C A N A D A
PROVINCE DE QUÉBEC
District de Longueuil

C O U R S U P É R I E U R E
(RECOURS COLLECTIF)

N° : 505-06-000020-144

PASCAL DUPUIS
Requérant

c.

POLYONE CANADA INC.
Intimée

SIGNIFICATION PAR TÉLÉCOPIEUR - BORDEREAU DE TRANSMISSION
(Article 146.01 C.p.c.)

DESTINATAIRE :

Me James R. Nazem
Place du Canada
1010, de la Gauchetière ouest, bureau 1315
Montréal (Québec) H3B 2N2

Procureurs du requérant

T 514 392.0000 • F **514 392.0013**

DATE : Le 6 mai 2014

HEURE DE LA TRANSMISSION :

NATURE DU DOCUMENT : **REQUÊTE POUR PERMISSION D'INTERROGER LE REQUÉRANT PASCAL DUPUIS ET POUR PERMISSION D'INTRODUIRE UNE PREUVE APPROPRIÉE et PIÈCE R-1**

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Procureurs de l'intimée

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POLYONE CANADA INC.

Intimée

REQUÊTE POUR PERMISSION D'INTERROGER LE REQUÉRANT PASCAL DUPUIS ET POUR PERMISSION D'INTRODUIRE UNE PREUVE APPROPRIÉE
(Art. 2, 20, 46, 397 et 1002 *C.p.c.*)

À L'HONORABLE THOMAS M. DAVIS, J.C.S., DÉSIGNÉ POUR ENTENDRE LE PRÉSENT DOSSIER, L'INTIMÉE POLYONE CANADA INC. EXPOSE RESPECTUEUSEMENT CE QUI SUIT :

I. INTRODUCTION

1. Suite à un incident s'étant déroulé à St-Rémi le 18 décembre 2013, le requérant Pascal Dupuis (« **Dupuis** ») a déposé le 13 janvier 2014 une Requête pour être autorisé à intenter un recours collectif au nom des résidents de la Ville de St-Rémi (la « **Ville** ») et de toutes les personnes travaillant dans un immeuble desservi par l'aqueduc de la Ville;

2. Plus particulièrement, Dupuis prétend qu'il y aurait eu, le 18 décembre 2013, un déversement d'eau non potable contenue à une tour de refroidissement de PolyOne Canada inc. (« **PolyOne** ») directement dans le réseau d'eau potable distribuée par la Ville;

3. Dupuis allègue au paragraphe 2.9 de sa requête pour être autorisé à intenter un recours collectif :

> Suite à la défaillance d'une valve dans le système de gestion de l'eau de la tour de refroidissement en soirée du 18 décembre 2013, l'eau non potable du réservoir s'est mélangée à l'eau distribuée par le réseau d'aqueduc de la Ville. Autrement dit, un déversement d'eau a eu lieu en raison d'un inversement du flux des eaux de la tour de refroidissement;

4. Sur cette seule base, Dupuis allègue que PolyOne serait responsable de tous les problèmes d'approvisionnement en eau potable vécus par les citoyens de la Ville depuis le 19 décembre dernier;

5. Par la présente, PolyOne demande à cette Cour la permission d'interroger Dupuis et de produire le rapport préparé par la firme indépendante CH2M Hill;

6. PolyOne soumet que l'interrogatoire de Dupuis et la production du rapport de CH2M Hill sont nécessaires afin de permettre à cette Cour d'évaluer les critères d'autorisation du recours collectif prévus à l'article 1003 *C.p.c.* et de se livrer à un véritable processus de filtrage;

II. INTERROGATOIRE DE PASCAL DUPUIS

7. La requête pour autorisation d'exercer un recours collectif de Dupuis contient très peu d'information au sujet de ce dernier et plus particulièrement, sur ses capacités d'agir à titre de représentant du groupe proposé;

8. PolyOne soumet qu'il est important que Dupuis explique en plus de détails en quoi il est en mesure d'assurer une représentation adéquate des membres du groupe proposé et quelles sont les démarches qu'il a effectuées, le cas échéant, avant d'intenter ce recours;

9. PolyOne soumet que l'interrogatoire de Dupuis permettra d'obtenir les informations pertinentes à cet égard;

III. RAPPORT DE CH2M HILL

10. Dupuis allègue qu'une tour de refroidissement de l'usine de PolyOne serait à l'origine d'un déversement de polluant dans le système d'eau potable de la Ville;

11. Dans cette optique, PolyOne soumet que le rapport préparé par CH2M Hill, suite à une visite des lieux et une inspection rigoureuse, jette un éclairage essentiel sur les faits en litige, tel qu'il appert d'une copie du rapport (**pièce R-1**);

12. CH2M Hill conclut que l'eau dans la tour de refroidissement de l'usine de PolyOne ne peut pas avoir débordée ou s'être déversée dans les réservoirs d'eau potable de la Ville:

> Based on information reviewed, the water could not have leaked into the Town's potable water supply, because a complete path was not present.

13. Bien que les tribunaux doivent exercer leur discrétion et éviter que le stade de l'autorisation déclenche des débats sur le mérite d'un dossier, Il n'en demeure pas moins que le rôle du juge n'est ni stérilisé, ni limité à accepter aveuglément les éléments de preuve et allégations de la partie requérante;

14. Le rapport de CH2M Hill (pièce R-1) constitue une preuve appropriée car elle est destinée à contredire des éléments invraisemblables, faux ou inexacts et donc, à établir l'absence d'une apparence de droit sérieuse;

15. Cette preuve est aussi appropriée puisqu'elle donnera un meilleur aperçu global de la situation et permettra de procéder plus efficacement lors de l'autorisation;

