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COMMISSIONER'S OFFICE

33-44 9th Street, Astoria, NY 111068 P 2:08
2023 MAY 11

April 25, 2023

The Honorable Eric Adams
City Hall
New York, NY 10007

I am writing to you as the CEO of an Armored Car Company located in Astoria NY. Our commercially plated vehicles have been receiving an increased amount of EPA Idling tickets in the last six months. I understand and appreciate the wish to lower emissions and reduce the carbon footprint of vehicles operating in New York City.

My issue is that our industry is faced with other concerns that go against the shutting off of vehicles while parked outside of a service location. I have attached a letter from the National Armored Car Association (NAC) and the Independent Armored Car Operators Association (IACOA) sent to the Executive Director of the Bureau of Environmental Compliance. Our company is a member of IACOA.

The industry recognizes that the majority of armored car robberies involve the use of violent force and occur when an armored car is stopped, and the crew members are outside the safety of the vehicle. Often these robberies occur in highly populated urban areas widely accessed by the public and require law enforcement's response-creating a potential threat to both the general public and peace officers.

As our industry works to mitigate hazards to our employees and the public, the industry has made 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. To maintain the safety of our crew and those in the surrounding area, external cameras must operate continually to allow the driver to remain vigilant of threats and be ready to reposition the vehicle at a moment's notice in the case of a robbery attempt. 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. One crewmember must always be within the vehicle at all times.

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. Across our industry, preparedness, safety, and proven strategies are crucial to reducing risk facing our employees and the public. Variance from the air code enables the industry to carry out these critical safety practices.

www.securecash.nyc



33-44 9th Street, Astoria, NY 11106

I would appreciate if we could speak with you about providing our industry with an exemption to the current law, or a more generous time allowance, that still allows us to provide for the safety of our crew members as well as maintaining the OSHA standard we must abide by as to the safety and comfort of the armored crews while performing their duties.

Electric vehicles for our industry have just become available for armored security retrofitting by the builders of armored vehicles. Our next purchase of vehicles planned for this year will be fully electric. Understandably it will take several years for us to convert our entire fleet involved in servicing the five boroughs to full electric vehicles.

Sincerely,

Clifford Jordan
CEO

Secure Cash LLC
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Astoria, NY 11106
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(917) 533-2699

Cc: Rohit T. Aggarwala, Commissioner NYC DEP



**National Armored
Car Association**



IACOA

INDEPENDENT ARMORED CAR OPERATORS ASSOCIATION

November 16, 2022,

Via Comment Submission Portal

Mark Page, Jr.
Executive Director
Bureau of Environmental Compliance
Department of Environmental Protection
59-17 Junction Blvd., 8th Floor
Flushing, NY 111373
Alyssa Preston.
Bureau of Environmental Compliance
Department of Environmental Protection
59-17 Junction Blvd., 8th Floor
Flushing, NY 111373

Dear Executive Director Page:

On behalf of the National Armored Car Association (NACA) and the Independent Armored Car Operators Association (IACOA), we write in support of the Department of Environmental Protection granting Loomis Armored's variance petition 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. Industry variances are necessary to prevent armored car companies from facing the unreasonable hardship that compliance with the Code would entail. As members of NACA and IACOA continue to make substantial investments in sustainability measures, we respectfully request that NYC DEP provide variance to our industry to reduce the risk to New York City's small businesses and financial institutions until reliable, tested, and safe idling technology is available to the industry.

NACA's and IACOA's members 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. Together, we have handled virtually every note in circulation in the United States.

Given the role of Association members in transporting, protecting, and storing, coin, currency, negotiable instruments, precious metals, gemstones, and other valuables, armored car guards are attractive targets for criminal enterprises. The industry recognizes that the majority of armored car robberies involve the use of violent force and occur when an armored car is stopped and the crew members are outside the safety of the vehicle. Often these robberies occur in highly populated urban areas widely accessed by the public and require law enforcement's response—creating a potential threat to both the general public and peace officers.

As our industry works to mitigate hazards to our employees and the public, the industry has made 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. To maintain the safety of our crew and those in the surrounding area, external cameras must operate continually to allow the driver to remain vigilant of threats and be ready to reposition the vehicle at a moment's notice in the case of a robbery attempt. 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. Across our industry, preparedness, safety, and proven strategies are crucial to reducing risk facing our employees and the public. Variance from the air code enables the industry to carry out these critical safety practices.

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 Loomis Armored's anti-idle variance request. Without approving this request, 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,

Vince Modarelli
NACA President

Renee Menzies-McCallum
IACOA President