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HOW AGILENT CROSSLAB COMPLIANCE SERVICES INTEGRATE WITH QUALITY SYSTEMS AND REGULATIONS

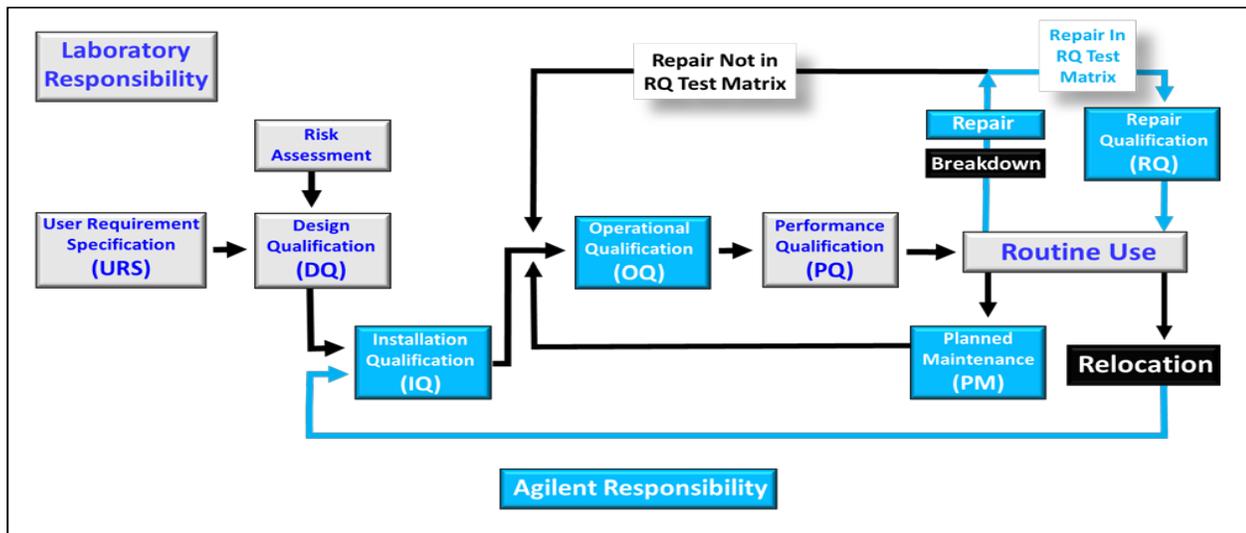
Agilent CrossLab Compliance Services



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 Pharmacopeia (USP) is the only major pharmacopeia 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.

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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Customer Approval of Alternative Method and EQR Storage

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

Authorize Agilent to store EQRs for their internal 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.

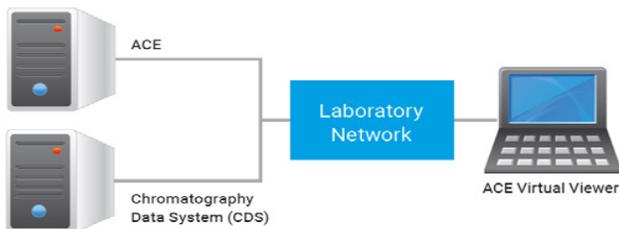
Network ACE (Agilent Recommended)

