GRID: 5,000 sq. ft.
- S1 — PREVIOUS ASPHALT SAMPLE LOCATION
- RS3 — PREVIOUS SUB-BASE SAMPLE LOCATION
- PREVIOUS SOIL SAMPLE LOCATION
- ORIGINAL SOIL SAMPLE LOCATION
- STEP OUT SAMPLE LOCATION
- WWTP — WASTEWATER TREATMENT PLANT
- IMPACTED SOIL

NOTE:
DRAWING INFORMATION TAKEN FROM DEWATERING PAD DECOMMISSION DRAWING (DATED NOVEMBER 17, 2010) PREPARED BY POLLUTION RISK SERVICES.

NORTH

0' 50' 100'

GRAPHIC SCALE: 1" = 50'

PLOT DATE: Jul 13, 2017 - 3:20pm - jblake
FILE LOCATION: \\sme-incipz\WIP\069638.00\CAD\069638.00.025.001\rev0\069638.00-SB.dwg

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Project
SHEBOYGAN RIVER SUPERFUND SITE

Project Location
SHEBOYGAN, WISCONSIN

Sheet Name
PHASE II SAMPLE LOCATIONS AND EXTENT OF IMPACTED SOIL- MARYLAND AVENUE SITE

No.	Revision Date

Date: 7-1-17
CADD: JAB
Designer: KE
Scale: 1" = 50'
Project: 069638.00.025.001
Figure No.: 3

APPENDIX 1
PROUCL DOCUMENTATION

1				**General UCL Statistics for Full Data Sets**								
2		**User Selected Options**										
3		From File		Sheet1.wst								
4		Full Precision		OFF								
5		Confidence Coefficient		95%								
6		Number of Bootstrap Operations		2000								
7												
8												
9	**Benzo(a)pyrene**											
10												
11						**General Statistics**							
12				Number of Valid Observations	75					Number of Distinct Observations	70	
13												
14				**Raw Statistics**						**Log-transformed Statistics**		
15				Minimum	0.0013					Minimum of Log Data	-6.645	
16				Maximum	27.7					Maximum of Log Data	3.321	
17				Mean	1.183					Mean of log Data	-2.491	
18				Geometric Mean	0.0828					SD of log Data	2.449	
19				Median	0.0611							
20				SD	4.204							
21				Std. Error of Mean	0.485							
22				Coefficient of Variation	3.552							
23				Skewness	5.508							
24												
25						**Relevant UCL Statistics**							
26				**Normal Distribution Test**						**Lognormal Distribution Test**		
27				Lilliefors Test Statistic	0.389					Lilliefors Test Statistic	0.0739	
28				Lilliefors Critical Value	0.102					Lilliefors Critical Value	0.102	
29				**Data not Normal at 5% Significance Level**						**Data appear Lognormal at 5% Significance Level**		
30												
31				**Assuming Normal Distribution**						**Assuming Lognormal Distribution**		
32				95% Student's-t UCL	1.992					95% H-UCL	5.207	
33				**95% UCLs (Adjusted for Skewness)**						95% Chebyshev (MVUE) UCL	4.372	
34				95% Adjusted-CLT UCL (Chen-1995)	2.312					97.5% Chebyshev (MVUE) UCL	5.642	
35				95% Modified-t UCL (Johnson-1978)	2.044					99% Chebyshev (MVUE) UCL	8.137	
36												
37				**Gamma Distribution Test**						**Data Distribution**		
38				k star (bias corrected)	0.263					**Data appear Lognormal at 5% Significance Level**		
39				Theta Star	4.501							
40				MLE of Mean	1.183							
41				MLE of Standard Deviation	2.308							
42				nu star	39.44							
43				Approximate Chi Square Value (.05)	26.05					**Nonparametric Statistics**		
44				Adjusted Level of Significance	0.0468					95% CLT UCL	1.982	
45				Adjusted Chi Square Value	25.84					95% Jackknife UCL	1.992	
46										95% Standard Bootstrap UCL	1.962	
47				Anderson-Darling Test Statistic	4.292					95% Bootstrap-t UCL	4.372	
48				Anderson-Darling 5% Critical Value	0.881					95% Hall's Bootstrap UCL	5.299	
49				Kolmogorov-Smirnov Test Statistic	0.196					95% Percentile Bootstrap UCL	2.144	
50				Kolmogorov-Smirnov 5% Critical Value	0.113					95% BCA Bootstrap UCL	2.447	
51				**Data not Gamma Distributed at 5% Significance Level**						95% Chebyshev(Mean, Sd) UCL	3.299	
52										97.5% Chebyshev(Mean, Sd) UCL	4.215	
53				**Assuming Gamma Distribution**						99% Chebyshev(Mean, Sd) UCL	6.014	
54				95% Approximate Gamma UCL (Use when n >= 40)	1.792							