16. Cette Cour a précisé, notamment dans l'affaire *Dallaire c. Eli Lilly Canada inc.*, B.E. 2006BE-327 (C.S.), que rien n'empêche la production d'une ou plusieurs expertises avant la présentation de la requête en autorisation, à condition bien sûr que de telles expertises soient pertinentes et appropriées pour décider du bien-fondé de la requête en autorisation, comme c'est le cas en l'espèce;

17. À la lumière de ce qui précède, PolyOne demande l'autorisation d'interroger Dupuis et de produire le rapport de CH2M Hill (pièce R-1);

POUR CES MOTIFS, PLAISE À CETTE HONORABLE COUR :

AUTORISER l'Intimée, PolyOne Canada inc., à interroger (hors Cour ou lors de l'audition) le requérant Pascal Dupuis relativement à sa capacité d'assurer une représentation adéquate des membres du groupe proposé;

AUTORISER l'Intimée, PolyOne Canada Inc., à introduire en preuve le rapport de CH2M Hill (pièce R-1);

LE TOUT frais à suivre, sauf en cas de contestation.

Montréal, le 6 mai 2014

LCM AVOCATS INC.
Procureurs de l'Intimée
POLYONE CANADA INC.

AFFIDAVIT

Je, soussigné, Sébastien C. Caron, avocat, exerçant ma profession au sein de l'étude LCM Avocats inc., située au 1000, de la Gauchetière Ouest, bureau 1510, en les ville et district de Montréal, affirme solennellement ce qui suit :

1. Je suis l'un des procureurs de l'Intimée PolyOne Canada inc. dans la présente cause;

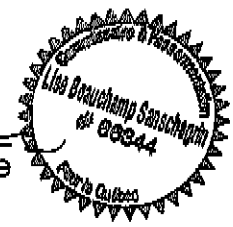
2. Tous les faits allégués dans la présente requête sont vrais.

et j'ai signé

SÉBASTIEN C. CARON

Affirmé solennellement devant moi, à Montréal, le 6 mai 2014

Commissaire à l'assermentation pour le Québec



AVIS DE PRÉSENTATION

Destinataire : Me James R. Nazem
Place du Canada
1010, de la Gauchetière Ouest, bureau 1315
Montréal (Québec) H3B 2N2

Procureur du requérant

PRENEZ AVIS que la *Requête pour permission d'interroger le requérant Pascal Dupuis et pour permission d'introduire une preuve appropriée* sera présentée pour adjudication devant l'honorable Thomas M. Davis, juge de la Cour supérieure, du district de Longueuil, à une date à être déterminée, au Palais de justice de Longueuil situé au 1111, boul. Jacques-Cartier Est, ou aussitôt que conseil pourra être entendu.

VEUILLEZ AGIR EN CONSÉQUENCE.

Montréal, le 6 mai 2014

LCM Avocats inc.

LCM AVOCATS INC.
Procureurs de l'Intimée
POLYONE CANADA INC.

R-1

TECHNICAL MEMORANDUM CH2MHILL®

Cooling Tower Leak Assessment – PolyOne St. Rémi, Québec

PREPARED FOR: Woody Ban, PolyOne Corporation

PREPARED BY: Frank Absl, Ing., CH2M HILL
Tuan Tran, CH2M HILL

COPIES: Jeff Currier, CH2M HILL

DATE: March 5, 2014

Introduction

At your request, we visited PolyOne's St. Rémi facility to conduct an inspection of the cooling tower system of the Plasticizer Area along with related process and potable water piping connected to it. We understand that the facility experienced a water loss in the water tank of the plasticizer area cooling tower on December 18, 2013, which initially was thought to have been released from the St. Rémi facility to the Town of St. Rémi (Town) potable water distribution system. PolyOne has requested this independent post-mortem engineering assessment of the existing piping configuration within the plant to assist in evaluating if a release to the Town's potable water distribution system could have occurred, and what conditions would have been required to allow the release to occur.

Per your request, this memorandum presents a summary of observations from the inspection and discussion of plausible scenarios that could have caused the cooling water loss.

Executive Summary

A site inspection was completed on January 28, 29, and 30, 2014 to collect information regarding the cooling water system for the purposes of evaluating the pathway of water loss from the cooling system experienced on December 18, 2013. Based on the information reviewed, it appears that the water loss can be attributed to freezing within the cooling tower, which resulted in overflow of the cooling water to the roof. Based on information reviewed, the water could not have leaked into the Town's potable water supply, because a complete path was not present.

The only identified situation which could have allowed cooling water to enter the potable supply was during a 15 minute period during attempts to refill the system (12:00 to 12:15AM on Dec. 19), after the water loss from the cooling tower. During this period, cooling water could have been pumped into the potable water system if the cooling system pressure exceeded that of the potable system. Based on PolyOne's reported observations during this 15 minute period, a low-pressure /low-flow alarm was flashing which indicates that the cooling water system wasn't primed and therefore not developing pressure. Based on this information, no water could have entered the potable water system during this 15 minute period.

Methodology

A site inspection was completed on January 28, 29, and 30, 2014. During the inspection, information on the potable water piping and the cooling water systems was obtained from the following sources:

- Facility tour and visual tracing of the potable water piping and cooling water systems, including an inspection of the cooling towers, and roof.
- Interviews with the following facility personnel:
  - Mario Tremblay, Plant Manager
  - Ghislain St. Cyr, Process Engineer
  - Normand Poupart, Maintenance Technician

- Review of facility documentation including the facility data acquisition system (Aquatrax) that measures various process operating information including make-up water and blow-down flow rates for the cooling towers.
- Following the inspection, telephone calls were made to the technical support staff of Delta Cooling Towers, the cooling tower manufacturer of the Plasticizer Area.

Summary of Observations

This section provides information which leads to the conclusion that the loss of cooling water was attributed to freezing within the cooling tower which resulted in overflow to the roof.

