October 24, 2022

Via email to: MarkPa@dep.nyc.gov, AlyssaP@dep.nyc.gov

Mark Page, Jr.
Executive Director
Bureau of Environmental Compliance
Department of Environmental Protection
59-17 Junction Blvd., 8th Floor
Flushing, NY 11373

Alyssa Preston
Bureau of Environmental Compliance
Department of Environmental Protection
59-17 Junction Blvd., 8th Floor
Flushing, NY 11373

Dear Executive Director Page:

On behalf of Loomis Armored US, LLC and its subsidaries (”Loomis”), I write to request a variance from Section 24-163 of the Air Code. I am enclosing our completed Air Code Variance Application and including an explanation to item II in the Attached Materials.

I am sorry that we did not receive your email of Feburary 10, 2022 and the subsequent denial of our extension request. We have not found Griffin’s idle reduction technology to be a viable option for us, but we are evaluating and gradually incorporating, where feasible, electric armored vehicles into our fleet in order to reduce transportation carbon emissions. We believe the actions outlined in our Application and the supporting materials demonstrate our desire to assist the City of New York in reducing emissions associated with vehicle idling.

Thank you for your consideration in this matter. Should you have any questions, please feel free to contact me.

Sincerely,

Craig L. Albiston
Chief Compliance Officer
Loomis Armored US, LLC
Direct: 731.435.6719
Email: craig.albiston@us.loomis.com

NYC DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bureau of Environmental Compliance
59-17 Junction Boulevard, 9th Floor, Flushing, NY 11373

AIR CODE VARIANCE APPLICATION

I. APPLICANT INFORMATION

Name Loomis Armored US, LLC ("Loomis") Tel # 713.435.6719

Address 2500 CityWest Blvd., Suite 2300 City Houston State TX Zip 77042

Capacity: For itself and its subsidiary Loomis International (US) LLC ("Loomis")

Client(s): Our client list is confidential, but we service multiple NYC businesses, financial institutions, and public sector customers.

What section of the Air Code are you asking for a variance from? 24-163 (Vehicle Idling)

II. Please explain why complying with the Air Code section specified above would impose unreasonable hardship. Attach any documentation that will assist the department in reviewing your application.

Please see attached materials.

III. I hereby declare that the information provided herein and in any and all accompanying attachments is true and complete to the best of my knowledge. I understand that failure to comply with the conditions set forth by the Department in an approval of the application shall render the variance null and void.

Craig Albiston for Loomis 10/24/2022	Craig Albiston 10/24/2022
Print Name of Applicant Date	Signature of Applicant Date

Please complete the form and include a cover page listing the supporting documentation that is being submitted and mail to:

Alyssa Preston
Bureau of Environmental Compliance
Department of Environmental Protection
59-17 Junction Boulevard
8th Floor
Flushing, NY 11373

Materials In Support of Loomis' Variance Request
From The Requirements for Limiting Idling to Three (3) Minutes [or One (1) Minute if Next To A School] as Set Forth in §24-163 of the New York City Administrative Code

By way of information, Loomis Armored US, LLC, for itself and on behalf of its subsidiary, Loomis International (US) LLC ("Loomis") is engaged in the business of transporting, protecting, and storing currency, coin, negotiable instruments, precious metals, gemstones, and other valuables for its customers. Loomis provides these services by dispatching armored vehicles on daily runs to Loomis customers' pick-up and delivery locations. These services are performed by dispatching specialized armored vehicles on daily runs on predetermined routes and according to strict time schedules, all of which are based on security needs and customer requirements. Depending on various factors, such as the type of shipment and amount of valuables on board the armored vehicle, the crew in the armored vehicles consists of a Driver, Messenger, and in some cases additional Guards.

Vehicle Configuration, Employee Safety & Servicing NYC Clients. Due to the unique nature of armored vehicles and the dangers to life and property they are designed to protect against, Loomis respectfully requests a commonsense variance from New York City Administrative Code Sec. 24-163 to allow its armored vehicles to idle for greater than three (3) minutes. Permitting greater idling will allow the armored vehicle to instantly move to escape an imminent attack, thus avoiding potential danger to our crew, the general public, and property[1]. Additionally, Loomis' vehicles are all outfitted with equipment designed to promote the safety of our vehicle crew (and the public), including but not limited to bullet resistant windows, cameras, sirens, and sensors, and this equipment requires a significant draw on the vehicle's power and necessitates the continuous operation of the vehicle. Shutting these vehicles off creates security risk and potential danger to the Loomis crew and the public, any of which could require city resources (law enforcement) to address (See, National Armored Car Association letter attached).

