



Commonwealth of Massachusetts  
Executive Office of Energy and Environmental Affairs  
**Department of Environmental Protection**

**Address:** 100 Cambridge Street, Suite 900, Boston MA 02114 | **Phone:** 617-292-5500

**Maura T. Healey**  
Governor

**Kim Driscoll**  
Lieutenant Governor

**Rebecca Tepper**  
Secretary

**Bonnie Heiple**  
Commissioner

**Final**

June 15, 2026

Rick McCullough, Envi. Engineer  
Patriot Beverages, LLC  
20 Harvard Road  
Littleton, MA 01460

City/Town: Littleton  
Program: Water Management Act (WMA)  
WMA Permit #: 9P-2-13-158.01  
Action: FINAL Renewed Permit

Dear Mr. McCullough:

Please find the following attached:

- Findings of Fact in Support of the FINAL Water Management Act Permit Decision; and,
- Final Water Management Act Permit #9P-2-13-158.01 for the Patriot Beverages, LLC in the Merrimack River Basin.

A Draft of the Renewed Permit was posted in the Public Notice section of the April 8, 2026, edition of the Massachusetts Environmental Policy Act (MEPA) Environmental Monitor. Notice of the Draft Renewed Permit was also sent to all WMA Registrants and Permittees in the Merrimack River Basin and to other interested parties offering a 30-day comment period. No comments were received.

The signature on this cover letter indicates formal issuance of the attached documents. If you have any questions regarding this information, please contact Brittany Segill at [Brittany.segill@mass.gov](mailto:Brittany.segill@mass.gov) or me, Duane LeVangie, at [duane.levangie@mass.gov](mailto:duane.levangie@mass.gov) or (617) 780-1962.

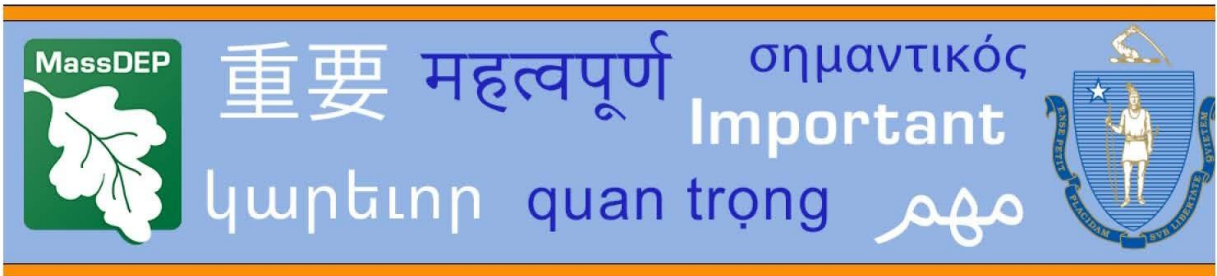
Sincerely,

Duane LeVangie, Chief  
Water Management Program  
Bureau of Water Resources

Ecc: Jonathan Guzman, Groundwork Lawrence  
Heather McMann, Groundwork Lawrence  
Lydia Olson, Massachusetts Rivers Alliance  
Matthew Thorne, Merrimack River Watershed Council

James Lyons, BWR Deputy Regional Director, MassDEP-Worcester

Sharepoint:\DWPWMA\Permit Renewals\Merrimack\Littleton-Patriot Beverages, LLC-9P-2-13-158.01-  
Final WMA Permit – 06-15-2026 - a11y



**Communication for Non-English-Speaking Parties**

***This document is important and should be translated immediately.***

If you need this document translated, please contact MassDEP's Director of Environmental Justice at the telephone number listed below.

**Español Spanish**

Este documento es importante y debe ser traducido inmediatamente. Si necesita traducir este documento, póngase en contacto con el Director de Justicia Ambiental de MassDEP (*MassDEP's Director of Environmental Justice*) en el número de teléfono que figura más abajo.

**Português Portuguese**

Este documento é importante e deve ser traduzido imediatamente. Se você precisar traduzir este documento, entre em contato com o Diretor de Justiça Ambiental do MassDEP no número de telefone listado abaixo.