The service water supply system for the St. Rémi facility as observed during the plant visit is shown in Schematic A. The main supply line is 150 mm diameter. It splits to two 50 mm diameter pipes; one is provided with a reduced pressure backflow preventer and one is capped off. The service water supply piping feeds various fixture units including water closets, lavatories, showers, as well as process systems including vacuum pumps, steam generator, water softener, and two water tanks servicing the facility cooling towers. The water tanks are referred to as the "Flexible Area" water tank and the "Plasticizer Area" water tank. The water loss was observed in the Plasticizer Area water tank on December 18, 2013. Photos of the service water supply system and process systems are shown in the attached Appendix.

On January 28, 2014 the pressure gauge on the water supply line immediately downstream of the backflow preventer was indicating 30 pounds per square inch gauge (psig) at 11h00. The facility staff have indicated that the Town water supply system pressure typically varies between 30 psig and 55 psig. The same day the pressure gauge on process pump P-19 servicing the Plasticizer Area tower was reading 54 psig.

The water supply system connects to process systems at various points within the facility as shown in Schematic A. Most connections are not provided with backflow preventers. The connections to the facility Flexible Area and Plasticizer Area cooling tanks are through the roof of the tanks and terminate above the tanks' overflow outlet. As such, an air gap is present which prevents process water from flowing back to the water supply system from the tanks.

The facility's staff have indicated that the water loss from the Plasticizer Area cooling tank occurred on 18 December, 2013. A totalized volume of 14.1 m^3 is estimated to have leaked out of the Plasticizer Area tank system between 10h00 on 18 December, 2013 and 02h00 on 19 December, 2013 (i.e., over 16 hours). This volume is estimated as follows:

- 20,540 L of make-up water as recorded on the Aquatrax (the Aquatrax is a data logger that records flow information from plant instruments)
- Minus 2,766 L of blow-down as recorded on the Aquatrax
- Minus 3,667 L of evaporation prorated from a typical day data
- 20,540 – 2,766 – 3,667 = 14,107 L (or, 14.1 m^3)[1]

However, the 14.1 m^3 volume does not include the service water (from the potable water supply) that was admitted manually to the system between 00h00 and 01h00 through the 50mm cross connecting valve (Valve B, see schematic A). This additional volume is not recorded through any plant instrumentation and is not possible to quantify.

The following comments are based on observations of service water connections to the Plasticizer Area tank during CH2M HILL's site inspection between January 28 and 30, 2014. Before midnight on 18 December, 2013, which corresponds to the time at which the plant operator reportedly observed the system was empty and opened the 50 mm Valve B (connection between hard water supply and process water), the process water could not have leaked back to the water supply piping for two reasons:

[1] 1,000L = 1m^3

- The water supply feed to the Plasticizer Area tank is through the top of the tank and terminates above the tank's overflow outlet. Therefore, the configuration provides a constant air gap between the maximum water level in the tank and the water supply pipe.
- There isn't a direct connection between the higher process water pressure of 56 psig and the lower water supply pressure of 30 psig (worst case scenario; the water supply pressure reportedly varies between 30 and 60 psig). Facility staff have indicated that the 50 mm Valve B was closed before midnight on 18 December, 2013 as is generally the case during normal operations.
- Based on Aquatrax data, it is projected that the leak started to occur at approximately 10:00AM on December 18. The missing water volume of 12.25 m^3 which is the calculated volume of water that was lost on December 18, 2013 over 14 hours from 10:00 AM to midnight (14.1 m^3 x 14hr/16hr) could not have leaked through a 50 mm closed valve over 14 hours. Note that this valve passed a pressure test conducted by the facility staff on 23 December, 2013 as reported by plant staff. The missing water volume of 12.25 m^3 is the estimated amount that was lost from the system before plant staff was aware of the abnormal situation and before Valve B was opened.

During the January 28-30 2014 inspection of the Plasticizer Area cooling tower, significant icicles were noted at the base of the tower as shown in Photo 10. Also, the roof of the building was covered with ice over a large area from the tower to a roof drain. This is evidence that the cooling tower had been leaking process water onto the roof. The evacuation path for water is through the roof drainage system which discharges to the town of St. Rémi sewerage system. PolyOne provided conductivity tests on water obtained from roof ice between the cooling tower and roof drain, and on ice/snow from other parts of the roof. The results showed elevated conductivity between the cooling tower and roof drain, further suggesting that process water had leaked onto the roof, and ultimately into the sewer.

It is noted that between 00h00 and 00h15 AM on December 19, 2013 (i.e., 15 minutes later), during which time Valve B was first opened to refill the system and then process circulation pump 19 was stopped 15 minutes later, there was a situation which could have created a direct path of process water to the potable water supply piping (refer to Schematic B). This situation arises if pump 19 causes process water pressure to be higher than the potable water pressure, while Valve B is open. Considering a conservative scenario of a potable water supply pressure of 30 psig and a process water pressure of 56 psig, a 50 mm piping length of 125 m between Valve B and the incoming water supply connection to the facility, and 25 local fittings (elbows or equivalent), a flow of approximately 4 L/sec could have been created. Over 15 minutes this flow would correspond to approximately 3,600 L. However, the cooling water system is equipped with an alarm which PolyOne has indicated flashes when the system pressure drops below 3 psig or when there is no flow. The plant operator has reportedly indicated that during the 15 minutes in question, this alarm was flashing, there was insufficient water in the cooling tank, and pump 19 (the only pump in operation) was observed to be running dry as the pump was showing priming and pumping issues. These observations indicate that the cooling system was not primed and could not pump any water or develop any pressure. Since flow and pressure are related, the cooling system cannot develop pressure without establishing flow when it is connected to a tank at atmospheric pressure. Note that the centerline of circulation pump 19 suction piping from the cooling tank is 200 mm above the centerline of the cooling tower pump suction piping from the cooling tank, suggesting that the cooling tower pump was capable of draining the system through the leakage on the cooling tower. Therefore, although the path was available for cooling water to enter the potable water system over a 15 minute period, the cooling water system did not reach the pressure which could have created this condition, and thus it can be concluded that cooling water could not have entered the potable system.