In addition to the security protocols, there is a health and safety reason why Loomis is requesting the ability to idle: the sealed armored vehicle's windows do not roll down, thus requiring the use of heat or air conditioning for ventilation and climate control[2]. Typically, while making a delivery or pick up of valuables, the Messenger, who may at times be accompanied by a Guard, exits from the rear or side compartment of the armored vehicle, while the Driver remains in the front cab of the vehicle, guarding the property contained within the vehicle and also acting as a Guard for the Messenger, while staying vigilant and observing the surrounding area for potential danger or attack. For security reasons, and as mentioned above, the armored vehicle has windows that cannot roll down and the Driver can only open his/her door under certain controlled circumstances, and the Driver needs to be able to operate the vehicle's air conditioner/heater for both comfort and a safe level of airflow.

Anti-Idling Technology & More Sustainable Vehicles. Loomis is working to identify alternatives to idling its vehicles. Regarding advances of anti-idling technology systems for diesel and regular fuel vehicles,

[1]The City of New York Mayor Eric L. Adams, "Mayors Management Report," September 2022, reposted online at https://www1.nyc.gov/assets/operations/downloads/pdf/mmr2022/2022_mmr.pdf; ("Overall *major felony crime increased by 26 percent* [emphasis added] compared to Fiscal 2021. Forcible rape increased by 63 percent, while *robbery increased by 24 percent and felonious assault increased by 17 percent* [emphasis added]. Grand larceny increased by 38 percent and grand larceny auto increased by 25 percent. Murder decreased by 5 percent compared to Fiscal 2021. The Department will continue to strengthen its crime reduction efforts with neighborhood and precision policing, while advocating for legislative amendments and community-based solutions.")

[2] Livia Albeck-Ripka, "UPS Drivers Say 'Brutal' Heat is Endangering Their Lives," The New York Times, Sunday, August 21, 2022, reposted online at UPS Drivers Say 'Brutal' Heat Is Endangering Their Lives - The New York Times (nytimes.com) (accessed August 23, 2022).

Loomis' primary vehicle manufacturing vendor has reviewed this technology (including the technology described in Griffin Armor's video). Proof-of-principal prototypes were generally developed by Loomis' manufacturer, but several difficulties were identified in making reliable long-term systems (See, Cite Armored letter attached). We, through our vendor, will continue to keep ourselves apprised of any breakthrough anti-idling technologies. Loomis' primary focus for the future is evaluating and investing in more sustainable electric armored vehicles[3]. If viable, electric vehicles will address the idling issue. Presently, we have a handful of these vehicles in service throughout the U.S., including one recently placed at our Moonachie, New Jersey Branch. This electric vehicle is now servicing clients in New York City. We anticipate adding electric vehicles to our fleet servicing the New York City boroughs by year end, with more coming in early 2023 if the vehicles are successful in serving our customer and security needs. As a caveat, electric armored vehicles have a limited range before they need to be charged, so we recognize that technological advances are necessary to fully, or even, mostly electrify Loomis' fleet. That said, Loomis is the leader among its peers in deploying more sustainable vehicles[4] and is committed to increasing the number of electric armored vehicles on the road over the next five years.

Conclusion. The Company has submitted a Vehicle Detail Form (with combined vehicle information) as required by DEP, however, it should be noted that these vehicles service multiple clients both inside and outside of New York City. Given the Company's current client base, Loomis has approximately 21 routes that service the New York City boroughs on a typical day. While we have found that today's idle reduction technology is not a viable option for us, we believe that we are making satisfactory and substantial progress to limit fossil fuel emissions associated with fleet idling by adding more electric armored vehicles to our fleet.

Requested Relief

1. Loomis respectfully requests that the NYC Department of Environmental Protection grant us a variance exception to the Idling Prohibition for Heavy Duty Vehicles under §24-163 of the New York City Administrative Code.

