



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204  
(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

Eric J. Holcomb  
Governor

Brian C. Rockensuess  
Commissioner

June 27, 2024

VIA ELECTRONIC MAIL

Matthew Schwerdtfeger  
Healthcare Realty Services LLC as agent for HTA Administration Building  
640 Eskenazi Avenue  
Indianapolis, IN 46202  
[mschwerdtfeger@healthcarerealty.com](mailto:mschwerdtfeger@healthcarerealty.com)

Re: Inspection Summary Letter  
Healthcare Realty Services LLC as agent  
for HTA Administration Building  
Source ID 097-00757  
Indianapolis, Marion County

Dear Matthew Schwerdtfeger:

On June 14, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of Healthcare Realty Services LLC as agent for HTA Administration Building, located at 640 Eskenazi Avenue in Indianapolis, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Inspection Type: Commitment  
Inspection Results: No violations were observed

Please direct any questions to me at (317) 694-8691 or by email at [jbautist@idem.in.gov](mailto:jbautist@idem.in.gov).

Sincerely,

Johnathan Bautista, Compliance Inspector  
Compliance Section 2  
Office of Air Quality

ACES ID: 298424 (Inspection)

cc: Johnathan Bautista, Compliance and Enforcement Branch, Office of Air Quality  
Erin R. Gordon, Compliance and Enforcement Branch, Office of Air Quality  
Cindy L. Ketchem, Healthcare Realty Services LLC, [cketchem@healthcarerealty.com](mailto:cketchem@healthcarerealty.com)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FIELD INSPECTION REPORT**



<b>SOURCE INFORMATION</b>	
SOURCE NAME	Healthcare Realty Services LLC as agent for HTA Administration Building
SOURCE LOCATION	640 Eskenazi Avenue, Indianapolis, Indiana 46202 Marion County
MAILING ADDRESS	640 Eskenazi Avenue, Indianapolis, IN 46202
PLANT ID	097-00757
<u>PERMIT INFORMATION</u>	Permit Type: TVOP Permit Number: 097-46534-00757 Permit Expiration Date: 12/10/2025 VFC Document No.(hyperlink): <a href="#">83478740</a>
ATTAINMENT STATUS	<input checked="" type="checkbox"/> Attainment for all criteria pollutants <input type="checkbox"/> Nonattainment for <input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> CO <input type="checkbox"/> O <sub>3</sub> <input type="checkbox"/> NO <sub>2</sub> <input type="checkbox"/> Pb <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub>
SOURCE STATUS	<input type="checkbox"/> PSD Major (326 IAC 2-2) <input type="checkbox"/> Major Source of HAPs <input type="checkbox"/> Emission Offset (326 IAC 2-3) <input checked="" type="checkbox"/> Area Source of HAPs <input type="checkbox"/> Acid Rain (326 IAC 21)
<u>SOURCE DESCRIPTION</u>	The Permittee owns and operates a stationary general medical and surgical hospital.

<b>INSPECTION INFORMATION</b>												
INSPECTED BY	Johnathan Bautista and Erin R. Gordon											
INSPECTION DATE AND TIME	June 14, 2024	TIME IN: 10:25 AM	TIME OUT: 12:09 PM									
REPORTED BY	Johnathan Bautista	REPORT DATE: 06/26/2024										
<u>COMPLIANCE PERIOD REVIEWED</u>	2022 to 2024											
<u>INSPECTION NOTIFICATION</u>	<input checked="" type="checkbox"/> Unannounced <input type="checkbox"/> Announced:											
INSPECTION OBJECTIVE(S)	<input checked="" type="checkbox"/> Compliance Monitoring Strategy (CMS) <input type="checkbox"/> Commitment <input type="checkbox"/> Mega-Site: <input type="checkbox"/> FCE <input type="checkbox"/> PCE <input type="checkbox"/> Complaint <input type="checkbox"/> Other: <input type="checkbox"/> Surveillance											
ACES TRACKING NUMBER(S)	Inspection: 298424	Complaint: N/A	Violation/Warning: N/A									
RM TRACKING NUMBER(S)	Complaint: N/A											
<u>INSPECTION BACKGROUND</u>	<ul style="list-style-type: none"> <li>Purpose of Inspection: To fulfill the Compliance Monitoring Schedule (CMS) and determine compliance with the company's air permit and the state's air rules.</li> <li>The following permits were active during the compliance period:</li> </ul> <table border="1"> <thead> <tr> <th>Permit #</th> <th>Permit Type</th> <th>Issue Date</th> </tr> </thead> <tbody> <tr> <td>097-46534-00757</td> <td>TV AA/Modification/Other</td> <td>05/19/2023</td> </tr> <tr> <td>097-42940-00757</td> <td>TV Initial/Renewal</td> <td>12/10/2020</td> </tr> </tbody> </table> <p>Healthcare Realty Services LLC is located inside the Fifth Third Bank Building at Eskenazi Health.</p>			Permit #	Permit Type	Issue Date	097-46534-00757	TV AA/Modification/Other	05/19/2023	097-42940-00757	TV Initial/Renewal	12/10/2020
Permit #	Permit Type	Issue Date										
097-46534-00757	TV AA/Modification/Other	05/19/2023										
097-42940-00757	TV Initial/Renewal	12/10/2020										