Release Scenarios

CH2M HILL's inspection team believes that the cooling water loss that occurred during 18 December, 2013 took place in the Plasticizer Area cooling tower. The large volume of missing process water of 12.25 m^3 could not have leaked to the potable water supply system as an open path did not exist.

The leakage of the cooling tower is likely resulting from a blockage of the 200 mm drain exiting the base of the cooling tower. From December 12 to 18, mean daily temperatures ranged from -11.4 ^{0}C to -20 ^{0}C, with daily lows (excluding wind chill) ranging to -25^{0}C (as reported at by Environment Canada from Montreal's Trudeau Airport

weather station). It is very possible that the combination of very cold temperatures extending over a long period while the cooling tower fan was left in operation could have had a significant effect on the operation of the cooling tower. Note that during the winter, the water typically enters the cooling tower at approximately 4°C and is cooled to around 0°C. As the tower is not insulated, ice could build up as observed in the tower inspection photos. Therefore, it is likely that blockage of the 200mm drain is related to freezing.

This freezing effect could result from any of the following situations:

- Accumulation of small ice pellets on the strainer installed at the inlet of the drain which could restrict flow and cause overflow in the cooling tower.
- Build-up of frazil ice on the strainer (frazil ice is small crystals of ice that have little buoyancy. Through secondary nucleation their size increases and can block a strainer).
- Build-up of ice inside the drain since the drain is metal and is not insulated. This can be common in extremely cold climates.

The centerline of the cooling tower overflow is 445 mm (17.5") above the centerline of the 200 mm diameter drain pipe. The cooling process flow is 31.5 L/sec (500 usgpm). When the available open surface area of the 200 mm diameter drain pipe shrinks to about 120 mm diameter equivalent due to freezing or a blockage situation, the water level is expected to increase such that leakage would start leaving the tower through the overflow. In the event that the overflow becomes plugged with ice, the water level would continue to rise and would exit via the air intake vents.

An additional scenario considered was whether or not the cooling tower fan could draw from the drain during periods when the air inlets were sealed with ice. Though significant ice was found on the air inlets of the cooling tower, the cooling tower fan is not strong enough to create a vacuum condition that would raise the water level to the overflow drain level. According to the cooling tower manufacturer (Delta Cooling Towers) the fan is rated for a couple of inches of water column which is well below the 17.5" that are required to raise the water to the overflow drain level.

Conclusions

A site inspection of the St. Rémi plant was completed on January 28, 29, and 30, 2014. CH2M HILL's inspection team believes that the release of process water on 18 December, 2014 occurred within the Plasticizer Area cooling tower located at the plant roof. The leaked water drained to the town's sewerage system.

A potential pathway for cooling water to enter the potable water supply system occurred during the filling of the cooling tank with potable water between 00h00 and 00h15 on 19 December, 2013. During this period, the cooling water system pressure would need to have been greater than that of the potable water supply pressure to result in cooling water entering the potable system. Based on the plant Operator's observations that the pump was running dry and the alarm connected to a pressure and a flow switch was active during this period, the cooling water system did not develop a water pressure that could have allowed process water to enter the potable water supply system.

Limitations

The findings and conclusions presented herein are based solely on the extent of observations and information gathered during the post-incident site inspection. In preparing this report, CH2M HILL relied, in whole or in part, on data and information provided by the Client and third parties, which information has not been independently verified by CH2M HILL and which CH2M HILL has assumed to be accurate, complete, reliable, and current. Therefore, while CH2M HILL has utilized its best efforts in preparing this Report, CH2M HILL does not warrant or guarantee the conclusions set forth in this Report which are dependent or based upon data, information or statements supplied by third parties or the client.

The CH2M HILL's staff who performed this work are not lawyers; therefore, the report is not a legal representation or interpretation of laws, rules, regulations, or policies of local, provincial, or federal governmental agencies. CH2M HILL

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All findings and conclusions stated in this report are based on facts and circumstances as they existed during the time that the report was prepared. Any changes in fact or circumstances upon which the report was based may change the findings reported. Should additional relevant information become available after the date of this report, CH2M HILL reserves the right to review this new information and modify, as deemed necessary, any or all of the opinions presented in this report. CH2M HILL cannot report on, or accurately predict, events that may change the site conditions after the described services are performed, whether occurring naturally or caused by external forces.

