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154718.010200

Via Edgar

Securities and Exchange Commission
Division of Corporation Finance
100 F Street, N.E.
Washington, DC 20549
Attn: Jay Ingram, Legal Branch Chief

Re: Aqua Metals, Inc.
Amendment No. 4 to Registration Statement on Form S-1
SEC File No. 333-204826

Dear Mr. Ingram:

On behalf of our client, Aqua Metals, Inc., a Delaware corporation (the “*Company*”), we are submitting this letter concurrently with the Company’s filing of an Amendment No. 4 (“*Amendment*”) to the above-referenced Registration Statement on Form S-1 (“*Registration Statement*”).

The Amendment is being filed for purposes of registering a ten percent (10%) increase in the shares of common stock to be offered by the Company, prior to any exercise of the underwriters’ over-allotment option. In addition, the Amendment reflects a decrease in the underwriters’ discount from 8% to 7.65%. There have been no substantive changes made to the disclosure in the prospectus made part of the Amendment other than to give effect to the two aforementioned matters.

The Company has been advised by the underwriters’ representative that the underwriters intend to circulate an electronic copy of the prospectus made part of the Amendment to all parties expected to participate in the offering.

Thank you in advance for your review. Please contact the undersigned with any questions or comments at (949) 732-6557.

Very truly yours,

/s/ Daniel K. Donahue
Daniel K. Donahue

cc: Aqua Metals, Inc.
Golenbock Eiseman Assor Bell & Peskoe LLP
Armanino LLP