DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

National Institutes of Health
Bethesda, Maryland 20892

www.nih.gov

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To: Dr. James Taylor
Office of Animal care and use.

From: Mr. William K. Floyd
Chief. Environmental Protection Branch, DS, ORS

Subject: Disposal of Fish Tank Water contaminated with MS-222

The National Institutes of Health (NIH) conducts different biomedical research protocols which generate different types of chemical waste. One of the protocols involves the use of MS-222 product, known as Tricaine methanesulfonate. The product is diluted with water and introduced in Zebra fish either by direct injection or introduced indirectly through fish tanks containing MS-222. In both cases the concentration of MS-222 is extremely low and is not hazardous.

According to Food and Administration, 21CFR Part 529, FDA amended the animal drug regulations to reflect approval of an Abbreviated New Animal Drug Application (ANADA) filed by Western Chemical Inc. The ANADA provides for the use of Tricaine methanesulfonate in the water of fish and other cold-blooded aquatic animals for temporary immobilization. The agency has determined under 21 CFR 25.33(a)(1) that this action is a type that does not individually or cumulatively have a significant effect on the human environment.

The researchers generate this waste in large fish tanks and MS-222 is the sole ingredient present in the tank water. Since the product is not on the EPA regulated chemical list and according to FDA, the product does not have a significant effect on human, it is not a hazardous waste.

Therefore, we are recommending the following steps to dispose the fish tank water containing MS-222:

- Test the fish tanks for the pH value and make sure pH is between 6 and 10 to meet Washington Suburban Sanitary Commission (WSSC) requirement. If the pH value is not within the specified range, call for Chemical Waste Contractor at 496-4710 to pick up the waste.
- If the pH value is between 6 and 10, discard the tank water into a sanitary sewer.

If you have any question, please call Swati Damle or myself at 496-7990.

Thank you.

William K Floyd

cc:
Dr. Debra Wilson