

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	10/08/2025	
Media Program:	RCRA Compliance Evaluation Inspection	
Regulatory Program(s)	Hazardous Waste, Used Oil	
Company Name:	Latch Oil Inc.	
Facility Name:	Latch Oil	
Facility Physical Location:	702 TX-63 W	
(city, state, zip code)	Jasper, TX, 75951	
Mailing address:	702 TX-63 W	
(city, state, zip code)	Jasper, TX, 75951	
County/Parish:	Jasper	
Facility Phone Number	985-323-9080	
Facility Contact:	Thomas Bond	Operations Manager
	Thomasbond@big4trucking.net	
FRS Number:	110070122950	
Identification/Permit Number:	TXR000084013	
Media Identifier Number:	NA	
NAICS:	811111	
SIC:	5172	
Personnel participating in inspection:		
Bill Mansfield	EPA Region 6	Inspector
Thomas Bond	Latch Oil	Operations Manager
EPA Lead Inspector Signature/Date	WILLIAM MANSFIELD Digitally signed by WILLIAM MANSFIELD Date: 2025.11.25 09:30:01 -06'00'	
	Bill Mansfield	Date
Supervisor Signature/Date	DEBRA PANDAK Digitally signed by DEBRA PANDAK Date: 2025.11.25 09:36:12 -06'00'	
	Debra Pandak	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Bill Mansfield arrived at the Smitty's/Latch Oil Facility at 10:21AM on 10/08/2025 for an announced inspection. I met with Mr. Bond, Operations Manager. I presented my credentials to Mr. Bond and informed him that this was an EPA inspection to determine compliance with the Resource Conservation and Recovery Act (RCRA) at this Facility. The scope of the inspection is to perform a full Compliance Evaluation Inspection (CEI) pursuant to RCRA.

This report serves as documentation of all onsite activities and observations during the inspection of the Latch Oil facility. Photographs taken during the inspection to document onsite observations are included as Appendix 1.

FACILITY DESCRIPTION

Latch Oil is a 9.5-acre product distribution facility consisting of:

- A 22,000 square foot warehouse,
- 2 tank batteries with a total of 18 above ground product storage tanks,
- A maintenance building for maintaining product distribution vehicles,
- A no longer used retail products store and offices in the main building that are part of the warehouse.

According to Mr. Bond, the facility receives bulk and packaged oil products from the Smitty's Independence, Louisiana location and then local distribution trucks pick up the bulk oil or other packaged products to be delivered to customers.

Section II – OBSERVATIONS

Warehouse:

In the warehouse, I observed metal racks with totes and drums. All the containers I observed in the warehouse had product labels or handwritten product information (Appendix 1, Photos 1-3). No wastes were observed in the warehouse area.

Tank Batteries:

Outside of the warehouse on the west side of the main building, I observed a small tank battery with 5 above ground storage tanks in secondary containment. All the tanks had handwritten product labeling (Appendix 1, Photos 4-5).

Continuing to walk west, I came to a second tank battery with 13 above ground storage tanks in secondary containment. All the tanks had handwritten product labeling (Appendix 1, Photo 6). No wastes were observed in the tank batteries.

Large Storage Shed:

Walking south to the southwest corner of the facility, I observed a large storage shed. In the storage shed, I observed several totes and drums labeled “flush”. I asked Mr. Bond what the flush material was, and he said it was product flushed out of the hoses used to fill the above ground product storage tanks. He also said the flush containers are normally sent back to Smitty’s in Roseland as product, but since the incident on August 22, 2025, the product is being held at this facility (Appendix 1, Photo 7). No wastes were observed in the large storage shed.

In the same area as the large storage shed and while walking back towards the warehouse, I opened a trailer sitting in the field next to the second tank battery and I observed that the trailer was empty.

Maintenance Building:

I then walked back through the warehouse to the east side of the facility to take a look at the maintenance building on the far east side of the property. In the maintenance building, I observed floor trenches filled with dirt. One of the trenches was only half filled with dirt and I could visually see an oily material in the bottom of the concrete trench. I asked Mr. Bond about the trenches, and he said he did not know for sure why they were being filled in. I could visually see the concrete in the bottom of the trench, so the oily material observed was a thin layer of residue. I also observed a tote of used oil that was not labeled and either appeared to be leaking, or possibly used oil had been spilled when filling the tote (Appendix 1, Photos 9-11).

I then walked out and around the outside of the maintenance building to look at a covered storage area on the east side of the maintenance building. In this covered storage area, I observed one tote with the top partially cut off that appeared to be used oil and did not have a label. I observed another tote in the storage area that had the top cut off and was labeled “waste”. This “waste” tote contained oily dry sweep and absorbent pads (Appendix 1, Photo 12). I asked Mr. Bond what the waste was, and he said he did not know. I also asked Mr. Bond if a hazardous waste determination had been made, and he said he did not know.

