BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
Complainant,)))	
V.)	
ALTIVITY PACKAGING, LLC, a Delaware limited liability company, INTRA-PLANT MAINTENANCE CORPORATION, an Illinois corporation, IRONHUSTLER EXCAVATING, INC., an Illinois corporation, and RON BRIGHT, d/b/a) PCB No. 1) (Enforcement))	2-21 ent – Land)
Quarter Construction,)	
Respondents.)	

NOTICE OF ELECTRONIC FILING

To: See Attached Service List

PLEASE TAKE NOTICE that on June 13, 2012, I electronically filed with the Office of the Clerk of the Pollution Control Board Intra-Plant Maintenance Corporation's Answer to Amended Cross Claim for Contribution by Respondent Altivity Packaging, LLC, a copy of which is herewith served upon you.

CHARLES M. ROCK

CHARLES M. ROCK
HASSELBERG ROCK BELL & KUPPLER LLP
Suite 200 Associated Bank Building
4600 North Brandywine Drive
Peoria, Illinois 61614
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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
v.)
ALTIVITY PACKAGING, LLC, a Delaware limited liability company, INTRA-PLANT MAINTENANCE CORPORATION, an Illinois corporation, IRONHUSTLER EXCAVATING, INC., an Illinois corporation, and RON BRIGHT, d/b/a) PCB No. 12-21) (Enforcement – Land))
Quarter Construction,)
Respondents.))

INTRA-PLANT MAINTENANCE CORPORATION'S ANSWER TO AMENDED CROSS CLAIM FOR CONTRIBUTION BY RESPONDENT ALTIVITY PACKAGING, LLC

Respondent, Intra-Plant Maintenance Corporation ("IPM"), by its attorneys, Hasselberg, Rock, Bell & Kuppler LLP, states in Answer to the Amended Cross Claim for Contribution filed by Respondent Altivity Packaging, LLC ("Altivity") as follows:

- 1. IPM admits the allegations contained in Paragraph 1.
- 2. IPM admits the allegations contained in Paragraph 2.
- 3. IPM admits the allegations contained in Paragraph 3.
- 4. IPM denies the allegations contained in Paragraph 4 as to IPM only.
- 5. IPM denies the allegations contained in Paragraph 5 as to IPM only.
- 6. IPM denies the allegations contained in Paragraph 6 as to IPM only.
- 7. IPM denies the allegations contained in Paragraph 7 in that Paragraph 7 contains a conclusion of law.

Electronic Filing - Received, Clerk's Office, 06/13/2012

WHEREFORE, Respondent Intra-Plant Maintenance Corporation asks for the Amended Cross Claim for Contribution of Respondent Altivity Packaging, LLC to be dismissed.

Dated: June 13, 2012

CHARLES M. ROCK HASSELBERG ROCK BELL & KUPPLER LLP Suite 200 Associated Bank Building 4600 North Brandywine Drive Peoria, Illinois 61614 Telephone: (309) 688-9400

Fax: (309) 688-9430

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a copy of the foregoing Notice of Electronic Filing and Motion for Leave to File Cross-Complaint has been served upon the following persons by placing the same in a sealed envelope, addressed as stated, with First Class postage fully prepaid and by depositing the same in the United States mail at Springfield, Illinois this 13th day of June, 2012:

Thomas J. Immel, Esq. Feldman Wasser Draper & Cox P.O. Box 2418 1307 South Seventh Street Springfield, Illinois 62705

Eleni Kouimelis, Esq. Winston & Strawn LLP 35 W. Wacker Drive Chicago, IL 60601

William O'Neal, Esq. Winston & Strawn LLP 35 W. Wacker Drive Chicago, IL 60601 Stephanie B. Sebor, Esq. Winston & Strawn LLP 35 W. Wacker Drive Chicago, IL 60601

Raymond Callery, AAG – Environmental Office of the Illinois Attorney General 500 South Second Street Springfield, IL 62706

Carol Webb, Hearing Officer Illinois Pollution Control Board 1021 North Grand Avenue East P.O. Box 19274 Springfield, Illinois 62794-9274

And electronically filed with the Clerk of the Pollution Control Board on the same date.

Charles M. Rock