

		Tier 2 Pathway – B0858	
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H2B2 USA, LLC – SoHyCal

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Elaborated by:		
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June 5, 2026

**California Air Resources Board
Low Carbon Fuel Standard
1001 I Street
Sacramento, CA 95814**

RE: H2B2 USA, LLC Tier 2 Pathway No. B0858; Response to Thomas Fukuman.

H2B2 USA, LLC (“H2B2”) writes on behalf of the SoHyCal Renewable Hydrogen Production Project (“the project”) to provide a response to the comments received regarding the Tier 2 Pathways Application – B0858. The response falls within the scope of the Low Carbon Fuel Standard (“LCFS”) program, Title 17, California Code of Regulations (“CCR”) § 95488.7(d)(5)(A), requiring all applicants to respond to public comments related to the pathway application.

H2B2 appreciates the opportunity to respond to stakeholder input and is committed to providing a transparent and accurate explanation of the application process and its technology. H2B2 acknowledges and supports the California Air Resources Board (“CARB”) and the LCFS program and the monitoring of the CA-GREET life cycle analysis framework.

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Thomas Fukuman (“Commenter”) has submitted comments regarding said Tier 2 Pathway Application, raigin concerns related to the lifecycle assessment, project scope and environmental impacts. H2B2 appreciates the opportunity to address the concerns and questions with factual clarifications.

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1. Transportation of biofuel

All hydrogen transportation associated with the project is conducted in accordance with applicable federal, state, and local regulations governing the handling and transportation of hazardous materials. Transportation activities are performed by qualified third-party carriers specializing in the transport of compressed gases and other regulated materials, and are not conducted directly by H2B2.

These transportation providers are required to comply with regulations established by the U.S. Department of Transportation (DOT), the Federal Motor Carrier Safety Administration (FMCSA), the Pipeline and Hazardous Materials Safety Administration (PHMSA), and all applicable California regulatory agencies. Compliance includes specialized driver training, vehicle inspections, emergency response procedures, equipment certification requirements, and adherence to strict operating standards for the safe transportation of hydrogen.¹

Hydrogen is transported using purpose-built equipment designed for high-pressure hydrogen service, including certified storage vessels, pressure relief systems, leak-prevention measures, and emergency shutdown capabilities. Transport operators maintain comprehensive safety programs and emergency response protocols to address the unlikely event of an accident or release during transit.

By utilizing experienced hazardous materials transportation providers and adhering to established regulatory requirements, the project ensures that hydrogen is transported safely and responsibly from the production facility to its destination.

2. Treatment Facilities Near the Generation Site.

The SoHyCal project was intentionally designed to minimize the transportation of raw materials and maximize overall system efficiency. The hydrogen production facility is strategically co-located adjacent to Bar 20 Dairy, allowing the project to utilize renewable energy generated directly from the dairy's anaerobic digestion process.

¹ U.S. Department of Transportation (DOT), Hazardous Materials Regulations, 49 CFR Parts 171–180; Pipeline and Hazardous Materials Safety Administration (PHMSA), regulations governing the transportation of compressed hydrogen as a hazardous material; Federal Motor Carrier Safety Administration (FMCSA), Federal Motor Carrier Safety Regulations, 49 CFR Parts 350–399; National Fire Protection Association (NFPA), *NFPA 2: Hydrogen Technologies Code* (2023 Edition); and California Code of Regulations, Title 13 and Title 24, governing commercial motor carrier operations, hazardous materials transportation, and hydrogen-related safety requirements.

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Biogas produced from dairy manure is collected through the existing digester system and driven through a biogas pipeline to the dedicated on-site infrastructure to generate renewable electricity. This renewable electricity is then used directly at the hydrogen production facility to power the electrolysis process that produces renewable hydrogen. By locating the hydrogen production facility immediately adjacent to the energy source, the project eliminates the need to transport feedstocks or intermediate products over long distances.

Co-locating the hydrogen production facility with the renewable energy source provides several environmental and operational benefits. It eliminates transportation-related emissions, minimizes fuel consumption associated with moving raw materials, lowers infrastructure requirements, and improves overall energy efficiency. In addition, the proximity of the facility to the energy source enhances operational reliability and enables more efficient use of the renewable electricity generated by the dairy biogas system.

During project development, multiple production and logistics scenarios were evaluated. The selected configuration was determined to be the most practical, efficient, and environmentally beneficial approach for producing renewable hydrogen from the available resources. By generating hydrogen directly from renewable electricity at the source, the project minimizes unnecessary transportation impacts while maximizing the environmental benefits of renewable hydrogen production.

This integrated design supports California's greenhouse gas reduction goals by capturing renewable energy from dairy biogas and converting it into a zero-emission transportation fuel as close to the source of generation as possible.

3. Additional Storage Tanks for Emergency.

The current phase of the hydrogen production facility does not include redundant hydrogen storage tanks intended specifically as backup storage in the event of a storage vessel leak or accidental damage. Hydrogen produced at the facility is compressed and delivered in accordance with applicable industry standards, engineering specifications, and regulatory requirements.²

² National Fire Protection Association (NFPA), *NFPA 2: Hydrogen Technologies Code* (2023 Edition); International Code Council (ICC), *International Fire Code (IFC)*, Chapter 23, Hydrogen Motor Fuel Dispensing and Generating Facilities; U.S. Department of Energy, *Hydrogen Safety Best Practices Manual*, governing the design, operation, storage, compression, transportation, and handling of hydrogen systems.

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Future phases of the project may evaluate additional hydrogen storage capacity based on operational needs, customer demand, and system reliability considerations. Should additional storage be proposed, H2B2 will conduct a comprehensive engineering and safety evaluation to ensure that all aspects of facility design, emergency response, operational safety, environmental compliance, and regulatory requirements are fully addressed.

Any future storage expansion would be subject to applicable permitting processes, safety reviews, and industry standards to ensure the continued safe operation of the facility and protection of workers, the public, and the surrounding community.