



# Neville Chemical Company

2800 Neville Road, Pittsburgh, Pennsylvania 15225-1496

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March 13, 2001

2520042392844

Secretary of Labor  
Top-Hat Plan Exemption  
Pension and Welfare Benefits Administration  
Room N-5644  
U.S. Department of Labor  
200 Constitution Avenue, N.W.  
Washington D. C. 20210

Re: Neville Chemical Company Supplemental Executive Retirement Plan

Dear Secretary:

Pursuant to Section 2520.104-23 of the Department of Labor's Regulations, this letter will serve as notice that, with respect to the Neville Chemical Company Supplemental Executive Retirement Plan (The "Plan"), the undersigned intends to use the alternative form of compliance with the reporting and disclosure requirements of Part 1 of Title I of the Employee Retirement Income Security Act of 1974 (ERISA), which alternative form of compliance is provided in the aforesaid Regulations Section.

Pursuant to Regulations Section 2520.104-23 (b), the following information is provided:

1. Name and address of employer: Neville Chemical Company  
2800 Neville Road  
Pittsburgh, PA 15225
2. Employer's employer identification number: 25-0689790
3. Neville Chemical Company hereby declares that it maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.
4. Neville Chemical Company hereby states that it maintains only the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees, and the number of employees in the Plan is five (5).

Pursuant to Regulations Section 2520.104-23 (b)(2), Neville Chemical Company will provide Plan documents to the Secretary of Labor upon request as required by Section 104(a)(1) of ERISA.

Sincerely,

William J. Pesce  
Director of Human Resources

WJP/dlh

**NEVILLE** Neville Chemical Compa  
2800 Neville Road, Pittsburgh, Pennsylvania 15225

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right of the return address

**CERTIFIED**

Z 126 505 843

**MAIL**



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