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HOW AGILENT CROSSLAB COMPLIANCE SERVICES INTEGRATE WITH QUALITY SYSTEMS AND REGULATIONS

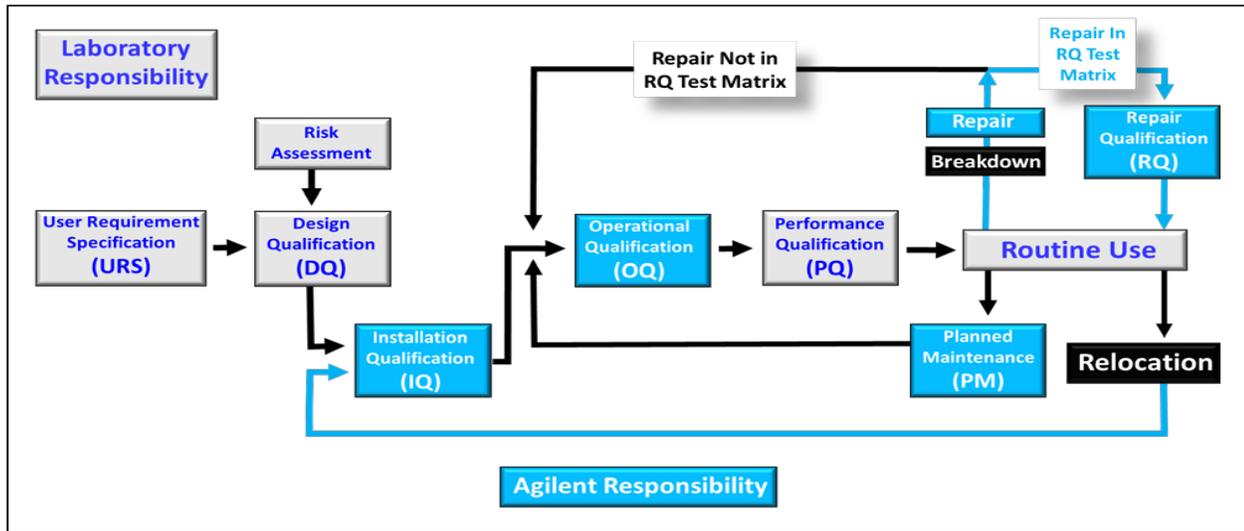
Agilent CrossLab Compliance Services



Agilent CrossLab Compliance Services

Agilent CrossLab Compliance Services are designed to seamlessly integrate with traditional quality systems used by firms and recognized by regulatory agencies worldwide. Analytical instruments must be suitable for their intended use. This requirement is good science in all laboratories and a regulatory requirement in pharma and biopharma laboratories. A life-cycle process for documenting and testing the suitability of laboratory instruments should be followed and Agilent recommends the life cycle framework defined in USP General Chapter <1058> on Analytical Instrument Qualification (AIQ). USP <1058> defines the governing framework and requirements that need to be satisfied, but the laboratory is responsible for how they satisfy these requirements.

- The United States Pharmacopoeia (USP) is the only major pharmacopoeia with a general chapter dedicated to analytical instrument qualification, making <1058> an important global regulatory reference. The information is provided in a scientific, risk-based approach to analytical instrument qualification (AIQ). However, the life-cycle framework contained within USP <1058> is not prescriptive in its implementation, making the embedded scientific and risk-based principles flexible and universally applicable.
- The scientific process followed by CrossLab uses the Agilent's Automated Compliance Engine (ACE) to deliver paperless electronic qualification. The life-cycle stages Agilent perform are highlighted in the life-cycle diagram below. As part of this life-cycle, Agilent can configure the qualification tests performed to align with user requirements.



USP <1058> AIQ Framework

NOTE: RQ services, described later in this document, can be added to standard qualification services.

ACE Workflow and Equipment Qualification Plans (EQPs)

Overview

Within the ACE workflow, the qualification tests, setpoints, and limits are defined in an EQP that can be configured to ensure that testing satisfies user requirements. When the qualification work is complete, an Equipment Qualification Report (EQR) is issued. The electronic workflow used within ACE has significant data integrity advantages over traditional paper or Excel-based qualification protocols, as validated calculations can be performed directly using electronic data such as chromatograms and metrology test values. Several of the instrument life-cycle stages are the responsibility of the laboratory, Agilent can provide compliance consultancy services and documentation which can help customers satisfy these requirements. These additional services are not included in our typical qualification offering.



High-level ACE Qualification Workflow

Standard and User-defined Limits

(Hardware qualifications only)

EQPs are available for download and approval as standard documents with Agilent recommended tests, setpoints, and limits, or they can be electronically configured by approved personnel to align with user requirements and intended range of use requirements. The degree of configuration depends on the analytical technology, but most EQPs can be configured to some degree, and one feature that can typically be changed is test limits.

EQPs are designed to be configurable (dependent on the analytical technology and standard requirements), but including additional tests or setpoints can impact the qualification time and associated cost. If a test limit is changed, ACE includes the capability to report results against the Agilent approved limit and any customer required limits (that is, both can be reported simultaneously).

If a user-defined test limit is more stringent than an Agilent recommended limit, Agilent makes no guarantee or obligation regarding the instrument passing the tighter test specification requirements. It is important to appreciate that tests performed under conditions of use (that is, to satisfy pharmaceutical monograph and application requirements) can have different limits than those defined in the OQ. It is the continuum of the combined OQ, PQ, and any point of use testing performed each time the instrument is used that together satisfy regulatory requirements.

User Requirements Specification (URS)

The purpose of user requirements is to document the intended use of the instrument within the life-cycle process and quality management system (QMS) being followed. Therefore, the URS is a customer / laboratory responsibility. Defining user requirements is often used to guide the customer in instrument selection and is stated as the first activity that should be followed in <1058>. The URS is important for two main reasons.

