

**SOAH DOCKET NO. 582-25-10510
TCEQ DOCKET NO. 2024-1612-MWD**

APPLICATION BY TREASURE ISLAND LAGUNA AZURE, LLC FOR NEW TPDES PERMIT WQ0016092001	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**APPLICANT TREASURE ISLAND LAGUNA AZURE, LLC’S REPLY TO
EXCEPTIONS TO THE PROPOSAL FOR DECISION**

Treasure Island Laguna Azure, LLC (“*Treasure Island*”) files the following Reply to Exceptions to the Proposal for Decision (“*PFD*”) issued by the Administrative Law Judges (“*ALJs*”) regarding Treasure Island’s application for Texas Pollutant Discharge Elimination System (“*TPDES*”) Permit No. WQ0016092001 (“*Application*”).

As the ALJs have aptly concluded in the ALJs’ October 8, 2025 letter, the City of Van Alstyne’s ‘exceptions’ to the PFD are not exceptional; they are the very same arguments that the City made in its closing briefs following the conclusion of the hearing on the merits. In other words, the City takes exception to the ALJs’ PFD by merely regurgitating arguments that the ALJs previously heard, considered, and rejected. Accordingly, the City’s Exceptions provide no basis for amending or reconsidering the ALJs’ PFD or any provision of the ALJs’ proposed final order.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, on October 13, 2025, a true and correct copy of Applicant’s foregoing Reply to Exceptions to the Proposal for Decision has been served via e-service and/or electronic mail on the following:

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By: _____
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