Executive Summary – Enforcement Matter – Case No. 68351
ZHISU GROUP LLC
RN101278208
Docket No. 2025-1298-PWS-E

Order Type:
Findings Agreed Order
Findings Order Justification:
Three or more enforcement actions (NOVs, orders, etc.) over the prior five year period for the same violation(s).
Media:
PWS
Small Business:
Yes
Location(s) Where Violation(s) Occurred:
Sutong China Tire Resources, 33402 Hempstead Highway, Hockley, Harris County
Type of Operation:
Public water supply
Other Significant Matters:
Additional Pending Enforcement Actions: No
Past-Due Penalties: No
Past-Due Fees: No
Other: N/A
Interested Third-Parties: None
Texas Register Publication Date: March 20, 2026
Comments Received: No

Penalty Information

Total Penalty Assessed: $5,022
Total Paid to General Revenue: $5,022
Total Due to General Revenue: $0
Payment Plan: N/A
Compliance History Classifications:
Person/CN - N/A
Site/RN - N/A
Major Source: No
Statutory Limit Adjustment: N/A
Applicable Penalty Policy: January 2021

Investigation Information

Complaint Date(s): N/A
Complaint Information: N/A
Date(s) of Investigation: July 28, 2025 through August 8, 2025
Date(s) of NOE(s): August 8, 2025

Executive Summary – Enforcement Matter – Case No. 68351
ZHISU GROUP LLC
RN101278208
Docket No. 2025-1298-PWS-E

Violation Information

1. Failed to submit a Disinfection Level Quarterly Report ("DLQOR") to the Executive Director ("ED") by the tenth day of the month following the end of each quarter [30 TEX. ADMIN. CODE § 290.110(e)(4)(A) and (f)(3)].

2. Failed to collect and report the results of routine monitoring samples for total coliform, fecal coliform, *Escherichia coli* (or other approved fecal indicator) at the required sampling sites to the ED [30 TEX. ADMIN. CODE § 290.109(d)(2)(F), (f), and (g)(4)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

On November 13, 2025, the Respondent collected the required number of total coliform, fecal coliform, *Escherichia coli* (or other approved fecal indicator) samples, had the samples analyzed, and reported the results to the ED for the Facility.

Technical Requirements:

The Order will require the Respondent to:

a. Within 30 days, update the Facility's operational guidance and conduct employee training to ensure that self-reporting requirements are properly accomplished, including the timely submission of signed and certified DLQORs;

b. Within 45 days, submit written certification to demonstrate compliance with a.;

c. Within 90 days, begin submitting DLQORs to the ED by the tenth day of the month following the end of each quarter. The provision will be satisfied upon one quarter of compliant reporting; and

d. Within 195 days, submit written certification to demonstrate compliance with c.

Contact Information

TCEQ Attorney: N/A
TCEQ Enforcement Coordinator: Katherine Argueta, Enforcement Division, Enforcement Team 4, MC R-12, (512) 239-4131; Michael Parrish, Enforcement Division, MC R-12, (512) 239-2548
Respondent: Zhisu Yang, Director, ZHISU GROUP LLC, 33402 Highway 290 Suite A, Hockley, Texas 77447
Respondent's Attorney: N/A

Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021) — *PCW Revision February 11, 2021*

DATES						
Assigned	18-Aug-2025					
PCW	22-Aug-2025	**Screening**	19-Aug-2025	**EPA Due**	30-Sep-2025	

RESPONDENT/FACILITY INFORMATION			
Respondent	ZHISU GROUP LLC		
Reg. Ent. Ref. No.	RN101278208		
Facility/Site Region	12-Houston	**Major/Minor Source**	Minor

CASE INFORMATION			
Enf./Case ID No.	68351	**No. of Violations**	2
Docket No.	2025-1298-PWS-E	**Order Type**	Findings
Media Program(s)	Public Water Supply	**Government/Non-Profit**	No
Multi-Media		**Enf. Coordinator**	Katherine Argueta
		EC's Team	Enforcement Team 4
Admin. Penalty $ Limit Minimum	$50	**Maximum**	$5,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties) — ***Subtotal 1*** **$3,500**

ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History **44.0%** Adjustment — ***Subtotals 2, 3, & 7*** **$1,540**

Notes: Enhancement for four NOVs with the same/similar violations, two NOVs with dissimilar violations, and one agreed order containing a denial of liability.

