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November 9, 2010

**VIA CERTIFIED MAIL,  
 RETURN RECEIPT REQUESTED**

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

Ladies/Gentlemen:

This letter constitutes the statement described in Department of Labor Regulations §2520.104-23(b) relating to an alternative form of compliance with the reporting and disclosure requirements of Part 1 of ERISA provided for certain employee pension plans for a select group of management or highly compensated employees:

1. The name and the address of the employer is Hydrite Chemical Co., 300 N. Patrick Boulevard, Suite 200, Brookfield, Wisconsin 53045-5816.
2. The employer's Federal Employer Identification Number is 39-0364390.
3. The employer declares that it maintains a plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. The employer maintains three (3) such plans. Each such plan covers one (1) employee.

Plan documents will be provided to the Secretary of Labor upon its request.

Very truly yours,

**QUARLES & BRADY LLP**

  
 Thomas A. Simonis

TAS:bh2

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U.S. Department of Labor  
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bcc: Mr. John A. Honkamp  
President  
Hydrite Chemical Co.  
300 N. Patrick Boulevard, Suite 200  
Drawer #0948  
Brookfield, WI 53008-0948 (Personal and Confidential)