



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 3**  
**Four Penn Center**  
**1600 John F. Kennedy Boulevard**  
**Philadelphia, Pennsylvania 19103-2029**

**Report Title:** Clean Water Act Compliance Inspection Report  
**Inspection Date(s):** 08/28/2024  
**Regulatory Program(s):** National Pollutant Discharge Elimination System (NPDES)  
**Type of Activity:** Industrial User Inspection  
**Site/Facility Name:** Universal Manufacturing  
**Permittee(s):** Universal Manufacturing Corporation  
**Site/Facility Operator:** Universal Manufacturing Corporation  
**Site/Facility Address:** 550 West New Castle Street  
Zelienople, PA 16063  
**Latitude:** 40.7949 **Longitude:** -80.1435  
**County/Parish:** Butler County  
**Permit Number:** PAP121504  
**NAICS Code:** 332323 **SIC:** 3446  
**Unique Project #:** ECAD-487

**Site/Facility Representative:** John M. Zbiegien, Vice President **Point of Contact** ☒  
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**EPA Inspector:** Jim Kline  
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|                        |                   |      |
|------------------------|-------------------|------|
| <b>Report Preparer</b> | Jim Kline (3ED32) | Date |
| <b>Signature/Date</b>  | NPDES Section 1   |      |

|                       |                                     |      |
|-----------------------|-------------------------------------|------|
| <b>Supervisor</b>     | Mark Zolandz, Section Chief (3ED32) | Date |
| <b>Signature/Date</b> | NPDES Section 1                     |      |

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## **I. Introduction**

On August 28, 2024, the United States Environmental Protection Agency, Region 3 (“EPA”), conducted an onsite Industrial User Pretreatment Inspection at the Universal Manufacturing (hereinafter, “Universal”) facility located at 550 West New Castle Street in Zelienople, Pennsylvania (hereinafter, the “Facility”). The purpose of the inspection was to observe the Facility’s compliance with the Clean Water Act (CWA) and to verify compliance with the National Pollutant Discharge Elimination System (NPDES) pretreatment program requirements and applicable State and Federal regulations. The EPA is the control authority for the Facility. The EPA lead inspector was Inspector Jim Kline (Inspector Kline). Prior to the inspection, advance notification was sent to the Pennsylvania Department of Environmental Protection (PADEP). PADEP did not have a representative present for the inspection.

### **A. Opening Conference**

Inspector Kline arrived at Universal on Wednesday, August 28<sup>th</sup>, 2024, at approximately 1:00PM (See **Attachment #1- Photo #1**). Upon arrival, Inspector Kline presented his credentials to Mr. John M. Zbiegien, Vice President. Inspector Kline conducted an opening conference. Attending were Inspector Kline and Mr. Zbiegien. Inspector Kline explained the purpose and scope of the inspection to Mr. Zbiegien.

Inspector Kline requested that any information that Universal deemed to be confidential business information (“CBI”) should be identified during the inspection and it would be handled as CBI according to the EPA CBI procedures.

Mr. Zbiegien stated Universal was incorporated in 1934 and is a fourth-generation family-owned business. Mr. Zbiegien added there are approximately fifty full-time employees at Universal and twenty-seven employees at their Universal Scaffold Systems, which is their rental and sales business. Mr. Zbiegien added operating hours are Monday through Friday, 6:00AM until 4:00PM.

### **B. Weather and Precipitation Conditions**

During the inspection, the weather was sunny with temperatures in the lower 90s degrees Fahrenheit.

## II. Facility Activity

According to Mr. Zbiegien, Universal manufactures steel tubular scaffolds and custom staging for various industries. Mr. Zbiegien stated Universal is categorized as a metal finisher as they have iron phosphate and powder coating lines.

According to Mr. Zbiegien, approximately 80-85% of the scaffold system components produced are manufactured overseas. Inspector Kline asked Mr. Zbiegien to describe the operations that do occur at Universal. Mr. Zbiegien stated they weld and paint scaffolding. Mr. Zbiegien stated that they have a two-stage system for parts to be powder coated. According to Mr. Zbiegien, parts are loaded onto a conveyor and enter the first stage of the spray pretreatment system where they are sprayed with heated iron phosphoric acid. The parts then enter the second stage for an ambient freshwater rinse. Parts exit the rinse and travel into an infrared dry-off oven, then are powder coated. Parts then enter a cure oven and are removed from the conveyor in the final inspection/assembly area (**See Attachment #2**).

