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LETTER TO ALL RESPIRATOR MANUFACTURERS

Subject: Sampling Procedures

The National Institute for Occupational Safety and Health (NIOSH) requires that respirator approval holders inspect and/or test samples of respirators and components as part of their quality control plans. This requirement is stated in Title 42, *Code of Federal Regulations*, Part 84 (42 CFR 84), specifically in §§ 84.41(b) through 84.41(i).

Some applicants or approval holders have had difficulty understanding how to select and use a sampling procedure which meets the requirements. This letter is intended to explain the practical use of common standard procedures acceptable to NIOSH.

This letter will not discuss statistical theory underlying acceptance sampling. If applicants or approval holders intend to use alternatives to the procedures described here, they must understand the concepts of acceptance sampling and process control. The use of more modern methods such as calculating process capability values (C_{pk}) or employing statistical process control (SPC) is encouraged where this is compatible with the approval holder's operations and provides equivalent assurance of respirator performance. Justification to demonstrate the equivalence of these procedures must be provided in the application seeking approval.

1. Selection of Sampling Procedures

1.1 Sampling by Variables. The standard sampling procedure specified in 42 CFR 84 is MIL-STD-414 [U.S. Department of Defense 1957]. This is a variable sampling plan, which means that the characteristic must be something that can be measured numerically on a continuous scale. Examples include the diameter of a hole in inches, the mass of a cartridge in grams, or the leakage of an exhalation valve in milliliters per minute. This procedure is only valid when the characteristic being measured has a statistically normal distribution over the population being sampled. The ANSI/ASQ Z1.9 standard [American National Standards Institute 2003b] is derived from MIL-STD-414, and NIOSH considers it to be equivalent.

1.2 Sampling by Attributes. The MIL-STD-105D sampling procedure [U.S. Department of Defense 1963] is explicitly accepted as an equivalent procedure in 42 CFR 84. This is an attribute sampling plan, which means that each characteristic is simply checked to see whether it is acceptable. Due to its simplicity, this standard and its derivatives are by far the most common in use. It has the advantage that it can be applied to characteristics which do not involve a numerical measurement (such as visual checks) as well as to those that are measurable. No calculations are needed to determine acceptance, and the procedure is valid whether the

characteristic has a normal distribution or not. Typically the sample sizes will be larger than the corresponding variable sampling plan. Procedures derived from this standard, and which NIOSH considers to be equivalent, include MIL-STD-105E [U.S. Department of Defense 1989] and ANSI/ASQ Z1.4 [American National Standards Institute 2003a].

1.3 Zero-Defect Sampling by Attributes. Another attribute sampling plan which NIOSH accepts as equivalent is the Squeglia C=0 procedure [Squeglia 2008]. While not directly derived from MIL-STD-105E, its plans are matched to that procedure and provide an acceptable statistical assurance of lot quality. The chief difference is that in all cases, the lot is only accepted if there are zero defects found in the sample (C=0). This procedure usually requires fewer samples than MIL-STD-105D and related standards, and is the simplest to use of those listed in this letter. However, it is generally only suitable when defects in production are extremely rare.

1.4 Equivalent Standards. The ANSI/ASQ standards mentioned above are revised periodically. In general, NIOSH will consider later editions of a given procedure to be equivalent. There may also be other national or international standards based on MIL-STD-414 or MIL-STD-105D that can be considered equivalent. If such a standard is used, NIOSH may request a copy from the applicant to verify its equivalence.

1.5 Obtaining Sampling Procedure Documents. One feature of MIL-STD plans is that as works of the United States Government, they may be copied free of charge. Those mentioned can be downloaded from the Internet Archive at <http://www.archive.org/> and may be available elsewhere. However, all MIL-STD documents in this letter have been cancelled by the Department of Defense and are no longer maintained or revised. The corresponding ANSI/ASQ standards are successors to the MIL-STD documents and have various minor improvements and clarifications added. Copies of these standards may be purchased from the American Society for Quality, the American National Standards Institute, or others who deal in national standards.

2. Acceptable Quality Level (AQL)

2.1 Meaning of AQL. The acceptable quality level is an indicator of the percent defective that can be considered satisfactory for a particular characteristic. Smaller AQL values mean that fewer defectives will be tolerated in an acceptable lot.

2.2 Selection of AQL. The classification of defects document submitted with each application as required by 42 CFR 84.41(c) through 84.41(e) must identify the severity level of each characteristic. The AQL to be used for sampling is shown in the table below and is defined in 42 CFR 84.41(g). The AQL value does not depend on lot size or any other factor, and it is generally improper to modify the AQL for any reason other than the defect classification.