95% Adjusted Gamma UCL (Use when n < 40)	1.806	
Potential UCL to Use		Use 95% H-UCL 5.207

ProUCL computes and outputs H-statistic based UCLs for historical reasons only.

H-statistic often results in unstable (both high and low) values of UCL95 as shown in examples in the Technical Guide.

It is therefore recommended to avoid the use of H-statistic based 95% UCLs.

Use of nonparametric methods are preferred to compute UCL95 for skewed data sets which do not follow a gamma distribution.

Note: Suggestions regarding the selection of a 95% UCL are provided to help the user to select the most appropriate 95% UCL.

These recommendations are based upon the results of the simulation studies summarized in Singh, Singh, and Iaci (2002)

and Singh and Singh (2003). For additional insight, the user may want to consult a statistician.

Benzo(a)anthracene

General Statistics

Number of Valid Observations	75	Number of Distinct Observations	71
Number of Missing Values	6		

Raw Statistics		**Log-transformed Statistics**	
Minimum	0.00165	Minimum of Log Data	-6.407
Maximum	29.2	Maximum of Log Data	3.374
Mean	1.232	Mean of log Data	-2.58
Geometric Mean	0.0758	SD of log Data	2.445
Median	0.0398		
SD	4.464		
Std. Error of Mean	0.515		
Coefficient of Variation	3.624		
Skewness	5.553		

Relevant UCL Statistics

Normal Distribution Test		**Lognormal Distribution Test**	
Lilliefors Test Statistic	0.391	Lilliefors Test Statistic	0.11
Lilliefors Critical Value	0.102	Lilliefors Critical Value	0.102
Data not Normal at 5% Significance Level		**Data not Lognormal at 5% Significance Level**	
Assuming Normal Distribution		**Assuming Lognormal Distribution**	
95% Student's-t UCL	2.09	95% H-UCL	4.701
95% UCLs (Adjusted for Skewness)		95% Chebyshev (MVUE) UCL	3.958
95% Adjusted-CLT UCL (Chen-1995)	2.433	97.5% Chebyshev (MVUE) UCL	5.107
95% Modified-t UCL (Johnson-1978)	2.145	99% Chebyshev (MVUE) UCL	7.363
Gamma Distribution Test		**Data Distribution**	
k star (bias corrected)	0.253	**Data do not follow a Discernable Distribution (0.05)**	
Theta Star	4.872		
MLE of Mean	1.232		
MLE of Standard Deviation	2.45		
nu star	37.92		
Approximate Chi Square Value (.05)	24.82	**Nonparametric Statistics**	
Adjusted Level of Significance	0.0468	95% CLT UCL	2.079
Adjusted Chi Square Value	24.61	95% Jackknife UCL	2.09
		95% Standard Bootstrap UCL	2.097
Anderson-Darling Test Statistic	5.13	95% Bootstrap-t UCL	4.89