**繁體中文 Chinese Traditional**

本文檔很重要，需要即刻進行翻譯。  
如需對本文檔進行翻譯，請透過如下列示電話號碼與 MassDEP 的環境司法總監聯絡。

**简体中文 Chinese Simplified**

这份文件非常重要，需要立即翻译。  
如果您需要翻译这份文件，请通过下方电话与 MassDEP 环境司法主任联系。

**Ayisyen Kreyòl Haitian Creole**

Dokiman sa a enpòtan epi yo ta dwe tradui l imedyatman. Si w bezwen tradui dokiman sa a, tanpri kontakte Direktè. Jistis Anviwònmanal MassDEP a nan nimewo telefòn ki endike anba a.

**Việt Vietnamese**

Tài liệu này rất quan trọng và phải được dịch ngay. Nếu quý vị cần bản dịch của tài liệu này, vui lòng liên hệ với Giám Đốc Phòng Công Lý Môi Trường của MassDEP theo số điện thoại được liệt kê bên dưới.

**ប្រទេសកម្ពុជា Khmer/Cambodian**

ឯកសារនេះមានសារៈសំខាន់ ហើយគួរត្រូវបានបកប្រែភ្លាមៗ។ ប្រសិនបើអ្នកត្រូវការអោយឯកសារនេះបកប្រែ សូមទាក់ទងនាយកផ្នែកយុត្តិធម៌បរិស្ថានរបស់ MassDEP តាមរយៈលេខទូរស័ព្ទដែលបានរាយនូចខាងក្រោម។

**Kriolu Kabuverdianu Cape Verdean**

Es dokumentu sta important i tenki ser tradusidu imediatamenti. Se nho ta presisa ke es dokumentu sta tradisidu, por favor kontata O Diretor di Justisia di Environman di DEP ku es numero di telefoni menxionadu di baixo.

**Contact Deneen Simpson 857-406-0738**  
**Massachusetts Department of Environmental Protection**  
**100 Cambridge Street 9<sup>th</sup> Floor Boston, MA 02114**  
TTY# MassRelay Service 1-800-439-2370 • <https://www.mass.gov/environmental-justice>  
(Version revised 8.2.2023) 310 CMR 1.03(5)(a)

## Русский Russian

Это чрезвычайно важный документ, и он должен быть немедленно переведен. Если вам нужен перевод этого документа, обратитесь к директору Департамента экологического правосудия MassDEP (MassDEP's Director of Environmental Justice) по телефону, указанному ниже.

## العربية Arabic

هذه الوثيقة مهمة وتجب ترجمتها على الفور.

إذا كنت بحاجة إلى ترجمة هذه الوثيقة، فيرجى الاتصال بمدير العدالة البيئية في MassDEP على رقم الهاتف المذكور أدناه.

## 한국어 Korean

이 문서는 중대하므로 즉시 번역되어야 합니다. 본 문서 번역이 필요하신 경우, 매사추세츠 환경보호부의 "환경정의" 담당자 분께 문의하십시오. 전화번호는 아래와 같습니다.

## հայերէն Armenian

Այս փաստաթուղթը կարևոր է, և պետք է անհապաղ թարգմանել այն: Եթե Ձեզ անհրաժեշտ է թարգմանել այս փաստաթուղթը, դիմեք Մասաչուսեթսի շրջակա միջավայրի պահպանության նախարարության (MassDEP) Բնապահպանական հարցերով արդարադատության ղեկավարին (Director of Environmental Justice)՝ ստորև նշված հեռախոսահամարով

## فارسی Farsi Persian

این نوشتار بسیار مهمی است و باید فوراً ترجمه شود. اگر نیاز به ترجمه این نوشتار دارید لطفاً با مدیر عدالت محیط زیستی MassDEP در شماره تلفن ذکر شده زیر تماس بگیرید.

## Français French

Ce document est important et doit être traduit immédiatement. Si vous avez besoin d'une traduction de ce document, veuillez contacter le directeur de la justice environnementale du MassDEP au numéro de téléphone indiqué ci-dessous.

## Deutsch German

Dieses Dokument ist wichtig und muss sofort übersetzt werden. Wenn Sie eine Übersetzung dieses Dokuments benötigen, wenden Sie sich bitte an MassDEP's Director of Environmental Justice (*Direktor für Umweltgerechtigkeit in Massachusetts*) unter der unten angegebenen Telefonnummer.