Appendix A
Facility Visit Photos - January 28 to January 30, 2014

APPENDIX A

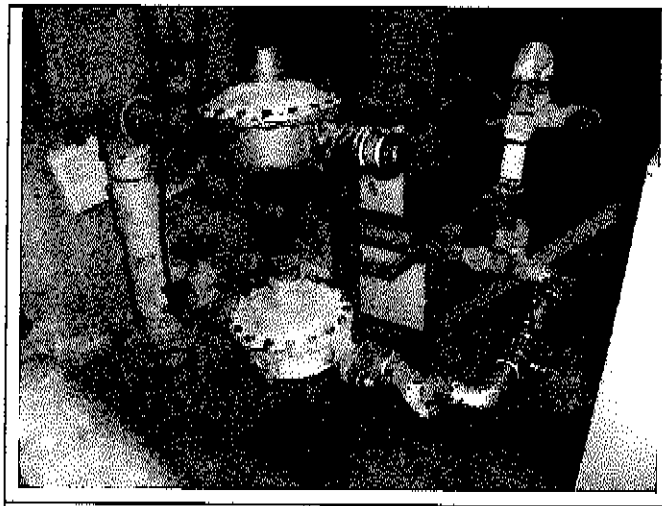


Photo 1 - Main water supply feed and backflow preventer

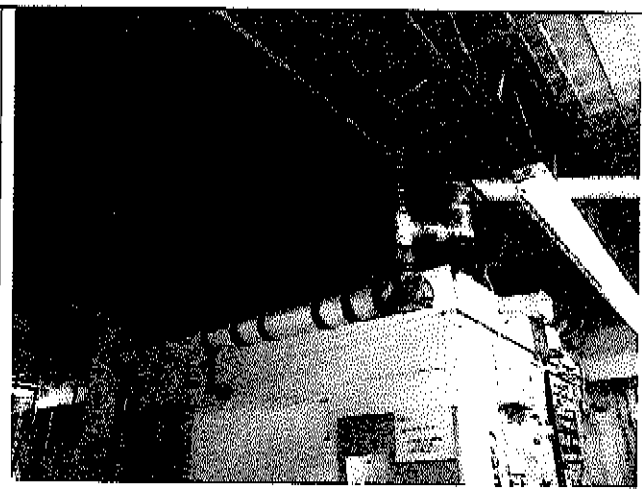


Photo 2 – Service water supply piping

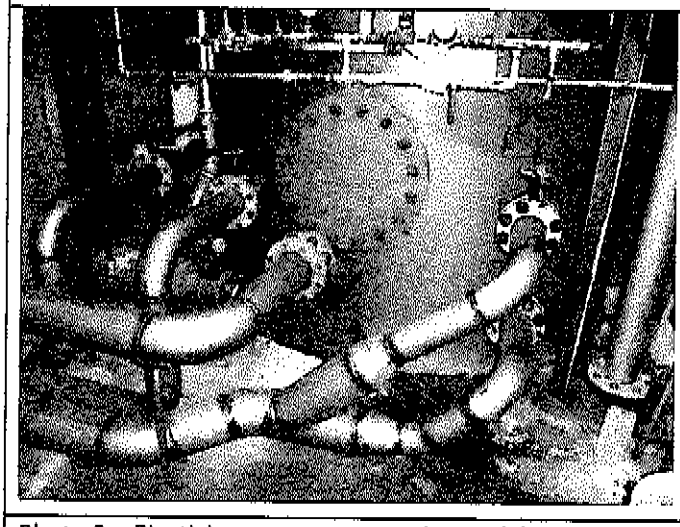


Photo 3 – Plasticizer area water tank – tank bottom

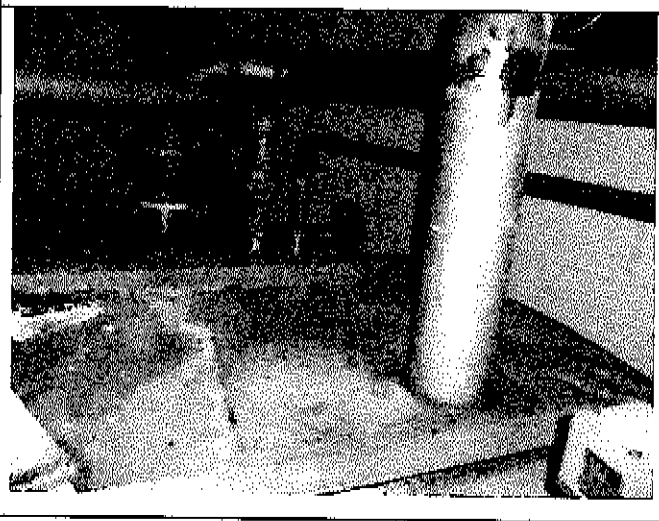


Photo 4 – Plasticizer area water tank – tank top with make-up water piping and process piping

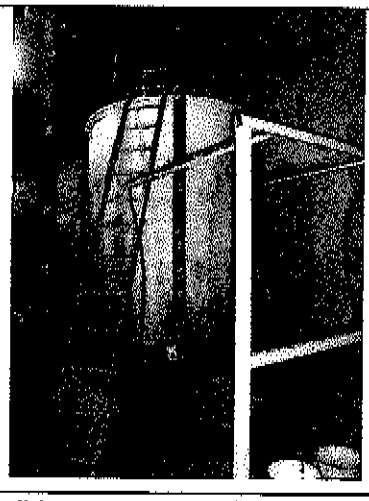


Photo 5 – Flexible area water tank

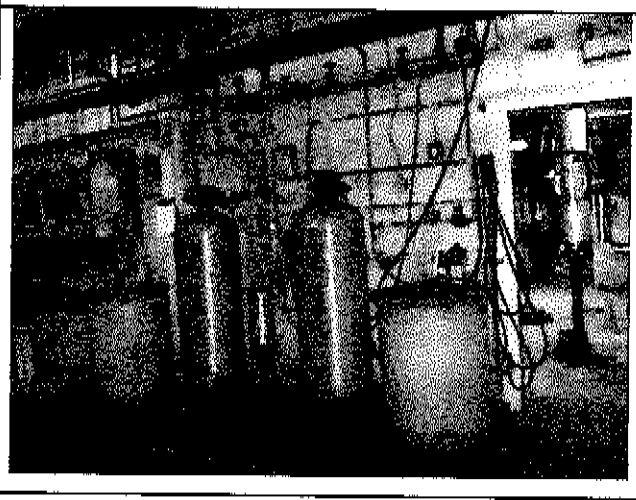


Photo 6 – Softener system

APPENDIX A

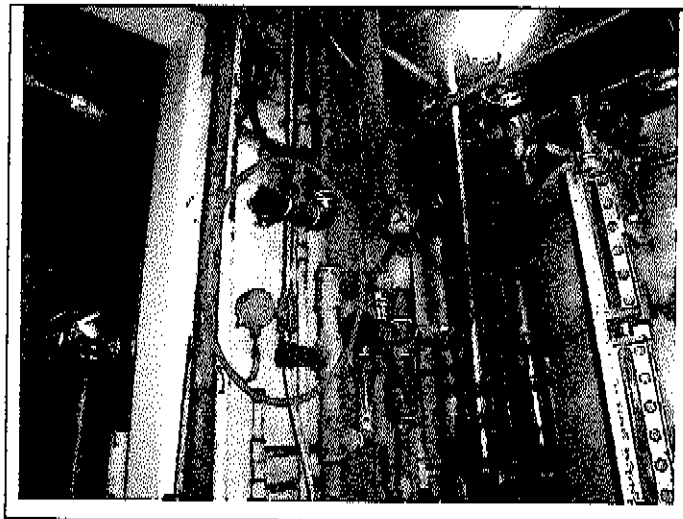


Photo 7 – Location of water supply valve B that was removed. Pipe capped off at both ends.