109				Anderson-Darling 5% Critical Value	0.886					95% Hall's Bootstrap UCL	5.827
110				Kolmogorov-Smirnov Test Statistic	0.215					95% Percentile Bootstrap UCL	2.147
111				Kolmogorov-Smirnov 5% Critical Value	0.113					95% BCA Bootstrap UCL	2.56
112				**Data not Gamma Distributed at 5% Significance Level**						95% Chebyshev(Mean, Sd) UCL	3.478
113										97.5% Chebyshev(Mean, Sd) UCL	4.45
114				**Assuming Gamma Distribution**						99% Chebyshev(Mean, Sd) UCL	6.36
115				95% Approximate Gamma UCL (Use when n >= 40)	1.882						
116				95% Adjusted Gamma UCL (Use when n < 40)	1.898						
117											
118				**Potential UCL to Use**						Use 95% Chebyshev (Mean, Sd) UCL	3.478
119											
120	**Note: Suggestions regarding the selection of a 95% UCL are provided to help the user to select the most appropriate 95% UCL.**										
121	**These recommendations are based upon the results of the simulation studies summarized in Singh, Singh, and Iaci (2002)**										
122	**and Singh and Singh (2003). For additional insight, the user may want to consult a statistician.**										
123											
124											
125	**Benzo(b)fluoranthene**										
126											
127					**General Statistics**						
128				Number of Valid Observations	75					Number of Distinct Observations	73
129											
130				**Raw Statistics**						**Log-transformed Statistics**	
131				Minimum	0.00145					Minimum of Log Data	-6.536
132				Maximum	38.2					Maximum of Log Data	3.643
133				Mean	1.645					Mean of log Data	-2.157
134				Geometric Mean	0.116					SD of log Data	2.479
135				Median	0.0887						
136				SD	5.812						
137				Std. Error of Mean	0.671						
138				Coefficient of Variation	3.532						
139				Skewness	5.545						
140											
141					**Relevant UCL Statistics**						
142				**Normal Distribution Test**						**Lognormal Distribution Test**	
143				Lilliefors Test Statistic	0.389					Lilliefors Test Statistic	0.0772
144				Lilliefors Critical Value	0.102					Lilliefors Critical Value	0.102
145				**Data not Normal at 5% Significance Level**						**Data appear Lognormal at 5% Significance Level**	
146											
147				**Assuming Normal Distribution**						**Assuming Lognormal Distribution**	
148				95% Student's-t UCL	2.763					95% H-UCL	8.039
149				**95% UCLs (Adjusted for Skewness)**						95% Chebyshev (MVUE) UCL	6.611
150				95% Adjusted-CLT UCL (Chen-1995)	3.208					97.5% Chebyshev (MVUE) UCL	8.542
151				95% Modified-t UCL (Johnson-1978)	2.835					99% Chebyshev (MVUE) UCL	12.33
152											
153				**Gamma Distribution Test**						**Data Distribution**	
154				k star (bias corrected)	0.263					**Data appear Lognormal at 5% Significance Level**	
155				Theta Star	6.249						
156				MLE of Mean	1.645						
157				MLE of Standard Deviation	3.207						
158				nu star	39.5						
159				Approximate Chi Square Value (.05)	26.1					**Nonparametric Statistics**	
160				Adjusted Level of Significance	0.0468					95% CLT UCL	2.749
161				Adjusted Chi Square Value	25.89					95% Jackknife UCL	2.763
162										95% Standard Bootstrap UCL	2.736