2. Loomis also respectfully requests that all pending §24-163 violations and associated hearings be dismissed upon the granting of this variance.

[3] See, XOS Partner: CITE Armored and Loomis, https://www.youtube.com/watch?v=LFsFDdePwJw

[4] For more information on Loomis' plans for the future, see the Company's Annual and Sustainability Report at https://www.loomis.com/sites/default/files/documents/202104012527-1_0.pdf

CITE ARMORED

built to protect

DATE: 07-18-22

Cash Transit Trucks are a unique vehicle design that have specialized design parameters that make incorporating anti-idle technologies more difficult. These vehicles are mostly sealed from the outside world for security purposes and therefore depend upon climate control to maintain reasonable interior temperatures. Furthermore, the climate control volume is the majority of the vehicle (compared to a small portion in typical cargo truck) and requires a larger amount of HVAC equipment. Typical commercial anti-idle systems are designed for short duration stops such as traffic lights (few minutes). Cash Transit Trucks operate parked more in the range of 10 to 30 minutes.

The vehicle temperature cannot be maintained at reasonable levels for these longer periods of time with just the cab's thermal mass alone (as is done with passenger car anti-idle). Stored thermal energy within the engine block is capable of providing interior heat during stops, but battery based cooling systems are required for hotter climates.

CITE Armored invested significant money to develop this type of system in the past. While proof-of-principal prototypes were developed, we found several difficulties in making reliable long term systems. A significant battery is required to deliver 2-3 horsepower for the air conditioner for 20 minutes. Then the battery must rapidly recharge before the next stop. This high duty-cycle puts large stresses on the battery vehicle electrical system, ultimately causing system reliability issues.

A reliable system would require greater integration at the chassis level, such as a higher voltage accessory bus, larger batteries, and high duty cycle starter. Similar systems are being implemented in passenger and light duty vehicles, but not made it up to heavy duty chassis.

Ken Russell
Sr VP Operations

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National Armored
Car Association

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603.582.7334
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October 18, 2022

Mark Page, Jr.
Executive Director
Bureau of Environmental Compliance
Department of Environmental Protection
59-17 Junction Blvd., 8th Floor
Flushing, NY 11373

Alyssa Preston
Bureau of Environmental Compliance
Department of Environmental Protection
59-17 Junction Blvd., 8th Floor
Flushing, NY 11373

RE: Variance from Idling Law

Dear Director Page:

On behalf of the National Armored Car Association (NACA), we write in support of industry variance petitions from section 24-163 of the Air Pollution Control Code ("Code") to allow for idle times of more than three minutes, or one minute if adjacent to a school, while armored cars are actively being used in the course of doing business. These variances are necessary to prevent our member companies from facing the unreasonable hardship that compliance with the Code would entail while they work to build upon their satisfactory progress in reducing carbon emissions via transformations to their fleet operations and to allow for the industry to continue reducing the risk to New York City's small businesses and financial institutions.[1]

Formed in 1929, NACA is a business association that brings together the three major companies of the armored car industry—Brink's, Garda, and Loomis—with a focus on protecting and promoting the common interests of the industry. These three organizations comprise approximately 90% of the armored car industry in the United States, and NACA members have handled virtually every dollar and coin in circulation. They provide secure transportation and cash management services for the Federal Reserve, financial institutions, state and local governments, and private businesses and individuals across the United States and internationally.

Justification for Variance

Given our industry's role in transporting, protecting, and storing, coin, currency, negotiable instruments, precious metals, gemstones, and other valuables, armored car guards are attractive targets for criminal enterprises. Statistics compiled by NACA members reveal that the majority of armored car robberies involve the use of violent force and occur when the armored car is stopped and the crew members are outside the safety of the vehicle. For instance, since 2000, there have been an average of fifty-three (53) armored car robberies per year, of which eighty-six percent (86%) involved the use of violent force and eighty-seven percent (87%) occurred while the employee was outside the safety of his/her truck. Most of these robberies and attempted robberies occur in highly populated urban areas widely accessed by the public and require the response of law enforcement—creating a potential threat to both the general public and peace officers. Based on the number of armored cars in operation in the U.S. (approximately 7,820) and number of stops per day (approximately 35) each vehicle makes, there are approximately **199,801,000** exposures per year where there is the potential for an armored car robbery to be committed when at least one crewmember is out of the vehicle.