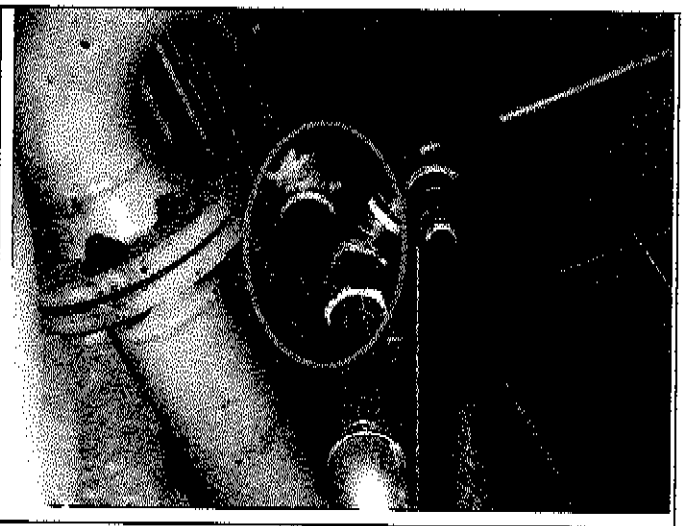


Photo 8 – Location of water supply valve A that was removed. Pipe capped off at both ends.

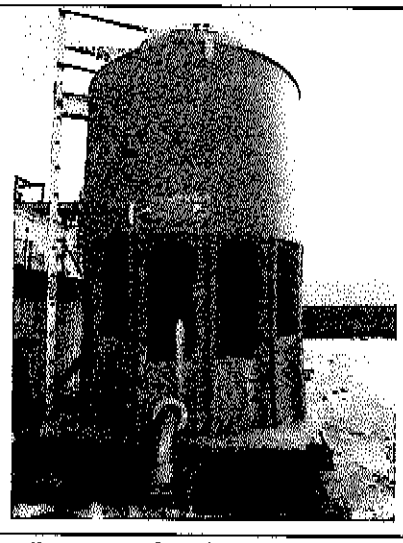


Photo 9 – Cooling tower for plasticizer area.

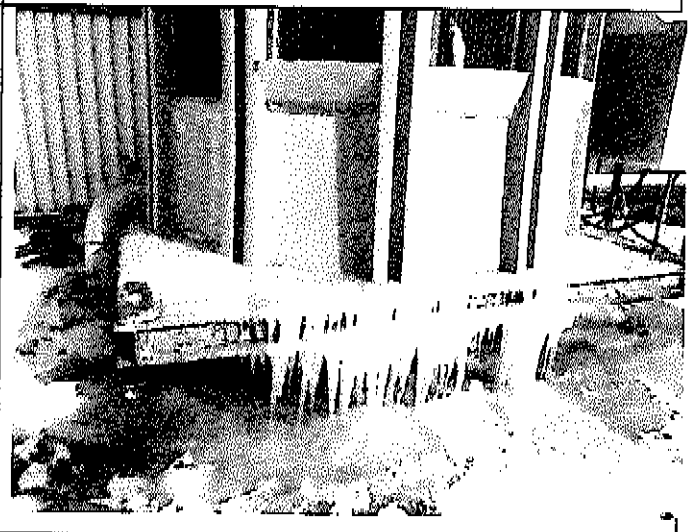


Photo 10 – Cooling tower for plasticizer area. Icicles at tower pan and freezing water at plant roof.