## Ελληνική Greek

Το έγγραφο αυτό είναι πολύ σημαντικό και πρέπει να μεταφραστεί αμέσως. Αν χρειάζεστε μετάφραση του εγγράφου αυτού, παρακαλώ επικοινωνήστε με τον Διευθυντή του Τμήματος Περιβαλλοντικής Δικαιοσύνης της Μασαχουσέτης στον αριθμό τηλεφώνου που αναγράφεται παρακάτω

## Italiano Italian

Questo documento è importante e deve essere tradotto immediatamente. Se hai bisogno di tradurre questo documento, contatta il Direttore della Giustizia Ambientale di MassDEP al numero di telefono sotto indicato.

## Język Polski Polish

Ten dokument jest ważny i powinien zostać niezwłocznie przetłumaczony. Jeśli potrzebne jest tłumaczenie tego dokumentu, należy skontaktować się z dyrektorem ds. sprawiedliwości środowiskowej MassDEP pod numerem telefonu podanym poniżej.

## हिन्दी Hindi

यह दस्तावेज महत्वपूर्ण है और इसका अनुवाद तुरंत किया जाना चाहिए। यदि आपको इस दस्तावेज का अनुवाद कराने की जरूरत है, तो कृपया नीचे दिए गए टेलीफोन नंबर पर MassDEP के पर्यावरणीय न्याय निदेशक से संपर्क करें।

Contact Deneen Simpson 857-406-0738

Massachusetts Department of Environmental Protection  
100 Cambridge Street 9<sup>th</sup> Floor Boston, MA 02114

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(Version revised 8.2.2023) 310 CMR 1.03(5)(a)



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**Finding of Fact in Support of  
Water Management Permit #9P-2-13-158.01  
Patriot Beverages, LLC**

The Massachusetts Department of Environmental Protection (the Department or MassDEP) has completed its review of Patriot Beverages, LLC's ("Patriot Beverages" or the "Permittee") Water Management Act (WMA) permit renewal application filed on November 28, 2017. The Department hereby proposes to issue Water Management Permit #9P-2-13-158.01 (the "Permit") in accordance with the Water Management Act (M.G.L. c. 21G) and the regulations promulgated thereunder at 310 CMR 36.00. The Department makes the following Findings of Fact in support of the attached Final Permit and includes herewith its reasons for issuing the Permit and for conditions of approval imposed, as required by M.G.L. c. 21G, § 11, and 310 CMR 36.00. The Permit is being issued since such action is necessary for the promotion of the purposes of M.G.L. c. 21G. The Department may amend, suspend or terminate the Permit, after notice and hearing, in accordance with the provisions of 310 CMR 36.29(1).

**Patriot Beverages, LLC's Water Withdrawal History**

Registration: Patriot Beverages holds Water Management Act Registration 21315801 for an average annual withdrawal volume of 0.22 million gallons per day (MGD) from 1 ground water source in the Merrimack River Basin: WM4413-01G (Process Well #1). Water Management Registrations, including Patriot Beverage's, were renewed in 2023.

Permit: Patriot Beverages' WMA Permit 9P-2-13-158.01 was originally issued on June 19, 1995 to a prior owner, Veryfine Products LLC. On December 23, 2016, this Permit and associated Registration were transferred to Patriot Beverages, LLC. This permit currently authorizes the permittee to withdraw from 1 groundwater source WM4413-02G, also known as Process Well #2, but it does not authorize any additional withdrawals beyond what is specified in their registration.

Permit Extension Act: All Merrimack River Basin water withdrawal permits were originally intended to expire on November 30, 2014. The expiration date in the Merrimack River Basin for all Water Management permits was extended for two years by Chapter 240 of the Acts of 2010 and further extended another two years to November 30, 2018 by Chapter 238 of the Acts of 2012, collectively known as the Permit Extension Act.

On July 21, 2017, MassDEP informed the Permittee that MassDEP would need additional time before making a determination on permit renewal applications in order to ensure that all permit

renewal Permittees fully understood the new Water Management Regulations (discussed below), and to give proper consideration to all permit renewal applications. Pursuant to M.G.L. c. 30A, § 13, and 310 CMR 36.18(7), the Permittee's Permit remains in full force and effect until MassDEP issues a final decision on the 2017 permit renewal permit application.

Permit Renewal Application: On November 28, 2017, Patriot Beverages, LLC applied to MassDEP for a permit renewal in the Merrimack River Basin. On August 20, 2025, MassDEP issued a Permit Renewal Order to Complete (OTC) outlining specific information that was required to renew the permit. The Permittee responded on November 7, 2025.

The expiration date for all WMA permits going forward in the Merrimack River Basin will be November 30, 2034 in order to restore the staggered permitting schedule, set forth in the Water Management Regulations.

