

| Stakeholder Group                          | Topic Area              | Interview Questions From 2008 EPA Study  | Changes from EPA Study  |
|--|-------------------------|--|---|
| Permit Writer                              | General                 | 1. What are your thoughts on trading as an approach for achieving water quality objectives? Do you see widespread opportunities for trading?   |   |
|  |                         | 2. What location-specific factors led you to consider water quality trading? Under what circumstances can water quality trading be part of the permitting process? For example, was establishment of a TMDL for the watershed/waterbody instrumental in motivating and allowing a trading approach? Similarly, were there aspects of the point source permit(s) that lent themselves to trading (e.g., a particular/common pollutant of interest)? |   |
|  |                         | 3. In your view, what factors have influenced the success or lack of success of the program?   |   |
|  | Procedures and Barriers | 4. Does the permit specify the procedures and “ground rules” of the trading program?   |   |
|  |                         | 5. How do you know if the program is improving water quality? In your assessment, has the program realized positive environmental benefits?  |   |
|  |                         | 6. How do you determine that overall effluent limits are being satisfied? For example, do you have specific data/models/assumptions you apply to characterize effluent reductions achieved by non-point source BMPs?   |   |
|  |                         | 7. Were specific trading ratios established for balancing reductions at one source with effluent from another? What analysis or assumptions did you use to establish trading ratios?   |   |
|  |                         | 8. Were there aspects of the permit writing/negotiation that were problematic or time consuming?   |   |
|  |                         | 9. Are there specific federal or state programs that either complement or constrain the implementation of the water quality trading program?   |   |
|  |                         | 10. Does the program require collaboration with other agencies (e.g., agencies implementing environmental, land use, or agricultural programs)? If so, describe these collaborations.  |   |
|  |                         | 11. Has the program introduced new auditing requirements? For example, are there procedures for verifying that effluent controls (e.g., non-point BMPs) are implemented and properly maintained? Do you consider these auditing responsibilities manageable and reasonable?  |   |
| Point Source - Participates in WQT Program | Background              | 1. How do you view water quality trading? As a tool within a regulatory framework? As a way of promoting voluntary stewardship? Or as something else?  |   |
|  |                         | 2. What was your primary incentive for getting involved in the water quality trading program? For example, was your participation motivated by a new wasteload allocation under a TMDL? Economic considerations?   | Add - What other factors were important in selecting trading as the preferred compliance option?  |
|  |                         | 3. Did you initiate the process of pursuing trading? Alternatively, were you approached by federal/state regulators about participating?   |   |
|  |                         | 4. Has the program been economically beneficial for you?   |   |
|  |                         | 5. Do you plan to continue participating in the trading program?   | ...in future permit cycles, or for other pollutants?  |
|  | Procedures and Barriers | 6. What responsibilities do you have under the trading agreement? For instance, are you responsible for identifying partners? If you trade with non-point sources, are you responsible for certifying non-point source BMPs? How do these procedures work? Are you satisfied with these procedures or could they be improved?  | Could be shortened to ask what the utility does to implement the program, what the agency does (e.g., maintain registry), and what roles third parties play. Accompany with a list of roles for some consistency. |

Draft Questions for NNWQT Demand Assessment Interviews/Survey

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|   |                   | 7. Has the program introduced new/additional reporting requirements for your facility? If so, are these requirements acceptable to you? Please explain.   |   |
|   |                   | 8. Were there aspects of the permit writing/negotiation that were problematic or time consuming for you?  |   |
|   |                   | 9. Do you have any insight as to why other point sources in the watershed choose not to participate in the program (if relevant)?   |   |
|   |                   | 10. Do you see any equity issues in the context of water quality trading (e.g., concerns over payments for non-point source control)?   |   |
| <b>Stakeholder Group</b>                        | <b>Topic Area</b> | <b>Interview Questions</b>  |   |
| Point Source - Not Participating in WQT Program | General           | 1. How do you view water quality trading? As a tool within a regulatory framework? As a way of promoting voluntary stewardship? Or as something else?   |   |
|   |                   | 2. Has your organization considered the use of water quality trading?   |   |
|   |                   | <b>If Yes</b>   | <b>If No</b>                                      |
|   |                   | 3. What was your primary incentive for considering a water quality trading program? For example, is your participation motivated by a new wasteload allocation under a TMDL? Economic considerations? | 3. Why not?                                       |
|   |                   | 4. Did you initiate the process of pursuing trading? Alternatively, were you approached by federal/state regulators about participating?  |   |
|   |                   | 5. Have you decided for or against initiating a water quality trading program?  |   |
|   |                   | <b>If yes (for) or undecided</b>  | <b>If yes (against)</b>                           |
|   |                   | 6. Are there any barriers or challenges that you faced in deciding to use trading or in implementing it?  | 4. Why did you decide against the use of trading? |