[1] The September 2022 Mayor's Management Report found "unparalleled increases in major crime categories," noting increases in felony crime (26%), robbery (24%), and felonious assault (17%) in the fiscal year 2022 vs. 2021. Our industry reduces risks facing small and large businesses, banks, and residents, through cash management assistance.

National Armored Car Association

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Given these recognized hazards to our employees and the public, armored car companies work to minimize the risks associated with robbery attempts. This includes significant investments in the development of specialized armored vehicles that are built with bullet resistant glass and panels, sealed from outside elements and retrofitted with energy-intensive security systems that are designed to protect guards—as well as the general public and peace officers—during customer pickups and drop offs. These security systems include cameras, sirens, sensors, electronic locks, and other equipment that require a constant and significant source of energy during prolonged stops that only a truck's engine can reliably power. For instance, external cameras must operate continually to allow the driver, who must be ready to reposition the vehicle at a moment's notice in the case of a robbery attempt, to remain vigilant of external threats. Furthermore, due to the sealed design of armored vehicles, the heat or a/c system must run continually during a stop to maintain a healthy ambient temperature and volume of airflow inside the cab and cargo areas. If a truck were to power off during a stop, security and air conditioning systems would drain the truck's battery, potentially stranding the crew and exposing the driver to extreme temperatures. As a result of these factors, the engine must remain running during stops to ensure the operability of security systems, temperature regulators, and operational protocol necessary to the safety of all parties.

Reducing Fleet Emissions – Satisfactory Progress Achieved

While writing to express support for NACA members' variance requests, we also acknowledge that the largest part of the armored car industry's carbon footprint comes from transportation. As a result, we want to draw your attention to the significant steps our industry is taking to reduce carbon emissions and some of the challenges that have arisen in trying to get there. As has been discussed earlier in this letter, transportation of valuables and cash requires the use of armored vehicles. The weight and compact design of these vehicles are unique to our industry and as such our members must pilot potential alternative solutions to fleet design and operation before adoption. This takes time, significant financial investment and can result in delays or drawbacks if the piloted changes do not end up working as intended. For instance, some of NACA's members spent significant resources and time to develop an idle-reduction system which automatically turned off the engine when the driver shifted into park—but that kept the internal systems running. Unfortunately, after testing prototypes of the technology in the field, system reliability issues prevented companies from moving forward with its adoption.

However, NACA members haven't stopped exploring alternative and environmentally friendly options for fleets where appropriate, such as the use of lighter vehicles, increased route optimization and efficiency, fleet management software, minimizing the total number of vehicles on the road and replacing eligible vehicles with hybrid and/or electric alternatives. In the case of transitioning fleets to electric, one member successfully worked with a vehicle supplier to test technical solutions for electrical armored trucks and purchased 20 electrified armored vehicles at the beginning of 2021. However, due to a shortage of components and challenges with infrastructure, the delivery of those vehicles has been delayed.[2] Another member has deployed more than 150 armored vehicles based on the newest generation of gas engines with lower emission levels and more efficient fuel consumption throughout the country.[3] Yet another member is testing solar panels on segments of new vehicles and piloting new start-stop technology.[4] As the industry invests substantially in sustainability initiatives, we urge recognition that developing such technologies takes time.

[2] Loomis Interim Report January - June 2022
[3] GardaWorld-2021-Sustainability-Report.pdf
[4] Brinks Sustainability Update July 2022

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Precedent Exists for Such Variance Requests