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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Model / Sample / Version	Setpoints and Parameters	Limits
Signal to Noise Ratio		
630 with KBR optics	Range: 1142 - 1042 cm ⁻¹	Ratio > 20,000:1 (Transmission) Ratio > 9,600:1 (DialPath, TumbIIR) Ratio > 8,500:1 (1B Diamond ATR, 1B ZnSe ATR) Ratio > 2,620:1 (1B Germanium ATR)
630 with ZnSe optics		Ratio > 25,000:1 (Transmission) Ratio > 12,000:1 (DialPath, TumbIIR, 1B Diamond ATR, 1B ZnSe ATR) Ratio > 3,275:1 (1B Germanium ATR)
4500, 5500		Ratio > 12,000:1 (DialPath, TumbIIR) Ratio > 9,600:1 (1B Diamond ATR, 3B Diamond ATR)
4300		Ratio > 18,000:1 Retro Reflector
Stability		
630, 4500, 5500, 4300	Tested: 1000 cm ⁻¹ region of the infrared spectrum	Stability < 1%
WN Accuracy and Repeatability		
630, 4500, 5500 / T / 5.5+	WN 1: 906.6 cm ⁻¹ WN 2: 1028.3 cm ⁻¹	Accuracy: ≤ 1.0 cm ⁻¹ (WN 1-7) Repeatability: ≤ 0.05 cm ⁻¹
4300 / RR / 5.6+	WN 3: 1154.5 cm ⁻¹ WN 4: 1583.0 cm ⁻¹ WN 5: 1601.2 cm ⁻¹ WN 6: 2849.5 cm ⁻¹ WN 7: 3060.0 cm ⁻¹	
630 / T / 5.2-4	WN 1: 1028.50 cm ⁻¹ WN 2: 1583.35 cm ⁻¹ WN 3: 1601.35 cm ⁻¹	Accuracy ≤ 0.3 cm ⁻¹ (WN 1, 3, 4) Accuracy ≤ 0.1 cm ⁻¹ (WN 2) Repeatability: ≤ 0.05 cm ⁻¹ (WN 1-4)
4500, 5500 / T / 5.2 – 5.4	WN 4: 3082.10 cm ⁻¹	Accuracy ≤ 1 cm ⁻¹ (WN 1-4)
630 / 1BATR / 5.5+	WN 1: 906.1 cm ⁻¹ WN 2: 1027.7 cm ⁻¹ WN 3: 1601.0 cm ⁻¹ WN 4: 3059.7 cm ⁻¹	Accuracy: ≤ 1.0 cm ⁻¹ (WN 1-4) Repeatability: ≤ 0.2 cm ⁻¹
630 / 1BATR / 5.2-4	WN 1: 904.9 cm ⁻¹ WN 2: 1026.4 cm ⁻¹ WN 3: 1599.4 cm ⁻¹	Accuracy: ≤ 1 cm ⁻¹ (WN 1-3) Repeatability: ≤ 0.2 cm ⁻¹ (WN 1-3)
4500, 5500 / 1BATR, 3BATR / 5.5+	WN 1: 906.1 cm ⁻¹ WN 2: 1027.7 cm ⁻¹ WN 3: 1601.0 cm ⁻¹ WN 4: 3059.7 cm ⁻¹	Accuracy: ≤ 2.0 cm ⁻¹ (WN 1-4) Repeatability: ≤ 0.2 cm ⁻¹
4500, 5500 / 1BATR, 3BATR / 5.2-4	WN 1: 904.9 cm ⁻¹ WN 2: 1026.4 cm ⁻¹ WN 3: 1599.4 cm ⁻¹	Accuracy: ≤ 2 cm ⁻¹ (WN 1-3)
WN Accuracy - Pharma		
630, 4500, 5500 / T / 5.2-4	WN 1: 906.6 cm ⁻¹ WN 2: 1028.3 cm ⁻¹ WN 3: 1154.5 cm ⁻¹ WN 4: 1583.0 cm ⁻¹ WN 5: 1601.2 cm ⁻¹ WN 6: 2849.5 cm ⁻¹ WN 7: 3060.0 cm ⁻¹	Accuracy: ≤ 1.0 cm ⁻¹ (WN 1-7)
Spectral Resolution		
630, 4500, 5500 / T / all versions	WN 1: 2870 cm ⁻¹ WN 2: 2849.5 cm ⁻¹	Test 1: Difference between absorption minimum at 2870.0 cm ⁻¹ and absorption maximum at 2849.5 cm ⁻¹ Difference: > 0.33 Abs