### **The Water Management Act (M.G.L.c.21G)**

The WMA requires the Department to issue permits that balance a variety of factors including without limitation:

- Impact of the withdrawal on other water sources;
- Water available within the safe yield of the water source;
- Reasonable protection of existing water uses, land values, investments and enterprises;
- Proposed use of the water and other existing or projected uses of water from the water source;
- Municipal and Massachusetts Water Resources Commission (WRC) water resource management plans;
- Reasonable conservation consistent with efficient water use;
- Reasonable protection of public drinking water supplies, water quality, wastewater treatment capacity, waste assimilation capacity, groundwater recharge areas, navigation, hydropower resources, water-based recreation, wetland habitat, fish and wildlife, agriculture, flood plains; and
- Reasonable economic development and job creation.

### **Water Management Regulation Revisions**

In 2010 the Executive Office of Energy and Environmental Affairs (EEA) convened the Sustainable Water Management Initiative (SWMI) for the purpose of incorporating the best available science into the management of the Commonwealth's water resources. SWMI was a multi-year process that included a wide range of stakeholders and support from the Departments of Environmental Protection, Fish and Game, and Conservation and Recreation. In November 2012 the *Massachusetts Sustainable Water Management Initiative Framework Summary* (<http://www.mass.gov/eea/docs/eea/water/swmi-framework-nov-2012.pdf>) was released.

On November 7, 2014, the Department adopted revised Water Management Regulations at 310 CMR 36.00 that incorporate elements of the SWMI framework and the Water Conservation Standards adopted by the Massachusetts WRC. The regulations reflect a carefully developed balance to protect the health of Massachusetts' water bodies while meeting the needs of businesses and communities for water.

Without limitation, the Department has incorporated the following into Water Management permitting:

- Safe yield determinations for the major river basins based on a new methodology developed through SWMI (see the Safe Yield in the Merrimack River Basin section of this document). For more information on the Safe Yield methodology, go to the November 28, 2012 SWMI Framework Summary and Appendices;
- Water needs forecasts for public water suppliers developed by the Department of Conservation and Recreation, Office of Water Resources (DCR), using a methodology reviewed and approved by the Massachusetts WRC;
- Water supply protection measures for public water supplies including Zone II delineations for groundwater sources, and wellhead and surface water protection measures as required by Massachusetts Drinking Water Regulations (310 CMR 22.00);
- Water conservation and performance standards reviewed and approved by the WRC in July 2018 (Details on the 2018 Massachusetts Water Conservation Standards | Mass.gov); including without limitation;
  - performance standard of 65 residential gallons per capita day or less;
  - performance standard of 10% or less unaccounted-for-water;
  - seasonal limits on nonessential outdoor water use;
  - a water conservation program that includes leak detection and repair, full metering of the system and proper maintenance of the meters, periodic review of pricing, and education and outreach to residents and industrial and commercial water users; and
- Environmental protections developed through SWMI, including without limitation;
  - protection for coldwater fish resources;
  - minimization of withdrawal impacts in areas stressed by groundwater use; and
  - mitigation of the impacts of increasing withdrawals

### **Safe Yield in the Merrimack River Basin**

This permit is being issued under the safe yield methodology adopted by the Department on November 7, 2014, and described in the regulations at 310 CMR 36.13. As of the date of issuance of this permit, the safe yield for the Merrimack River Basin is 900.4 million gallons per day (MGD), and total registered and permitted withdrawals, as of the date of issuance for this permit, are 80.11 MGD. The maximum withdrawals that will be authorized in this permit, and all other permits currently under review by the Department within the Merrimack Basin, will be within the safe yield and may be further conditioned as outlined in the regulations. As noted above this permit does not allocate any additional withdrawal volumes, so it will not impact the safe yield of the Merrimack Basin.

### **Findings of Fact for Permit Conditions in Patriot Beverages, LLC's Water Management Act Permit**

The following Findings of Fact for the special conditions included in the permit generally describe the rationale and background for each special condition in the permit. This summary of permit special conditions is not intended to, and should not be construed as, modifying any of the permit

special conditions. In the event of any ambiguity between this summary and the actual permit conditions, the permit language shall control.

**Special Condition 1, Maximum Authorized Annual Average Withdrawal Volume**, specifies the authorized annual average withdrawal volume for the life of this permit. As noted above, this permit authorizes no additional withdrawal volumes beyond the 0.22 MGD previously registered to Patriot Beverages (Registration #2-13-158.01).