Culpability No **0.0%** Enhancement — ***Subtotal 4*** **$0**

Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments — ***Subtotal 5*** **-$150**

Economic Benefit **0.0%** Enhancement* — ***Subtotal 6*** **$0**

Total EB Amounts $143
Estimated Cost of Compliance $375

**Capped at the Total EB $ Amount*

SUM OF SUBTOTALS 1-7 — ***Final Subtotal*** **$4,890**

OTHER FACTORS AS JUSTICE MAY REQUIRE **2.7%** — ***Adjustment*** **$132**

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes: Enhancement to capture the avoided costs of compliance for Violation Nos. 1 and 2.

Final Penalty Amount **$5,022**

STATUTORY LIMIT ADJUSTMENT — ***Final Assessed Penalty*** **$5,022**

DEFERRAL **0.0%** Reduction — ***Adjustment*** **$0**

Reduces the Final Assessed Penalty by the indicated percentage.

Notes: No deferral is recommended for Findings Orders.

PAYABLE PENALTY **$5,022**

Screening Date	19-Aug-2025	**Docket No.** 2025-1298-PWS-E	**PCW**
Respondent	ZHISU GROUP LLC		*Policy Revision 5 (January 28, 2021)*
Case ID No.	68351		*PCW Revision February 11, 2021*
Reg. Ent. Reference No.	RN101278208		
Media	Public Water Supply		
Enf. Coordinator	Katherine Argueta		

Compliance History Worksheet

>> Compliance History *Site* Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (*number of NOVs meeting criteria*)	4	20%
	Other written NOVs	2	4%
Orders	Any agreed final enforcement orders containing a denial of liability (*number of orders meeting criteria*)	1	20%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (*number of judgments or consent decrees meeting criteria*)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (*number of counts*)	0	0%
Emissions	Chronic excessive emissions events (*number of events*)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 *(number of audits for which notices were submitted)*	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (*number of audits for which violations were disclosed*)	0	0%

Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 44%

>> Repeat Violator (Subtotal 3)

N/A ***Adjustment Percentage (Subtotal 3)*** 0%

>> Compliance History Person Classification (Subtotal 7)

N/A ***Adjustment Percentage (Subtotal 7)*** 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for four NOVs with the same/similar violations, two NOVs with dissimilar violations, and one agreed order containing a denial of liability.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 44%

>> Final Compliance History Adjustment

Final Adjustment Percentage ****capped at 100%*** 44%

Screening Date 19-Aug-2025 **Docket No.** 2025-1298-PWS-E **PCW**

Respondent ZHISU GROUP LLC

Policy Revision 5 (January 28, 2021)

Case ID No. 68351

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN101278208

Media Public Water Supply

Enf. Coordinator Katherine Argueta

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code § 290.110(e)(4)(A) and (f)(3)

Violation Description Failed to submit a Disinfection Level Quarterly Report ("DLQOR") to the Executive Director by the tenth day of the month following the end of each quarter for the second, third, and fourth quarter of 2024 and the first quarter of 2025.

Base Penalty $5,000

>> Environmental, Property and Human Health Matrix

	Harm		
Release	Major	Moderate	Minor
Actual			
Potential			

OR

Percent 0.0%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor
	x		

Percent 10.0%

Matrix Notes: 100% of the rule requirements were not met.

Adjustment $4,500

$500

Violation Events

Number of Violation Events: 4

405 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty $2,000

Four single events are recommended, one per DLQOR missed.

