won't worry about environmental regulations."

They may have to start worrying. Last July, EPA issued regulations for users and uses of treating preservatives, including pentachlorophenol, creosote, and the inorganic arsenicals. As one rep put it, "penta and creosote were drenched in ink, but CCA had only a few stains."

"The regulations had very little impact on the treated material," says Koppers' Kusar. "They had a large impact on the treater. He has to realize he's now getting into the chemical business."

Concerning CCA, the regulations required proper clothing for handlers of the chemicals; sale to and use only by certified applicators; that no deposits be visible on the surface of the wood; that treaters must distribute hazard sheets to retailers and wholesalers and encourage them to pass on the information to customers; that users must monitor levels of airborne arsenic, and that labels indicating restricted use be put on the product prior to release for shipment.

American Wood Preservers Institute (AWPI) has made a procedural appeal and protest, filing last August for an administrative hearing. An EPA law judge is expected to hear the appeal early this year, with no decision anticipated until late fall. Until then, the regulations are not effective for AWPI's members.

"When judge, jury and executioner are the same agency there's a tendency to go overboard in regulations," says Ted Duke, retiring AWPI president.

Attorneys for AWPI listed 15 broad issues of protest, including that EPA's actions are beyond its authority, are procedurally defective or are unnecessary to prevent adverse effects on the environment; that health and safety data do not demonstrate need to restrict use to certified applicators; and that EPA has no authority under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) to regulate treated wood products or require treaters to attach consumer information sheets to treated wood.

AWPI will consider taking the matter to court if this appeal fails. Several makers and users indicated, however, that the EPA regulations would shake out many abusers in the field.

The Future

Meanwhile, CCA-treated lumber will continue to flood the market. "Because of the way southern pine takes treating, the product will grow," says SPIB's Kimbell. "The percentage of treated pine may go up to even more than 50%."

How do plant and preservative makers and users see the horizon?

"We see the demand coming from the heavy consumer do-it-yourselfers as well as contractors," says Osmose's Horton.

"The South is more mature now than other markets," says WOODTEC's Lathan. "The bulk of growth will be in the Northeast, Midwest and West Coast. It's become competitive as hell. We have to be more selective and businesslike."

"We see our market shrinking geographically," says Dean. "We're having to become sharper and more aggressive

AWPA Reported Production of Treated Products by Chemical Type
(Million Cubic Feet)

	1972	1973	1974	1975	1976	1977	1978	1979	1980	1981
CHROMATED COPPER ARSENATE(CCA)	25.6	29.4	41.1	29.9	--	42.7	62.3	95.7	111.0	131.3
PERCENT OF TOTAL	9.4	11.6	15.0	12.2	--	17.1	22.0	27.3	33.5	37.5
CREOSOTE & CREOSOTE COAL-TAR	125.5	106.4	120.0	110.5	108.2	116.7	139.8	124.5	110.8	124.1
PERCENT OF TOTAL	46.0	41.8	43.7	45.3	42.1	46.6	49.3	35.5	33.5	35.5
PETROLEUM-PENTACHLOROPHENOL(PENTA)	75.8	80.0	--	60.8	--	54.8	68.3	72.6	60.8	52.6
PERCENT OF TOTAL	27.8	31.4	--	24.9	--	21.9	24.1	20.7	18.4	15.0
CREOSOTE-PETROLEUM	28.9	23.5	--	32.1	30.0	20.7	18.6	45.0	31.4	24.3
PERCENT OF TOTAL	10.6	9.2	--	13.2	11.7	8.3	6.6	12.8	9.5	6.9
FIRE RETARDANTS	5.8	5.7	--	4.5	5.4	2.2	1.6	5.4	6.3	10.4
PERCENT OF TOTAL	2.1	2.2	--	1.8	2.1	0.9	0.6	1.5	1.9	3.0
ACID COPPER CHROMATE	1.9	2.4	2.5	1.4	1.8	1.1	--	1.5	1.8	2.0
PERCENT OF TOTAL	0.7	0.9	0.9	0.6	0.7	0.4	--	0.4	0.5	0.6
CHROMATED ZINC CHLORIDE	0.9	0.7	--	0.5	0.9	1.2	1.6	1.5	0.8	1.1
PERCENT OF TOTAL	0.3	0.3	--	0.2	0.3	0.5	0.6	0.4	0.2	0.3
CREOSOTE-PENTA	1.2	0.6	--	0.9	0.8	4.7	1.5	1.0	1.3	0.5
PERCENT OF TOTAL	0.4	0.2	--	0.4	0.3	1.9	0.5	0.3	0.4	0.1
FLUOR CHROME ARSENATE PHENOL	5.5	3.6	--	1.8	0.8	0.2	--	0.2	0.4	0.2
PERCENT OF TOTAL	2.0	1.4	--	0.7	0.3	0.1	--	0.1	0.1	0.1
ALL OTHER CHEMICALS	1.5	2.0	--	1.8	--	9.2	2.6	3.5	6.5	3.4
PERCENT OF TOTAL	0.6	0.8	--	0.7	--	3.7	0.9	1.0	2.0	1.0
TOTAL AWPA REPORTED PRODUCTION	272.6	254.4	274.7	244.1	257.2	250.3	283.5	351.0	331.0	349.8