- It is a regulatory requirement for FDA and EU GMP that the intended use of the instrument and any software must be specified.
- Investment protection perspective means getting the right instrument for the right job.

Qualification protocols should test the instrument against any limits or specifications listed in the URS, which should document the intended range of use. Depending on the instrument complexity and how it is classified, a separate URS document may not be needed, but the URS requirements of the <1058> framework must be satisfied. A separate URS is almost always recommended for computerized systems.

An instrument performance specification is a product of the instrument development process by the supplier. It typically documents the performance the instrument can achieve. The URS should be based on intended use of the instrument and not the instrument specification. Additionally, if the intended use of a system changes, this may trigger a need to review the URS and associated qualification testing (for example, to ensure range of use is tested if used with a new analytical procedure).

Agilent offers compliance consultation services and documentation that can help customers address URS requirements.

Design Qualification (DQ)

The main function of the DQ stage of the laboratory instrument life-cycle process is to document why the selected instrument is suitable. Typically, this includes consideration of the instrument specification, how the instrument will be qualified, and the QMS followed by the instrument manufacturer. All together, these confirm that instrument performance is capable of satisfying user requirements. Depending on laboratory instrument life-cycle policy or SOPs being followed, instrument requirements and the relationship between the URS and DQ stages may vary – but as long as the <1058> framework principles are satisfied, this is not a problem, as it is left to each laboratory to justify and document its specific approaches.

The responsibility for satisfying DQ requirements primarily lies with the laboratory, with support from the supplier.

Agilent’s approach to satisfying DQ requirements of USP <1058> includes the following.

- All Agilent hardware and software laboratory products, including the ACE software used to deliver qualification services, are designed, manufactured, and tested according to Agilent internal quality life-cycle development procedures.
- Certificates of Agilent testing, validation, and conformance to standards are provided with new Agilent instruments and similar certification can be provided for ACE software.
- Agilent is capable of installation, support, preventive maintenance, on-going qualification, and re-qualification after repair and user training worldwide.

Agilent offers a compliance consultation service that can help customers with DQ documentation.

Installation Qualification (IQ)

The main functions of the IQ stage are to document that laboratory is suitable (for example, critical systems typically include a site inspection / checklist), that the instrument is installed correctly in the environment, and IQ checks such as module start up are completed. IQ is provided and automated by ACE, which collects, checks, and tests Agilent hardware and software products for the following.

1. Purchase Order Details: Allows the customer to verify that the instrument being qualified matches their design requirements (if available) and purchase order.
2. Preparation and Installation Details: Gathers and records information about preparation and installation documents.
3. Documentation: Gathers and records information about reference and user manuals for initial installations.
4. Product Quality Assurance Details: Collects and records certificates and other forms that verify that the vendor has developed and built the product according to internal standards.
5. Startup: Verifies that all modules/components start up properly.
6. Installation Verification (software only): Verifies the correctness of all installation-related files.

Operational Qualification (OQ)

The main function of the OQ stage is to evaluate and document instrument performance at the intended operational range of use. OQ protocols should include a mix of metrology, functional, and operational tests. ACE qualification protocols include information about the test description and rational, setpoints, and the limits (acceptance criteria) for each technique, category, and instrument configuration.

OQ is provided and automated by ACE. ACE checks and tests for Agilent hardware and software products include the following.

- Metrological tests such as flow, temperature, pressure, and so on that ensure that the system is performing within Agilent (or user) specifications.
- Qualification results are reported in the EQR, which can include details of all test certificates, standards, and training information for the engineer performing the work. (Note that the EQR can be configured to customer requirements.)
- System or "holistic" tests verify the combined functions of the various system components
- The qualification testing can be configured to ensure URS requirements, such as range of use are tested.

For software qualification, the OQ consists of automated diagnostics regression testing and verification of the software installation. This supports continued use of the software in regulated environments (at install and as part of supporting periodic review).

In line with regulatory requirements, the EQPs should be approved before work is performed and the EQR should be reviewed and approved when the work is complete (as illustrated in Figure 2). The EQR contains all the raw data, results, and relevant information and attachments for complete compliance and traceability.

Mechanical Qualification (MQ)

(Dissolution systems only)

The main function of the MQ stage is to document that the mechanical performance of the instrument meets specifications and is functioning properly.

Performance Qualification (PQ)

The main function of the PQ stage is to document that the instrument is fit for purpose under conditions of intended use and to create an approved framework that ensures the instrument continues to perform as required. Because instrument range of use is tested within the OQ stage, it is usually not necessary to test this during PQ. It should be noted that requirements for instrument maintenance and repair fall within the PQ life cycle stage within the USP <1058> framework, as they are components of ensuring the continued performance of the instrument.

The customer is responsible for satisfying PQ requirements. (NOTE: Agilent can provide a PQ for Dissolution systems only.)

It is important to note that PQ is a lifecycle activity and not a one-time event. PQ tests may include activities such as method validation or system suitability tests (SST), but in Agilent's opinion, SSTs contribute towards ensuring continued performance of the instrument (that is, PQ testing), but do may not fully satisfy <1058> PQ requirements.

Repair Qualification (RQ)

After an instrument is repaired, tests should be performed to evaluate the effectiveness of the repair and document that repaired instrument satisfies performance requirements. Agilent offers a service called Repair Qualification (RQ), which refers to the requalification of laboratory instrument hardware after a repair. For some laboratory systems, to document the performance after repair may require a full OQ. However, for some modular or component-based systems, such as HPLC and GC for example, partial qualification testing can be justified. This is accomplished by performing the qualification tests that are applicable to only the module or system component related to the repair, reducing the time the instrument is out of service. Re-qualifying the instrument after repair is a regulatory requirement defined in USP <1058>.

Agilent offers service contracts to repair and requalify an instrument during the period between scheduled annual OQs.

