

		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 Mary Elizabeth, M.S., R.E.H.S.

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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Mary Elizabeth, M.S. (“Commenter”), has submitted comments regarding the H2B2 Tier 2 Pathway Application. H2B2 is pleased to address the issues raised and appreciates the opportunity to provide information clarifying the project and the pathway application associated.

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1. Hydrogen Transportation Distance Assumptions

The Commenter questions whether the 140 miles listed on the application are for a one-way or a round-trip. The 140 miles shown on the Tier 2 application are based on CA-GREET modeling under the CARB established methodology. Thus, the miles listed are noted as the transportation distance of 140 miles covering the delivery of renewable hydrogen from the SoHyCal facility to refueling stations, as stated in the Tier 2 Staff Report.¹

Transportation distances are reported annually as part of LCFS reporting and recordkeeping requirements. Any changes to the parameters that can possibly not reflect the certified pathway would be submitted and aligned with the CARB LCFS regulatory requirements.

Actual transportation distances will be reported, state annual reporting requirements need to follow LCFS regulations.²

2. Feedstock Disclosure and Digester Inputs

The Commenter describes the flammability hazards of hydrogen and concerns regarding leak-detection systems. H2B2 acknowledges that hydrogen is a flammable fuel, which is why appropriate engineering controls were included in the design, as well as in the safety systems and operating procedures. Hydrogen production, compression, transportation, and dispensing systems are managed carefully and safely to comply with federal, state, and local safety regulations.³ Furthermore, upon the approval of the state and local permits given for the production of hydrogen through electrolysis, these precautions were evaluated thoroughly and given approval under the required permits.

It is important to note that hydrogen gas being produced is meant for mobility, fueling fuel-cell powered vehicles to be considered low-emissions or zero-emissions.

¹ Tier 2 Staff Report for Application No. B0858, "Gaseous Hydrogen from Electrolysis Using Electricity Derived from Dairy Manure Biogas at Bar 20 Dairy in Kerman, California," California Air Resources Board, stating that "to be conservative, the longest distance (140 miles) from the SoHyCal facility to H2 refueling stations was adopted."

² California Air Resources Board, *Low Carbon Fuel Standard Tier 2 Fuel Pathway Application Guidance*; and California Air Resources Board, *CA-GREET 4.0 Model Documentation*, describing the methodology used to calculate transportation and distribution emissions for fuel pathways.

³ National Fire Protection Association, *NFPA 2: Hydrogen Technologies Code*; and International Code Council, *International Fire Code*, Hydrogen Fuel Gas Provisions

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3. Hydrogen Leakage and Climate Effects

Hydrogen leakage was considered during plant design, and H2B2 notes that there is no onsite hydrogen storage. Hydrogen produced and compressed is transferred directly into a hydrogen trailer, and production is conducted only when necessary. Upon completion of filling a hydrogen trailer, production is ceased, and continued refueling of the following trailer is planned. Minimizing leakage is done not only as a safety measure but also to ensure maximum production efficiency. Thus, metering and leak detectors are installed and programmed to pause or stop production if leakage is detected. Hydrogen-handling systems are designed to meet safety requirements.

4. Water Quality Control Board

H2B2 appreciates the concern for water-related risks and recognizes the importance of protecting the groundwater quality. This is done by Bar 20 dairy, which operates under permits and regulatory oversight. These matters are considered in the permitting, monitoring, reporting, and enforcement programs that are known in the LCFS pathway certification process.⁴ H2B2 believes that concerns raised regarding the water quality and related issues fall outside the scope of the Tier 2 pathway certification set for the renewable hydrogen production.

5. Livestock Population Numbers

Suggestions for any increase in dairy going forward are assumptions that cannot be proven true and are not influenced by H2B2 for this project or its plans to expand. Any discrepancies do not reflect H2B2's Tier 2 pathway application and do not take part in the management of the livestock population.

H2B2 believes there is no concrete evidence demonstrating that the livestock population used in the pathway application resulted in an error in the life cycle assessment. Although important, the discrepancy does not affect the value of the carbon intensity calculated in this application.

The herd data provided in the application pathway constitutes confidential business information and is not publicly disclosed; however, records submitted to CARB demonstrate that the facility is operating within permitted limits and that livestock populations for the relevant categories are below those authorized in the applicable air district permits. Differences between permitted herd capacity and the livestock population cited in CARB materials reflect the distinction between maximum allowable permit limits and actual herd counts used for LCFS reporting, and do not indicate any exceedance or non-compliance.

⁴ California Water Code §§ 13260–13267; Central Valley Regional Water Quality Control Board Dairy General Order Program.