



P.O. BOX 5111 • SOUTHFIELD, MI 48086-5111 • (248) 358-5800 • FAX (248) 358-5803

June 22, 1999

2520042394104

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

Re: *Detrex Corporation—Supplemental Pension Plans for Thomas Mark and William C. King*

Dear People:

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This statement is filed pursuant to Labor Regulation Section 2520.104-23 (alternative method of compliance for pension plans for certain select employees). Detrex Corporation is the plan sponsor and administrator of two pension plans...

- (1) which are maintained by Detrex primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees, and
- (2) for which benefits (i) are paid as needed solely from the general assets of Detrex, (ii) are provided exclusively through insurance contracts or policies, the premiums for which are paid directly by the employer from its general assets, issued by an insurance company or similar organization which is qualified to do business in any State, or (iii) both.

This filing is made by Detrex Corporation, Attention: Pension Committee, P.O. Box 5111 Southfield, Michigan, 48086-5111.

The EIN of Detrex is 38-0480840.

Detrex maintains two slightly different top hat plans, each covering one employee only. One plan covers William C. King, the other covers Thomas Mark.

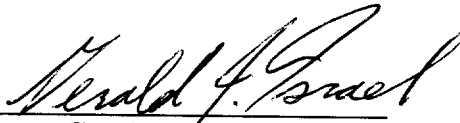
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Plan documents (which are contained within the individual employment contract of each participant) will be provided to the Secretary of Labor upon request, as required by ERISA Section 104(a)(1).

For further information, please contact Gerald J. Israel, Vice President of Finance, CFO, and Treasurer of Detrex.

Very truly yours,

DETREX CORPORATION

by: 
Gerald J. Israel
*Vice President of Finance,
CFO, and Treasurer*

cc: DFVC Program
Robert B. Stevenson, Esq.

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CERTIFIED

Z 416 968 943

MAIL

RETURN RECEIPT REQUESTED



444 SOUTH MAIN STREET
ANN ARBOR, MICHIGAN
48104-2304

**Top Hat Plan Exemption Pension and
Welfare Benefits Administration**

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U S DEPARTMENT OF LABOR
200 CONSTITUTION AVENUE NW
WASHINGTON DC 20210



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