Defect Classification	AQL ^{1,2}
Major A	1.0
Major B	2.5
Minor	4.0

¹ These are called “index values” in the Squeglia C=0 procedure.

² It is acceptable to use a smaller (more stringent) AQL value.

2.3 Critical Characteristics. Characteristics identified as Critical in the classification of defects are not assigned an AQL and are not eligible for any form of sampling. Each item made must be 100% inspected as required by 42 CFR 84.41(f) and the entire lot rejected when a defect is found. Any plans to perform rework on the lot must be approved as part of the product quality plan.

2.4 Cross-References. See MIL-STD-414 section A4; ANSI/ASQ Z1.9-2003 sections A2.1, A4; MIL-STD-105D section 4; MIL-STD-105E sections 3.1, 4.4; ANSI/ASQ Z1.4-2003 section 4; Squeglia C=0 pages 3, 6.

3. Inspection Level

3.1 Meaning of Inspection Level. The inspection level decides the number of samples to be drawn for a particular lot size and determines the sampling plan’s ability to discriminate between conforming and nonconforming lots. Lower inspection levels increase the risk that a nonconforming lot will be accepted.

3.2 Selection of Inspection Level. The inspection level to be used is shown in the “normal” column of the table below and is defined in 42 CFR 84.41(h). As a special exception, NIOSH is permitted under 42 CFR 84.41(i) to allow a lower inspection level for destructive testing only. The minimum level NIOSH will accept under this exception is in the “destructive” column. Approval of a level lower than the “normal” level is entirely at NIOSH’s option and will only be granted if the rest of the inspection plan ensures adequate control over product quality.

Procedure	Minimum Inspection Level	
	Normal	Destructive ¹
MIL-STD-414	IV	I
ANSI/ASQ Z1.9-2003	II	S-3
MIL-STD-105D	II	S-2
MIL-STD-105E	II	S-2
ANSI/ASQ Z1.4-2003	II	S-2

¹ Only permitted with specific prior approval from NIOSH.

The Squeglia C=0 procedure does not use the concept of inspection levels and NIOSH treats it as equivalent to inspection level II of MIL-STD-105D.

3.3 Cross-References. See MIL-STD-414 section A7.1; ANSI/ASQ Z1.9-2003 section A7.1; MIL-STD-105D sections 9.2, 9.3; MIL-STD-105E sections 4.9.1, 4.9.2; ANSI/ASQ Z1.4-2003 sections 9.2, 9.3.

4. Normal, Reduced, and Tightened Inspection

4.1 Use of Switching Rules. Most sampling procedures referenced in this letter contain rules allowing reduced inspection under certain conditions. Reduced inspection may be used only when all conditions listed in the switching rules are met. This includes the requirement that production is not irregular or delayed. A history of lot acceptance at one manufacturing site

cannot be used to move to reduced sampling at another site. Approval holders may choose to stay at normal inspection even when conditions for reduced inspection are met. However, tightened inspection is not optional and must be used where specified by the rules. The Squeglia C=0 procedure does not recommend switching rules, and reduced inspection is not permitted by NIOSH for that procedure. Tightened inspection is not required for the Squeglia C=0 procedure.

4.2 Records to Support Reduced Inspection. To use reduced inspection, the approval holder must maintain inspection records showing that the conditions in the applicable procedure are met. Such records must be available for review during NIOSH on-site audits.

4.3 Cross-References. See MIL-STD-414 sections A8, B14, C14, D14; ANSI/ASQ Z1.9-2003 section A10; MIL-STD-105D section 8; MIL-STD-105E sections 4.6, 4.7, 4.8; ANSI/ASQ Z1.4-2003 section 8; Squeglia C=0 pages 14, 16.

5. Lots or Batches

5.1 Definition of Lot. Each procedure listed in this letter requires that product be grouped into inspection lots (the term “batch” means the same as “lot”). Each lot consists of product which has been manufactured under essentially the same conditions in the same production facility and at essentially the same time. For example, if a production line is shut down for a week for maintenance, it is wrong to consider product made before and after the shutdown as part of the same lot.

5.2 Selection of Samples from Lot. Each sample drawn from a lot must be representative of the lot. For example, when drawing a sample of 200 pieces from a lot of 10,000 it would be improper to select the first 200 respirators produced to use as the sample. As another example, if respirators being produced on five machines are being combined into an inspection lot, then one-fifth of the sample drawn must come from each machine. As noted in section 6.2 of this letter, each sample taken for double or multiple sampling must be representative of the whole lot.

