



Oregon

Tina Kotek, Governor

Department of Environmental Quality
Eastern Region Pendleton Office
800 SE Emigrant Ave., Suite 330
Pendleton, OR 97801
(541) 276-4062

October 24, 2025

Jen Krajcik, Artificial Production Supervisor
?Imtwaha Fish Hatchery
CTUIR Department of Natural Resources
Nixyaawii Governance Center
46411 Timine Way
Pendleton, OR 97801

RE: **Pre-Enforcement Notice**
Confederated Tribes of Umatilla – ?Imtwaha Fish Hatchery
2025-PEN-10018
NDPES permit # 103227
WQ file #126275
FIS ID#: 310976
WQ – Umatilla County

Dear Mrs. Krajcik,

The Confederated Tribes of the Umatilla Indian Reservation’s (Permittee) is permitted under the National Pollution Discharge Elimination System (NPDES) for the ?Imtwaha Fish Hatchery, NPDES Permit No. 103227.

Schedule B.1, Table B.3 provides effluent monitoring frequency requirements at Outfalls 001 and 002. Table B.3 requires the facility to monitor for effluent pH at each outfall weekly. Schedule A of the permit provides daily maximum limits for effluent pH at the outfalls.

Table B3: Outfall 001 and 002 Effluent Monitoring Requirements

Item or Parameter	Units	Time Period	Minimum Frequency	Sample Type/ Required Action See note a.	Report Statistic See note b.
pH (00400)	SU	Year-round	Weekly	Continuous/Grab	Daily Maximum Daily Minimum
pH Excursion >60min (82581)	occur/mo	Year-round	Monthly	Calculated	Total
pH Excursion Total Accum (82582)	min	Year-round	Monthly	Calculated	Total

The facility self-reported violations in a noncompliance report form on August 13, 2025 (Attachment 1), stating that effluent pH samples were not taken from Outfall 002 for two weeks in July 2025. Previous enforcement notices have been issued to the facility for similar violations.

Monitoring Violations

Based on this review, DEQ has concluded that the Confederated Tribes of the Umatilla Indian Reservation ?Imtwaha Fish Hatchery is responsible for the following two (2) violations of its permit and Oregon environmental law:

Monitoring Period	Violation	Class
July 13 – July 19, 2025 (1 weeks)	Failing to collect weekly effluent pH monitoring data at Outfall 002 required in Schedule B of the permit; OAR 340-012-0055(1)(o).	I
June 20 – July 26, 2024 (1 week)	Failing to collect weekly effluent pH monitoring data at Outfall 002 required in Schedule B of the permit; OAR 340-012-0055(1)(o).	I

Class I violations are considered to be the most serious violations; Class III violations are the least serious.

Environmental Impact of Violations

Fulfilling the mandatory monitoring and reporting conditions is an important obligation. Without monitoring and evaluation of data supplied by required monitoring, the facility, DEQ, and the public are unable to evaluate the effectiveness of the system. An ineffective treatment system can cause water quality impairments and/or public health hazards.

Referral for DEQ Formal Enforcement Action


The violation cited above posed the risk of significant environmental harm and the matter is being referred to the DEQ's Office of Compliance and Enforcement for formal enforcement action. Formal enforcement action may result in assessment of civil penalties and/or a Department order. A formal enforcement action may include a civil penalty assessment for each day of violation.

If you believe any of the facts in this notice are in error, you may provide information to me at the address shown at the top of this letter. I will consider any new information you submit and take appropriate action. If you have any questions, please contact me at anna.morgan-hayes@deq.oregon.gov or at 541-246-4562.

