

Date: August 31, 2023 RE: GHC Support for H Cycle, LLC's Article 2 Designation

Dear Staff at CalRecycle:

We are writing to convey our support for H Cycle, LLC's waste-to-hydrogen process, a pivotal solution in addressing organics diversion challenges within California. Our endorsement is firmly aligned with your agency's commendable drive to explore novel collection and processing technologies, prioritizing SB 1383 compliance across our jurisdictions.

The Green Hydrogen Coalition (GHC) stands as a 501(c)(3) non-profit organization dedicated to education. Since its inception in 2019, GHC has recognized the transformative potential of "green hydrogen" in expediting multi-sector decarbonization and combatting climate change. Our mission revolves around facilitating policies and practices that propel green hydrogen production and adoption throughout the economy, catalyzing a future fueled by carbon-free energy. Supported by foundations, renewable energy stakeholders, utilities, and advocates for an accessible green hydrogen fuel economy, GHC underscores the importance of a reliable and affordable energy transition.

As substantiated by the Hoover Commission report and various reliable sources, the challenges encountered by the state's waste haulers and processors collaborating with municipalities in organics diversion persist due to restricted capacity and feedstock contamination, which impede anaerobic digestion and composting processes mandated by SB 1383.

In our assessment, the H Cycle process stands as a complementary approach to existing diversion methods. Its distinction lies in its capacity to target organic-rich streams sourced from MSW and C&D, streams that are traditionally challenging to purify due to the inclusion of glass, metal, or hard-to-handle materials like paper. The distinctive ability of the H Cycle process to extract hydrogen from energy-rich organics through thermal conversion is especially noteworthy, providing a viable outlet for inert materials such as glass and rock within slag. This innovation eliminates the need for costly and often unfeasible pre-processing steps.

Furthermore, as the future of trucking gravitates toward zero-emission vehicles in alignment with CARB's Scoping Plan, and the recent adoption of the Advanced Clean Fleet (ACF) regulation mandates the phasing out of all internal combustion engine vehicles at the end of their life cycles, H Cycle's potential to deliver competitively-priced and low-carbon hydrogen derived from locally processed organic waste to hydrogen fuel cell-electric trucks emerges as a promising avenue. This not only advances the transition to fossil-fuel-free fleets but also ushers in cleaner air for our communities. These solutions embody a circular approach, repurposing waste that would otherwise end up in landfills to defossilize significant industrial sources and heavy-duty diesel trucks.



The prospect of collaborating with H Cycle in pursuit of crucial California environmental goals, notably SB 1383, SB 32 (aiming for a 40% reduction in carbon emissions by 2030), and the state's overarching objective of carbon neutrality by 2045, fills us with anticipation. We urge CalRecycle to expeditiously evaluate H Cycle's Article 2 designation and approve this imperative pathway toward addressing an escalating environmental concern.

Respectfully submitted,

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