



# 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

July 2, 2024

VIA ELECTRONIC MAIL

Alicia Warren  
Eskenazi Health  
720 Eskenazi Avenue  
Indianapolis, IN 46202  
[alicia.warren@eskenazihealth.edu](mailto:alicia.warren@eskenazihealth.edu)

Re: Inspection Summary Letter  
Eskenazi Health  
Source ID 097-00041  
Indianapolis, Marion County

Dear Alicia Warren:

On June 27, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of Eskenazi Health, located at 720 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: 298880 (Inspection)

cc: Johnathan Bautista, Compliance and Enforcement Branch, Office of Air Quality

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



SOURCE INFORMATION	
SOURCE NAME	Eskenazi Health
SOURCE LOCATION	720 Eskenazi Avenue, Indianapolis, Indiana 46202 Marion County
MAILING ADDRESS	720 Eskenazi Avenue, Indianapolis, IN 46202
PLANT ID	097-00041
<u>PERMIT INFORMATION</u>	Permit Type: TVOP Permit Number: 097-42938-00041 Permit Expiration Date: 03/26/2026 VFC Document No.(hyperlink): <a href="#">83134495</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.

INSPECTION INFORMATION									
INSPECTED BY	Johnathan Bautista								
INSPECTION DATE AND TIME	June 27, 2024	TIME IN: 10:55 AM	TIME OUT: 11:15 AM						
REPORTED BY	Johnathan Bautista	REPORT DATE: 06/27/2024							
<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: 298880	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>097-42938-00041</td> <td>TV Initial/Renewal</td> <td>03/26/2021</td> </tr> </tbody> </table>			Permit #	Permit Type	Issue Date	097-42938-00041	TV Initial/Renewal	03/26/2021
Permit #	Permit Type	Issue Date							
097-42938-00041	TV Initial/Renewal	03/26/2021							

SOURCE PERSONNEL INTERVIEWED			
Name	Title	Phone Number	Email Address
Alicia R. Warren	Director of Facilities & Engineering Plant Operations	317-880-5585	<a href="mailto:Alicia.warren@eskenazihealth.edu">Alicia.warren@eskenazihealth.edu</a>
Benjamin Hanzlik	Manager of Facilities	302-750-9280	<a href="mailto:benjamin.hanzlik@eskenazihealth.edu">benjamin.hanzlik@eskenazihealth.edu</a>

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
Date	Inspection/Complaint Type	Result	Comments
04/06/2022	CMS	Violations Noted	The 2021 ACC was submitted late.
10/16/2019	CMS	No Violations Noted	None.

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)		
Informal Enforcement Actions		
Date Issued	Action Taken	Describe Violation(s)
04/05/2023	Violation Letter	1) Generators 1, 2, and 3 exceeded fifty (50) hours of non-emergency use in the third quarter of 2022, in violation of 40 CFR 60.4211 and Permit 097-42938-00041 Condition E.1.2.
04/06/2022	Violation Letter	The 2021 ACC was submitted late.
Formal Enforcement Actions		
<i>No formal enforcement actions have been taken against the source in the previous five (5) years.</i>		
Other Relevant Actions		
Action Taken	Comments	
N/A	None	

PERMIT SECTION D.1		
Emission Units and Control Devices:		
<b>Emissions Unit Description:</b>		
(a) Five (5) diesel-fired emergency generators, constructed in 2011, identified as Emergency Generators 1-5, each with a maximum capacity of 3,633 hp or 2,500 KW, exhausting to Stack S-G1 through S-G5.		
[Under 40 CFR 60, Subpart IIII these units are affected sources.]		
[Under 40 CFR 63, Subpart ZZZZ these units are affected sources.]		
Specifically Regulated Insignificant Activities:		
(a) Five (5) natural gas-fired dock heaters rated at 0.05 MMBtu/hr each, for a total of 0.25 MMBtu/hr, using no controls, and exhausting indoors.		
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:		
326 IAC 6.5-1-2(a): Particulate emission limitations; modification by commissioner (PM)		
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