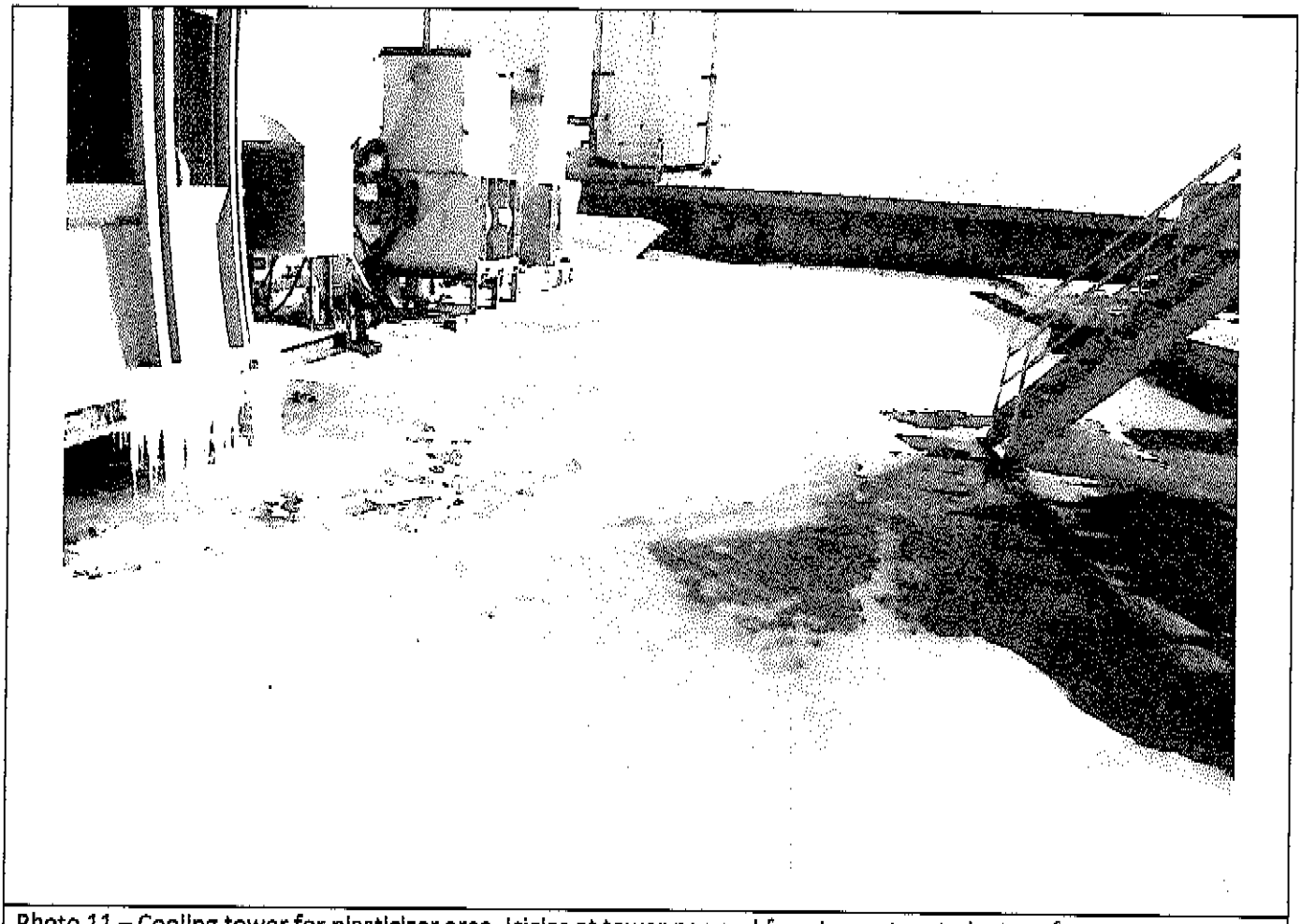
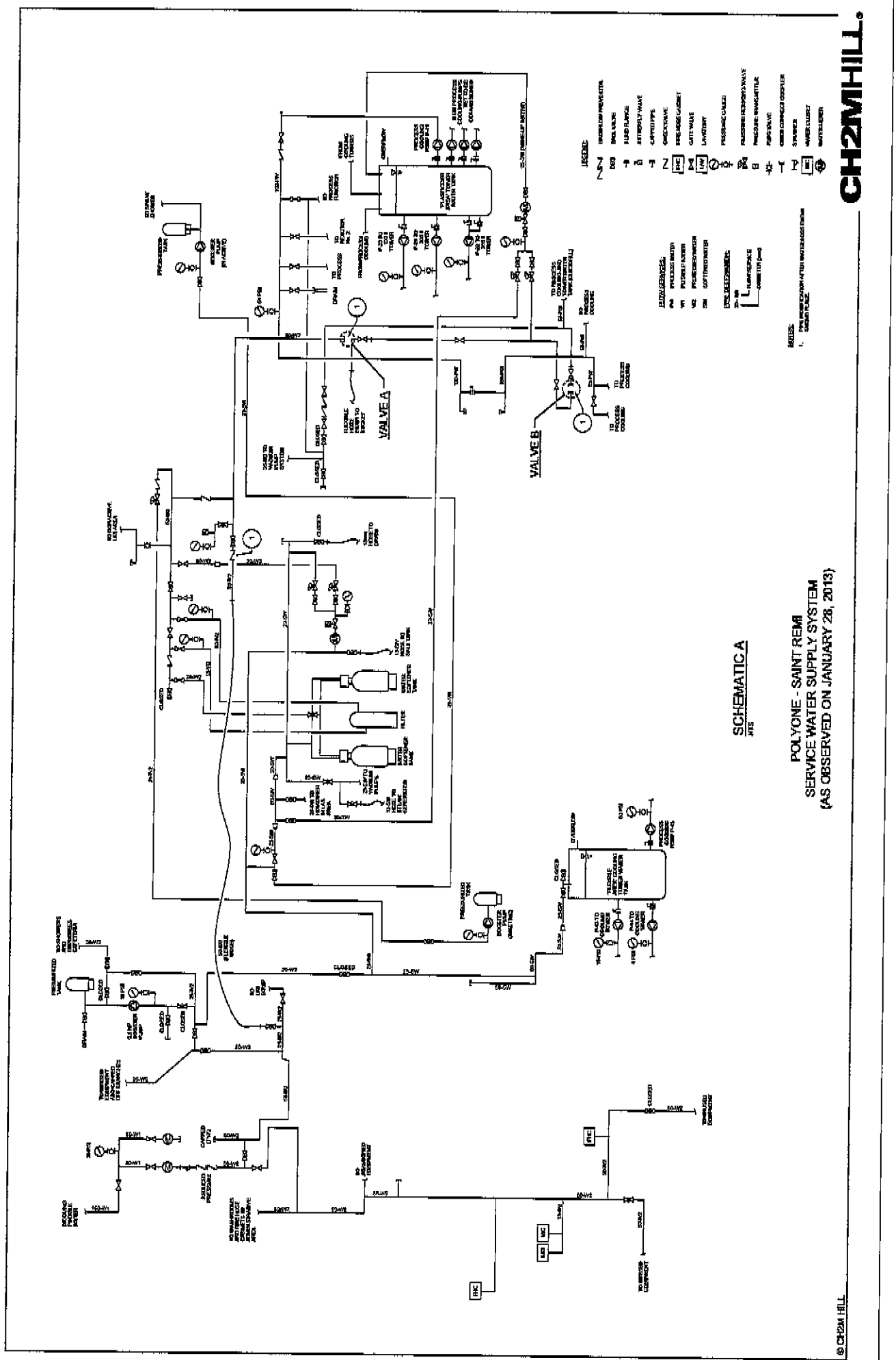
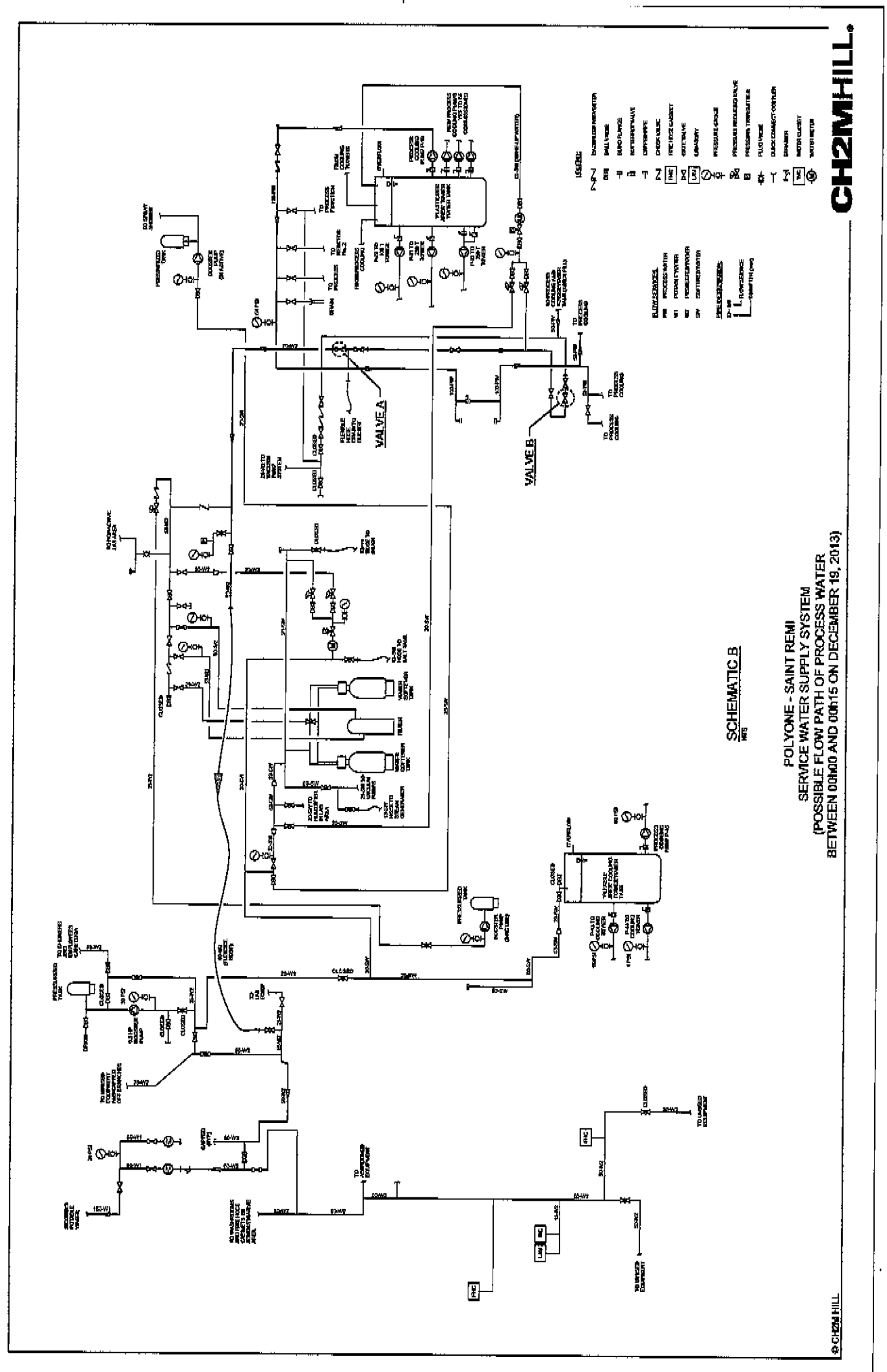


