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: 140D0426Q0262

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.**

   The Josephine Mine Site is located on lands managed by the BLM approximately two miles north of Metaline Falls, Washington. The Josephine Mine Site includes the Josephine, Yellowhead, and Lookout Mines, East Josephine Shaft, and the Josephine Mill #2. The Site is heavily forested and in steep terrain. The mines and mill are flanked on the east side by the Pend Oreille River. The mines to the north of the Site are bisected by Flume Creek from the Josephine Mill #2 to the south. Mining at the Josephine Site began in the early 1900s and was used to process ore and extract primarily lead and zinc. The Josephine Mill #2 experienced periods of low utilization during the 1950s and ultimately closed in the 1960s. The EPA listed the Josephine Mill #2 on the Federal Facilities Hazardous Waste Compliance Docket (EPA ID: WAN001002400) in 2004.

   This order will provide for a Community Involvement Plan (CIP), cost tracking, and Site Management Plan (SMP) for the Josephine Mine Site. BLM is currently conducting an Environmental Evaluation/Cost Analysis (EE/CA) with HSG, LLC on a different order (140L0619D0001/140L0124F0103). The EE/CA provides a comparative analysis of removal action options for hazardous waste sites to determine the most effective and cost-efficient method for addressing the environmental concerns. The CIP briefs the public and stakeholders on the findings from the EE/CA and provides for public comment and input for BLM to make final decisions for potential removal actions at the site. Additionally, BLM requires cost tracking support for Central Hazardous Funds (CHF) to hold potentially responsible parties accountable for costs under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). A Site Management Plan is also included to provide for an outline of the strategy for assessing and future remediation of the hazard waste sites, as a result of the EE/CA and the public comments.

This non-severable order will provide an 18 month period of performance from date of award and has an overall estimated value of [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 the only responsible source capable of performing the required services due to HSG performing the EE/CA for the site. The CIP effort is technically and programmatically interconnected with the ongoing EE/CA work which results in the level of quality being unique or highly specialized. The two activities rely on the same site data, technical analyses, and understanding of site conditions which are developed during the EE/CA process. Because the EE/CA and CIP activities are inextricably linked, the contractor performing the EE/CA possesses detailed institutional knowledge of the site, including historical investigation data, contaminant distribution, site geology, hydrology, and the analytical framework used to evaluate removal action alternatives. This knowledge is critical to developing an effective CIP that is technically consistent with the ongoing CERCLA evaluation. In order to avoid risks of inconsistencies in technical assumptions, analytical methods, and recommendations between the EE/CA and the CIP, it is vital that HSG provide the CIP support services to ensure the necessary level of quality needed for mission success. Maintaining continuity by having the same contractor perform both efforts ensures technical integration of public comments, reduces project risk, and supports timely decision-making for the CERCLA removal action. In regards to cost tracking and the SMP, these actions are also a logical extensions due to them being necessary for tracking costs and preparing for future removal actions which will be recommended as a result of the EE/CA and the CIP effort.

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 involved in the development of the EE/CA and having unique knowledge of the site other than HSG. Their highly specialized or unique understanding of mountain hydrology, and mining influenced waters, and work on the EE/CA

which is needed to successfully meet the level of quality needed for the technical support services at the Josephine Mine.

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: 2026.03.18 15:23:46 -05'00'

Joan Clarkston
Contracting Officer

Concur

ELIZABETH EARP
Digitally signed by ELIZABETH EARP
Date: 2026.03.18 09:03:13 -07'00'

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