



February 9, 2024

Mr. John Diamant
Dept. of Ecology
State of Washington

RE: Continuous Flow Monitor Failure

Dear Mr. Diamant:

Thank you for taking time to discuss a recent flow monitor failure event at our Camas, WA facility. This letter is being sent to officially inform you of the failure, the actions taken, and record the event for the January 2024 DMR.

nLIGHT Camas permit ST 6070 section S2.A(1) has a requirement for Continuous Metered measurement of effluent for Flow and pH. On 2 February 2024 while reviewing our AWN Numbers, it was found that the Teledyne ISCOS Signature Flow Meter had stopped working and recording flow data after 6 January 2024. This created a gap of 26 days without meeting the requirement for continuous monitoring flow. This did not impact the continuous monitoring of pH.

Corrective actions have been implemented with the installation of an alternative measurement system on 2 February 2024.

An analysis of the discharge during these 26 days was conducted with the following:

- 23 days had no discharge due to production shut downs
- 3 days were believed to have discharge due to production operations. The estimated discharge for those three days is 126 gallons.

Permit ST 6070 section S3.F parts a, b, c, and e require timely report, depending on the condition. Please consider the phone call and this document as reporting the noncompliance. This will be further documented in the monthly monitoring report.

Best regards,

A handwritten signature in black ink, appearing to read "Sam Jones".

Sam Jones
EHS Manager
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Camas_ST6270_Fina

Enc: Permit No. ST 6270, Attachment 1 Reporting Requirements Table

Attachment 1: Reporting Requirements per S3.F.c

ID	Report Requirement	Response
i.	A description of the noncompliance and its cause.	Continuous monitoring was not in effect due to an equipment failure of the flow meter.
ii.	The period of noncompliance, including exact dates and times.	January 7, 2024 to February 2, 2024
iii.	The estimated time the Permittee expects the noncompliance to continue if not yet corrected.	None – The issue has been resolved
iv.	Steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.	<ul style="list-style-type: none">• Added daily checks of the operation of the flow meter• Fix main flow meter• Add automated monitoring and recording of the flow meter
v.	If the noncompliance involves an overflow prior to the treatment works, an estimate of the quantity (in gallons) of untreated overflow.	No overflow