Good Faith Efforts to Comply

0.0%

Reduction $0

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	

Notes: The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal $2,000

Economic Benefit (EB) for this violation

Estimated EB Amount $102

Statutory Limit Test

Violation Final Penalty Total $2,958

This violation Final Assessed Penalty (adjusted for limits) $2,958

Economic Benefit Worksheet

Respondent ZHISU GROUP LLC
Case ID No. 68351
Reg. Ent. Reference No. RN101278208
Media Public Water Supply
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Delayed Costs							
Equipment				0.00	$0	$0	$0
Buildings				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Engineering/Construction				0.00	$0	$0	$0
Land				0.00	$0	n/a	$0
Record Keeping System	$45	28-Jul-2025	29-Dec-2026	1.42	$3	n/a	$3
Training/Sampling	$100	28-Jul-2025	29-Dec-2026	1.42	$7	n/a	$7
Remediation/Disposal				0.00	$0	n/a	$0
Permit Costs				0.00	$0	n/a	$0
Other (as needed)				0.00	$0	n/a	$0
Notes for DELAYED costs	The record keeping system and training/sampling delayed costs include the estimated amounts to update the Facility's operational guidance and conduct employee training to ensure that all DLQORs are submitted to the TCEQ in a timely manner, calculated from the record review date to the estimated date of compliance.						
Avoided Costs	**ANNUALIZE avoided costs before entering item (except for one-time avoided costs)**						
Disposal				0.00	$0	$0	$0
Personnel				0.00	$0	$0	$0
Inspection/Reporting/Sampling				0.00	$0	$0	$0
Supplies/Equipment				0.00	$0	$0	$0
Financial Assurance				0.00	$0	$0	$0
ONE-TIME avoided costs	$90	10-Apr-2025	19-Aug-2025	0.36	$2	$90	$92
Other (as needed)				0.00	$0	$0	$0
Notes for AVOIDED costs	The avoided cost includes the estimated amount to prepare and submit a DLQOR ($22 per DLQOR x four reports and accrued interest), calculated from the date the report was due for the first quarter of 2025 to the date of screening.						

Approx. Cost of Compliance $235

TOTAL $102

Screening Date	19-Aug-2025	**Docket No.** 2025-1298-PWS-E	**PCW**
Respondent	ZHISU GROUP LLC		*Policy Revision 5 (January 28, 2021)*
Case ID No.	68351		*PCW Revision February 11, 2021*
Reg. Ent. Reference No.	RN101278208		
Media	Public Water Supply		
Enf. Coordinator	Katherine Argueta		

Violation Number 2

Rule Cite(s) 30 Tex. Admin. Code § 290.109(d)(2)(F), (f), and (g)(4)

Violation Description Failed to collect and report the results of routine monitoring samples for total coliform, fecal coliform, Escherichia coli (or other approved fecal indicator) at the required sampling sites to the Executive Director for the April and May 2025 monitoring periods.

Base Penalty $5,000

>> Environmental, Property and Human Health Matrix

OR	Harm			
Release	Major	Moderate	Minor	
Actual				
Potential	x			

Percent 15.0%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes: Failure to collect and report routine monitoring sampling for total coliform, fecal coliform, Escherichia coli (or other approved fecal indicator) could expose persons served by the Facility to undetected contaminants which would exceed levels protective of human health.

Adjustment $4,250

$750

Violation Events

Number of Violation Events: 2 — 60 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty $1,500

Two single events are recommended, one per missed monitoring period.

Good Faith Efforts to Comply

10.0% Reduction $150

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		x
N/A		

Notes: The Respondent achieved compliance on November 13, 2025.