Section III – AREAS OF CONCERN (AOC)

The following is a list of areas of concern discussed with the facility representative.

AOC 1: Used oil tote in the maintenance building. A used oil tote in the maintenance building was not labeled with the words “Used Oil” per 40 CFR § 279.22, and was either leaking or used oil was spilled when filling.

AOC 2: Used oil tote and waste tote in covered storage area on east side of maintenance building. The used oil tote, with the top partially cut off, was not labeled as “Used Oil” per 40 CFR § 279.22, and the waste tote, that had the top completely cut off, was labeled as waste but with no indication of the contents indicating a potential labeling issue per 40 CFR § 262. Mr. Bond was also unsure of any waste determinations made for this waste tote that would be a requirement per 40 CFR § 262.11.

Closing Conference

EPA Region 6 inspector Bill Mansfield conducted a closing conference at Smitty's/Latch Oil Facility at 12:35PM on 10/08/2025 for the inspection. During the closing conference, I reviewed the two Areas of Concern noted during the inspection, fielded questions from facility personnel, and provided information about the next steps in the inspection process.

Section IV – FOLLOW UP

An email was sent to Mr. Bond on 11/13/2025 to request shipping documents for material coming into or out of the Jasper, TX facility for the last six months.

EPA is awaiting additional information from the facility.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 12 photos taken 10/08/2025

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Facility/Location:		Latch Oil /Jasper, TX					
City:	Jasper	County:	Jasper County	State:	TX	Direction:	
Filename:	DSCN1651.JPG	Photo Date:	10/08/2025	Time:	10:56:50		
Photographer:	Bill Mansfield			Witness Name:			



Description:	One rack of products in the product warehouse facing northwest.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Facility/Location:		Latch Oil /Jasper, TX					
City:	Jasper	County:	Jasper County	State:	TX	Direction:	
Filename:	DSCN1652.JPG	Photo Date:	10/08/2025	Time:	10:56:57		
Photographer:	Bill Mansfield			Witness Name:			



Description:	East aisle of product warehouse facing north.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Facility/Location:		Latch Oil /Jasper, TX					
City:	Jasper	County:	Jasper County	State:	TX	Direction:	
Filename:	DSCN1653.JPG	Photo Date:	10/08/2025		Time:	11:13:42	
Photographer:	Bill Mansfield			Witness Name:			



Description:	Product label on container showing Latch Oil and Latch Oil names.		
Latitude:	N/A	Longitude:	N/A

