

**Vincent Sapienza, P.E.**  
*Commissioner*

**Michael Gilsenan**  
Assistant Commissioner  
Environmental Compliance  
mgilsenan@dep.nyc.gov

59-17 Junction Boulevard  
Flushing, NY 11373  
T: (718) 595-4543  
F: (718) 595-4544

December 17, 2018

Mr. G. Robinson Hess  
Assistant General Counsel  
Brinks Inc.  
652 Kent Avenue  
Brooklyn, NY 11249

Re: Variance from Idling Law

Dear Mr. Hess:

I am writing in response to your letter dated November 30, 2018, requesting a variance from the requirements for limiting idling to either three minutes, or one minute if adjacent to a school, as set forth in Section 24-163 of the Air Pollution Control Code.

Your request has been granted based upon the circumstances that these armored cars when actively being used in the course of doing business, must idle in order to operate video cameras and to avoid a safety or a health emergency. This exception does not apply when the employees are not performing their job responsibilities, including but not limited to taking lunch. These two conditions are also recognized by the California Air Resources as exceptions to the idling requirements that CARB has codified as exceptions in an "Advisory for Commercial Motor Vehicle Idling".

This variance is granted pursuant to Section 24-110 of the Air Pollution Control Code. Please be advised that this waiver shall expire December 17, 2021. The three-year waiver is issued for this period, as there may be advances in technology that no longer necessitate the vehicles to idle. This waiver may also be renewed with supporting documentation.

Sincerely,



Michael Gilsonan