Model / Sample / Version	Setpoints and Parameters	Limits
	WN 3: 1589 cm ⁻¹ WN 4: 1583 cm ⁻¹	Test 2: Difference between absorption minimum at 1589.0 cm ⁻¹ and absorption maximum at 1583.0 cm ⁻¹ Difference: > 0.08 Abs
4300 / RR / all versions	WN 1: 2870 cm ⁻¹ WN 2: 2849.5 cm ⁻¹ WN 3: 1589 cm ⁻¹ WN 4: 1583 cm ⁻¹	Test 1: Difference between absorption minimum at 2870.0 cm ⁻¹ and absorption maximum at 2849.5 cm ⁻¹ Difference: > 0.33 Abs Test 2: Difference between absorption minimum at 1589.0 cm ⁻¹ and absorption maximum at 1583.0 cm ⁻¹ Difference: > 0.04 Abs
630, 4500, 5500 / 1BATR, 3BATR / all versions	WN 1: 2870 cm ⁻¹ WN 2: 2848 cm ⁻¹ WN 3: 1598 cm ⁻¹ WN 4: 1589 cm ⁻¹	Ratio 1: Ratio between absorption maximum at 2848.0 cm ⁻¹ and absorption at 2870.0 cm ⁻¹ Ratio: ≥ 1.15 Ratio 2: Ratio between absorption maximum at 1598.0 cm ⁻¹ and absorption at 1589.0 cm ⁻¹ Ratio: ≥ 1.30

LDIR Tests

Model	Setpoints and Parameters	Limits
Instrument Tests		
8700	Refer to report	Refer to report

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, Ph. Eur., 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.

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.

Diagnostic Verification

Description (FTIR): This test verifies that the accessory is recognized; checks the instrument’s energy levels and temperatures; makes adjustments if the energy level is too high or low; (LDIR) This test verifies that the instrument’s diagnostic indicators are within factory specifications.

Procedure: Run the automated test; a pass/fail status is determined automatically and included in the report.

Signal to Noise Ratio

Description: This test measures the signal to noise ratio from 1142 – 1042 cm⁻¹. The ratio is defined as the reciprocal of the RMS noise in the defined region for a blank sample measured with a blank background.

Procedure: Run the automated test; a pass/fail status is determined automatically and included in the report.

Stability

Description: This test measures the short-term stability of the 1000 cm⁻¹ region of the infrared spectrum. Stability is calculated as the baseline differences observed over the selected time period.

Procedure: Run the automated test; a pass/fail status is determined automatically and included in the report.

Wavenumber Accuracy and Repeatability

Description: This test measures the accuracy and precision of the wavenumber scale. For accuracy, wavenumbers from a spectrum of a polystyrene film are determined and compared to wavenumbers set by an NIST SRM 1921b traceable polystyrene film. Repeatability is calculated as the standard deviation of the test.

Procedure: Run the automated test; a pass/fail status is determined automatically and included in the report.

Wavenumber Accuracy – Pharma

Description: This test measures the accuracy of the wavenumber scale in accordance with the specified setpoints and limits in pharmacopeia. For accuracy, wavenumbers from a spectrum of a polystyrene film are determined and compared to wavenumbers set by pharmacopeia using an NIST SRM 1921b traceable polystyrene film.

Procedure: Using the controlling software, run the dedicated method (delivered via the ACE software) and follow the software prompts to completion; a pass/fail status is determined automatically and included in the report.

Spectral Resolution

Description: This test uses the absorption values between specified maximum and minimum peaks, and then calculates either the difference for transmission type sample interfaces (as stated in the European Pharmacopeia) or the ratio for ATR type sample interfaces to determine spectral resolution of the instrument. The test uses the spectrum obtained using an NIST SRM 1921b traceable polystyrene film.

Procedure: Depending on the revision of the controlling software, either run the dedicated method (delivered via the ACE software) or run the automated test and follow the software prompts to completion; a pass/fail status is determined automatically and included in the report.

Instrument Tests

Description: This test consists of several separate individual tests that verify the respective function of the instrument. Together the completed tests determine that the instrument is functioning correctly.

Procedure: Run the automated test; a pass/fail status is determined automatically and recorded in ACE.

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