Photo 11 – Cooling tower for plasticizer area. Icicles at tower pan and freezing water at plant roof.

Appendix B
Service Water System Schematic


CH2MHILL
POLYONE - SAINT REMI
SERVICE WATER SUPPLY SYSTEM
(AS OBSERVED ON JANUARY 28, 2013)
SCHEMATIC A
VALVE A
VALVE B
© CH2M HILL


CH2MHILL
POLYONE - SAINT REMI
SERVICE WATER SUPPLY SYSTEM
(POSSIBLE FLOW PATH OF PROCESS WATER
BETWEEN 00h00 AND 00h15 ON DECEMBER 19, 2013)
SCHEMATIC B
VALVE A
VALVE B
LEGEND
BLOWDOWNS
PW PROCESS WATER
WT POTABLE WATER
RO REVERSE OSMOSIS
DW DEMINERALIZATION
FLOW RESISTANCE
TO PROCESS COOLING
TO PROCESS
TO SERVICE EQUIPMENT
TO AMMONIA EQUIPMENT
TO CHILLED EQUIPMENT
PROCESS WATER
POTABLE WATER
REVERSE OSMOSIS
DEMINERALIZATION
CH2MHILL

N° : 505-06-000020-144

COUR SUPÉRIEURE
(Recours collectif)
District de Longueuil

PASCAL DUPUIS

Requérant

c.

POLYONE CANADA INC.

Intimée

REQUÊTE POUR PERMISSION D'INTERROGER LE REQUÉRANT PASCAL DUPUIS ET POUR PERMISSION D'INTRODUIRE UNE PREUVE APPROPRIÉE
(Art. 2, 20, 46, 397 et 1002 *C.p.c.*)
et Pièce R-1

ORIGINAL

Code: BL5788 N/Réf. : 25627/10

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