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May 23, 2014

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



**RE: State Water Board General Order
Streamline Permitting of Recycled Water Uses**

Dear Ms. Townsend:

Chevron U.S.A. Inc. (CUSA) is an oil and gas exploration and production company with various California facilities. We appreciate the opportunity to comment on the proposed State Water Board General Order. CUSA believes streamlining permitting of recycled water uses is an excellent idea, and should be pursued.

The draft general order is limited to treated municipal wastewater for non-potable uses. The intended uses for this municipal wastewater are agricultural irrigation, landscape irrigation, dust control and cooling tower make-up water. It is Chevron's belief that restricting the general order to municipal water for these types of uses prevents a large number of water sources from being used. There are many types of treated industrial wastewater sources that would be ideal for these uses, and they are being prevented from using the streamline permitting suggested by the draft general order.

Both the State Water Resources Control Board and the California Department of Public Health general documents define recycled water as "any waters (treated) that are or can be reused for beneficial purposes". However, all of the specific policies related to recycled water refer to criteria for reuse of treated municipal wastewater. Chevron believes there are many sources for beneficial reuse of treated industrial wastewater that are being overlooked by taking this approach. One big advantage of certain types of industrial wastewater is that biological hazards will not be an issue. The draft general order discusses "tertiary disinfected" and "secondary disinfected" municipal wastewaters. Most types of industrial wastewater would not have any concern of "infection" and would not even need to be treated to these standards.

Chevron understands that most industrial wastewaters will need to be treated to meet certain standards. However, if the water does meet these standards (treated or not), shouldn't it be considered for these non-potable uses in the same way that treated domestic wastewaters are? Chevron would like to request that the scope of the proposed General Order be widened to include industrial wastewater, including produced water streams.

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If you have any questions or require additional information please contact me at phone number (661) 654-7141 or by email beckdl@chevron.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Daniel Beck', written in a cursive style.

Daniel Beck
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