

**From:** [BROWN Courtney](#)  
**To:** [ROOT Jenny](#)  
**Cc:** [CARLOUGH Les](#)  
**Subject:** here is my proposed change to the C factor  
**Date:** Wednesday, September 12, 2012 3:29:00 PM  
**Attachments:** [Cfactor.proposed.rev..docx](#)

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I never liked how you couldn't give a Respondent credit for taking efforts to ensure the violation wouldn't be repeated unless it was "extraordinary." So, this is what my proposed revision aims to address.

Courtney Brown  
DEQ Office of Compliance and Enforcement  
811 SW 6th Ave.  
Portland, OR 97204-1390  
ph: 503-229-6839  
fax: 503-229-5100