The permit does authorize Patriots Beverages to withdraw their registered volume from some combination of Well #1 (WM4413-01G) and Well #2 (WM4413-02G).

As shown in Table 1, the Permittee’s annual average daily volume in recent years has been in compliance with its total authorized volume. Although they haven’t withdrawn water in most of the previous years, they expressed new plans and demand which require the continuation of this permit and its source.

**Table 1: Patriot Beverage’s System-Wide Water Withdrawals (MGD)**

Withdrawal Basin	Registered Volume	Permitted Volume	Total Allocation	Actual Withdrawals				
				2024	2023	2022	2021	2020
Merrimack	0.22	0.0	0.22	0.025	0	0	0	0

**Special Condition 2, Maximum Authorized Daily Withdrawal From Withdrawal Point**, specifies that withdrawals from individual withdrawal points are not to exceed the approved maximum daily volumes listed below without specific advanced approval from the Department. The authorized maximum daily rate is based on the approved Zone II rate.

**Table 2: Patriot Beverages’ System-Wide Water Withdrawals**

Well Name	Source ID	Permit or Registration	Maximum Daily Rate (MGD)	Actual Withdrawals (MGD)				
				2024	2023	2022	2021	2020
Well #1	WM4413-01G	Reg.	*	0.15	0	0	0	0
Well #2	WM4413-02G	Permit	0.22	0	0	0	0	0

*\*Maximum daily rate was not assigned in the registration process.*

**Former Special Condition 3, Wetlands and Vernal Pool Monitoring**, The previous permittee, Veryfine Products, Inc., met the Wetlands Monitoring Requirement outlined in their original permit. The Department’s review of this documentation revealed no significant impact on wetlands. Therefore, this condition will be removed in the renewed permit.

**Special Condition 3, Water Conservation Requirements**, updates the water conservation requirements to reflect the Water Conservation Standards for the Commonwealth of Massachusetts reviewed and approved by the Water Resources Commission (WRC) in July 2018. ([Details on the 2018 Massachusetts Water Conservation Standards | Mass.gov](#)).

**Special Condition 4, Minimization of Groundwater Withdrawal Impacts in Stressed Basins**, requires permittees with groundwater sources in subbasins having an August net groundwater depletion (August NGD) of 25% or greater are required to develop a plan to minimize the impact of their withdrawals to the greatest extent feasible. Merrimack River Subbasin 13054 where source Well #2 (02G) is located has an August NGD of 88.60%. As a result, this Special Condition of the WMA Permit requires the Permittee to develop and implement a Minimization Plan.

MassDEP review shows that the Permittee has no surface water supply impoundments, therefore surface water releases do not need to be addressed as part of the Permittee's Minimization Plan. In addition, both of Patriot Beverage's sources are located in subbasin 13054, so shifting withdrawals to other less depleted August NGD subbasins is also not a requirement of the Minimization Plan.

To satisfy the Minimization requirement, this special condition of the Permit requires the implementation of additional cost-effective conservation measures that go beyond these standard conservation measures. Those measures are outlined in Appendix A to the permit which documents their efforts including annual water audits, evaporative cooler recycling, and employee awareness training.

### **Other Potential Permit Requirements**

#### **Mitigation of Impacts for Withdrawals that Exceed Baseline Withdrawals**

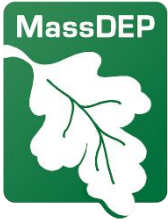
Permittees requesting an increase above their baseline withdrawal rate must undertake mitigation activities commensurate with the impact of their increased withdrawals. Baseline withdrawal is the volume of water withdrawn during calendar year 2005 plus 5%, or the average annual volume withdrawn from 2003 through 2005 plus 5%, whichever is greater provided that:

- a) baseline cannot be less than a permittee's registered volume;
- b) baseline cannot be greater than the permittee's authorized volume for 2005; and
- c) if, during the period from 2003 to 2005, the permittee's withdrawals from the water source were interrupted due to contamination of the source or construction of a treatment plant, MassDEP will use best available data to establish a Baseline volume from the water source.

Patriot Beverage's baseline is 0.22 MGD, based on withdrawals made during calendar year 2005 plus 5%. Mitigation is not required at this time because the permit has authorized no additional volumes beyond the registered volume, which is the baseline. Should the Permittee need more than 0.22 MGD, they will need to file and obtain a new permit and provide the required mitigation, if feasible.