The level of retesting is prescribed in the RQ section of ACE: a form is displayed for the operator showing all types of repairs possible and the retesting required. Part of an example form for an LC system is shown below.

| Re-Qualification After Repair | | |
|--|------------|---|
| Pump Strategies | | |
| Repair/Replace Strategy | Modules | OO Testing |
| Internal pump head parts, active inlet valve (or AIV cartridge), (parts of) check valves, reference valves, inlet manifold or pump drive, or taking pump head apart to clean (versus repair) | Any pump | Flow Accuracy & Precision |
| Pulse damper, pressure transducer | Any pump | Flow Accuracy & Precision |
| Multi-channel gradient valve | Quaternary | Flow Accuracy & Precision Gradient Composition |

The full list of RQ repair and retest guidance is available for customer review.

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SESSION FOLDER / EQR AND SERVICE DELIVERY METHODS

CUSTOMER APPROVAL OF ALTERNATIVE SERVICE METHOD AND EQR STORAGE

Agilent CrossLab Compliance Services



Overview

Agilent recommends use of **Network ACE** for CrossLab qualification services that are enabled using the Agilent Automated Compliance Engine (ACE) software. Network ACE and Local ACE both access data directly (default methods) and are considered equivalent from a data integrity and data traceability perspective (see below). To provide additional flexibility in qualification service delivery, an alternative method is also available that accesses data indirectly. Use of the alternative method requires customer pre-approval using this form.

Session Folder / EQR

The ACE qualification session folder includes the Equipment Qualification Report (EQR) and all associated qualification data. At the end of qualification service, the Agilent Field Service Engineer (FSE) transfers these electronic files to the customer using the customer-preferred method.

Select the checkbox for the method used.

| Method | Definition | Selected Method |
|--|---|--------------------------|
| Network ACE (Agilent recommended) | No transfer required; session folder / EQR stored on the same network node as ACE software. | <input type="checkbox"/> |
| Customer Networked / Non-Networked Storage Location | FSE transfers the session folder / EQR to a location using a customer-supplied (1) open USB or LAN port or (2) link to customer SharePoint site (requires FSE wireless access at site). | <input type="checkbox"/> |
| CD / DVD / USB Drive | FSE transfers the session folder / EQR to media; for CDs and DVDs, FSE also signs the media. | <input type="checkbox"/> |

Service Delivery

Methods

| Method | Definition |
|--|--|
| Network ACE (Agilent recommended) | ACE software is installed on a network node within the laboratory LAN infrastructure. Raw data locations are always captured in the equipment qualification report (EQR), which provides end to end traceability and a fully characterized data workflow in the delivery. This method requires collaboration with the customer to load ACE behind the customer firewall. |
| Local ACE | ACE software resides on an independent external drive that can be driven from the system controller, where the customer data system (CDS) resides. Because the external drive is connected to the CDS, the data integrity of this method is equivalent to that of the Network ACE delivery method. Raw data is imported directly into ACE by the Data Manager tool, with the data paths always captured in the report, which provides data traceability assurance. |
| Alternative (Requires pre-approval) | This method requires customer pre-approval due to data integrity implications. <u>Only choose this option in scenarios like the following:</u> <ul style="list-style-type: none"> ACE software is not run from a PC directly connected to the customer CDS, such as the FSE's laptop. System data files are transferred indirectly from the CDS to the FSE laptop instead of directly as done with Network and Local ACE methods. Data is acquired using a CDS on the FSE's laptop and transferred directly to ACE. The CDS used in this method is qualified for data collection purposes. |

Agilent EQR Quality Assessment

Select the checkbox below to authorize Agilent to temporarily store copies of the EQRs generated by ACE for Agilent internal assessments. The intention of the assessment is to evaluate the delivery of the qualification service, with a focus to improve delivery and assess the appropriateness of data integrity measures. The storage is exclusively for the internal assessment by Agilent and is not shared with other organizations. It is not to be considered a backup for the EQR provided at qualification delivery.

Customer Approval of Alternative Method and Agilent EQR Quality Assessment

Authorize Agilent to use the alternative method (check for approval):

Authorize Agilent to temporarily store EQRs for their internal quality assessment (check for approval):

Approved By/Title:

Date Approved:

Comments:

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Introduction

With heightened scrutiny of data integrity, the Agilent Automated Compliance Engine (ACE) software must be able to access instrument-generated raw data files one of two ways: directly, using the connection between network nodes or with the server; and indirectly, through storage in a secure transfer location. (In this document, data integrity refers to the who, what, and where of data used in generating an ACE equipment qualification report, or EQR.)

ACE includes three main service delivery methods that address data integrity requirements; the rest of this document provides details to determine which one best fits a customer's needs.

Regardless of the delivery method, ACE features and delivery procedures are compatible.

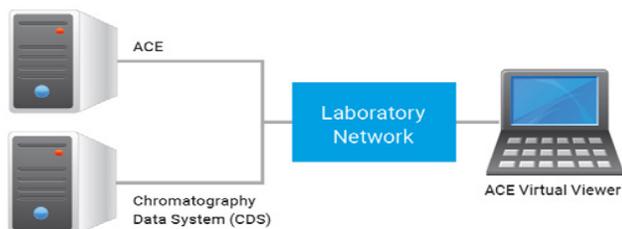
Network ACE (Agilent Recommended)

Overview



ACE software is installed on a network node within the laboratory LAN infrastructure, which requires collaboration with the customer to load ACE behind their firewall. Raw data locations are always captured in the EQR, which provides end-to-end traceability and a fully characterized data workflow in the delivery.

Details



Typical Network ACE installation diagram

Installing ACE in a separate node (a.k.a. the host PC) on the same network as the system controller offers data traceability that is equivalent to an installation on the system controller itself. The system controller (where the CDS resides) and the ACE host PC are identified and seen by the server and subject to the customer's data access controls and general IT policies. The CDS's audit trail records data movements between nodes or between the client and server, and ACE's data traceability features identify the original data directory and therefore ensures end-to-end data traceability

The ACE host PC has a separate/partitioned drive for ACE software. During ACE's installation, two services are setup on the operating system (OS): one for security and the other as a watchdog. Because the ACE host PC sits on the network as a shared drive, engineers access ACE through the networked drive: ACE is not installed on ACE Virtual Viewer PCs.

