



Shields Business Solutions, Inc.

Since 1970

5 Twosome Drive Moorestown, New Jersey 08057

☎ 856.727.0227 📠 856.727.9090

Attn: Commissioner and/or Assistant Commissioner Office
Department of Environmental Protection
59-17 Junction Boulevard, 13th Floor
Flushing, NY 11373

December 26, 2022

RE: Request for Variance from Idling Law

Dear Sir/Madam,

The purpose of this letter is to formally request a variance from the requirements for limiting idling for either three minutes, or one minute if adjacent to a school, as set forth in Section 24-163 of the air Pollution Control Code.

The reason for this request is based on the following:

- 1) Shields Business Solutions is an Armored Car Company delivering and picking up cash, coin and other valuables throughout New York City and State. A copy of our NY State Armored Car License #1555049 is attached herewith.
- 2) Armored Car vehicles must idle while operating (pickup and/or drop off) to maintain the various security equipment (GPS tracker, alarms, video cameras, open door indicators) as well as health and welfare systems (HVAC)
- 3) Due to the specialty design of armored vehicles, the bulletproofing prevents the ability to open windows creating a safety hazard on hot summer and cold winter days. The HVAC also provides fresh air circulation. Additionally, the crews wear body armor which increases their body temperature, making climate control a paramount safety concern.

It is for these reasons that we respectfully request Shields Business Solutions be issued a variance for Section 24-110 of the Air Pollution Control Code in alliance with the other Armored Car Companies who have already received variances. (Rapid Armored Corporation, EPIC Security Corp)

Thank you for your consideration and we look forward to hearing a favorable response from your office. Please do not hesitate to reach out to me directly with any questions or additional information you need.

Thomas J. Raftery
Chief Operating Officer



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

Year	Make	Model
2014	Ford	E350 -Armored Van
2022	International	CV 515 Armored Truck
2018	Ford	F550 - Armored Truck
2014	Ford	E350 -Armored Van
2017	Ford	F550 - Armored Truck
2017	Ford	F550 - Armored Truck
2018	Dodge	Pro-Master -Armored Van
2018	Ford	E350 -Armored Van
2014	Ford	E350 -Armored Van
2015	Ford	E250 -Armored Van
2007	Ford	E350 -Armored Van
2022	Ford	F550 - Armored Truck
2012	Ford	E350 -Armored Van
2014	Ford	E350 -Armored Van
2021	Ford	F550 - Armored Truck
2021	Ford	F550 - Armored Truck
2018	Ford	F550 - Armored Truck
2014	Ford	E350 -Armored Van
2022	Ford	E-350 Armored Van
2013	Ford	E350 -Armored Van
2020	Ford	F550 - Armored Truck
2020	Ford	F550 - Armored Truck
2014	Ford	E350 -Armored Van
2011	Ford	E350 -Armored Van

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

Both, 75% Gas 25% 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.

Ford E350 - GVW – 9500 lbs.

Ford F550 - GVW - 19,500 lbs.

Int'l CV 515 – GVW – 23,500 lbs.

Promaster – GVW – 9,350 lbs.



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IV. How much power is required to power all the required units in the vehicle or the fleet? Varies by design and vehicle type.

a. List all the equipment that requires external power:

- GPS Locator
- Four Cameras
- On board DVR
- Backing Dashboard Monitor
- High Security Alarm System
- Siren
- Loudspeaker
- Electronic Ignition Lock
- Mobile Scanner Charging Station
- Electronic Solenoid High Security Slam Locks
- Electronic High Security Open-Door Indicators/Alarms.
- Cabin Fans

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

Unless the vehicle is inside a secured location, the vehicle runs all day. Our current average route time is 10.33 hours, 9.33 of those hours the truck is running.

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

Yes, but due to the weight of the armoring/bullet resistant panels and glass, the added weight would decrease needed GVW to support the routes workload. There is also very decreased amount of available space once the upfitting of the armoring, interior safe, shelving, etc.

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.

In order to get the insurance needed to run the business, one person must remain in the vehicle. The insurance protects the crew and customers valuables in the event of a holdup. Moreover, crews wear a tactical uniform that include duty belts/ holsters and bullet resistant vests which make the cabin environment a paramount safety concern. The air circulation, heating and air conditioning are critical to the health and welfare of the driver. The trucks are, by design, rolling vaults so there is no option to open a window. Extreme weather seasons like winter and summer exacerbate the need for HVAC.



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We are currently working with our truck builder to investigate the viability of a fully electric vehicle and/or a single person high security vehicle that could allow for the truck to be left unattended thereby reducing the need to run the HVAC system. There are currently some one person trucks being used by the large national providers who can self-insure, smaller independent armored companies are looking for ways to make a model that can work for them.

Some of the challenges we are facing is the weight of the electric batteries needed to power an armored truck. It appears the batteries alone would weigh between 1000 – 3000 lbs. which would significantly reduce the pay load capacity requiring us to upgrade the vehicle size at significant cost.

The weight of a full 40-gallon fuel tank only weighs 240lbs. Moreover, if the added weight requires we go above 26,000 lbs., we will have to hire CDL Class B drivers which who are paid at a higher rate than the non-CDL drivers we currently use. The move to CDL drivers also adds additional administrative and compliance costs. These added expenses in total would be significant and I am not sure we could pass this onto the customers which could lead to lost business and staff reductions.

Since the pandemic the cost of our armored trucks has increased 36%. If we had to upgrade the size of the truck to accommodate the extra GVW that an electric vehicle would require, I believe the cost increase by at least an additional 25 to 50%, electrification notwithstanding. Currently each new vehicle we purchase has the latest emission reduction technology available.

From an operational perspective, when we service ATMs we send out the cash pre-packaged in cassettes to decrease the amount of time at the location. Our average service time is under 8 - 10 minutes. Our competitors send out the cash in bags making the crew member swap out the new load by hand on site, which results in more than double the time we spend on site.

As technology continues to develop, I am certain that the electrical armored truck will become commercially available in the next few years where smaller armored service providers can participate without being placed at an unfair pricing and insurance disadvantage.

Thank you for consideration on this very important safety concern.

Tom Raftery, COO