SOURCE PERSONNEL INTERVIEWED			
Name	Title	Phone Number	Email Address
Matthew Schwerdtfeger	Portfolio Chief Engineer	317-504-3051	<a href="mailto:mschwerdtfeger@healthcarerealty.com">mschwerdtfeger@healthcarerealty.com</a>
Cindy L. Ketchem	Portfolio Manager	317-997-7819	<a href="mailto:cketchem@healthcarerealty.com">cketchem@healthcarerealty.com</a>

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
Date	Inspection/Complaint Type	Result	Comments
01/20/2022	CMS	No Violations Noted	None.
12/05/2019	CMS	No Violations Noted	None.

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)		
<b>Informal Enforcement Actions</b>		
Date Issued	Action Taken	Describe Violation(s)
04/27/2021	Violation Letter	Late submittal of 2020 ACC.
<b>Formal Enforcement Actions</b>		
No formal enforcement actions have been taken against the source in the previous five (5) years.		
<b>Other Relevant Actions</b>		
Action Taken	Comments	
N/A	None.	

PERMIT SECTION D.1		
Emission Units and Control Devices:		
<b>Emissions Unit Description:</b>		
(a)	Four (4) natural gas-fired boilers, identified as B4, B5, B6 and B7, constructed in 2011, with a maximum capacity of 2.0 million British thermal units per hour (MMBtu/hr), each, using no control, and exhausting to stacks S-B4, S-B5, S-B6, and S-B7, respectively.	
(b)	One (1) diesel-fired emergency generator, identified as Emergency Generator 8, constructed in 2011, with a maximum capacity of 470 horsepower (hp), using no control, and exhausting to Stack S-G8.	
	[Under 40 CFR 60, Subpart IIII, this is an affected facility.]	
	[Under 40 CFR 63, Subpart ZZZZ, this is an affected facility.]	
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> CO <input type="checkbox"/> VOC <input checked="" type="checkbox"/> PM <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub> <input type="checkbox"/> HAPS		
Applicable Rules:		
<ul style="list-style-type: none"> <li>• 326 IAC 6.5-1-2(a): Particulate emission limitations; modification by commissioner (PM)</li> <li>• 326 IAC 6.5-1-2(b)(3): Particulate emission limitations; modification by commissioner (PM)</li> </ul>		
Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

PERMIT SECTION D.1		
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Recordkeeping Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: PMP		
Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Observations and Comments:		
<p><b>Observed</b></p> <ul style="list-style-type: none"> <li>The emergency generator was not operating, and no visible emission was observed. The unit appeared to be in good working order.</li> <li>Four (4) boilers were observed and all boilers except B-4 were operating during the inspection. B-4 was shut down for repair since it has been having issues with the ignitor. Mr. Schwerdtfeger stated that the ignitor has given out and on planning to fix it soon. There were no visible emissions observed from the boilers. The boilers on-site were listed B-1 to B-4 instead of B4 to B7 as on the permit but are the same permitted units.</li> </ul> <p><b>PMP</b> A Preventative Maintenance Plan (PMP) for the facility was reviewed and found to be adequate. The source complies with Conditions D.1.2 and B.10. The PMP was created by Leech and Russell.</p>		
Permit Section Compliance Status:		
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:		