Finally, we draw your attention to the fact that there is precedent for granting variance requests from anti-idling laws. In fact, both the United States Environmental Protection Agency and California Environmental Protection Agency Air Resources Board recognize the critical importance of exempting armored car operators from idling requirements. The EPA's Model State Idling Law exempts armored car vehicle idles "when a person remains inside the vehicle to guard the contents, or while the vehicle is being loaded or unloaded," stating that such exemption is "common sense" similar to that of emergency vehicles.[5] California's Environmental Protection Agency Air Resources Board issued an advisory acknowledging and exempting armored cars from idling: (1) "necessary for operating video cameras" as they "may need to be in constant operation and of sufficient draw to require idling the vehicle's primary engine," or (2) "to avoid a safety or health emergency" as crew "health and safety could be compromised if they were not allowed a source of heat or air conditioning," and "for safety purposes the engine may need to remain running in order to be able to leave the premises abruptly in the event of an attempted robbery or other emergency situation."[6] The state of California also recognizes this vital exemption in the recently amended California Code of Regulation Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.[7] Prior to 2022, the NYC Department of Environmental Protection approved "common sense" variance requests for NACA members to idle for greater than three minutes. We encourage the Agency to resume approving variance requests from our industry, a common practice nationwide, even in stringent states.

Conclusion

Given the aspects of operational security and the safety considerations of the people of New York City, we respectfully request that the Department of Environment Protection approve the anti-idle variance requests submitted by our members. Without approving these requests, the restrictions placed on guard operations will negatively and significantly impact the ability of our industry to ensure the safety of our guards, cargo, bystanders, and law enforcement. The industry will continue to advance pledges to increase its sustainability and reduce its carbon footprint and asks during this intensive research and development process that the city support safe practices that protect the people and businesses of New York.

Sincerely,

Basil Thomson

Basil Thomson
Executive Director, NACA

CC Mayor Eric Adams
Police Commissioner Keechant Sewell

[5] Office of Transportation and Air Quality, Model State Idling Law § (2006).
[6] Air Resources Board, Armored Vehicle Idling Advisory § (2008).
[7] Cal. Admin. Code tit. 13, § 2485, 13 CA ADC § 2485

Submit this form on your company's letterhead. A hearing shall be scheduled only after all accompanying documentation as requested below is provided.

I. Details of the Vehicle or Description of the fleet:

Make……., Model……, Year……..

II. Does this vehicle or fleet run on gasoline or diesel?

III. What is vehicle's weight rating (GVWR) and registered weight for the vehicle? If the vehicles are identical, please provide just one weight of the vehicle.

GVWR _____ lbs. Registered weight _____ lbs.

For answers to items I through III, please see Table attached.

IV. How much power is required to power all the required units in the vehicle or the fleet?

Power consumption varies, but peak draw is around 100 amps.

a. List all the equipment that requires external power.

- *Air Conditioner and heating (large cabin, no windows that can open)*
- *Camera system - 4-6 cameras with continuous recording*
- *Siren*
- *Public Address (PA) System*
- *Electronics locks (80 amps for short burst)*
- *Security System*
- *RFID Readers*
- *Biometric scanners*
- *Onboard image processing computer*
- *Telematics/GPS/cell data modem*

b. How many hours is required for each piece of equipment to run on external power?

All the equipment listed above is operated continuously while carrying currency and other valuables outside of the Loomis branch

V. Have you considered installing a Battery power APU unit or Gasoline power APU?

1. If yes, list APU details……..…

If no, list the reasons why not……..……....

Loomis and its vendor invested significant money (~$200,000) to develop an anti-idle system in the past. Proof-of-principal prototypes were developed and testing for a year. We found several

difficulties in making reliable long term systems. A significant battery is required to deliver 2-3 horsepower for the air conditioner for 20 minutes. Then, the battery must rapidly recharge before the next stop. This high duty-cycle puts large stresses on the battery vehicle electrical system, ultimately causing system reliability issues.

A reliable system would require greater integration at the chassis level, such as a higher voltage accessory bus, larger batteries, and high duty cycle starter. Similar systems are being implemented in passenger and light duty vehicles, but have not made it up to heavy duty chassises.

2. Explain in detail why we should approve your waiver, including a cost analysis, undue hardship burdens, and improvements to your fleet to reduce engine idling.

Please see the attached Materials in Support of Loomis' Variance Request.