Requirements

Installation

- Install on a host PC with a separate drive (different from that of the OS)
- Attach to a network that clients can access
- 500 GB
- NTFS format
- User has local administration rights
- Customer installation instruction document is available

Operational

- User has an ACE node logon with a minimum of power user rights permissions; user also has a personal ACE account and password added through the ACE licensing tool
- Up to 5 users with 3 open sessions each can access the NDA simultaneously
- Exception to ports 11121-11141 on ACE node, clients, and switch's/Smart Hubs to be open on the network

Local ACE

Overview



ACE software resides on an independent drive that can be driven from the system controller, where the CDS resides. Because the drive is connected to the CDS, this method's data integrity is equivalent to preferred 1 method's. Raw data is imported directly into ACE by ACE's Data Manager tool, and data paths are captured in reports to provide data traceability.

ACE software resides on an independent drive that can be driven from the system controller, where the CDS resides. Because the drive is connected to the CDS, this method's data integrity is equivalent to the Network ACE method. Raw data is imported directly into ACE by ACE's Data Manager tool, and data paths are captured in reports to provide data traceability.

Details

ACE is designed to run from a dedicated drive, without leaving a footprint on the host PC. Therefore, it can be connected directly to the system controller (where the CDS resides) without altering the system's qualification status. For additional protection, the drive can be driven by another host PC on the same network; also, the drive can remain on site with the customer for use by the Agilent Field Service Engineer (FSE) during service deliveries only.

Alternative Method

This method requires customer pre-approval due to data integrity implications and only applies in scenarios like the following:

- ACE software is not run from a PC directly connected to the customer CDS, such as the FSE's laptop. System data files are transferred indirectly from the CDS to the FSE laptop instead of directly as done with Network and Local ACE methods.
- Data is acquired using a CDS on the FSE's laptop and transferred directly to ACE. The CDS used in this method is qualified for data collection purposes.

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Standard OQ Test Suite

This document describes the test program for qualifying GC systems, and the following table lists all OQ tests.

Notes

- Headspace tests apply only if a headspace sampler is an integral part of the system.
- LTM and LTM II tests apply only if those modules are installed.
- Injection Precision is included once, for the first configuration, when a liquid sampler is the only sampler. If the configuration includes a COC as an additional inlet, however, the Injection Precision test is included twice: once for the COC inlet and once for the other inlet.
- Injection Carry Over is included for headspace configurations but not for liquid sampler configurations (it can be ordered as EXTRA COST TEST).
- Inlet Pressure Decay is not included for GCs configured with mass spectrometer detectors. Pressure units of psi or kPa are used and dependent upon configuration.
- 88xx series ECDs are actually μ ECDs, so μ ECD limits from the table below apply to these models.

Non-supported Configurations

Configurations that include the following are not supported:

- Capillary Flow Technology (CFT) devices
- Thermal desorbers
- Purge and trap samplers
- SP-1 or SP-2 analyzers
- Hardware SP-1 systems (custom analyzers)
- Nickel catalysts (methanisers)
- Valves: including – but not limited to – the following:
 - Gas sampling valves (GSV) outside of the headspace sampler
 - Liquid sampling valves (LSV)
 - Stream selection valves (SSV)

Key: Fixed setpoints/limits Variances allowed

General Tests

| Test | Setpoints and Parameters | Limits |
|--|--|--|
| CDS Logon Verification | N/A | Evidence of logon used to collect qualification data (except when using customer CDS and no logon required) |
| System Inspection and Basic Safety and Operation | N/A | Gases, chassis electric grounding, interlocks, hydrogen shutdown, and so on all correct |
| GC Oven Temperature Accuracy and Stability (Agilent Intuvo 9000) | Column connector = 230.0°C Oven 1 = 230.0°C Oven 2 = 100.0°C Stability measured at oven 2 | Accuracy $\geq -5.0\%$ and $\leq 5.0\%$ of setpoint in K (oven) Accuracy $\geq -1.0\%$ and $\leq 2.0\%$ of setpoint in K (column connector) Stability $\leq 0.5^\circ\text{C}$ |
| GC Oven Temperature Accuracy and Stability | Temperature 1 = 230.0°C Temperature 2 = 100.0°C Stability measured at temperature 2 | Accuracy $\geq -1.0\%$ and $\leq 1.0\%$ of setpoint in K Stability $\leq 0.5^\circ\text{C}$ (Agilent) Stability $\leq 1.0^\circ\text{C}$ (Others) |
| Vial Heater Temperature Accuracy | Temperature: 60.0°C | Diff. from setpoint $\geq -2.0^\circ\text{C}$, $\leq 2.0^\circ\text{C}$ |

| Test | Setpoints and Parameters | Limits |
|--|--|--|
| Inlet Pressure Decay (non-MS) (EPC or manual control only) | Inlet pressure: 25.0 psi 172.4 kPa | Pressure change / 5 minutes: ≥ -2.0 psi and ≤ 0.5 psi ≥ -13.8 kPa and ≤ 3.4 kPa |
| Inlet Pressure Accuracy (EPC or manual control only) | Inlet pressure: 25.0 psi 172.4 kPa | Accuracy: ≤ 1.2 psi ≤ 8.3 kPa |
| Inlet Flow Stability (EFC control only) | Inlet flow: 4.0 mL/minute | Accuracy ≤ 10.0% Precision ≤ 5.0% |
| Scouting Run | Injection volume on column: varies by configuration | N/A |
| Injection Precision (Purged/Packed) | ALS with purged/packed injection port; without HSS Injection volume on column: 1.0 µL | Retention time RSD ≤ 1.00% Area RSD ≤ 3.00% (FID, TCD) Area RSD ≤ 5.00% (other detectors) |
| Injection Precision (non-Purged/Packed) | Injection volume (IV) on column: 1.0 µL (ALS) 0.2 µL (ALS, 7820) 1000 or 3000 µL (Agilent HSS) 250 µL (CTC HSS) 500 µL (CTC HSS, Intuvo 9000, FID) 0.5 µL (ALS, Invuvo 9000, SS/FID, TCD) Injection time: 0.02 minutes (pressure-balanced HSS only) | Retention time RSD ≤ 1.00% Area RSD ≤ 3.00% (ALS, Agilent HSS) Area RSD ≤ 4.00% (CTC HSS) Area RSD ≤ 8.00% (NCD, SCD; ALS only) |
| Injection Carry Over (HSS only) | Same as Injection Precision | Area carry over ≤ 1.00% |

