



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, PORTLAND DISTRICT
BONNEVILLE LOCK AND DAM
PO BOX 150
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CENWP-ODB (RN 1130)

25 February 2021

MEMORANDUM FOR RECORD

SUBJECT: 2021 AQUI-S Disposal, Bonneville Adult Fish Facility

1. **BACKGROUND:** Researchers periodically conduct fish sampling at the Bonneville Adult Fish Facility. The sampling process requires use of AQUI-S 20E, an investigational new animal drug (INAD), which is a fish anesthetic widely used in fisheries across the region. Participants in the U.S Fish and Wildlife (USFWS) study of AQUI-S are authorized to use the chemical per the study protocols.
2. **SAMPLING:** Fish sampling is conducted between the months of April and October. Anesthetic is used to sedate the fish for handling and is administered by contact in a 300-gallon tank. During warm weather the tank may be emptied multiple times daily resulting in large quantities of anesthetic wastewater.
3. **DISPOSAL:** Per paragraph 4 of the USFWS National INAD Program Participant letter "As specified in all INAD authorizations, all INAD drug use must be in compliance with NPDES permitting requirements. Investigators are responsible for contacting their local NPDES permitting offices to ensure they have no objection to the proposed use of any drug under INAD authorization." At this time, an NPDES permit has not been obtained therefore this wastewater cannot be discharged into waters of the United States. Disposal of AQUI-S will be permitted on Corps property in compliance with all local, state, and federal regulations assuming all of the following conditions are met.
4. **Conditions for disposal are as follows:**
 - a. Researchers will coordinate with Bonneville Fish Biologists and Environmental Compliance Coordinators at the start of the season to determine three (3) ground disposal locations that will not impact ground water, surface water, nor cause degradation to the land.
 - b. Researchers will provide a disposal plan for dispersal of the wastewater that describes daily rotation of the disposal locations and techniques used to reduce erosion and avoid contamination of ground and surface water. This plan will be approved by Bonneville Environmental Compliance.
 - c. Researchers will monitor and document disposal dates, times, quantities, and observations of locations. This documentation will be submitted weekly to the Bonneville Fish Biologists.

