How to sub-register a product

Thank you for considering sub-registering your product with Pilot Chemical Company. Founded in 1952 in Los Angeles, California, Pilot Chemical is a privately held surfactant and quaternary manufacturing company now headquartered in Cincinnati, Ohio. Pilot Chemical is dedicated to providing innovative and effective chemical solutions that started with our revolutionary ice-cold sulfonation process invented by our founder, John Morrisroe. Pilot Chemical is the world’s largest producer of Alkyl Diphenyloxide Disulfonates and Alkyl Diphenyloxide Disulfonic Acids as well as the 2nd largest supplier of anionic surfactants in North America.

To help you with your sub-registration process, here is an overview of the steps that will be taken.

First, to help you choose a product and formulation that best fits your needs, you will need to contact your Regional Sales Manager (RSM). Please visit our Pilot Contacts page and perform a Region Search to find the RSM for your area.

Your RSM will then forward your request to our Sub-Registration Team. There, your product will be assigned to a Sub-Registration Specialist (SRS) who will work with you directly to complete the sub-registration process. The SRS will provide you a detailed document of the steps involved in this process, as well as helpful tips and pointers which you can use to develop your container label(s).

Information your SRS will need from you:

- EPA establishment number for formulating company
- EPA company number for distributing company
- Name and title of individual signing on behalf of formulating company
- Name and title of individual signing on behalf of distributing company
- Your product brand name
- Container sizes

If you do not have a company number, please use the <letter template>link> to apply for one. This can take anywhere from 1 – 2 months to receive.

To turn your EPA company number into an establishment number, complete EPA Form 3540-8 and submit to the appropriate Regional Office. This can take anywhere from 1 – 3 months depending on region.

What you’ll need to prepare for your SRS:

- Draft label using Mason Master Label
  - Your draft label will be reviewed by your SRS and will be sent back with mandatory and suggested changes based on EPA regulations and our experience with state agencies.

Some things to consider:

- Time to completion is dependent on:
  - Application time for EPA company and establishment numbers.
  - The amount of revisions needed to bring container label up to Regulatory Standards.
  - Timely response to SRS requests.