Headspace Sampler Tests

| Test | Setpoints and Parameters | Limits |
|--|---|---|
| Headspace Leak (7697A, 7697A w/tray, 8697, 8697 XL) | N/A | Valve functions properly and HSS is leak tight |
| Headspace Vent and Pressurization Valve Integrity (G1888A and older) | N/A | Valve functions properly |
| Headspace Heated Zones Temperature Accuracy | Tline: 115.0°C Sample Loop: 110.0°C Syringe Heater: 110.0°C Oven: 100.0°C Agitator: 100.0°C (Applicable zones vary by model; * TurboMatrix 40, TurboMatrix 16, TurboMatrix 110, HS40XL, HS110, HS110XL models only) Tline is transferline. | Tline accuracy ≥ -1.8 and ≤ 5.2% of setpoint (7697A, 7697A w/tray, 8697, 8697 XL) Tline accuracy ≥ -4.3 and ≤ 4.3 % of setpoint (Others) Sample loop accuracy ≥ -4.0°C and ≤ 4.0°C (G1883, G1888A, 7697A, 7697A with tray, 8697, 8697 XL) Sample loop accuracy ≥ -5.0°C and ≤ 5.0°C (Others) Syringe heater accuracy ≥ -2.0°C and ≤ 2.0°C (CTC) Syringe heater accuracy ≥ -5.0°C and ≤ 5.0°C (Others) Oven accuracy ≥ -6.0°C and ≤ 6.0°C (7694, G1289B, G1290B) Oven accuracy ≥ -4.0°C and ≤ 4.0°C (G1883, G1888A) Oven accuracy ≥ -5.0°C and ≤ 5.0°C (PerkinElmer*) Oven accuracy ≥ -4.0°C and ≤ 4.0°C (PerkinElmer other models) Oven accuracy ≥ -4.0°C and ≤ 4.0°C (7697A, 7697A w/tray, 8697, 8697 XL) Oven accuracy ≥ -5.0°C and ≤ 5.0°C (Others) Agitator accuracy ≥ -2.0°C and ≤ 2.0°C (CTC) |

LTM Tests

| Test | Setpoints and Parameters | Limits |
|---------------------|--------------------------|---|
| LTM Basic Operation | Temperature: 60°C | Self test completes without errors Reference voltage (TP7) = 784 +/- 10 mV Transfer lines 1, 2 (TP3, TP5) = 794 +/- 50 mV Column temperature (TP1) = 784 +/- 10 mV |

| Test | Setpoints and Parameters | Limits |
|---|---|---|
| LTM Oven Temperature Accuracy and Stability | Temperature 1: 230.0°C Temperature 2: 100.0°C Stability measured at temperature 2 | Difference from setpoint ≤ 1.0% in K Stability ≤ 0.5°C |
| LTM Oven Temperature Ramp | Initial temperature: 50.0°C Ramp: 100.0°C/minute Final temperature: 280.0°C | Ramp accuracy ≤ 2.0°C/minute Ramp linearity ≥ 0.99900 Ramp precision ≤ 2.00% |
| LTM II Basic Operation | Set column set to 50.0°C to avoid damaging it without carrier | Self test completes without errors All LTM II heated zones heat up |
| LTM II Oven Temperature Accuracy | Temperature: 60.0°C | Transfer lines 1, 2 accuracy ≤ 4.0°C Column temperature ≤ 3.0°C |
| LTM II Oven Temperature Ramp | Initial temperature: 50.0°C Ramp: 100.0°C/minute Final temperature: 280.0°C | Automated test verifies that the ramp test is completed without any not ready statuses. |

FID Tests

| Test | Setpoints and Parameters | Limits |
|--|---|--|
| Detector Flow Accuracy | Flow rate, mL/minute: 30.0/25.0 (Agilent/others, fuel) 400.0 (All, oxidizer) 25.0 (All, make-up) | Accuracy ≤ 10.0% of setpoint (or 0.5 mL/minute, whichever is larger) |
| Noise and Drift | Detector signal | Noise ≤ 0.10 pA Drift ≤ 2.50 pA/hour |
| Signal to Noise (SS/MMI/ALS) | Signal height divided by ASTM baseline noise for known concentration and conditions. | S/N ≥ 300,000 (N ₂ makeup gas) S/N ≥ 240,000 (He makeup gas) |
| Signal to Noise (SS/MMI/HSS) | | S/N ≥ 5,000 (1000 µL loop) / 7,500 (3000 µL loop) (N ₂ makeup gas) S/N ≥ 4,000 (1000 µL loop) / 6,000 (3000 µL loop) (He makeup gas) S/N ≥ 2,250 (Intuvo 9000, 7820 with 3000 µL sample loop HSS, N ₂ makeup gas) S/N ≥ 1,800 (Intuvo 9000, 7820 with 3000 µL sample loop HSS, He makeup gas) S/N ≥ 1,500 (Intuvo 9000, 7820 with CTC HSS, N ₂ makeup gas) S/N ≥ 1,200 (Intuvo 9000, 7820 with CTC HSS, He makeup gas) |
| Signal to Noise (VI/HSS) | | S/N ≥ 4,000 (N ₂ makeup gas) S/N ≥ 3,200 (He makeup gas) |
| Signal to Noise (Non-SS/using 18710-60170) | | S/N ≥ 800 (N ₂ makeup gas) S/N ≥ 600 (He makeup gas) |
| Signal to Noise (Non-SS/using 5188-5372) | | S/N ≥ 200 (N ₂ makeup gas) S/N ≥ 160 (He makeup gas) |

