United States Department of the Interior

INTERIOR BUSINESS CENTER
Washington, DC 20240

LIMITED-SOURCES JUSTIFICATION
OVER THE MICRO-PURCHASE THRESHOLD AND
UNDER THE SIMPLIFIED ACQUISITION THRESHOLD
AUTHORITY: FAR 8.405-6 and 40 U.S.C 501

SOLICITATION NUMBER: 140D0426Q0146

This acquisition is conducted under the authority of the Multiple Award Schedule (MAS) Program.

1. **Contracting activity/agency.**

   Department of the Interior, Interior Business Center, Acquisition Services Directorate, Division 5 and Branch 2, on behalf of the Bureau of Land Management (BLM).

2. **Description of supplies or services required to meet agency needs.**

   This will be a new task order to provide Environmental Technical Support Services for the Formosa Mine Superfund Site located near Riddle, Oregon. This location is engaged in multifaceted environmental assessments and remediation projects and there are sensitive technical and policy issues that require specialized subject matter experience in order to support the BLM mission. This work is being completed in support of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). This effort is structurally complex and involves federal, state, and tribal stakeholders with various perspectives and interests, overlapping and potentially conflicting regulatory issues, and other complex challenges. Currently, the site discharges acid rock drainage and heavy metals (e.g. cadmium, copper, zinc, etc.) into the upper reaches of Middle Creek and South Fork Middle Creek drainages. The contractor will be required to assist the Government the agency in technical discussions, meetings, research, analysis, and evaluation of information/solutions pertaining to the site in preparation for eventual remediation efforts. Additionally, the contractor may participate in conducting site visits to perform environmental testing/sampling, analysis of samples, and other relevant technical support for environmental studies, as needed.

   This order is planned to have one base year, beginning around April 15, 2026, and two additional option years with an overall value of [redacted]. The planned value per year varies due to anticipated activities during each period; they are estimated as follows: Base Year is [redacted], Option Year 1 is [redacted], and Option Year 2 is [redacted]

3. **Identification of the limited source(s) to be solicited.**

   HSG, LLC
   2831 Saint Rose Parkway, Ste 213

Henderson, NV 89052-4840
Point of Contact: Blake Tubbs
Phone Number: 321-326-0055
GSA Contract Number: GS-10F-230BA

4. **Reason for authority cited.** The contracting officer has determined the circumstances of the action deem it necessary to limit the source.

   FAR 8.405-6(a)(1)(i)(B) - Only one source is capable of providing the supplies or services required at the level of quality required because the supplies or services are unique or highly specialized.

5. **Rationale.**

HSG is uniquely qualified to provide the specialized environmental support required for the Formosa Mine Superfund Site throughout the CERCLA process. HSG offers advanced expertise in mine-impacted watershed analysis, environmental data interpretation, and technical support necessary to inform remedial investigation, feasibility study, and remedy selection activities at complex mountainous mining sites. In support of this capability, HSG has access to a highly specialized hydrologic scientist with nationally recognized expertise in mountain hydrology and mining-influenced water systems. This resource holds a Ph.D. in hydrology and has authored multiple peer-reviewed publications focused on surface water–groundwater interactions, tracer-based hydrologic methods, and the characterization of acid mine drainage in steep, high-relief watersheds—conditions directly relevant to the Formosa Mine site. This combination of applied research experience and field-based technical expertise is vital to the overall success of the BLM mission and enables HSG to support the Government across multiple phases of the CERCLA process, including conceptual site model development, data gap analysis, evaluation of remedial alternatives, and interpretation of long-term monitoring results. Market research indicates that other FSS contractors do not possess the same integrated level of environmental science capability, published research foundation, and immediately available expertise necessary to meet the Government's needs without increased risk to schedule, quality, and technical defensibility. Accordingly, limiting consideration to HSG is in the best interest of the Government.

6. **Market Research.**

Mandatory sources were reviewed, and they are not available AbilityOne or UNICOR. Though there are several different contractors that provide Environmental Services through the GSA MAS, there are no other vendors that have the highly specialized or unique understanding of mountain hydrology and mining influenced waters needed to be successfully meet the level of quality needed for the technical support services at the Formosa Mine Superfund Site.

Under the authority of FAR 8.405-6, the undersigned hereby determines the circumstances of this action deem only one source is reasonably available as supported herein.

Digitally signed by JOAN CLARKSTON
Date: 2026.02.04 16:43:45 -06'00'

Joan Clarkston
Contracting Officer

Concur

ELIZABETH EARP Digitally signed by ELIZABETH EARP
Date: 2026.02.04 15:28:58 -08'00'

Elizabeth Earp
AML/HMM Project Manager
Oregon/Washington State Office
Bureau of Land Management