Violation Subtotal $1,350

Economic Benefit (EB) for this violation

Estimated EB Amount $41

Statutory Limit Test

Violation Final Penalty Total $2,064

This violation Final Assessed Penalty (adjusted for limits) $2,064

Economic Benefit Worksheet

Respondent ZHISU GROUP LLC
Case ID No. 68351
Reg. Ent. Reference No. RN101278208
Media Public Water Supply
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Delayed Costs							
Equipment				0.00	$0	$0	$0
Buildings				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Engineering/Construction				0.00	$0	$0	$0
Land				0.00	$0	n/a	$0
Record Keeping System				0.00	$0	n/a	$0
Training/Sampling	$100	28-Jul-2025	13-Nov-2025	0.30	$1	n/a	$1
Remediation/Disposal				0.00	$0	n/a	$0
Permit Costs				0.00	$0	n/a	$0
Other (as needed)				0.00	$0	n/a	$0
Notes for DELAYED costs	The delayed cost includes the estimated amount to implement improvements to the Facility's process procedures, guidance, training and/or oversight to ensure that future routine monitoring samples for total coliform, fecal coliform, Escherichia coli (or other approved fecal indicator) are collected by the Facility's personnel, analyzed, and the results reported to the Executive Director, calculated from the record review date to the date of compliance.						
Avoided Costs	**ANNUALIZE avoided costs before entering item (except for one-time avoided costs)**						
Disposal				0.00	$0	$0	$0
Personnel				0.00	$0	$0	$0
Inspection/Reporting/Sampling				0.00	$0	$0	$0
Supplies/Equipment				0.00	$0	$0	$0
Financial Assurance				0.00	$0	$0	$0
ONE-TIME avoided costs	$40	28-Jul-2025	19-Aug-2025	0.06	$0	$40	$40
Other (as needed)				0.00	$0	$0	$0
Notes for AVOIDED costs	The avoided cost includes the estimated amount to collect and have analyzed the required total coliform, fecal coliform, Escherichia coli (or other approved fecal indicator) samples ($20 per sample x one required sample x two monitoring periods), calculated from the date of the record review to the screening date.						
Approx. Cost of Compliance	$140				TOTAL		$41

The TCEQ is committed to accessibility.
To request a more accessible version of this report, please contact the TCEQ Help Desk at (512) 239-4357.

Compliance History Report

Compliance History Report for CN605524909, RN101278208, Rating Year 2025 which includes Compliance History (CH) components from September 1, 2020, through August 31, 2025.

Customer, Respondent, or Owner/Operator: CN605524909, ZHISU GROUP LLC **Classification:** NOT APPLICABLE **Rating:** N/A

Regulated Entity: RN101278208, SUTONG CHINA TIRE RESOURCES **Classification:** NOT APPLICABLE **Rating:** N/A

Complexity Points: N/A **Repeat Violator:** N/A

CH Group: 14 - Other

Location: 33402 HEMPSTEAD HIGHWAY IN HOCKLEY, HARRIS COUNTY TEXAS

TCEQ Region: REGION 12 - HOUSTON

ID Number(s):
PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 1013125

Compliance History Period: September 01, 2020 to August 31, 2025 **Rating Year:** 2025 **Rating Date:** 09/01/2025

Date Compliance History Report Prepared: January 08, 2026

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: January 08, 2021 to January 08, 2026

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Katherine Argueta **Phone:** (512) 239-4131

Site and Owner/Operator History:

1) Has the site been in existence and/or operation for the full five-year compliance period? NO
2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

1 Effective Date: 08/27/2024 ADMINORDER 2023-1451-PWS-E (1660 Order-Agreed Order With Denial)

Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter D 290.43(d)(2)
Description: Failure to provide a pressure release device and an easily readable pressure gauge on all pressure tanks.

Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.121(a)
30 TAC Chapter 290, SubChapter F 290.121(b)
Description: Failure to develop and maintain an up to date system monitoring plan.

Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter D 290.46(n)(1)
Description: Failure to maintain and make available accurate and up-to-date as-built plans or record drawings and specifications for each treatment plant, pump station, and storage tank.

Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter D 290.46(f)(2)
30 TAC Chapter 290, SubChapter D 290.46(f)(3)(B)(iv)
Description: Failure to make available the calibration records for laboratory equipment, flowmeters, rate-of-flow controllers, on-line turbidimeters, and on-line disinfectant residual analyzers.

B. Criminal convictions:

N/A

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

N/A

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

1 Date: 03/27/2025 (2085269)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.110(e)(4)(A)
30 TAC Chapter 290, SubChapter F 290.110(f)(2)
30 TAC Chapter 290, SubChapter F 290.110(f)(3)

Description: DLQOR MR 4Q2024 - The system failed to monitor and/or report distribution disinfectant residuals to the TCEQ for the fourth quarter of 2024 within the required timeline. ETT Point Value = 1

2 Date: 03/31/2025 (2085269)

Self Report? NO Classification: Moderate

Citation: 40 CFR Chapter 141, SubChapter D, PT 141, SubPT I 141.80(f)(3)
40 CFR Chapter 141, SubChapter D, PT 141, SubPT I 141.84(a)