TCD Tests

| Test | Setpoints and Parameters | Limits |
|------------------------------|--|--|
| Detector Flow Accuracy | Flow rate, mL/minute: 20.0 (All, reference) 2.0 (All, make-up) | Accuracy ≤ 10.0% of setpoint (or 0.5 mL/minute, whichever is larger) |
| Noise and Drift | Detector signal | Noise ≤ 0.15 DU (He or H ₂ carrier and makeup [or no makeup]) Noise ≤ 0.25 DU (N ₂ carrier and makeup [or no makeup]) Drift ≤ 2.20 DU/hour |
| Signal to Noise (SS/MMI) | Signal height divided by ASTM baseline noise for known concentration and conditions. | S/N ≥ 750 (N ₂ makeup gas) S/N ≥ 5,000 (He or H ₂ makeup gas) |
| Signal to Noise (Non-SS/MMI) | | S/N ≥ 4 (N ₂ makeup gas) S/N ≥ 100 (He or H ₂ makeup gas) |

NPD Tests

| Test | Setpoints and Parameters | Limits |
|-----------------|--|---|
| Noise and Drift | Detector signal | Noise ≤ 0.15 pA Drift ≤ 3.50 pA/hour |
| Signal to Noise | Signal height divided by ASTM baseline noise for known concentration and conditions. | S/N ≥ 300 |

ECD Tests

| Test | Setpoints and Parameters | Limits |
|------------------------|---|---|
| Detector Flow Accuracy | Flow rate, mL/minute: 6.0 (All, anode purge) 60.0 (Agilent only, make-up) | Accuracy ≤ 10.0% of setpoint (or 0.5 mL/minute, whichever is larger) |
| Noise and Drift | Detector signal | Noise ≤ 0.15 DU Drift ≤ 1.00 DU/hour |

μECD Tests

(Includes 88xx series ECDs as described in note on page 1.)

| Test | Setpoints and Parameters | Limits |
|------------------------|--|---|
| Detector Flow Accuracy | Flow rate, mL/minute: 25.0 (Agilent only, make-up) | Accuracy ≤ 10.0% of setpoint (or 0.5 mL/minute, whichever is larger) |
| Noise and Drift | Detector signal | Noise ≤ 3.00 DU Drift ≤ 15.00 DU/hour |
| Signal to Noise | Signal height divided by ASTM baseline noise for known concentration and conditions. | S/N ≥ 1,500 |

FPD New Style Tests

| Test | Setpoints and Parameters | Limits |
|------------------------|--|---|
| Detector Flow Accuracy | <u>P-mode</u> flow rate, mL/minute: 75.0 (All, fuel) 50.0 (All, make-up) 100.0 (All, oxidizer) <u>S-mode</u> flow rate, mL/minute: 50.0 (Agilent/others, fuel) 50.0 (Agilent/others, make-up) 60.0 (Agilent/others, oxidizer) | Accuracy ≤ 10.0% of setpoint (or 0.5 mL/minute, whichever is larger) |
| Noise and Drift | Detector signal, sulfur or phosphorous | Noise ≤ 5.00 DU Drift ≤ 5.00 DU/hour |
| Signal to Noise | Signal height divided by ASTM baseline noise for known concentration and conditions. | S/N ≥ 700 (sulfur) S/N ≥ 1,000 (phosphorous) |

FPD+ Tests

| Test | Setpoints and Parameters | Limits |
|------------------------|---|---|
| Detector Flow Accuracy | Flow rate, mL/minute: 60.0 (Agilent only, fuel) 60.0 (Agilent only, make-up) 60.0 (Agilent only, oxidizer) | Accuracy ≤ 10.0% of setpoint (or 0.5 mL/minute, whichever is larger) |
| Noise and Drift | Detector signal, sulfur | Noise ≤ 4.00 DU Drift ≤ 3.00 DU/hour |
| Noise and Drift | Detector signal, phosphorous | Noise ≤ 2.00 DU Drift ≤ 1.50 DU/hour |
| Signal to Noise | Signal height divided by ASTM baseline noise for known concentration and conditions. | S/N ≥ 1,400 (sulfur) S/N ≥ 2,400 (phosphorous) |

NCD Tests

| Test | Setpoints and Parameters | Limits |
|-----------------|--|--|
| Noise and Drift | Detector signal | Noise ≤ 5.00 pA Drift ≤ 50.00 pA/hour |
| Signal to Noise | Signal height divided by ASTM baseline noise for known concentration and conditions. | S/N ≥ 600 |

SCD Tests

| Test | Setpoints and Parameters | Limits |
|-----------------|--|---|
| Noise and Drift | Detector signal | Noise ≤ 15.00 pA Drift ≤ 50.00 pA/hour |
| Signal to Noise | Signal height divided by ASTM baseline noise for known concentration and conditions. | S/N ≥ 180 (SCD) S/N ≥ 18 (SCD on FID base) |