### **Cold Water Fish Resources (CFR) Protection**

Water Management Act Permittees with withdrawals that may impact the streamflow of a CFR (identified on subbasin maps) are required to evaluate methods for reducing impacts on CFRs through feasible optimization. The Permittee's sources are in subbasin 13054 that does not contain a CFR identified by the Department of Fish and Game, therefore no CFR protection is required.



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Commissioner

**WATER WITHDRAWAL PERMIT**  
**#9P-2-13-158.01**  
**Patriot Beverages, LLC**

This renewal of Permit #9P-2-13-158.01 is approved pursuant to the Massachusetts Water Management Act (WMA) for the sole purpose of authorizing the withdrawal of a volume of water as stated below and subject to the following special and general conditions. This Permit conveys no right in or to any property.

**PERMIT NUMBER:** 9P-2-13-158.01

**RIVER BASIN:** Merrimack

**PERMITTEE:** Patriot Beverages, LLC

**EFFECTIVE DATE:** June 15, 2026

**EXPIRATION DATE:** November 30, 2034

**NUMBER OF WITHDRAWAL POINTS:** 1

Groundwater: 1  
Surface Water: 0

**USE:** Industrial

**DAYS OF OPERATION:** 365

**LOCATION(S):**

**Table 1: Withdrawal Point Identification**

<b>Source Name</b>	<b>Source Code</b>	<b>Location</b>
Process Well #2	WM4413-02G	20 Harvard Road, Littleton

## SPECIAL CONDITIONS

### 1. Maximum Authorized Annual Average Withdrawal Volume

This permit authorizes the Patriot Beverages, LLC (“Patriot Beverages” or the “Permittee”) to withdraw water from the Merrimack River Basin at the rate described below in Table 2. This permit authorizes no additional volumes beyond the 0.22 million gallons per day (80.3 million gallons per year) currently authorized to Patriot Beverages under Water Management Act Registration 21315801 in the Merrimack River Basin. The authorized withdrawal volume is expressed both as an annual average daily withdrawal rate (million gallons per day or MGD) and as a total annual withdrawal volume (million gallons per year or MGY) for each permit period of the permit term. The Department of Environmental Protection (MassDEP) will use the raw water withdrawal volume from all authorized withdrawal points to assess compliance with the registered and permitted withdrawal volumes.

**Table 2: Maximum Authorized Withdrawal Volumes**

Permit Periods	Total Water Withdrawal Volumes			
	Permit		Registration + Permit	
	Daily Average (MGD)	Total Annual (MGY)	Daily Average (MGD)	Total Annual (MGY)
06/15/2026 to 11/30/2034	0.0	0.0	0.22 + 0 = 0.22	80.3 + 0 = 80.3

### 2. Maximum Authorized Daily Withdrawals from Withdrawal Point

Withdrawal from the following source is not to exceed the approved maximum daily rate listed in Table 3 without advance approval from the Department.

**Table 3: Maximum Daily Withdrawal Volumes**

Source Name	PWS Source Code ID	Maximum Daily Rate (MGD)
Process Well #2	WM4413-02G	0.22

### 3. Water Conservation Requirements

Based on the minimum water conservation requirements, MassDEP has accepted the Water Conservation Plan (revised October 22, 2025) submitted by the permittee as a permit condition (see Appendix A).

### 4. Minimization of Groundwater Withdrawal Impacts in Stressed Basins

To minimize the impact of its Merrimack River basin withdrawals on groundwater depleted subbasins, the Permittee shall implement water conservation measures that go beyond the standard measures by adhering to the Water Conservation and Minimization Plan outlined in

Appendix A.

**GENERAL PERMIT CONDITIONS (applicable to all permittees)**

No withdrawal in excess of 100,000 gallons per day over the registered volume (if any) shall be made following the expiration of this permit, unless the Department has received a timely permit renewal application pursuant to 310 CMR 36.00.