Description: LSLI Inventory TT - System failed to complete the initial lead service line inventory by October 16, 2024. ETT Point Value = 5

Self Report? NO Classification: Moderate

Citation: 40 CFR Chapter 141, SubChapter D, PT 141, SubPT I 141.90(e)(1)

Description: LSLI Inventory Reporting - System failed to submit an initial inventory of service lines to the State no later than October 16, 2024. ETT Point Value = 1

3 Date: 05/28/2025 (2085269)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(b)(2)(A)
30 TAC Chapter 290, SubChapter F 290.122(f)

Description: LSLI Inventory TT PN – Failure to submit a public notification, accompanied with a signed Certificate of Delivery, to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time-period that public notice was required for a lead service line inventory. ETT Point Value = 1

4 Date: 06/09/2025 (2085269)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.109(d)
30 TAC Chapter 290, SubChapter F 290.109(d)(2)(F)
30 TAC Chapter 290, SubChapter F 290.109(g)(4)
30 TAC Chapter 290, SubChapter F 290.109(g)(5)
40 CFR Chapter 141, SubChapter D, PT 141, SubPT Y 141.853(a)(1)
40 CFR Chapter 141, SubChapter D, PT 141, SubPT Y 141.853(c)
40 CFR Chapter 141, SubChapter D, PT 141, SubPT Y 141.860(c)

Description: RTCR Routine MR Violation 04/2025 - Failure to collect and/or submit all routine monitoring sample(s) within the required timeline. ETT Point Value = 1

5 Date: 07/02/2025 (2085269)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.109(d)
30 TAC Chapter 290, SubChapter F 290.109(d)(2)(F)
30 TAC Chapter 290, SubChapter F 290.109(g)(4)
30 TAC Chapter 290, SubChapter F 290.109(g)(5)
40 CFR Chapter 141, SubChapter D, PT 141, SubPT Y 141.853(a)(1)
40 CFR Chapter 141, SubChapter D, PT 141, SubPT Y 141.853(c)
40 CFR Chapter 141, SubChapter D, PT 141, SubPT Y 141.860(c)

Description: RTCR Routine MR Violation 05/2025 - Failure to collect and/or submit all routine monitoring sample(s) within the required timeline. ETT Point Value = 1

6 Date: 07/28/2025 (2085269)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.110(e)(4)(A)
30 TAC Chapter 290, SubChapter F 290.110(f)(2)

30 TAC Chapter 290, SubChapter F 290.110(f)(3)

Description: DLQOR MR 1Q2025 - The system failed to monitor and/or report distribution disinfectant residuals to the TCEQ for the first quarter of 2025 within the required timeline. ETT Point Value = 1

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

IN THE MATTER OF AN	**§**	**BEFORE THE**
ENFORCEMENT ACTION	**§**	
CONCERNING	**§**	**TEXAS COMMISSION ON**
ZHISU GROUP LLC	**§**	
RN101278208	**§**	**ENVIRONMENTAL QUALITY**

AGREED ORDER
DOCKET NO. 2025-1298-PWS-E

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding ZHISU GROUP LLC (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 341. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent presented this Order to the Commission.

The Respondent understands that it has certain procedural rights at certain points in the enforcement process, including the right to formal notice of violations, notice of an evidentiary hearing, the right to an evidentiary hearing, and a right to appeal. By entering into this Order, the Respondent agrees to waive all notice and procedural rights.

It is further understood and agreed that this Order represents the complete and fully-integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable. The duties and responsibilities imposed by this Order are binding upon the Respondent.

The Commission makes the following Findings of Fact and Conclusions of Law:

I. FINDINGS OF FACT

1. The Respondent owns and operates a public water supply located at 33402 Hempstead Highway in Hockley, Harris County, Texas (the "Facility"). The Facility provides water for human consumption, has approximately three service connections, and serves at least 25 people per day for at least 60 days per year. As such, the Facility is a public water system as defined in 30 TEX. ADMIN. CODE § 290.38(73).