VUV Tests

| Test | Setpoints and Parameters | Limits | | |
|------------------------|--|--|--|--|
| Detector Flow Accuracy | Flow rate, mL/minute: 100.0 (VUV Analytics, system purge) 3.5 (VUV Analytics, make-up) | Accuracy ≤ 10.0% of setpoint (or 0.5 mL/minute, whichever is larger) | | |
| Noise and Drift | Detector signal, Band 2 | Noise ≤ 0.006 AU Drift ≤ 0.010 AU/hour | | |
| Signal to Noise | Signal height divided by ASTM baseline noise for known concentration and conditions. | S/N ≥ 780 (He carrier gas, He, H ₂ or N ₂ make-up gas) S/N ≥ 980 (H ₂ carrier gas, He, H ₂ or N ₂ make-up gas) S/N ≥ 650 (N ₂ carrier gas, He, H ₂ or N ₂ make-up gas) | | |
| Band Distribution | Normalized biphenyl peak area for known concentration and conditions. | Band | Minimum Normalized Biphenyl Absorbance | Maximum Normalized Biphenyl Absorbance |
| | | 1 | 7.9 | 10.6 |
| | | 2 | 7.2 | 8.7 |
| | | 3 | 5.5 | 7.3 |
| | | 4 | 9.2 | 12.0 |
| | | 5 | 10.3 | 14.0 |
| | | 6 | 11.2 | 14.8 |
| | | 7 | 16.1 | 21.2 |
| | | 8 | 8.1 | 16.4 |
| | | 9 | 4.6 | 5.9 |
| | | 10 | 2.5 | 4.5 |
| | | 11 | 0.0 | 0.8 |
| 12 | 0.0 | 0.1 | | |

Test Design and Rationale

Overview

Many GMP/GLP enforcement agency inspectors now ask firms to provide a risk assessment of their equipment and computer systems plus a science-based rationale for subsequent validation and qualification testing.

GENERAL RISK STATEMENT: Any laboratory chemical system used for raw material testing or final drug product / medical device testing in GMP or used in formal GLP studies will likely fall into a HIGH RISK category. This risk assessment will imply the need for IQ & OQ & on-going qualification. ANY USER SPECIFIC RISK ANALYSIS SUPERCEDES THIS GENERAL RISK STATEMENT.

The rest of this section outlines the science-based rationale for each test in the Agilent hardware OQ plus a brief test design and procedure description.

The recommended set of hardware OQ tests described in this EQP derives from Agilent’s interpretation of FDA, USP, and GAMP guidelines and other authoritative expert literature.

OQ test design incorporates both modular and holistic testing, which is a proven and regulatory acceptable approach. When applicable, direct metrology is used to test pump flow rates and thermal-controlled column compartments, for example. Holistic chemical testing is used to evaluate critical instrument characteristics

When applicable, certified reference standards and calibrated equipment are used.

Considering the number of setpoints, parameters, and conditions of each recommended OQ test, the proven concepts of worst case, range, and representative have been applied. If a property or characteristic is known to have its worst performance at one end of a range of use, this is the setpoint that should be tested and other setpoints are not required. If a property or characteristic has no known worst case, testing at the high and low points of the range of use is required. If there are too many possible use cases and conditions to realistically test (and none is a worst case), a representative sample for test is the best approach.

CDS Logon Verification

Description: To satisfy the attributable requirement of ALCOA+, evidence of the logon used to collect data must be provided unless a customer CDS is used and no logon is required.

Procedure: The test uses a screen capture to document who is logged on to the software that controls the instrument being qualified. The capture is automatically included with this test in the EQR.

System Inspection and Basic Safety and Operation

Description: System must be in safe and operational condition before starting the OQ tests.

Procedure: The instrument is given a general inspection and its basic safety features are challenged to ensure proper operation.

GC Oven Temperature Accuracy and Stability

Description: Oven temperature accuracy is important for comparability between systems and transferring methods. Oven temperature stability is critical for qualitative and quantitative analysis.

Procedure: At two different temperatures, accuracy is measured using an external calibrated thermometer and expressed as the difference between found and setpoint values. At one of these, a statistically significant number of additional readings are taken during the total duration of the test and stability is expressed as the delta between the highest and lowest temperatures.

LTM Tests

Description: The RTD is a column packed in a heating foil. Although columns are generally considered to be consumables and not part of a hardware qualification, in this case the "oven" includes the column so tests are required to evaluate its functionality.

A direct temperature measurement (vs. indirect) is preferred but not feasible in this case given the LTM design: adding a temperature sensor to the metal foil introduces a cold spot and adversely affects temperature, and inserting a probe into the RTD requires taking the column apart.

One indirect temperature measurement is a direct measurement of the return voltage from the RTD, which can be converted to temperature using a known equation.

Another indirect temperature measurement would be chemical tests. If the system is not able to heat up in a reproducible way, you might see a shift in retention times. Because this kind of measurement is used by Agilent (and many other vendors) to evaluate system performance, it would be difficult for LTM to rework the complete chemical test suite: especially detector-specific tests like Signal to Noise and Signal Noise and Drift. The RTD can be any column and noise, in particular, is influenced by the column type.

Based on the above, the following qualification is executed when an LTM is installed:

1. A complete GC qualification without Injection Precision (IP) is run with standard oven procedures. An LTM Basic Operation test is scheduled to show the LTM is functional.
2. An LTM Oven Temperature Accuracy and Stability test is executed. This test is similar to the standard GC Oven Temperature Accuracy and Stability.
3. An LTM Oven Temperature Ramp test is executed, similar to the standard GC Oven Temperature Ramp test, but it uses a much higher ramp.
4. The IP test is run using the LTM module. Inlet, detector, and RTD modules are tested separately in steps 1-3, but this test verifies that all components work together. LTM runs in general are very short due to the high oven ramp and very fast cool down rate.

Procedure for LTM Basic Operation: After completing the self-test, four different temperatures (voltages) are measured: reference voltage (setpoint), return voltage (column temperature), and both transfer lines. This assures that all zones are functional, correctly installed, and connected.

Procedure for LTM Oven Temperature Accuracy and Stability: This test uses a calibrated voltmeter to determine temperature accuracy and stability of the LTM oven. (Voltages are measured and then converted to temperatures using a known relation. The converted temperatures are used in all calculations and limit comparisons.)

