



**seaway bolt & specials corp.**

2520040763402

PIPE PLUGS • SPECIAL THREADED FASTENERS

January 30, 2004

Top-Hat Plan Exemption  
Employee Benefits Security Administration  
Room N-1513  
U.S. Department of Labor  
200 Constitution Avenue, NW  
Washington, DC 20210

Re: Seaway Bolt & Specials Corp.

Ladies and Gentlemen:

In accordance with Department of Labor Regulation Section 2520.104-23, Seaway Bolt & Specials Corp. (the "Company") hereby notifies you that the Company has established and maintains two (2) unfounded pension ("top-hat") plans primarily for the purpose of providing deferred compensation for a select group of management and highly compensated employees, as described below:

Name, Address, and IRS Employer Identification Number of the Company

Seaway Bolt & Specials Corp.  
P.O. Box 908  
11561 Station Road  
Columbia Station, OH 44028

Employer Identification Number: 34-0831700

Names of Plans and Number of Employees Participating

Name of Plan: Seaway Bolt & Specials Corp. Deferred Compensation Agreement  
for James W. Goodwin

Number of Participants: There is currently one (1) participant in this plan.

Name of Plan: Seaway Bolt & Specials Corp. Deferred Compensation Agreement  
for Raymond L. Gurnick

Number of Participants: There is currently one (1) participant in this plan.

If you have any questions concerning the foregoing information, please contact the undersigned.

Sincerely,

SEAWAY BOLT & SPECIALS CORP.

Raymond L. Gurnick  
President

RLG/lw