Inspector Kline asked Mr. Zbiegien if Universal discharges any of their process wastewater to the Western Butler County Authority. Mr. Zbiegien stated their pretreatment wastewater tank is physically connected to the Western Butler County Authority, but they do not discharge wastewater to the Western Butler County Authority. Mr. Zbiegien stated all process wastewater is collected and stored in their pretreatment holding tank. Mr. Zbiegien stated that Crystal Clean in Evans City, Pennsylvania comes in and removes their wastewater. Inspector Kline asked Mr. Zbiegien if the wastewater is hauled to the Western Butler County Authority for treatment. Mr. Zbiegien stated the wastewater is not hauled to the Authority. Mr. Zbiegien stated that Universal has not discharged wastewater to the Western Butler County Authority since 2009. Inspector Kline asked Mr. Zbiegien what is discharged to the Western Butler County Authority. Mr. Zbiegien stated they only discharge sanitary waste to them.

Mr. Zbiegien stated that he submits biannual self-certified non-discharge reports to the Western Butler County Authority and the EPA. Inspector Kline obtained a copy of the most recent biannual self-certified non-discharge report dated January 4, 2024 (**See Attachment #3**).

## III. Observations

Inspector Kline conducted a tour of Universal. Accompanying Inspector Kline was Mr. Zbiegien.

**Observation #1:** The first area visited was the “High Bay.” This area had general storage of scaffolding systems.

**Observation #2:** Inspector Kline visited the Welding Bay. This area was for fitting and welding.

**Observation #3:** Inspector Kline visited the Pretreatment System Area. Inspector Kline observed the 865-gallon treatment tank associated with Stage 1 (**See Attachment #1- Photos #2 & #3**). Inspector Kline observed the Stage 2 450-gallon treatment tank (**See Attachment #1- Photos #2 & #4**).

**Observation #4:** Inspector Kline observed the Pretreatment Holding Tank (See **Attachment #1- Photos #5 & #6**). Inspector Kline could not observe a connecting valve or piping which connects Universal to the Western Butler County Authority. Inspector Kline asked Mr. Zbiegien if he could identify and point out the actual connections. Mr. Zbiegien looked but could not readily identify the connection. Mr. Zbiegien stated the connection is there, and that they were connected to the Western Butler County Authority.

This concluded the physical inspection portion of Universal.

#### **IV. Records Review**

In preparation for this inspection, Inspector Kline reviewed the biannual non-discharge certification letters submitted to the EPA since August 2020. In total there were six letters which indicated Universal did not discharge industrial wastewaters to the Western Butler County Authority.

Inspector Kline completed the Industrial User Checklist with input from Mr. Zbiegien (See **Attachment #4**).

#### **V. Closing Conference**

Inspector Kline conducted a closing conference with Mr. Zbiegien. Inspector Kline shared preliminary observations about the facility. Inspector Kline reiterated that all the preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared are subject to further investigation by EPA staff upon the additional review of records and documentation. Additional observations may be contained in this inspection report and the attachments that were not identified at the time of the closing conference.

#### **VI. Follow-up Communications**

Inspector Kline received an e-mail from Mr. Zbiegien on 9/24/2024. In the e-mail, Mr. Zbiegien stated that the valve was removed and all associated lines which were connected from the Pretreatment Tank to the Western Butler County Authority were removed and or capped-off. Mr. Zbiegien provided Inspector Kline two photographs of the removal (See **Attachment #1- Photos #7 & #8**). In a 9/30/2024 e-mail to Inspector Kline, Mr. Zbiegien provided a copy of the bill of lading dated 9/6/2024 from Crystal Clean for the removal of the contents from the Pretreatment Tank (See **Attachment #5**). The receiving destination was Crystal Clean located at 201 Lindsay Road in Zelienople, Pennsylvania.

## **VII. List of Attachments**

**Attachment 1: Photos**

**Attachment 2: Pretreatment Flow Diagram**

**Attachment 3: Non-discharge Report**

**Attachment 4: IU Checklist**

**Attachment 5: Bill of Lading**