Procedure for LTM Oven Temperature Ramp: This test uses a calibrated digital thermometer to determine the accuracy, linearity, and precision of the LTM oven temperature program. Linearity is defined as the correlation coefficient (r) and uses data points that are part of the ramp. Ramp accuracy is defined as the absolute difference between the slope of the linear curve fit through the same data points used for linearity calculations (calculated ramp) and its setpoint. Precision is calculated as the RSD value over the three calculated ramps.

LTM II Tests

Description: Same as LTM tests.

Procedure for LTM II Basic Operation: After completing the self test, all heated zones of the LTM II column are measured to verify that they heat up. This assures that all zones are functional, correctly installed, and connected.

Procedure for LTM II Oven Temperature Accuracy: This test uses a controlled environment to heat the LTM II column without applying power (heat) to the LTM II module. When temperature is stabilized, the LTM II temperature sensors reported values are recorded and compared against the temperature setpoint of the controlled environment.

Procedure for LTM II Oven Temperature Ramp: This test uses a built-in test to evaluate the LTM oven temperature program.

Headspace Leak

Description: Proper operation of the valves is critical for repeatable peak areas and carry over.

Procedure: This test verifies that the valves operate properly with no excessive leaks or restricted internal flow paths.

Headspace Vent and Pressurization Valve Integrity

Description: Proper operation of the valves is critical for repeatable peak areas and carry over.

Procedure: This test verifies that the valves operate properly: with no excessive leaks or restricted internal flow paths.

Headspace Heated Zones Temperature Accuracy

Description: Temperature accuracy of the heated zones is important for comparing systems and transferring methods. Oven accuracy is critical to quantitative headspace methods.

Procedure: The temperature is measured using an external calibrated thermometer with appropriate probe design. Accuracy is determined as the difference between found and setpoint values.

Vial Heater Temperature Accuracy

Description: The 7693A vial heater option can be used during sample preparation. This test verifies that it heats accurately.

Procedure: The heater temperature is measured with an external thermometer and accuracy is calculated as the difference between the measured value and setpoint.

Inlet Pressure Decay

Description: Inlet pressure integrity is critical for repeatable injection and retention times. The pressure decay and pressure accuracy tests combine to demonstrate pressure integrity. **NOTE:** If there is too much air in the system, the MS system's Tune test indicates a leaking detector, so pressure decay is not necessary for MS-only systems.

Procedure: Inlet is capped, a pressure applied, and inlet flow turned off. The pressure decay is recorded over a specified time range.

Inlet Pressure Accuracy

Description: Inlet pressure integrity is critical for repeatable injection and retention times. The pressure decay and pressure accuracy tests combine to demonstrate pressure integrity. This test checks for accurate pressure to the head of the column. Column flow is achieved by maintaining a constant pressure against a known restriction. Because the restriction is a function of the column geometry, measuring pressure in the inlet is the most accurate way to determine flow.

Procedure: The inlet is capped, a pressure is applied, and the inlet pressure is recorded using an external calibrated manometer connected to the inlet.

Inlet Flow Stability

Description: Inlet flow stability is critical for repeatable injection and retention times. Inlet flow accuracy and precision tests combine to demonstrate inlet flow stability.

Procedure: Column flow setpoint is achieved, all detector flows are turned off, and calculations are made: flow accuracy as the absolute % difference of the mean of the ten flow readings and the setpoint; flow precision as the % RSD of ten flow readings.

Detector Flow Accuracy

Description: Detector flow accuracy is critical for a stable detector signal. Incorrect flows may have an impact on detector performance.

Procedure: Flow accuracy is determined by measuring the flows with a calibrated mass flowmeter and then comparing the results to the test setpoints and the values displayed by the GC.

Noise and Drift

Description: This test gives an indication of detector sensitivity and stability.

Procedure: The signal is monitored at specified conditions appropriate to the type of detector over a twenty-minute period. The signal noise is calculated based on ASTM E594-96 as the average peak-to-peak noise in a number of signal segments.

The drift is calculated as the slope of the linear regression for the signal. Detector type and the gases used all contribute to different performance and therefore different limits for each configuration.

Scouting Run

Description: This test is used to determine the chromatogram for presence of expected peaks, sufficient run time, and proper integration events prior to the start of the actual qualification runs.

Signal to Noise

Description: Sensitivity of GC detection is a critical performance feature in quantitative and qualitative analysis. A signal-to-noise value of a representative compound at known concentration provides sensitivity statistics.

Procedure: A traceable standard is injected and signal to noise is calculated.

Injection Precision

Description: System precision is critical for quantitative analysis.

Procedure: An initial stabilizing injection is made, followed by six repeat injections of a traceable standard followed by a final blank injection. The % RSD of the six injections is calculated to provide precision statistics. There are separate dedicated instrument parameters and reference standards applicable to each inlet/detector combination. This test is performed with liquid and headspace sampler configurations.

Injection Carry Over

Description: Low carry over from a previous injection is critical for accuracy of quantitative and reliability of qualitative analysis. For headspace samplers, the engineering condition contributes to carry over performance, so this is a core OQ test for these samplers.

For liquid samplers, carry over performance is contingent on many variable factors independent of the engineering condition of the GC system. Many different syringe wash programs are available that can eliminate carry over. These are user selectable and may be application specific. The condition of the injection syringe is the only controllable engineering factor. The injection syringe is typically replaced for new during PM before OQ. Therefore, the carry over test for liquid samplers is offered only as an optional extra fee test in a customer-configured EQP.

Procedure: The blank injection after the six repeat injections of the precision test is evaluated for carry over, and the result is expressed as a percentage.

Band Distribution

Description: Accurate band distribution and spectral consistency, across all bands for a representative compound, is critical for ensuring specificity of the VUV detector.

Procedure: A traceable standard is injected and the peak area of the analyte of interest is normalized for each band and evaluated against the performance criteria.

www.agilent.com/chem/qualification

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