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September 21, 2016

154718.010200

Via Edgar

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

Re: Aqua Metals, Inc.  
Amendment No. 1 to Registration Statement on Form S-3  
Filed September 16, 2016  
SEC File No. 333-213501

Dear Mr. Slivka:

On behalf of our client, Aqua Metals, Inc., a Delaware corporation (the "**Company**"), we are responding to the oral comment issued by Asia Timmons-Pierce of the staff of the Commission (the "**Staff**") to the undersigned on September 20, 2016 on the above-referenced Registration Statement on Form S-3 ("**Registration Statement**"). Concurrent with the filing of this letter, the Company is filing with the Commission an Amendment No. 2 to the Registration Statement ("**Amendment**").

The Amendment has been prepared in response to Ms. Timmons-Pierce's oral comment, the substance of which we have incorporated into this response letter for convenience.

**Staff Comment and Company Response**

Part II, Item 16. Exhibits

- I. Please revise the exhibit index to reflect that the Form T-1 Statement of Eligibility will be filed under the electronic form 305B2 after effectiveness and not in a post-effective amendment or in a Form 8-K.***

**Response:** We have revised the exhibit index as requested. Please see page II-2 of the Amendment.

We have also revised the Registration Statement to include in Part II, Item 17 the undertaking required by subpart (j) of Item 512 of Regulation S-K. Please see page II-4 of the Amendment.

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The Company has endeavored to fully respond to the Staff's comment. 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.

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