

**From:** [Estabrook, Katie@ARB](mailto:Estabrook.Katie@ARB)  
**To:** [Bechtold, Bradley@ARB](mailto:Bechtold,Bradley@ARB)  
**Subject:** FW: Comments on getting to zero discharge for highly toxic chemicals in California communities  
**Date:** Friday, January 27, 2023 12:27:22 PM

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Can you add this to the docket?

## Katie Estabrook

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**From:** Amy Kyle <[amydkyle@berkeley.edu](mailto:amydkyle@berkeley.edu)>  
**Sent:** Friday, January 27, 2023 12:14 PM  
**To:** Estabrook, Katie@ARB <[katie.estabrook@arb.ca.gov](mailto:katie.estabrook@arb.ca.gov)>  
**Subject:** Comments on getting to zero discharge for highly toxic chemicals in California communities

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I am not able to get a good connection to comment. This is at my end and I am not requesting technical assistance.

I appreciate your concern for making the process work.

I would like to submit these comments to the docket if possible.

1. The proposed rule establishes an important process to implement technologies to achieve zero discharge of proposed chrome 6, which we know is a highly toxic chemical. The rule should be adopted and the process should move forward.
2. The proposal incorporates the concept of shifting to zero discharge technologies for highly toxic compounds in communities and the concept of transition support for businesses to adapt. These are both important principles that should be adopted here and applied more broadly.
3. We need greater emphasis at CARB on developing, incentivizing, and implementing zero discharge technologies for highly toxic compounds especially when releases are occurring in communities, beyond this case. I have no doubt that CARB and the districts could accelerate zero discharge technologies. Technologies do not just "develop," but need to be incentivized.
5. To reduce cumulative impacts of toxics in communities, we need to reduce a number of sources that may not be the most significant individually, but that collectively create a disproportionate burden of pollution. We cannot continue to consider each source separately.

Thank you for your consideration of these comments.

Amy D Kyle, PhD MPH