

Quality Control and Assurance

All claim-specific procedures, site evaluations, designs, strategies, tests, reports and other deliverables are processed through ECC Horizon's centralized quality control center to assure consistency and conformance with the firm's standards of care, technical merit, defensibility and cost control.

Network Contractor Qualifications

All ECC Horizon network contractors render their services according to strict standards of customer care, ethical conduct and cooperation. Each service provider is an established vendor in its respective geographic area and holds appropriate state contracts, registrations and licenses. Each firm provides 24-hour emergency response services, 365 days of the year.

All emergency response providers are audited periodically by ECC Horizon's risk management staff to assure the contractor's readiness, quality of service and dedication to the loss-control mandate.

National Database of Usual & Customary (U&C) Charges

All emergency response services under ECC Horizon's program are charged on a time and materials basis in accordance with the firm's national database of usual and customary (U&C) charges for environmental services.

ECC Horizon's supervisory and professional services are rendered on a time and materials basis according to its annual Schedule of Fees.

Program Structure

This program is structured to prevent conflicts of interest that may arise in "single-source" emergency service plans. All claim oversight, professional services, testing and technical supervisory activities are provided by ECC Horizon. All physical containment and remediation services are provided by local members of ECC Horizon's emergency response network. Physical remediation work may also be provided by independent first-responders already on the site. Ideally, these first responders should ultimately operate in accordance with ECC Horizon's U&C procedures. Waste disposal services may be provided either by ECC Horizon or by local contractors depending on the site-specific circumstances of the claim.

ECC Horizon does not have an economic interest in any member of the emergency spill response network or receive financial payments, reimbursements, commissions or other considerations from any network members, their owners and/or affiliates. ECC Horizon is independently owned and is not affiliated with any other contractor or other entity in its emergency response network.

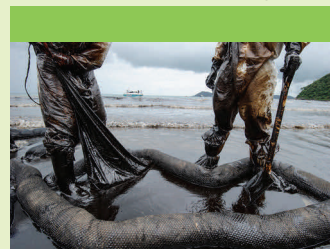
ECC Horizon's economic interest in establishing and maintaining this emergency response network derives solely from the fees it charges and receives for the services it renders on a time and/or materials basis.

Program Customization

This emergency response program provides a single point of comprehensive and consistent service to national organizations that have wide-ranging geographic exposures to unanticipated environmental events. From pre-event planning to immediate response execution to post-event cleanup and compliance action, this program provides reliable and predictable mechanisms for controlling losses when environmental accidents

occur. The program's services can also be selectively adjusted and changed.

Clients are thus invited to discuss with ECC Horizon how this program may best be optimized to serve their specific needs.



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Environmental Claim & Project Management



National Emergency Response Program



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ECC Horizon provides environmental emergency response services to insurers and their customers in every region of the United States. Through its own in-house service facilities and its national network of independent emergency response contractors, ECC Horizon controls claim losses arising from pollution events occurring on roadways, private and public properties as well as within waterways and coastal areas.

With more than 24 years of environmental claim experience, ECC Horizon's emergency response program is dedicated to qualifying causation, characterizing damages, directing remedial actions and working with regulators to achieve cost-effective and timely results. And in every case, our central objective is to ensure that vendor charges an insurer might reimburse are only paid for services that are necessary, properly rendered and appropriately charged.

Environmental emergency response events typically result in remediation charges that have not been previously agreed between vendors and their potential payers. To address this tension, ECC Horizon's response program provides a degree of predictability to an otherwise irregular process through the following orientation and pre-claim activities:

- We work with each insured to identify geographic areas in which emergency response services are most likely to be required.
- We evaluate each insured's activities to identify potential risks for which emergency response services might be necessary.
- We establish early notification procedures with insureds to allow for ECC Horizon's timely coordination and assumption of remediation services from government-directed first responders in order to better control service costs.
- If not already enlisted, we recruit into our network potential contractors near to the areas in which the insured operates. These contractors would then fully subscribe to the network's usual and customary service fees and charges.
- We maintain normal communication with first-responders before emergency events occur to enhance cooperation and accelerate management transfers to ECC Horizon's control when emergency events happen.



To assure appropriate emergency response action as needed, ECC Horizon's staff is on call 24 hours a day, 365 days a year. ECC Horizon personnel respond to claim sites without charge for airfare or other travel time charges. These costs are absorbed by ECC Horizon as administrative expenses associated with the firm's operations. However, mobilization charges by local emergency contractors are susceptible to reimbursement according to each vendor's service agreement.

Upon notification, ECC Horizon directs the emergency contractor closest to the claim site to respond immediately. In addition, a designated ECC Horizon manager mobilizes to the site within 1 to 24 hours of notification, as needed. All post-emergency remedial services are managed by ECC Horizon.

All designated ECC Horizon professional staff are employed on a full-time basis and are both experienced and expert in managing remedial services. Each professional employee possesses relevant academic credentials which may include advanced degrees relevant to the firm's practice.



When an emergency response event occurs, ECC Horizon provides the following services:

- We identify loss causation and evaluate claimed site conditions.
- We identify subrogation opportunities when presented.
- We monitor and assume earliest possible control over all remediation, investigation, testing and other services, when appropriate.
- We conduct forensic investigations, as necessary.
- We audit and adjust contractor invoices and proposed charges to ensure that all services are necessary, properly rendered and appropriately charged.
- We provide or arrange for all regulatory reporting and communications.
- We assess, develop and direct all necessary remedial actions following the initial emergency response event.
- We provide complete and timely reports to insurers and insureds regarding events, conditions, communications, costs and other relevant information.
- We provide expert reporting and litigation support services as directed.