Source: Data Resources, Inc.

U.S. Treated Lumber and Timbers Demand by End Use
(Million Board Feet)

	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995
SINGLE-FAMILY DEMAND	771.7	948.5	1,042.3	974.4	943.3	1,165.9	1,345.3	1,189.4	1,118.2	1,439.9	1,580.1	1,376.3	1,229.9
PERCENT OF TOTAL	23.5	24.6	24.9	23.0	21.8	23.6	24.9	22.2	20.8	23.1	23.5	20.6	18.7
MULTIFAMILY DEMAND	288.4	317.0	330.4	317.5	313.8	358.9	390.4	360.8	349.4	425.1	448.1	412.4	382.1
PERCENT OF TOTAL	8.8	8.2	7.9	7.5	7.3	7.3	7.2	6.7	6.5	6.8	6.7	6.2	5.8
NONRESIDENTIAL BUILDING & NON-BUILDING DEMAND	247.9	288.9	348.2	394.3	401.9	436.3	471.1	513.2	506.1	575.9	634.8	705.4	632.7
PERCENT OF TOTAL	7.5	7.5	8.3	9.3	9.3	8.8	8.7	9.6	9.4	9.2	9.4	10.6	9.6
FARM DEMAND	271.6	275.1	310.8	327.5	338.2	349.9	381.5	379.0	398.1	425.9	493.6	501.7	559.4
PERCENT OF TOTAL	8.3	7.1	7.4	7.7	7.8	7.1	7.1	7.1	7.4	6.8	7.3	7.5	8.5
INDUSTRIAL, GOVERNMENT AND MISC. DEMAND	167.8	185.3	199.6	212.9	211.0	226.5	250.1	273.3	275.2	295.6	325.1	354.2	353.3
PERCENT OF TOTAL	5.1	4.8	4.8	5.0	4.9	4.6	4.6	5.1	5.1	4.7	4.8	5.3	5.4
RESIDENTIAL REPAIRS AND ALTERATIONS DEMAND	1,541.4	1,837.0	1,962.0	2,003.9	2,113.7	2,402.7	2,559.9	2,632.4	2,727.4	3,081.0	3,254.0	3,324.0	3,430.5
PERCENT OF TOTAL	46.9	47.7	46.8	47.4	48.9	48.6	47.4	49.2	50.7	49.3	48.3	49.8	52.1
TOTAL U.S. DEMAND	3,288.9	3,851.9	4,193.3	4,230.5	4,321.8	4,940.2	5,398.4	5,348.0	5,374.4	6,243.4	6,735.6	6,674.1	6,587.9