2. During a record review for the Facility conducted on July 28, 2025 through August 8, 2025, an investigator documented that the Respondent:

   a. Did not submit a Disinfection Level Quarterly Report ("DLQOR") to the Executive Director for the second, third, and fourth quarter of 2024 and the first quarter of 2025.

   b. Did not collect and report the results of routine monitoring samples for total coliform, fecal coliform, Escherichia coli (or other approved fecal indicator) at the required sampling sites to the Executive Director for the April and May 2025 monitoring periods.

3. The Executive Director recognizes that on November 13, 2025, the Respondent collected the required number of total coliform, fecal coliform, Escherichia coli (or other approved fecal indicator) samples, had the samples analyzed, and reported the results to the Executive Director for the Facility.

II. CONCLUSIONS OF LAW

1. As evidenced by Finding of Fact No. 1, the Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. HEALTH & SAFETY CODE ch. 341 and the rules of the TCEQ.

2. As evidenced by Finding of Fact No. 2.a, the Respondent failed to submit a DLQOR to the Executive Director by the tenth day of the month following the end of each quarter, in violation of 30 TEX. ADMIN. CODE § 290.110(e)(4)(A) and (f)(3).

3. As evidenced by Finding of Fact No. 2.b, the Respondent failed to collect and report the results of routine monitoring samples for total coliform, fecal coliform, Escherichia coli (or other approved fecal indicator) at the required sampling sites to the Executive Director, in violation of 30 TEX. ADMIN. CODE § 290.109(d)(2)(F), (f), and (g)(4).

4. Pursuant to TEX. HEALTH & SAFETY CODE § 341.049(a), the TCEQ has the authority to assess an administrative penalty against the Respondent for violations of state statutes within the TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.

5. An administrative penalty in the amount of $5,022 is justified by the facts recited in this Order, and considered in light of the factors set forth in TEX. HEALTH & SAFETY CODE § 341.049(b). The Respondent paid the $5,022 penalty.

III. ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondent is assessed a penalty as set forth in Conclusion of Law No. 5 for violations of state statutes and rules of the TCEQ. The payment of this penalty and the Respondent's compliance with all the requirements set forth in this Order resolve only the matters set forth by this Order in this action. The Commission shall not be constrained in any manner from requiring corrective actions or penalties for violations that are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: ZHISU GROUP LLC, Docket No. 2025-1298-PWS-E" to:

   Financial Administration Division, Revenue Operations Section
   Attention: Cashier's Office, MC 214
   Texas Commission on Environmental Quality
   P.O. Box 13088
   Austin, Texas 78711-3088

2. The Respondent shall undertake the following technical requirements:

a. Within 30 days after the effective date of this Order, update the Facility's operational guidance and conduct employee training to ensure that self-reporting requirements are properly accomplished, including the timely submission of signed and certified DLQORs, in accordance with 30 TEX. ADMIN. CODE § 290.110;

b. Within 45 days after the effective date of this Order, submit written certification as described in Ordering Provision No. 2.d below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.a.

c. Within 90 days after the effective date of this Order, begin submitting DLQORs to the Executive Director by the tenth day of the month following the end of each quarter, in accordance with 30 TEX. ADMIN. CODE § 290.110. The provision will be satisfied upon one quarter of compliant reporting. DLQORs shall be submitted to:

DLQOR Coordinator
Water Supply Division, MC 155
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

d. Within 195 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.c. The certification shall be signed by the Respondent and shall include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

Enforcement Division, MC 149A
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

with a copy to:

Drinking Water Special Functions Section Manager
Water Supply Division, MC 155
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

3. All relief not expressly granted in this Order is denied.

4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.

5. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Enforcement Division at the address listed above.

6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms in this Order.

7. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.

8. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.

9. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively,

the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.

10. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	Date
Kristie Mello-Jurach	04/14/2026
For the Executive Director	Date

I, the undersigned, have read and understand the attached Order. I am authorized to agree to the attached Order, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this Order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the OAG for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the OAG of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

Signature	2/13/26 Date
ZHISU YANG	CEO
Name (Printed or typed) Authorized Representative of ZHISU GROUP LLC	Title

☐ *If mailing address has changed, please check this box and provide the new address below:*

Instructions: Send the original, signed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Ordering Provision 1 of this Order.