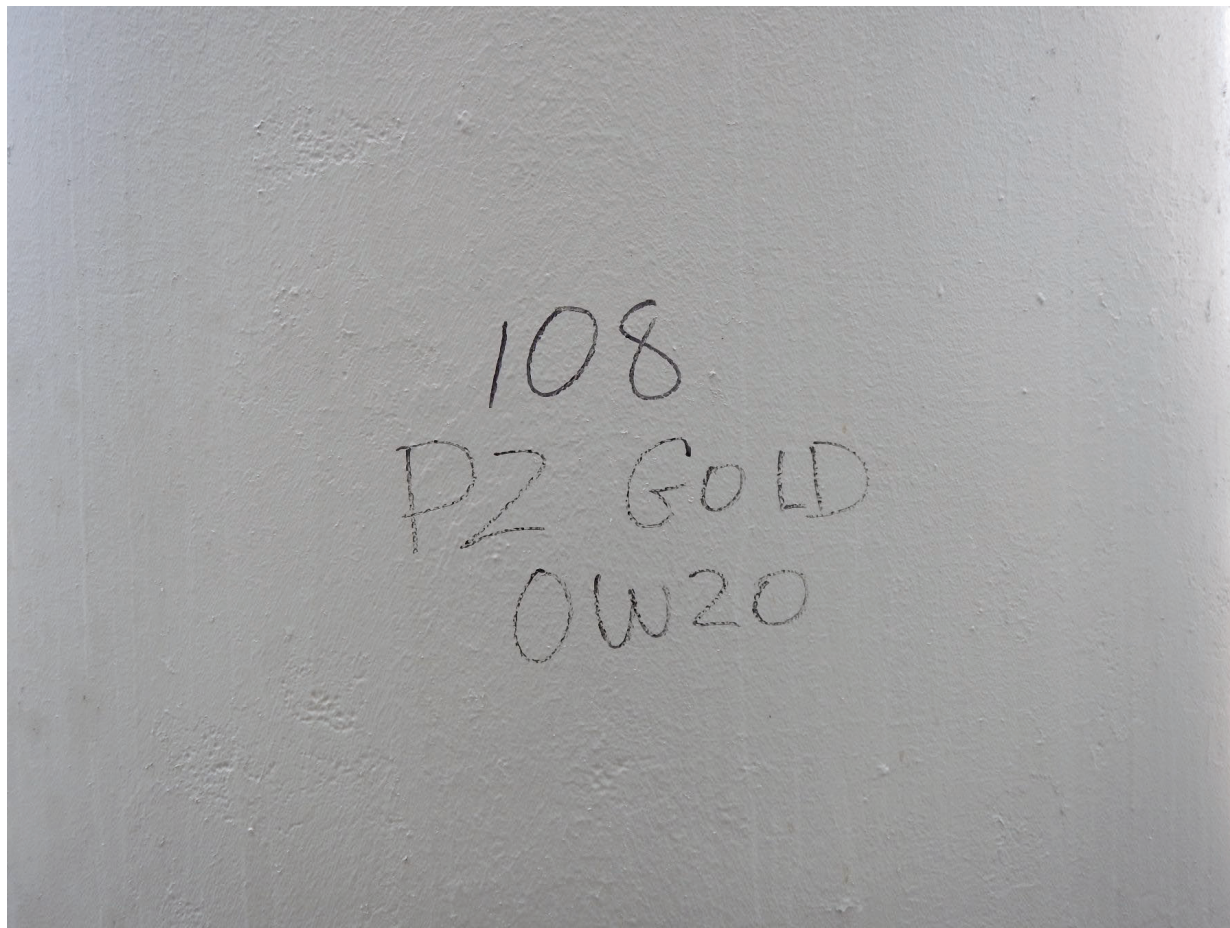


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Facility/Location:		Latch Oil /Jasper, TX					
City:	Jasper	County:	Jasper County	State:	TX	Direction:	
Filename:	DSCN1654.JPG	Photo Date:	10/08/2025		Time:	11:24:37	
Photographer:	Bill Mansfield			Witness Name:			



Description:	Wax pencil labeling on product tank in first set of tanks on the west side of the main building facing west.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Facility/Location:		Latch Oil /Jasper, TX					
City:	Jasper	County:	Jasper County	State:	TX	Direction:	
Filename:	DSCN1655.JPG	Photo Date:	10/08/2025		Time:	11:24:49	
Photographer:	Bill Mansfield			Witness Name:			



Description:	First set of 5 product tanks on the west side of the main building facing northwest.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Facility/Location:	Latch Oil /Jasper, TX						
City:	Jasper	County:	Jasper County	State:	TX	Direction:	
Filename:	DSCN1656.JPG	Photo Date:	10/08/2025	Time:	11:39:28		
Photographer:	Bill Mansfield			Witness Name:			



Description:	Second set of 13 product tanks on the west side of facility property facing northwest.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Facility/Location:		Latch Oil /Jasper, TX					
City:	Jasper	County:	Jasper County	State:	TX	Direction:	
Filename:	DSCN1657.JPG	Photo Date:	10/08/2025		Time:	11:42:21	
Photographer:	Bill Mansfield			Witness Name:			



Description:	Wash containers filled with product to be sent back to Independence facility. These containers are in a building called the "shed" on the southwest corner of the facility property.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Facility/Location:		Latch Oil /Jasper, TX					
City:	Jasper	County:	Jasper County	State:	TX	Direction:	
Filename:	DSCN1658.JPG	Photo Date:	10/08/2025		Time:	11:53:31	
Photographer:	Bill Mansfield			Witness Name:			



Description:	Outside of "shed" on the southwest corner of the facility facing west southwest.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Facility/Location:		Latch Oil /Jasper, TX					
City:	Jasper	County:	Jasper County	State:	TX	Direction:	
Filename:	DSCN1659.JPG	Photo Date:	10/08/2025		Time:	12:12:00	
Photographer:	Bill Mansfield			Witness Name:			



Description:	Totes stored in the maintenance building on the east side of the facility property. Tote on the left contains used oil and was not labeled and appeared to be leaking. Tote on the right is product.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Facility/Location:		Latch Oil /Jasper, TX					
City:	Jasper	County:	Jasper County	State:	TX	Direction:	
Filename:	DSCN1660.JPG	Photo Date:	10/08/2025		Time:	12:14:32	
Photographer:	Bill Mansfield			Witness Name:			



Description:	Floor trench in maintenance building that is half filled in with dirt.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Facility/Location:		Latch Oil /Jasper, TX					
City:	Jasper	County:	Jasper County	State:	TX	Direction:	
Filename:	DSCN1661.JPG	Photo Date:	10/08/2025		Time:	12:15:43	
Photographer:	Bill Mansfield			Witness Name:			



Description:	Trench in maintenance building that is completely filled with dirt.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Facility/Location:	Latch Oil /Jasper, TX						
City:	Jasper	County:	Jasper County	State:	TX	Direction:	
Filename:	DSCN1662.JPG	Photo Date:	10/08/2025	Time:	12:18:41		
Photographer:	Bill Mansfield			Witness Name:			



Description:	2 Totes stored on the east side of the maintenance building. Left tote is not labeled and appeared to be used oil. Right tote labeled "waste" and has oily dry sweep and absorbent pads inside.		
Latitude:	N/A	Longitude:	N/A