

March 14, 2005

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

Re: Top Hat Plan Exemption

Gentlemen:

Pursuant to Section 2520.104-23 of the Federal Regulations; Chapter XXV of Title 29-Labor, this Company respectfully submits the following information:

(1) Name and Address of Employer:

Holly Oak Chemical, Inc.
305 W. Jones Street
P.O. Box 266
Fountain Inn, SC 29644

(2) Employer Identification Number:

57-0721191

(3) Declaration:

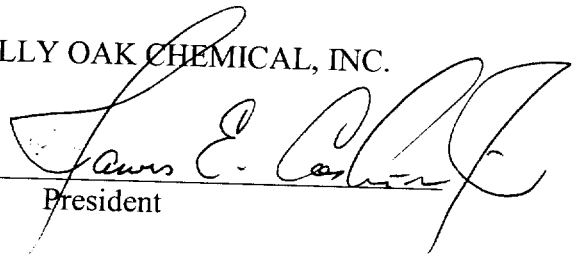
This Company maintains, as an Employer, an unfunded plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

(4) Number of Plans and Participants:

One plan, having one participant.

Respectfully submitted,

HOLLY OAK CHEMICAL, INC.

By: 
President

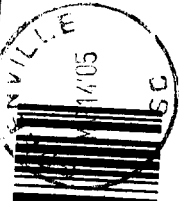
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