PERMIT SECTION E.1: Emergency Generator		
Emission Units and Control Devices:		
Emissions Unit Description:		
(b) One (1) diesel-fired emergency generator, identified as Emergency Generator 8, constructed in 2011, with a maximum capacity of 470 horsepower (hp), using no control, and exhausting to Stack S-G8.		
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO <sub>2</sub> <input checked="" type="checkbox"/> NO <sub>x</sub> <input checked="" type="checkbox"/> CO <input type="checkbox"/> VOC <input checked="" type="checkbox"/> PM <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub> <input type="checkbox"/> HAPS		
Applicable Rule:		
40 CFR 60, Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines		
Applicability Information:		
Under 40 CFR 60, Subpart IIII, this is an affected facility. 4I Non-Fire Pump Engines Manufactured After 4/1/2006		
Requirement:	Applicable	Violation Noted
Emission Limitations/Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Work Practice/Operating Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Record Keeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: Operation and maintenance records		
Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<b>PERMIT SECTION E.1: Emergency Generator</b>		
Preventive Maintenance Plan [326 IAC 1-6-3]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Observations and Comments:</b>		
See Section D.1 for more information.		
<p><b><u>Emergency Generator</u></b>                      Emergency Generator 8 is equipped with a non-resettable hour meter, which displayed a value of 191.00 hours during the inspection. The engine is certified by the manufacturer and complies with Condition E.1.2(6) and 40 CFR 60.4204(b).</p>		
<p><b><u>Operation and Maintenance Records</u></b>                      Maintenance on the generator is conducted weekly, monthly, quarterly, and annually. Maintenance on the generator is conducted both by MacAllister and in-house.</p>		
<b>Permit Section Compliance Status:</b>		
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:		

<b>PERMIT SECTION E.2: Emergency Generator</b>		
<b>Emission Units and Control Devices:</b>		
<b>Emissions Unit Description:</b>		
(b) One (1) diesel-fired emergency generator, identified as Emergency Generator 8, constructed in 2011, with a maximum capacity of 470 horsepower (hp), using no control, and exhausting to Stack S-G8.		
<b>Pollutants with Emission Limits or Applicable Standards:</b>		
<input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> CO <input type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub> <input checked="" type="checkbox"/> HAPS		
<b>Applicable Rule:</b>		
40 CFR Part 63, Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines		
<b>Applicability Information:</b>		
Under 40 CFR 63, Subpart ZZZZ, this is an affected facility.		
<b>Requirement:</b>	<b>Applicable</b>	<b>Violation Noted</b>
Emission Limitations/Standards	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Work Practice/Operating Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Record Keeping Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Types of Records Reviewed:</b>		
Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan [326 IAC 1-6-3]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Observations and Comments:</b>		
See Section E.1 for additional information.		

PERMIT SECTION E.2: Emergency Generator
The emergency generator complies with 40 CFR 63 Subpart ZZZZ by meeting the requirements of 40 CFR 60 Subpart IIII.
Permit Section Compliance Status:
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:

ADDITIONAL SOURCE COMPLIANCE REVIEW:
The following reports are required and were reviewed:
<input checked="" type="checkbox"/> Annual Compliance Certification(s) <input checked="" type="checkbox"/> Deviation & Compliance Monitoring Report(s) <input type="checkbox"/> Annual Notification(s) <input checked="" type="checkbox"/> Emission Statement(s)
The reports are consistent with inspection observations. <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</span>
The permit accurately represents emission units observed on site. <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</span>
Compliance assistance was provided during the inspection. <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</span>
The source is required to have a Risk Management Plan [40 CFR 68]. <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
If yes, the source has a plan. <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</span>
If yes, the employees have been trained. <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</span>
<u>Additional Information and Comments:</u>
<p><b><u>Quarterly Deviation and Monitoring Reports</u></b>                      Healthcare Realty Services LLC as agent for HTA Administration Building has been submitting its Quarterly Deviation and Monitoring Reports on time, in compliance with Condition of C.18. There have been no late Quarterly Deviation and Monitoring Reports in the prior five (5) years.</p> <p><b><u>Annual Compliance Certifications</u></b>                      In the prior five (5) years, Healthcare Realty Services LLC as agent for HTA Administration Building submitted the 2020 ACC late. The 2021, 2022, 2023, and 2024 ACCs were submitted on time.</p> <p><b><u>Emission Statements</u></b>                      Although Condition C.16 requires Triennial Emissions Statements to be submitted, Healthcare Realty Services LLC as agent for HTA Administration Building does not need to submit them. Permit #46534 is a Title V Administrative Amendment and has Eskenazi Health (097-00041) as the primary source and allows the hospital to submit the emission statements on HTA's behalf. Additionally, Eskenazi Health is the primary source for Citizens Thermal Chiller-Boiler Plant (097-00754).</p>
Additional Source Compliance Review Status:
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:

<b>INSPECTION FINDINGS</b>	
<input checked="" type="checkbox"/> No violations were observed or determined at the time of the inspection. <input type="checkbox"/> The following violations were determined at the time of the inspection:	
RECOMMENDED ACTION	Issue inspection summary letter.
EXIT INTERVIEW	I explained my findings, recommendations, and conclusions with Matthew Schwerdtfeger prior to exiting the facility.