

DR. SHEA DISREGARDS KNOWN LIMITATIONS OF TU APPROACH

- **Based primarily on acute toxicity mechanisms**
 - EPA scientists recognized that the TU approach would be underprotective for other toxicity mechanisms

- **Chronic tests are very limited in number — of species, of life stages, of pure compounds, of toxicity mechanisms**
 - Adds many layers of uncertainty to predictive accuracy of chronic effects model
 - This is why this is a screening tool