Sincerely,



Confederated Tribes of the Umatilla Indian Reservation ?Imtwaha Fish Hatchery
October 24, 2025
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Anna Morgan-Hayes
Water Quality Permit Writer and Compliance
Specialist
Eastern Region, DEQ

cc: Mike Hiatt, WQ Manager, Eastern Region, DEQ
Megan Poskaitis, WQ Permitting, HQ DEQ
Alyssa Witt, Water Quality, Eastern Region DEQ
Roxy Nayar, Tribal Liaison, HQ DEQ
Oregon Records Management Solution

Attachment 1: Noncompliance Reporting Form [Outfall 002], Confederated Tribes of Umatilla Indian Reservation Walla Walla Hatchery [?Imtwaha Fish Hatchery], August 13, 2025



Oregon Department of Environmental Quality

Noncompliance Reporting Form

For all permit violations, including monitoring requirements.

Use this form to report all instances of noncompliance *except* sanitary sewage overflows. Fill out all fields and sign. You may attach additional information to this report to explain the circumstances of noncompliance. This information may include but is not limited to maintenance records and monitoring results.

FACILITY / CONTACT INFORMATION		
Name of Permittee: CTUIR Imtwaha Hatchery		
Contact Name: Jen Krajcik		
Phone: 541-429-7278	Email: jenniferkrajcik@ctuir.org	Date: 8/13/2025
DEQ Permit #: 103227	DEQ File #: 126275	EPA ID #: OR0044717
Has non-compliance been corrected?: <input checked="" type="radio"/> Yes <input type="radio"/> No		
Expected time noncompliance is expected to continue: 2 weeks		
Date/Time Started: 7/14/2025	Date/Time Stopped: 7/22/2025	
Description of Noncompliance: Failure to complete grab pH sample of Intake 001 and Outfall 002 (Main) on 7/14/2025 and 7/21/2025 at the hatchery due to pH meter malfunction; failed to add pH to required analysis on Chain of Custody form for Umpqua research Company to complete the sampling. Outfall 001 (Ponds) had no discharge during the weeks in question.		
AGENCY AND PUBLIC NOTIFICATION		
Was the non-compliance one of the following:		
• A noncompliance which may endanger health or the environment	Yes <input type="radio"/>	No <input checked="" type="radio"/>
• An unanticipated bypass which exceeds any effluent limitation in this permit	Yes <input type="radio"/>	No <input checked="" type="radio"/>
• An upset which exceeds any effluent limitation in this permit	Yes <input type="radio"/>	No <input checked="" type="radio"/>
• Violation of a maximum daily discharge limitation	Yes <input type="radio"/>	No <input checked="" type="radio"/>
If yes to any of the above, complete the rest of this section.		
OERS Number:		
Signs posted? Where?: N/A		
Media contacted? Who?: N/A		
List any other steps taken to notify the public and/or state and federal agencies:		
CAUSE(S)		
Cause or suspected cause(s): pH meter at hatchery malfunctioned, trouble shooting didn't resolve the issue. There was a failure to add pH to the Analysis Required section of the Chain of Custody form alerting Umpqua Research Company that pH was needed in addition to standard TSS analysis.		



Oregon DEQ Noncompliance Reporting Form
 continued

RAINFALL DATA			
Rainfall (for storm-related noncompliance):	inches	Design Storm:	inches
Source of rainfall data:			
CORRECTIVE ACTIONS			
List actions taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.			
Actions taken (describe):			
A new pH meter was ordered. Staff were alerted to the issue and told to add pH to the Chain of Custody under Analysis Required when on station pH meter is out of order.			
Actions planned and schedule for those actions (describe):			
When the pH meter was found to be unusable on 7/14/2025, a Purchase Requisition was placed with CTUIR to order a new pH meter. New Meter was received on August 6th and used for sampling the following week on August 11th. Repeated failure to add pH to Analysis Required section will be discussed in a crew meeting on August 20th.			
COMMENTS			
Comments:			

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Jennifer Krajcik Digitally signed by Jennifer Krajcik
Date: 2025.08.13 17:41:40 -07'00'
 Authorized Signature
Jennifer Krajcik
 Name (print)
Artificial Production Supervisor
 Title (print)

08/13/2025
 Date
08/13/2025
 Phone
jenniferkrajcik@ctuir.org
 Email