- 1. Duty to Comply:** The permittee shall comply at all times with the terms and conditions of this permit, the Act, the Water Management Act regulations at 310 CMR 36.00, and all other applicable State and Federal statutes and regulations.
- 2. Operation and Maintenance:** The permittee shall at all times properly operate and maintain all facilities and equipment installed or used to withdraw water so as not to impair the purposes and interests of the Act.
- 3. Entry and Inspections:** The permittee or the permittee's agent shall allow personnel or authorized agents or employees of the Department to enter and examine at reasonable times any property, facility, operation, equipment or activity involving the withdrawal of water, and to inspect and copy any relevant records, for the purpose of determining compliance with this permit, the Act or the regulations published pursuant thereto, upon presentation of proper identification and an oral statement of purpose.
- 4. Water Emergency:** Withdrawal volumes authorized by this permit are subject to restriction in any water emergency declared by the Department pursuant to M.G.L. c. 21G, §§ 15-17, M.G.L. c. 111, §§ 160, or any other enabling authority.
- 5. Transfer of Permits:** This permit shall not be transferred in whole or in part unless and until the Department approves such transfer in writing, pursuant to the submittal of a transfer application in accordance with 310 CMR 36.33 on forms provided by the Department requesting such approval and received by the Department at least thirty (30) days before the effective date of the proposed transfer. No transfer application shall be deemed filed unless it is accompanied by the applicable transfer fee as set forth in 310 CMR 4.00.
- 6. Duty to Report:** The permittee shall complete and submit annually, on a form provided by the Department, all of the information required by said form including, without limitation, a certified statement of the withdrawal. Such report shall be received by the Department by the date specified on the form each year. For public water supplier permittees, the report form is the MassDEP Drinking Water Program Public Water Supply Annual Statistical Report.
- 7. Annual Compliance Fee:** The permittee shall submit any applicable annual compliance fee as established in 310 CMR 4.00.
- 8. Duty to Maintain Records:** The permittee shall maintain withdrawal records and other information in sufficient detail to demonstrate compliance with this permit.

**9. Metering:** All withdrawal points included within the permit shall be metered. Meters are to be calibrated annually. Meters shall be maintained and replaced as necessary to ensure the accuracy of the withdrawal records.

**10. Amendment, Suspension, or Termination:** The Department may amend, suspend or terminate the permit in accordance with M.G.L. c. 21G and 310 CMR 36.29.

## **NOTICE OF APPEAL RIGHTS**

Any person aggrieved by this decision may request an adjudicatory hearing by timely filing a Notice of Claim for an Adjudicatory Appeal (“Notice of Claim”) in accordance with 310 CMR 36.37 and 310 CMR 1.01 within twenty-one (21) days of receipt of this Permit. The Notice of Claim shall state specifically, clearly, and concisely the facts that are grounds for the appeal, the relief sought, and any additional information required by applicable law or regulation. A copy of this Permit shall be included with the Notice of Claim. No request for an appeal of this permit shall be validly filed unless a copy of the request is sent at the same time by certified mail, or delivered by hand, to the local water resources management official in the community in which the withdrawal point is located; and for any person appealing this decision, who is not the Permittee, unless such person notifies the Permittee of the appeal in writing by certified mail or by hand within five (5) days of mailing the appeal to the Department.

The Notice of Claim and supporting documentation, including a copy of the fee transmittal form and a copy of the check, must be sent by certified mail or hand delivered to:

Case Administrator  
Office of Appeals and Dispute Resolution  
Department of Environmental Protection  
100 Cambridge Street, Suite 900  
Boston, MA 02114

In addition, the Department’s fee transmittal form, together with a valid check or money order made payable to the Commonwealth of Massachusetts in the amount of \$100 for the appeal filing fee, if required, must be mailed to:

Commonwealth of Massachusetts Lock Box  
Department of Environmental Protection  
P.O. Box 4062  
Boston, MA 02211

The Notice of Claim may be dismissed if the filing fee is not paid unless the appellant is exempt or granted a waiver. The filing fee is not required if the appellant is a city, town (or municipal agency), county, district of the Commonwealth of Massachusetts, or a municipal housing authority. The Department may waive the adjudicatory filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, along with the hearing request, an affidavit setting forth the facts believed to support the claim of undue financial hardship.



June 15, 2026

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Duane LeVangie  
Water Management Program Chief  
Bureau of Water Resources

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Date

**Appendix A**  
**WATER CONSERVATION & MINIMIZATION PLAN**  
Revised October 22, 2025

The Patriot Beverage facility is located on Harvard Road in Littleton, Massachusetts, situated in the Stoney Brook Watershed of the Merrimack River Basin. The surficial geology at the plant location is composed of glaciofluvial and ice contact deposits. One on-site water well completed in the overburden, is used to furnish product, container-cooling, and facility washdown water and other unit operations.