Loomis Fleet Details

Please Note: Not All Vehicles Listed Service NYC Customers on a Daily Basis

	Vehicle	Branch	Year	Make	Model	Lic State/Prov	Lic Plate	Fuel Type	GVWR	REGW
1	02615	5200	2004	INTERNATIONAL	3800	NJ	XA257Y	Diesel	25,500	
2	02676	5200	2004	INTERNATIONAL	3800	NJ	XZ576G	Diesel	25,500	
3	02796	5200	2005	FORD	F550	NJ	XY239P	Diesel	17,950	
4	02888	5200	2006	INTERNATIONAL	1300	NJ	XG833J	Diesel	25,500	
5	07085	5200	2007	INTERNATIONAL	1300	NJ	XCSA44	Diesel	25,500	
6	07128	5200	2008	INTERNATIONAL	1300	NJ	XBSL88	Diesel	25,500	
7	07169	5200	2008	INTERNATIONAL	1300	NJ	XM994B	Diesel	25,500	
8	11031	5200	2012	INTERNATIONAL	1300	NJ	XX745D	Diesel	25,500	
9	14094	5200	2015	INTERNATIONAL	1300	NJ	XCBY27	Diesel	25,500	
10	14110	5200	2015	INTERNATIONAL	1300	NJ	XCBY28	Diesel	25,500	
11	14111	5200	2015	INTERNATIONAL	1300	NJ	XCBY26	Diesel	25,500	
12	15158	5200	2016	INTERNATIONAL	1300	NJ	XDZD73	Diesel	25,500	
13	18108	5200	2019	INTERNATIONAL	1300	NJ	XGTU69	Diesel	19,501	
14	22492	5200	2021	XOS	SA1	NJ	XMDK63	Electric	23,000	
16	11496	5517	2010	FREIGHTLINER	F3CC144 SPRINTER	NY	14718NA	Diesel	11,030	11,500
17	11498	5517	2010	FREIGHTLINER	F3CC144 SPRINTER	NY	75056KA	Diesel	11,030	11,500
18	11539	5517	2010	FREIGHTLINER	F3CC144 SPRINTER	NY	75022KA	Diesel	11,030	11,500
19	13003	5517	2013	CHEVROLET	CG33503 EXPRESS CUTA	NY	94159MD	Diesel	12,300	
20	14083	5517	2015	INTERNATIONAL	1300	NY	30562MG	Diesel	25,500	25,000
21	14084	5517	2015	INTERNATIONAL	1300	NY	30556MG	Diesel	25,500	25,000
22	17102	5517	2018	INTERNATIONAL	1300	NY	26654ML	Diesel	19,501	25,500
23	17129	5517	2018	INTERNATIONAL	1300	NY	26972ML	Diesel	19,501	25,500
24	18187	5517	2019	INTERNATIONAL	1300	NY	62978MM	Diesel	19,501	25,500
25	19105	5517	2020	INTERNATIONAL	1300	NY	26142MN	Diesel	19,501	19,500
26	19129	5517	2020	INTERNATIONAL	1300	NY	26431MN	Diesel	19,501	19,500
27	19205	5517	2020	INTERNATIONAL	1300	NY	39016NA	Diesel	19,501	19,500
28	15195	6050	2016	HINO	268	NY	18551MN	Diesel	25,950	
29	15315	6050	2007	FREIGHTLINER	SPRINTER 3500	NY	99526MH	Diesel	10,001	25,500
30	19400	6050	2019	INTERNATIONAL	HV513	NY	13685PF	Diesel	73,500	22,000
31	19501	6050	2009	INTERNATIONAL	4300	NY	97893PA	Diesel	26,001	
32	19503	6050	2009	INTERNATIONAL	4300	NY	10238PB	Diesel	26,001	
33	19506	6050	2017	INTERNATIONAL	DURASTAR 4300	NY	55614PC	Diesel	26,001	
34	19507	6050	2018	INTERNATIONAL	DURASTAR 4300	NY	69983PC	Diesel	26,001	
35	19508	6050	2018	INTERNATIONAL	DURASTAR 4300	NY	69984PC	Diesel	26,001	
36	19509	6050	2016	FORD	TRANSIT VAN	NY	97076MK	Diesel	10,001	12,000
37	21301	6050	2022	INTERNATIONAL	LT625	NY	41225Z	Diesel	80,000	17,526
38	21302	6050	2022	INTERNATIONAL	LT625	NY	41226Z	Diesel	80,000	17,526