



Massachusetts Department of Environmental Protection
Bureau of Water Resources – Drinking Water Program
Fact Sheet – Certified Operator Licensing Requirements for Vending Machines

A Water Vending Machine, as defined in [236 CMR 2.03](#), is “a self-service public water system which, upon payment, dispenses drinking water in bulk without the necessity of replenishing the device between each vending function.” Per the [US EPA’s definition of a water vending machine](#), a water vending machine is considered a Public Water System (PWS) and is classified as a Non-Community system. Therefore, as a PWS, they are required to be operated by a Certified Operator.

The distribution and treatment classifications of water vending machine systems are as follows. **Most water vending machines in Massachusetts have a I-VNDD treatment classification and a VSS distribution classification.**

Treatment Classification	Distribution Classification												
<p>Water vending machines with treatment (filters with chemical addition, including disinfection, and/or reverse osmosis systems) are given treatment classifications in accordance with 310 CMR 22.11B(4)(b). Specific classifications are determined by the gallons of water that are vended in one day, as detailed in the table below.</p> <p>Table: Classifications of Water Vending Machine PWS</p> <table border="1" data-bbox="142 978 763 1262"> <thead> <tr> <th colspan="2" data-bbox="142 978 763 1056">Water Vending Machines with Treatment (310 CMR 22.11B(4)(b)-(c))</th> </tr> <tr> <th data-bbox="142 1058 467 1094">VOLUME</th> <th data-bbox="469 1058 763 1094">License Required</th> </tr> </thead> <tbody> <tr> <td data-bbox="142 1096 467 1134">2,000 gal/day or less</td> <td data-bbox="469 1096 763 1134">I-VNDD</td> </tr> <tr> <td data-bbox="142 1136 467 1173">2,001 – 5,000 gal/day</td> <td data-bbox="469 1136 763 1173">II-VNDD</td> </tr> <tr> <td data-bbox="142 1176 467 1213">5,001 – 50,000 gal/day</td> <td data-bbox="469 1176 763 1213">III-VNDD</td> </tr> <tr> <td data-bbox="142 1215 467 1253">> 50,000 gal/day</td> <td data-bbox="469 1215 763 1253">IV-VNDD</td> </tr> </tbody> </table> <p>Water vending machines with “no treatment” (e.g., consists of ultra-violet disinfection systems with no chemical addition and/or reverse osmosis with only cartridge filters) are not given a treatment classification.</p>	Water Vending Machines with Treatment (310 CMR 22.11B(4)(b)-(c))		VOLUME	License Required	2,000 gal/day or less	I-VNDD	2,001 – 5,000 gal/day	II-VNDD	5,001 – 50,000 gal/day	III-VNDD	> 50,000 gal/day	IV-VNDD	<p>All water vending machines are given a distribution classification of Very Small System (VSS) in accordance with 310 CMR 22.11B(4)(c).</p>
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Water vending machine PWS must be operated by a Certified Operator holding a Vending (VND) license for the grade matching or exceeding the grade of the PWS ([236 CMR 3.02\(1\)](#)). Alternatively, the Certified Operator may hold a regular license as long as the license grade matches or exceeds the grade of the PWS.

To obtain a VND license, per the requirements of [236 CMR 4.01\(1\)](#), applicants must meet the following requirements:

1. Pass the operator exam corresponding to the classification of the PWS. Note: there are no exams specific to water vending machines. Applicants must take the grade and type of examination matching the grade of the PWS. For example, to be the operator of a water vending machine PWS that is classified I-VNDD/VSS requires passing both the Treatment 1 and VSS exams.
2. Three months of vending machine operation experience or a certificate of proficiency from a vending machine organization such as National Automatic Merchandising Association (NAMA) and a high school diploma or its equivalent (GED).

It is important to note that experience in a Class VSS or Class VND PWS may not be used toward qualifying for any higher-grade license (Grades 1D through 4D or Grades 1T through 4T). (236 CMR 3.02(7)).

Also note that new water vending machine units must:

1. Receive MassDEP New Technology Approval (BRP WS31 – Vending Machines and POU/POE Devices or BRP WS11 – Minor New Technology Approval – No Field Test);
2. Obtain approval to install a vending machine (BRP WS30 A or B – Permits to Install Vending Machine or POU/POE Treatment Device or BRP WS35 A or B – Permit to Install Multiple Vending Machine or POU/POE Treatment Devices at Ten or More Locations in One Distribution System,);
3. Register as a PWS with MassDEP
4. Receive Department of Public Health approval.

Learn more about the approval process at <https://www.mass.gov/info-details/approval-of-water-vending-machines-by-massdep-and-dph>.

If you have questions about vending machine public water systems, please contact the MassDEP Drinking Water Program at program.director-dwp@mass.gov. If you have questions about water operator licensure, please contact the Board of Certification of Operators of Drinking Water Supply Facilities at DrinkingWaterBoard@mass.gov.