All product, process, and domestic use water is supplied by a combination of the on-site groundwater well and public water from the Littleton Water Department. Both water sources are combined together and then processed through a reverse osmosis (RO) system prior to use. The facility is comprised of four production departments, a 150,000 square foot warehousing and distribution center, a wastewater purification plant and various office and support activities. The well water and town water is used in the production departments, wastewater treatment facility, and for sanitary uses. A small research building is used by the Littleton High School robotics club.

**WATER USAGE**

Well water is supplied by one gravel developed well put into operation in 1987 and is combined with the town public water supply for use throughout the plant. Well water is used for sealed product container evaporative cooling. Hot pack processing of beverages requires rapid cooling below the temperature which will degrade the quality of the product. Well water is also used in washdown stations used to clean machine exteriors and floors, and for product batching. Town water is supplied through a six-inch manifold rebuilt in 1994 and distributed to the various departments. Cross connection protection is provided by eleven backflow protection devices certified by the Town of Littleton and a licensed inspector annually as required under 310 CMR 22.22 (10) C. Town water and well water is used for all product batch formulation; all process sanitation operations including; tanks, pipes, fillers, filters and product container rinsing, boiler makeup water, fire sprinkler protection and domestic sanitation use.

**WASTEWATER TREATMENT/DISCHARGE**

Well water used in the evaporative cooling process is recirculated through closed loop cooling towers to minimize loss. Excess cooling water, container rinse water and water from other sources which require minimum wastewater purification is piped to the aerobic treatment operation. Wastewater discharged to the floor drains containing product, ingredients and cleaners is piped first to the anaerobic treatment of the Wastewater Purification Plant, then combined with the other wastewaters in the aerobic process. After final filtering and ultraviolet sterilization, all water is discharged to Reedy Meadow Brook within the Stoney Brook Watershed. Stream sampling and wastewater effluent testing is done in accordance with the provisions of NPDES Permit MA 0004936 effective October 1, 2025. All sanitary sewage is discharged to dedicated subsurface leaching systems. The systems upgraded to the standards of Title V revision 1995, in the spring of 1995.

### **EMPLOYEE AWARENESS PLAN**

Employees will be made aware of water conservation efforts at the quarterly plant meetings. Water usage is monitored daily by managers, line supervisors and wastewater staff. Awareness training sessions will be held quarterly with all employees.

### **CONSERVATION TECHNIQUES REDUCTION MINIMIZATION**

A water audit is currently being conducted and will be updated on an annual basis. Coordination with the town of Littleton Water department is being performed. Preventative Maintenance measures are performed on water use equipment as scheduled. Efforts have been made to modify the processes to minimize the use of well water and town water. High pressure\low volume washers have been installed in all production departments to reduce the volume of water used in cleaning floors, walls and conveyors. Use of pressure washer saves 80% of the water used at conventional washdown stations. Cooling tunnel water nozzles are maintained weekly to assure optimal cooling efficiency, reducing the need for extra makeup water. Reuse of water is achieved at feasible production line locations. The Line B labelers return water to the Line B coolers for reuse.

The demand for water has been minimized by lengthening the cleaning cycles of the CIP sanitation system over a period of the last few years, and monitoring process temperatures to prevent "burn on" of product. Both measures eliminate the need to repeat cleaning and rinse cycles. Lab technicians are using ice to cool line samples rather than running water through one-pass cooling chambers. The wastewater treatment plant began operation of water reuse project on November 6, 2025. This includes reusing the final effluent wastewater in the belt press unit operation. Future reuse of wastewater effluent includes supplying the rotary screen, and polymer feed pumping skid.

### **RECYCLING**

Water used in the evaporative cooler is recirculated through roof top cooling towers with the capability of reclaiming 80% of the water used in the cooling process. Multi-stage heat exchangers heat and cool the product as required by water previously used in the cooling or heating process respectively.

### **MAINTENANCE PROCEDURES**

Maintenance activities contributing to the water conservation effort include metering all incoming and discharged water by department to track usage. In addition, all steam condensate is piped to a return system to be reused in as boiler makeup water. Employees from all departments are active in reporting and repairing leaks as they appear. It is also a combined effort between Production, Maintenance, Environmental and Sanitation departments to maintain cooling towers, cooler nozzles, pressure washers and other equipment. Also, these departments suggest and implement new ideas to conserve water.