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August 5, 1997

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Top Hat Plan Exemption  
Pension & Welfare Benefits Admin.  
Room N-5638  
U.S. Department of Labor  
200 Constitution Avenue NW  
Washington, DC 20210

DOL - PWBA  
PUBLIC INFORMATION  
97 AUG 14 PM 12:37

Dear Sir or Madam:

Pursuant to Department of Labor Regulation 2520.104-23, the following information is being provided regarding a non-qualified deferred compensation plan sponsored by Zephyr Aluminum Products, Inc., for a select management or highly compensated employee.

Name of Employer: Zephyr Aluminum Products, Inc.  
Employer Identification No.: 42-0862051  
Address: 555 Huff Street  
Dubuque, Iowa 52001

Number of Plans Maintained: One (1)

Number of Employees in Each Plan: One (1)

We will provide plan documents upon request in accordance with ERISA Section 104(a)(1).

Top Hat Plan Exemption  
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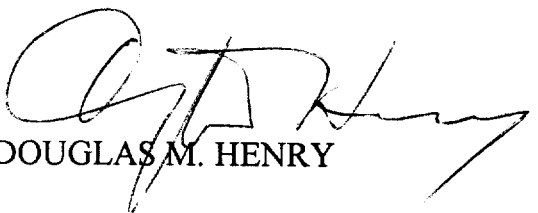
August 5, 1997

Please contact us if you have any questions on any of the above information.

Sincerely,

FUERSTE, CAREW, COYLE,  
JUERGENS & SUDMEIER, P.C.

BY:



DOUGLAS M. HENRY

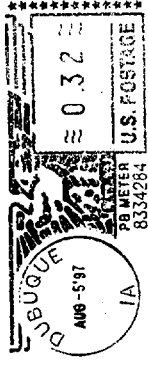
Attorneys for Zephyr Aluminum  
Products, Inc.

DMH/dmk

cc: Al Timmerman  
Zephyr Aluminum Products, Inc.  
P.O. Box 936  
555 Huff Street  
Dubuque, IA 52004-0936

DOL-PWBA  
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TOP HAT PLAN EXEMPTION  
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