163				Anderson-Darling Test Statistic	4.059					95% Bootstrap-t UCL	5.841
164				Anderson-Darling 5% Critical Value	0.881					95% Hall's Bootstrap UCL	7.705
165				Kolmogorov-Smirnov Test Statistic	0.199					95% Percentile Bootstrap UCL	2.912
166				Kolmogorov-Smirnov 5% Critical Value	0.113					95% BCA Bootstrap UCL	3.297
167				**Data not Gamma Distributed at 5% Significance Level**						95% Chebyshev(Mean, Sd) UCL	4.571
168										97.5% Chebyshev(Mean, Sd) UCL	5.836
169				**Assuming Gamma Distribution**						99% Chebyshev(Mean, Sd) UCL	8.323
170				95% Approximate Gamma UCL (Use when n >= 40)	2.49						
171				95% Adjusted Gamma UCL (Use when n < 40)	2.511						
172											
173				**Potential UCL to Use**						Use 95% H-UCL	8.039
174											
175				**ProUCL computes and outputs H-statistic based UCLs for historical reasons only.**							
176				**H-statistic often results in unstable (both high and low) values of UCL95 as shown in examples in the Technical Guide.**							
177				**It is therefore recommended to avoid the use of H-statistic based 95% UCLs.**							
178				**Use of nonparametric methods are preferred to compute UCL95 for skewed data sets which do not follow a gamma distribution.**							
179											
180				**Note: Suggestions regarding the selection of a 95% UCL are provided to help the user to select the most appropriate 95% UCL.**							
181				**These recommendations are based upon the results of the simulation studies summarized in Singh, Singh, and Iaci (2002)**							
182				**and Singh and Singh (2003). For additional insight, the user may want to consult a statistician.**							
183											
184											
185	**Lead**										
186											
187				**General Statistics**							
188				Number of Valid Observations	65					Number of Distinct Observations	54
189				Number of Missing Values	10						
190											
191				**Raw Statistics**						**Log-transformed Statistics**	
192				Minimum	1.3					Minimum of Log Data	0.262
193				Maximum	1530					Maximum of Log Data	7.333
194				Mean	69.59					Mean of log Data	2.795
195				Geometric Mean	16.37					SD of log Data	1.729
196				Median	13.8						
197				SD	194.9						
198				Std. Error of Mean	24.17						
199				Coefficient of Variation	2.801						
200				Skewness	6.801						
201											
202				**Relevant UCL Statistics**							
203				**Normal Distribution Test**						**Lognormal Distribution Test**	
204				Lilliefors Test Statistic	0.363					Lilliefors Test Statistic	0.13
205				Lilliefors Critical Value	0.11					Lilliefors Critical Value	0.11
206				**Data not Normal at 5% Significance Level**						**Data not Lognormal at 5% Significance Level**	
207											
208				**Assuming Normal Distribution**						**Assuming Lognormal Distribution**	
209				95% Student's-t UCL	109.9					95% H-UCL	130.9
210				**95% UCLs (Adjusted for Skewness)**						95% Chebyshev (MVUE) UCL	161.6
211				95% Adjusted-CLT UCL (Chen-1995)	131.1					97.5% Chebyshev (MVUE) UCL	201.6
212				95% Modified-t UCL (Johnson-1978)	113.3					99% Chebyshev (MVUE) UCL	280.1
213											
214				**Gamma Distribution Test**						**Data Distribution**	
215				k star (bias corrected)	0.436					**Data do not follow a Discernable Distribution (0.05)**	
216				Theta Star	159.5						

MLE of Mean	69.59	
MLE of Standard Deviation	105.4	
nu star	56.72	
Approximate Chi Square Value (.05)	40.41	**Nonparametric Statistics**
Adjusted Level of Significance	0.0463	95% CLT UCL 109.4
Adjusted Chi Square Value	40.1	95% Jackknife UCL 109.9
		95% Standard Bootstrap UCL 108.6
Anderson-Darling Test Statistic	2.458	95% Bootstrap-t UCL 178.1
Anderson-Darling 5% Critical Value	0.829	95% Hall's Bootstrap UCL 257.4
Kolmogorov-Smirnov Test Statistic	0.155	95% Percentile Bootstrap UCL 112.7
Kolmogorov-Smirnov 5% Critical Value	0.118	95% BCA Bootstrap UCL 144.8
Data not Gamma Distributed at 5% Significance Level		95% Chebyshev(Mean, Sd) UCL 175
		97.5% Chebyshev(Mean, Sd) UCL 220.6
Assuming Gamma Distribution		99% Chebyshev(Mean, Sd) UCL 310.1
95% Approximate Gamma UCL (Use when n >= 40)	97.68	
95% Adjusted Gamma UCL (Use when n < 40)	98.44	
Potential UCL to Use		Use 95% Chebyshev (Mean, Sd) UCL 175

Note: Suggestions regarding the selection of a 95% UCL are provided to help the user to select the most appropriate 95% UCL.
These recommendations are based upon the results of the simulation studies summarized in Singh, Singh, and Iaci (2002)
and Singh and Singh (2003). For additional insight, the user may want to consult a statistician.

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