5.3 Inspection Lot vs. Other Lot Designations. The grouping of finished respirators into lots for shipment or other purposes may differ from the grouping used for inspection. The lot number marked on the respirator or its container, as required by 42 CFR 84.33(g), does not necessarily need to be the same number used for inspection purposes. However, the approval holder must maintain traceability between lot numbering systems if more than one is used. For example, a shipping lot number must be traceable to the corresponding production lot number (or numbers).

5.4 Cross-References. See MIL-STD-414 sections A5, A7.2; ANSI/ASQ Z1.9-2003 sections A2.4, A5, A7.2; MIL-STD-105D sections 5, 7.2; MIL-STD-105E sections 3.12, 3.13, 4.3, 4.5.1; ANSI/ASQ Z1.4-2003 sections 5, 7.2; Squeglia C=0 page 2.

6. Specific Considerations for Attribute Plans

6.1 Following Arrows to Select Appropriate Sampling Plan. Where the sampling plan indicated leads to an arrow in the table, follow the arrow to the next available sampling plan. This will

point to a new code letter row in the table with the acceptance and rejection numbers and a new corresponding sample size to be used.

As an example, consider sampling of a lot of 200 pieces under MIL-STD-105D for a Major A characteristic at inspection level II. Code letter G is selected from Table I, and an AQL of 1.0 is used. An arrow pointing downward is contained in Table II-A for these conditions, indicating that code letter G is not available and code letter H must be used. This means that the appropriate sample size is 50 pieces, not 32, and that the lot is accepted if there are 0 or 1 defective pieces, and rejected if there are 2 or more defectives.

6.2 Single, Double, or Multiple Sampling. Most attribute procedures include double or multiple sampling plans (the Squeglia C=0 procedure only has single plans). Any of these options included in the procedure may be selected. Note that each sample drawn must be representative of the entire lot. Double and multiple sampling tend to require fewer samples when lot quality is either much better or much worse than the AQL. Single sampling is simpler to administer and apply correctly than double or multiple sampling and is the overwhelmingly popular choice.

As an example, consider a lot of 200 pieces under MIL-STD-105D for a Minor characteristic at inspection level II. Code letter G is selected from Table I, and an AQL of 4.0 is used. For single sampling, Table II-A indicates that the sample size is 32. The lot is accepted if there are 3 or fewer defective pieces, and it is rejected if there are 4 or more defectives. For double sampling, Table III-A is used instead and an initial sample of 20 would be drawn. The lot is accepted if there are 0 or 1 defectives, and it is rejected if there are 4 or more defectives. If there are 2 or 3 defectives, then a second sample of 20 is drawn from the lot and inspected. If after both samples (totaling 40 pieces) are inspected there are a total of 4 or fewer defectives, then the lot is accepted; if 5 or more defectives, then the lot is rejected. Multiple sampling (Table IV-A) works in a similar fashion, except that there are up to seven rounds of sampling to reach a decision.

6.2.1 Cross-References. See MIL-STD-105D sections 7.4, 9.5, 10.1.1, 10.1.2, 10.1.3; MIL-STD-105E sections 4.5.3, 4.9.4, 4.10.1.1, 4.10.1.2, 4.10.1.3; ANSI/ASQ Z1.4-2003 sections 7.4, 9.5, 10.1.1, 10.1.2, 10.1.3.

7. Specific Considerations for Variable Plans

7.1 Variability Unknown vs. Variability Known. A variability unknown method should normally be used. The variability known method may only be used when the production process is under strict control and the process parameters influencing final respirator performance are well understood. Data must be provided with the application for approval, available during on-site audits, and continuously updated to support the standard deviation value (σ) used.

7.2 Single Specification Limit vs. Double Specification Limit. This is selected on the basis of whether there is only one limit value (such as penetration less than or equal to 5%) or two limit values (such as cartridge mass between 95 and 105 grams) for the characteristic.

7.3 Standard Deviation Method vs. Range Method. Either method may be selected. The standard deviation method generally requires fewer samples, but more complex computations.

7.4 Form 1 vs. Form 2. The two forms are equivalent and either one may be selected. Form 2 is recommended as it yields figures which must be calculated anyway to satisfy the switching rules.