PERMIT SECTION D.1		
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
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: N/A		
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>PMP</b>                      Eskenazi Health did have an adequate Preventative Maintenance Plan (PMP) for the facility, meeting the standards outlined in Conditions B.10 and D.1.2.</p> <p><b>Emergency Generators</b>                      The emergency generators did not operate under observation during the inspection. No visible emissions were observed. The source maintains a preventative maintenance plan for the generators. This plan was reviewed and found to be adequate. See Section E.1 for more information.</p> <p><b>Dock Heaters</b>                      The dock heaters were observed during the inspection. The observed equipment appeared to be in good working order.</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		
Emission Units and Control Devices:		
<p><b>Emissions Unit Description:</b></p> <p>(a) Five (5) diesel-fired emergency generators, constructed in 2011, identified as Emergency Generators 1-5, each with a maximum capacity of 3,633 hp or 2,500 KW, exhausting to Stack S-G1 through S-G5.</p> <p>[Under 40 CFR 60, Subpart IIII these units are affected sources.]                      [Under 40 CFR 63, Subpart ZZZZ these units are affected sources.]</p>		
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 these units are affected sources. New, emergency units		
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

PERMIT SECTION E.1														
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												
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												
Observations and Comments:														
<p>See Section D.1 for additional information.</p> <p>The engines are equipped with a non-resettable hour meter, which displayed the following at the most recent service:</p> <table border="1"> <thead> <tr> <th>Emergency Generators</th> <th>Hour Meter Reading</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>717.6</td> </tr> <tr> <td>2</td> <td>716.5</td> </tr> <tr> <td>3</td> <td>560</td> </tr> <tr> <td>4</td> <td>549.2</td> </tr> <tr> <td>5</td> <td>547.7</td> </tr> </tbody> </table> <p>The Emergency Generators appeared to be in good working order. The engine is certified and maintained according to the recommendations of the manufacturer.</p> <p><b><u>Operation and Maintenance Records</u></b>                      MacAllister Machinery services the generators for the source semi-annually and conducts fuel testing. The source conducts monthly and weekly maintenance in-house. Operation and maintenance logs indicating emergency and non-emergency were reviewed and found to be adequate.</p>			Emergency Generators	Hour Meter Reading	1	717.6	2	716.5	3	560	4	549.2	5	547.7
Emergency Generators	Hour Meter Reading													
1	717.6													
2	716.5													
3	560													
4	549.2													
5	547.7													
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.2		
Emission Units and Control Devices:		
<b>Emissions Unit Description:</b>		
(a) Five (5) diesel-fired emergency generators, constructed in 2011, identified as Emergency Generators 1-5, each with a maximum capacity of 3,633 hp or 2,500 KW, exhausting to Stack S-G1 through S-G5.		
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 type="checkbox"/> PM <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub> <input checked="" type="checkbox"/> HAPS		
Applicable Rule:		
40 CFR 63 Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines		
Applicability Information:		
Under 40 CFR 63, Subpart ZZZZ these units are affected sources New, emergency units at an area source, greater than 500 horsepower		
Requirement:	Applicable	Violation Noted
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
Types of Records Reviewed: N/A		
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
Observations and Comments:		
See Sections D.1 and E.1 for additional information.  Compliance with 40 CFR 63 Subpart ZZZZ is through 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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
The permit accurately represents emission units observed on site.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Compliance assistance was provided during the inspection.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
The source is required to have a Risk Management Plan [40 CFR 68].	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, the source has a plan.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
If yes, the employees have been trained.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Additional Information and Comments:	

**ADDITIONAL SOURCE COMPLIANCE REVIEW:**

**Quarterly Deviation and Monitoring Reports**

Eskenazi Health has been submitting its Quarterly Deviation and Monitoring Reports on time, in compliance with Condition of C.16. There have been no late Quarterly Deviation and Monitoring Reports in the prior five (5) years.

**Annual Compliance Certifications**

In the prior five (5) years, Eskenazi Health submitted the 2021 ACC late. The 2020, 2022, 2023, and 2024 ACCs were submitted on time.

**Emission Statements**

Eskenazi Health, Citizens Thermal Chiller-Boiler Plant (097-00754), and HTA-Administration Building, LLC (097-00757) are under common control. Citizens Thermal Plant and HTA-Administration Building are support buildings for Eskenazi Health, therefore, they are considered one (1) source as defined by 326 IAC 2-7-1(22). Eskenazi Health submits the Emission Statements on behalf of the sources mentioned above since the source serves as the primary source. See Condition A.2 for more information

Eskenazi Health has been submitting its Triennial Emission Statements on time, in compliance with Condition C.14. There have been no late Emission Statements in the prior five (5) years.

**Additional Source Compliance Review Status:**

- No violations were observed or determined for this permit section at the time of the inspection.
- The following violations were determined for this permit section at the time of the inspection:

**INSPECTION FINDINGS**

- No violations were observed or determined at the time of the inspection.
- 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 Alicia R. Warren and Benjamin Hanzlik prior to exiting the facility.