7.5 Cross-References. See MIL-STD-414 Introduction, section A6.2; ANSI/ASQ Z1.9-2003 Introduction, section A6.2.

8. Scope

8.1 Limitation to Approved Quality Control Plans. Approval holders may perform additional testing and inspection not listed in their approved quality control plans. Sampling for these additional inspections is not required to meet the requirements set forth in 42 CFR 84 and this letter. However, there must be a reasonable basis for selecting the sampling plans used.

8.2 Limitation to Required Testing. In some cases, applicants may wish to list testing and inspection in their quality control plans above that required by NIOSH for effective quality control of respirator performance. Sampling done for these additional inspections is not required to meet the requirements in 42 CFR 84 and this letter. Additional testing should be identified clearly, such as with the notation “additional inspection,” on documents submitted with the application to avoid delay and requests for clarification during processing. Any such testing listed in the approved quality control plan must be conducted as required by 42 CFR 84.42(c).

9. Common Errors

9.1 Selection of Inadequate Inspection Levels. The minimum acceptable inspection level is described in section 3.2 of this letter. If a product quality control plan does not specify inspection levels, NIOSH assumes that the level in the “normal” column of the table will be used. Use of lower levels without specific approval, whatever the reason, is a failure to conform to NIOSH requirements and can result in revocation of approval under 42 CFR 84.43(c).

9.2 Selection of Plan Based on Desired Sample Size. It is entirely improper to choose a desired sample size and work backwards to identify a proposed AQL and inspection level which will yield this result. To do so reflects a fundamental misunderstanding of the basis for sampling plans. The appropriate AQL and inspection level are stated in sections 2.2 and 3.2 of this letter.

9.3 Selection of Defect Classification Based on Desired AQL. As in 9.2, the defect classification drives the selection of AQL, not the other way around. Each defect must be classified based solely on the definitions in 42 CFR 84.41(d).

9.4 Modification of AQL or Inspection Level Based on Lot Size or Other Factors. The AQL and inspection level are chosen by the criteria in sections 2.2 and 3.2 of this letter. Approval holders are free to use higher inspection levels if greater discrimination is desired, or to use lower (more stringent) AQLs if a smaller percent defective is desired. However, these should not be modified based on lot size or inspection history, as provisions already exist to account for those factors. Changing AQL values or inspection levels is likely to result in a statistically invalid plan.

9.5 Inappropriate Use of Reduced Inspection. As described in section 4.1 of this letter, reduced inspection is permitted only when all conditions of the relevant procedure are met. When there are significant delays or changes in production processes, approval holders must revert to normal inspection. It will be considered a nonconformance during NIOSH on-site audits if the records described in section 4.2 of this letter are not available.

9.6 Incorrect Sample Size When Following Arrows in Sampling Tables. When using attribute sampling, be careful when following arrows in the sampling plan tables. A different sample size must be used to correspond with the new code letter as described in section 6.1 of this letter.

9.7 Improper Drawing of Samples. Each sample drawn must be representative of the entire lot as described in section 5.2 of this letter. The typical method is to select samples at random. However, other methods (such as every tenth piece) may be used so long as the sample is not biased in any way as a result. If a lot contains multiple sublots, the sample must contain a proportional number of pieces from each subplot.

10. References

American National Standards Institute [2003a]. Sampling procedures and tables for inspection by attributes. Milwaukee, WI: American Society for Quality, American National Standard ANSI/ASQ Z1.4-2003.

American National Standards Institute [2003b]. Sampling procedures and tables for inspection by variables for percent nonconforming. Milwaukee, WI: American Society for Quality, American National Standard ANSI/ASQ Z1.9-2003.

Squeglia NL [2008]. Zero acceptance number sampling plans. 5th ed. Milwaukee, WI: American Society for Quality.

U.S. Department of Defense [1957]. Sampling procedures and tables for inspection by variables for percent defective. Washington, DC: Office of the Assistant Secretary of Defense (Supply and Logistics), Military Standard MIL-STD-414 (including Notice 1, 8 May 1968).

U.S. Department of Defense [1963]. Sampling procedures and tables for inspection by attributes. Washington, DC: U.S. Government Printing Office, Military Standard MIL-STD-105D (including Change Notice 2, 20 March 1964).

U.S. Department of Defense [1989]. Sampling procedures and tables for inspection by attributes. Washington, DC: Department of Defense, Military Standard MIL-STD-105E.

For further information regarding sampling, contact Vance Kochenderfer via electronic mail at vck6@cdc.gov or by telephone at 412-386-4029. General inquiries may be directed to the Technology Evaluation Branch at npptl@cdc.gov or 412-386-4000.

Sincerely yours,

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